

Privacy notice for Grant Recipients and Applicants

The Royal Bank of Scotland Group Pensioners' Association Benevolent Fund ("we", "us", RBSGPABF) is a charity registered under the Charities Act 1960, No. 277974. We are an independent grant-making fund. We aim to relieve poverty and provide financial assistance to retired members of the Group's pension fund and their dependants.

In order to pursue our aim and to comply with our policies, we receive, store and make use of information about our Grant Recipients and Applicants. Some of this information is Personal Data under the General Data Protection Regulation (GDPR). This Privacy Notice sets out details of the information that we collect and hold in order to comply with the GDPR.

Identity of the data controller

The Royal Bank of Scotland Group Pensioners' Association Benevolent Fund is the controller responsible for your Personal Data.

Purpose of the processing and legal basis for the processing, legitimate interests of the controller

We hold and make use of your personal data in order to administer applications and any grants we may award. We need to collect and hold this data in order to conduct our due diligence and to make reasonable assessments when awarding grants. We may continue to hold your personal data beyond any final grant payment date to inform future grant applications and to enable us to review the impact of our grant making activities. As we are a grant making Fund, holding this data to make and implement grants is in our legitimate interests and this is our legal basis for processing your data.

Recipients of personal data

We will not sell or otherwise pass your personal data to third parties (except as may be required by law or regulation, or directly in connection with your application or grant).

We do not make use of automated decision making techniques or profiling and your personal data will not be used in this way.

Transfers to third country and safeguards

We will not sell or otherwise pass your personal data outside of the EU (except as may be required by law or regulation, or directly in connection with your application or grant). It is in the nature of electronic communication, such as emails, and data storage that the precise geographic location of the data may not be under our control at all times. For example, we may send or receive emails to or about you while our Trustees are travelling. Our external data storage is encrypted and held

securely by a data storage provider. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access.

Retention period, criteria used to determine the retention period

We review how long we keep your personal data on a regular basis. We will keep your personal data on our secure systems for as long as is necessary, up to a maximum of 10 years, both to administer your application and any subsequent grant, and for our own review purposes, in accordance with the GDPR.

The existence of each data subject's rights

You have the right to request a copy of the personal information that we hold about you. If you would like a copy of some or all of your personal information, please email us at rbsgpa.benfund.trustees@gmail.com or write to us at 10 Gardiner Road, Edinburgh, EH4 3RR. We may charge a reasonable fee where a request is manifestly unfounded or excessive.

We want to make sure that your personal information is accurate and up to date. You may ask us to rectify information you think is inaccurate or incomplete.

Data Portability

You have the right to receive your personal information, which you have provided to us in a certain format, and to transfer that to another controller in specific circumstances.

The right to withdraw consent

To the extent that, now or in the future, we rely on your consent as our lawful basis for processing your personal data, you have the right to withdraw that consent at any time.

The right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with the Information Commissioner's Office if you think we have processed your personal data inappropriately.

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