The NatWest Group
Pensioners Benevolent Fund

Registered Charity No. 277974

Privacy Notice

Details of how The NatWest Group Pensioners Benevolent Fund charity uses your personal data

Reviewed and approved:

July 2026

Privacy Notice

Introduction

The NatWest Group Pensioners Benevolent Fund takes our responsibilities to our applicants and donors seriously and we are committed to being transparent in how we use your personal data.

'Personal data' means any information about you or that can be used to identify you. This includes basic information like your name, email address or application number, but also any information that is linked to you.

- For a grant applicant, this could be the details in your application form and any supporting evidence you provide, including bank statements or invoices.
- For grant recipients, this could include your bank details which are used to make payment of the grant.
- For donors, this could include any cheques, Direct Debit Mandates or Standing Order forms used to make your donation.

This Privacy Notice explains who we are, how we collect, use, share and secure your personal information, and how to use your rights.

Who we are

The NatWest Group Pensioners Benevolent Fund ("we", "our", "us", "the Charity") is a charity registered under the Charites Act 1960, No. 277974. You can check our registration on the UK Government's site at www.register-of-charities.charitycommission.gov.uk/en/charity-search

We are an independent grant-making charity. We aim to relieve poverty and provide financial assistance to retired employees of the NatWest Group and their dependents.

To do this, we need to collect, use, store and occasionally share Personal Data about our applicants and donors. Under the UK's Data Protection Act 2018 (DPA) (which includes the UK's General Data Protection Regulations, GDPR), this makes us the Data Controller.

As a Data Controller, we are registered with the Information Commissioner's Office, the UK's data protection regulator. Our registration number is ZA533415. You can check our registration on the ICO's website at https://ico.org.uk/ESDWebPages/Search

Our purposes for processing your personal data

We have four main purposes for collecting and using personal data, and we will need to use different types of personal data for each purpose.

These are:

- **Applications:**
  Collecting and assessing applications for financial support from the Charity, paying grants to successful applicants and answering queries about applications.
  Types of personal data used: name, contact details, evidence of eligibility (e.g. pension records, bank statements), details of the grant purpose (e.g. invoices, receipts), details of any relevant dependents, bank details for successful grants.

- **Donations:**
  Processing donations made to the Charity to help fund our work.
  Types of personal data used: Name, payment details (e.g. cheque, Standing Order form), Gift Aid status, any history of previous donations.

- **Charity Administration:**
  As a regulated charity, we must keep effective records of our work and cooperate with external requests for information to ensure we are acting responsibly, such as our annual financial audit.
  Types of personal data used: Name, contact details, evidence for applications, financial information for grant payments.

- **Marketing:**
  We will use personal data to get feedback on the application experience so we can make improvements. We also use personal data for promotional activity, both to raise awareness of the work we do and to encourage donations.
  Types of personal data used: Name, contact details, marketing preferences, donation history.

We only obtain personal data directly from you or from someone you've allowed to give us your information, such as a joint application with your spouse or a referral from another charity.

For some applications, we appreciate that you will want to share '**special category data**' with us. This is any kind of personal data that is particularly sensitive, such as information about health conditions. We will only use this information for the specific purpose you have sent it to us (i.e. making a decision on your application).

We will only use your personal data for the purposes given above, and we do not use any automated decision-making or profiling for any purpose. If this were to change, we would request your permission in advance.

Our lawful basis for processing your personal data

Under the DPA, all Data Controllers need to have specific legal reason for collecting and using personal data, called a 'lawful basis'. Below we have explained the lawful basis we use for different purposes.

Consent:

- Our main lawful basis is **consent**. This means that you give us your permission to use and store your personal data at the time you give it to us.

- In most cases (Applications), this will be through the Data Protection Consent Form you complete when you submit an application to us, and which explains what we use your data for and why.
- You can withdraw your consent at any time prior to a grant payment being made, but this can impact our ability to process your application (see the **Your Rights** section below).
- If you make a donation, you are providing consent through action. In other words, when you choose to donate to us, you are telling us to use the information you've given (e.g. your card details, Gift Aid instructions) to process the payment you requested.

Legitimate Interests:

- Our secondary lawful basis is '**legitimate interests**'. This means that we use your personal information in a way that you would reasonably expect us to, even if you haven't specifically given permission, and with certain protections.
- For example, we use the 'legitimate interests' basis to send out requests for feedback from recent applicants or to conduct analysis on historic applications so that we can learn and improve our charitable services.
- We also use legitimate interests to promote the Charity and encourage donations, but with clear details on how to opt-out of future marketing in every communication.

Compliance with a Legal Obligation:

- Our third lawful basis is '**compliance with a legal obligation**'. This is where we need to process certain personal data to meet our legal requirements.
- For example, as an independent charity, we may need to share information about donations we receive with tax authorities, or with our external auditors to ensure grants are processed and paid correctly.

Who we share your data with

For some applications, we may suggest sharing your information with other charities who may be better able to support you, such as the Bank Workers Charity. We will only share your information with other charities with your express permission.

Where an application is successful, we will share limited personal data with our external examiners to evidence that we have handled payments correctly. We are also legally required to share personal data with our regulators and law enforcement if it is requested.

We do not share your information with any other third parties and we will never sell your information. We also do not share information with any parties outside of the UK for any reason.

How long we keep your personal data

We only retain your personal data for as long as is reasonably necessary to fulfil our role as a grant-making charity.

If you make an application to us, we will typically keep an electronic copy of this (including your Personal Data) for 7 years. If paper documents are provided in an application, these will be scanned to the electronic record within 1 month of the application and then either returned to you or destroyed.

We need to retain a record of applications to enable effective governance of the Charity, including external audits, and to enable us to send promotional information about the Charity to you.

If you make a donation, we will retain any declaration forms used for Gift Aid for six years. Gift Aid is a government scheme that enables charities to claim back tax, enabling us to receive an extra 25p for every £1 donated. We must retain these records for tax purposes.

Your Rights

Under UK data protection laws, you have a range of rights in how we use and hold your personal data, which we've listed below. To request any of these rights, please use the details in the Contact Us section below.

- **Right of Access**:
  You have the right to ask us for a copy of all personal information we hold about you at any time, including details of who we have shared this with. There is no charge for this and your information will be provided electronically.
  Please note: We will need to verify your identity to provide your data and we cannot share information about another person (e.g. spouse) without their separate permission. We have the right to charge a fee where any access requests are manifestly unfounded or excessive.

- **Right to Data Portability**:
  You have the right to ask us to transfer the personal data you select to another organisation electronically, or to you, free of charge.
  Please note: You will need to specify what information you want and where you want it sent to. We have the right to charge a fee for manifestly unfounded or excessive Portability Requests. If you want all of your information, an Access Request may be a better option.

- **Right to Withdraw Consent**:
  You can revoke your permission for us to use your data for applications at any time before a decision has been made (once a grant is paid, our service is complete). If you choose to withdraw your consent, any pending applications will be closed with immediate effect and your information will be deleted from our systems.

- **Right to Erasure**:
  You have the right to ask us to delete all or some of your personal data at any time. We will respond within one month to confirm the deletion has occurred or to explain why we were not able to complete your request.
  Please note: If you received a grant from us or used Gift Aid on a donation, we have legal obligations to retain certain essential financial data and this cannot be deleted.

- **Right to Rectification**:
  You have the right to ask us to correct or delete any personal information about you that you think is inaccurate or incomplete. You will need to provide us with the correct details to include.

- **Right to Object**:
  You have the right to object to us using your personal data for our legitimate interests, such as marketing activity. You will need to tell us what you're objecting to and why, and we will respond within one month.
  Please note: Any marketing communications we send will include an 'unsubscribe' or 'opt out' link. This will prevent you receiving any further promotional contact without the need to submit an Objection request.

- **Right to Restriction**:
  You have the right to ask us to restrict (i.e. stop) using your personal data whilst we are completing a Rectification or Object request as explained above.

If you make any request, we will respond to you as soon as we can and, in any event, within one month of receiving your request.

Complaints

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details below.

If you remain unhappy after receiving our response to your concerns, you have the right to refer your complaint to the Information Commissioner's Office (ICO). You can find out more on their website at www.ico.org.uk/make-a-complaint or by calling their helpline on 0303 123 1113.

Our Contact Details

If you would like to speak to us about any of the above, please contact us at:

Post: NWG Pensioners Benevolent Fund, Flat 20 Refinery House, 12 Gallions Road, London, E16 2DL

Email: contact@nwgpensbenfund.org.uk

Phone: 0300 772 7166

Approval and Review

This Privacy Notice will be regularly reviewed and approved to ensure its continuing appropriateness and all changes approved at a meeting of the Trustees before being implemented.