



Privacy Policy
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Who are we?

We are Mettle. We are the business account that helps you get ahead today. We're part of NatWest, which is part of the NatWest Group plc (NatWest Group).

This Privacy Notice explains how we collect and use your personal information, like your name, date of birth and information about your bank accounts.

It's important we keep your personal information safe and secure, as well as up-to-date and accurate. You also have a right to know how we use your information, so we'll do our best to explain it.

From time to time we may need to update this Privacy Notice. When we do, we'll put the updated version in the Mettle app and on our website. If we're making a major change to the notice, we'll contact you to let you know. It's a good idea to read it every time we make major changes, so you know exactly how we use your data and what your rights are.

How do we use your personal information?

We use your personal information in accordance with the provisions of the European General Data Protection Regulation (GDPR) 2018 to fulfill contractual obligations, meet our legal obligations or in the legitimate interest of the bank. If you want to know more about the lawful basis that Mettle use to use your personal information, feel free to contact us at Support@mettle.co.uk.

We use information we collect from our customers, and people that have shown an interest in Mettle, to help give them the best service we can. It helps us to run our business, and sometimes we need it to meet our legal responsibilities. For example, regulators or the police might ask us for information if they suspect fraud or money laundering.

We need some basic information so we can set you up with a Mettle account and provide you with our services. We use the information you first gave us when you signed up for your account to assess your application. We'll also use it to provide you with services. For example, opening or closing accounts, or making transfers.

We'll need it to confirm your identity, for example linking your device, username and password to your Mettle account. There are also laws around the way we gather and use your information that we need to follow.

Running our business

Sometimes we use your information when it is in our interests as a company. This means we might need to share it with other companies that help us run Mettle and provide our customers with the best service. We'll always aim to make sure it's in our customers' interest, when we use information in this way.

We might use your information to:

- Make sure everything in our service – e.g. mobile banking app, network, account and payment systems – is secure. We do this by checking our customers' access to our services to help prevent cyber-attacks and crime.
- Carry out general checks, and to keep records to prove that we're treating customers fairly.
- Tell you about new product features you might be interested in. We can send you this through the app, or by email, text or post.
- Tell you about our products if you have visited our site or shown an interest in our products.
- Check the quality of our customer support and train our staff. For example, we might check our customer chat interactions to help improve our customer support.
- Help us sell or reorganise a part of or all of our company.

Keeping our customers safe

We'll also use your information to make sure the decisions we take as a business are as safe as possible. This protects the interests of our customers. We'll use your information to:

- Carry out financial, anti-money laundering and risk assessments.
- Manage and take decisions about your accounts. For example, we use your personal information to prepare your statements.
- Carry out checks on our customers, potential customers and business partners. We might check your information against databases and sanctions lists and do online checks on you.
- Check it against credit reference and fraud preventions agencies, as well as the police and companies that verify people's ID.
- Trace anyone that owes you money to help you get it back.

Using your data for marketing

If you currently receive or agree to receive direct marketing from us, we may send marketing messages to you by email or push notification. We may also use social media companies or advertisers to show you messages about our products and services. For example, you may see ads from us in your social media feed.

You might also see ads from us on social media if you fit into a demographic we're targeting. These types of ads aren't targeted to you personally, but you might receive them if you fit into a particular age bracket, for example.

We'll never share your information with other companies for their own marketing reasons without your permission. You can change your marketing preferences any time you want, please contact customer support via chat in the Mettle app, or by emailing us at support@mettle.co.uk.

What information do we collect?

We collect information about you from several places, as we use it for lots of different reasons. We'll only use your data for the reasons laid out in the 'How we use your personal information' section.

Information you give us

You give us information when you first apply for a Mettle account. This includes:

- Information you give us through the Mettle app. For example, your name, contact details, ID and video recording
- Information about your financial circumstances.

Information we collect when you use our app and services

We collect information when you use the Mettle app and our other services. These include:

- Information about how you use your Mettle account, app and card. For example, any payments to and from your account. We may also collect information from other NatWest accounts you hold, or any other accounts if for example you've given us access to them through Open Banking.

Information we get from other companies

When you apply for a Mettle account, we check you're eligible for a Mettle account. We look at:

- Information from credit reference agencies - such as Equifax to confirm your company address.
- Fraud prevention agencies and anti-money laundering service providers. The fraud prevention and anti-money laundering agencies we use are called Onfido and Duedil.

We may also collect information about you from public sources to protect against money laundering or for market research. For example, we look at official public records, like the Electoral Register or Companies' House.

We may also use information published on social media platforms where you've engaged with us. For example, by following us on Instagram, liking the Mettle Facebook page or clicking on a Mettle ad on Facebook.

Information we get from your device

We'll get information from the device you use to access our services, such as your phone, tablet or computer. We look at:

- Technical information, such as your location, and IP address. We'll also look at the time zone you've set, the device, browser and operating system you're using and your device's unique ID.
- Information about the way you use the app or website. For example, we might look at the links you've clicked on, your searches and the pages you've looked at.

This type of personal information is typically used to help us protect your account, manage and improve our service to you. For example; we may use this information to verify that your mobile device is authenticated to use the app, or check if it has been jailbroken and we may use location to monitor transactions for fraud prevention.

Special categories of information

Sometimes we'll handle and use special types of information. For example, if someone applies for an account with us, we may check their criminal record if they have one. We do this to help us prevent fraud and financial crime.

Where you agree, we'll also collect biometric information – such as facial recognition – as part of the process of confirming your identity for your account opening. This is also to help us prevent fraud and financial crime.

We might collect information about your medical condition, or other sensitive personal information if we need to know this to support you as a customer. For example, you might choose to tell us about mental health issues, addiction or family circumstances that could affect your spending behaviour and financial situation. We'll only use this information if we have your consent.

What are your rights to your personal information?

Under the law, you have a right to ask for a copy of the personal information we hold about you. You can do this via chat in the Mettle app or by emailing us at support@mettle.co.uk. We can send a copy of your information to you, or someone else if you'd prefer, as long as it's technically possible and secure.

You can also ask us to correct the information we hold about you if it's not correct. For example, if you change your name, or if there is a problem with your account details.

If you think we don't need the information you gave us for the reasons you gave it to us, you can ask us to delete it. You can also ask us to limit how we use your information.

You can do this if you believe we have no legal reason to use your information or if we're not using it in a lawful way. There may be circumstances where we cannot action your deletion request, for example, under Financial Conduct Authority data retention requirements.

You can also make a complaint to us at any time. If you want to do this, Mettle's Data Protection Officer can be contacted by telephoning 0800 069 8380 or by emailing support@mettle.co.uk. If you aren't satisfied with the way we handle your complaint, you can take it to the Information Commissioner's Office (ICO). For more information, visit <https://ico.org.uk>.

Who do we share your information with?

We may share your information with other companies – both inside and outside the NatWest Group. For example, we might need to share your information to provide you with a product or service, or to help us run our business. Sometimes we'll have to do it to follow the law or help prevent crime.

We might share your information because:

- We need to recover money that was accidentally transferred into your account.

- We need to share it with the police or regulators to help tackle crime.
- You are a victim of financial crime. If this happens, and we need to use your data in this way, we'll ask you first. We may also share your data with other banks if we suspect money has entered your account as a result of a financial crime.
- We need to share data with credit reference and fraud prevention agencies.
- You are in debt and a debt collection agency has asked for it.
- We sell part or all of our business.
- We need it to help us improve our products and services to make them better for you. We'll always balance our own interests with those of our customers when we use information in this way.

If you ask us to, we'll share your information with a company that provides account information or payment services. In these cases, we aren't responsible for what that company does with your information. The way they handle your information will be governed by their agreement with you and any privacy statement they give you.

If extra users are added to your account, we may share information about how the account is used with all other users.

PrePrepay Technologies Limited

Your data is also shared with PrePrepay Technologies Limited trading as Prepay Solutions (PPS). PPS is a Data Controller in relation to your debit card and operation of your debit card. PPS does not use your personal data for marketing purposes. PPS uses your personal information such as name, address, email, phone number, use of your debit card and payments to and from your accounts.

You can contact PrePrepay Technologies Limited:

Online	https://www.pps.edenred.com/pages/privacy#Privacy
Email	DPO@prepaysolutions.com
Post	6th Floor 3 Sheldon Square London, Paddington W2 6HY

If we need to send your information outside the UK

We might need to send your information abroad to companies in the European Union. We'll only ever share information to companies that protect it in the same way we do and follow all the laws they need to.

We might need to share your information to countries outside the European Economic Area (countries in the European Union as well as Iceland, Liechtenstein and Norway). We'll only do this if we think your information is properly protected, based on the European Commission's assessment of the countries in question. We'll also only do it if the laws and regulations say we can.

If you would like a copy of the relevant data protection clauses in these contracts, contact us at Support@mettle.co.uk for a copy.

If we need to get in touch

If we need to get in touch, we'll usually contact you through the Mettle app. Sometimes we may use email, text message, push notifications, post and/or telephone. To help us get in touch with you, please keep your contact details in the app up to date.

Sometimes we track our messages with you, to help us give you the best service we can. We'll always make sure we do this legally. To read more about the information we collect, and how we use it, see the 'What information do we collect' section.

Checking your information

When you open an account with us, we'll need to check your personal and company information against credit reference, fraud prevention, ID and company verification services.

We do this so we can check your identity, and to help us prevent crime, fraud and money laundering. Sometimes we'll need to do it to trace anyone who might owe you money and get it back.

These outside agencies help to prevent crime and so have a legitimate interest to use your data. They have a right to control how your information is used. When they use your personal and company information, they have to follow all laws that apply to them.

Credit reference agencies

We give your information to Equifax, who are a credit reference agency. We do this to run an anti-money laundering search. We don't use this service for credit scoring and the search won't affect your credit score.

You can contact Equifax:

Online	www.equifax.co.uk/Contact-us/Contact_Us_Personal_Solutions.html
Post	Equifax Ltd, Customer Service Centre, PO Box 10036 Leicester LE3 4FS

Fraud prevention agencies

We'll need to make available information to fraud prevention agencies and other organisations. Our main partner for this is Cifas. They use your personal and company information to compare against any fraud listings in their database.

If we think you might have given us information that isn't right, we'll have to pass this on to Cifas. This can also be accessed by the police and other organisations. If we or Cifas think you are a risk, we might decide to stop providing services to you.

Cifas will create a record about any fraud or money laundering risk. If they believe you pose a risk, you could be refused services, financing or employment. Your data can be held by Cifas for up to six years.

You can contact Cifas:

Online	https://www.cifas.org.uk
Post	Consumer Affairs Cifas, 6th Floor, Lynton House 7-12 Tavistock Square London WC1H 9LT

Identification & Company Verification services

We'll also give your personal and company information to an ID verification service, Onfido and company verification service, Duedil. This makes opening your account as easy as possible.

If you want to know more about how your information will be used, you can contact them using the relevant details below.

You can contact Onfido:

Online	https://onfido.com/privacy/
Email	privacyrequests@onfido.com
Post	Privacy Office

3 Finsbury Avenue
London
EC2M 2PA

You can contact Duedil:

Online <https://www.duedil.com/privacy>
Email Privacy@duedil.com
Post DueDil Limited
10 Queen Street Place
London
EC4R 1AG

How long do we keep your information?

When you sign up for a Mettle account, we create a record that contains information about you and your account activity. We can hold these records both physically or electronically and in a range of formats.

We have to keep records so we can serve our customers in the best way we can. For example, if you ask us a question, you won't need to tell us old information again. We also need to keep records to follow the law.

How long we keep records depends on the type of record, as well as they type of activity, product or service. It also depends on what local laws apply. We normally keep account records for up to 10 years after you close your account, but this can change based on our business needs or which laws can apply.

In some cases, we might need to keep your information for longer. For example, a court or investigation might need us to keep it for longer, in case it's needed as evidence. If you would like more information about how long we keep your information, please contact us at Support@mettle.co.uk.