

# **Privacy Notice – Investor Relations and Shareholders**

#### About this privacy notice

This privacy notice applies to you if you are a current, former or prospective shareholder (or an individual who is a representative of a current, former or prospective shareholder) of NatWest Group plc ("NatWest Group") and sets out the basis on which any personal information about you will be processed by us. "We", "us" and "our" for the purposes of this notice refers to the relevant company within the NatWest Group of companies ("Group companies"), who processes your personal data and is a data controller in its own right for the purposes of data protection law.

This privacy policy extends to the share registry services which are carried out by Computershare Investor Services PLC ("Computershare"). We have appointed Computershare under the rules of the UK Companies Act 2006 to manage our register of shareholders. Computershare's role as registrar includes keeping an upto-date record of shares held by shareholders, administration of dividends, managing share transfers, issuing share certificates and supporting other regulatory functions. In carrying out registry services, Computershare processes personal information about you as a shareholder on our behalf.

If you use any of the apps and engagement tools which we, or Computershare (on our behalf), make available to our shareholders (for example the Computershare Investor Centre, Share Dealing Site, Proxy Voting Site and Employee Share Plans site) ("Online Services"), you should be aware of the additional privacy notices which Computershare make available for the relevant Online Service. This privacy notice supplements, but does not override, those notices.

We will amend this privacy notice from time to time to keep it up to date with current legal requirements and the way we operate our business. Please regularly check these pages for the latest version.

#### Personal information that we collect about you

We will collect and process various types of personal information about you. This may include:

- personal details such as name and address, occupation, contact details, email address, telephone number, and contact preferences where you have provided these to us;
- information to confirm your identity when you contact or engage with us;

- details of your past or present shareholdings and/or interests in shares in NatWest Group;
- details of how you have in the past exercised, or intend in the future to exercise, your voting rights attached to shares in NatWest Group;
- your bank or building society account details into which dividends and other income or capital returns on your shares have in the past, or should in the future, be paid; and
- your image or voice, where it is captured by audio and visual recording equipment.

We collect this personal information in a variety of ways, including

- when you provide it to us (by communicating with us, whether face-to-face, by phone, e-mail, through our website or otherwise);
- from third parties acting on your behalf such your agent, stock broker, lawyer or share plan administrator, for example, on shareholder application forms or stock transfer forms;
- where you exercise your rights in respect of your shares, including by your attendance at general meetings and voting in person or by your casting proxy votes, whether in hard copy form or by submitting electronic instructions via the CREST system;
- from third parties who perform services on our behalf, such as our registrars who assist us with maintenance of our share registers and with the conduct of our general meetings;
- by capturing your image and/or your voice on visual and/or audio recording equipment, for example on CCTV at our premises if you attend such premises, on any recordings made of our general meetings if you attend such meetings, and on any recordings made of other presentations to shareholders if you attend such presentations or as part of call recordings when you contact us.

#### Uses of your personal information

Your personal information may be stored and processed in the following ways and for the following purposes:

- to manage your shareholding interest in NatWest Group and to allow you to exercise your rights as a shareholder;
- to comply with laws and regulations to which NatWest Group is subject, including those that require us to keep records and file returns about the shareholdings in NatWest Group, pay you amounts due on your shares such as dividends, send you information about NatWest Group and comply with

disclosure requirements imposed or enforced by governmental authorities and regulatory agencies, including law enforcement agencies and tax authorities, to keep our shareholder register up-to-date (for example where you move address or change your name);

- to contact you with shareholder related information, including any shareholder newsletters and important information about dividend distributions, shareholder resolutions, reports and meetings, business, strategy and financial results, including details of any general meetings and any email alerts and communications you subscribe to through our website;
- to register you for and enable you to attend investor events and web conferences;
- to otherwise manage our relationship with you, including by meeting with you, communicating with you and to address any queries you raise with us;
- to enable us to enforce or defend our legal rights, including by bringing or defending legal claims that may be made by or against NatWest Group in relation to your shareholdings or interests in shares;
- to ensure the safety and security of attendees at our general meetings and at presentations to shareholders, and to keep records of those events; and
- to respond to information requests received pursuant to the Prudential Regulation Authority's Related Party Transaction Risk Rules; the European Banking Authority's Financial Reporting directive for credit institutions; International Financial Reporting Standards (IAS 24 – Related Party Disclosures); the UK Companies Act 2006; and any other relevant regulations.

We are entitled to use your personal information in these ways because:

- we have legal or regulatory obligations to do so;
- it is necessary to perform our contract(s) with you as a shareholder and/or holder of interests in shares in NatWest Group, as set out in the memorandum and articles of association of NatWest Group and/or in any share scheme or plan trust deed or rules;
- where relevant, you have provided us with your consent to process your personal data, for example to contact you with your preferred communications or email alerts; and/or
- it's in our legitimate interests, in the course of running our business, or to establish, exercise and defend our legal rights or otherwise to achieve the purposes referred to above that do not relate to complying with a legal obligation or performing our contract with you. Where we process your personal data only on the basis of our legitimate interest, you have the right to object to that use. However, we may not stop processing personal data where we have compelling grounds that override your interests, or where we need to process your personal data in order to establish, exercise or defend

legal claims. If you have any objections please contact us in accordance with the 'Contacting us' section below.

# Disclosure of your information to third parties

We share your personal information with other Group companies and third parties as described below:

- Employees in other Group companies, as necessary to operate our business, including the day to day administration of NatWest Group shareholdings, meeting statutory and regulatory requirements, filings, disclosures and communications;
- Computershare, as our Registrar, who manages our share register and any subsidiaries of Computershare, who provide services to help trace our shareholders;
- Payment providers who help us manage dividend and other payments to our shareholders;
- Solicitors, legal advisers and professional service firms who provide us with legal support in relation to our business or any litigation;
- Third party suppliers, agents or vendors for the purposes of providing services to us, such as service providers who help operate our IT and back office systems;
- Regulators who regulate how we operate, including where necessary the Financial Conduct Authority, the Prudential Regulation Authority, the London Stock Exchange, HMRC and the Information Commissioner's Office;
- In addition to the above, we will share your personal information:
  - if the law requires or permits disclosure, or there is a duty to the public to share or disclose your personal information, for example for the purpose of verifying shareholdings or contacting shareholders about matters relating to the company, their shareholding or a related exercise of rights;
  - with third parties acting on your behalf such your agent, stock broker, lawyer or share plan administrator, or with any third party at your request or with your consent;
  - with any individual or company to whom we propose to transfer our obligations and rights in relation to the administration of our share register;
  - with any individual or company that is a potential purchaser of NatWest Group or a relevant Group company; and

- with any other person that requires access to or receipt of your personal information in connection with or as a result of any agreement we may have with or concerning you, or our arrangements with you; and/or
- o with courts, regulators, government bodies and similar organisations as required or permitted by law.

## Transfers of personal information outside the European Economic Area

Your personal information may be transferred outside the European Economic Area ("EEA") and processed by us, our affiliates or suppliers outside of the EEA.

Where we transfer your personal information outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal information will be protected by us in the EEA. This can be done in a number of ways, for instance the country that we send the information to might be approved by the European Commission; or the recipient may have signed up to a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect your personal information. In other circumstances the law may permit us to otherwise transfer your personal information outside the EEA.

In all cases, however, we will ensure that any transfer of your personal information is compliant with applicable data protection law.

You can obtain more details of the protection given to your personal information when it is transferred outside the EEA (including a copy of the standard information protection clauses which we have entered into with recipients of your personal information) by contacting us in accordance with the "Contacting us" section below.

# **Retention of personal information**

Your information will typically be retained for at least 10 years after you dispose of or otherwise transfer your shares or interest in shares in NatWest Group, in line with our records management policies. We may exceptionally retain your information for longer periods than those envisaged and this may vary depending on:

- the type of record in which your information is included, for example to meet regulatory, tax or accounting requirements;
- the purpose for which we are using it we will need to keep the information for as long as is necessary for that purpose;
- any legal obligations laws or regulation may set a minimum period for which we have to keep your personal information; or
- where we need to withhold destruction or disposal based on an order from the courts or an investigation by law enforcement agencies or our regulators.

This is intended to make sure that the NatWest Group will be able to produce records as evidence, if they're needed.

In addition, Computershare will typically retain your information for 10 years after you dispose of or otherwise transfer your shares or interest in shares in NatWest Group.

## Your rights

You have a number of legal rights in relation to the personal information that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal information and access to the personal information which we hold about you;
- where we rely on your consent, the right to withdraw your consent to our processing of your personal information at any time. Please note, however, that we may still be entitled to process your personal information if we have another legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal information in a structured, commonly used and machine-readable format and/or request that we transmit that information to a third party where this is technically feasible. Please note that this right only applies to personal information which you have provided to us;
- the right to request that we rectify your personal information if it is inaccurate or incomplete;
- the right to request that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled, and in some cases obliged, to retain it;
- the right to object to, and the right to request that we restrict, our processing
  of your personal information in certain circumstances. Again, there may be
  circumstances where you object to, or ask us to restrict, our processing of
  your personal information, but we are legally entitled to continue processing
  your personal information and/or to refuse that request; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the "Contacting us" section below. We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information where we know we are dealing with the right individual.

We may not always be able to do what you have asked, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally required or entitled to deal with the request in a different way.

You can find out more information about your rights by contacting the Information Commissioner's Office, or by searching their website at <a href="https://ico.org.uk/">https://ico.org.uk/</a>.

# **Contacting us**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information or the exercise of any of the rights listed above, or if you would like to raise a complaint to our Data Protection Officer, please contact us at fm-001960@rbos.co.uk or on 07795 676738.