

Privacy Policy

Last updated: 23 October 2023

We at NatWest Rooster Money care deeply about your privacy. We believe in transparency, and we're committed to being upfront about our privacy practices, including how we treat your personal data.

RoosterMoney is the trading name of World Learning Limited (“**NatWest Rooster Money**”, “**we**”, “**us**”, “**our**”) and corporate details are provided at the end of the policy. This policy applies to our website (RoosterMoney.com) and the NatWest Rooster Money app.

This policy forms part of the **NatWest Rooster Money Tracker Conditions** and **NatWest Rooster Money Payment Conditions** (together the “**Service Terms**”). It describes what information we collect in connection with the Service Terms in the course of providing the relevant services under those Service Terms (“**Services**”), as well as how we collect it, what we do with that information, the legal basis for processing and the rights and choices you have over how we use your data. This policy covers the personal data of both parents and their children. In order for us to be able to provide the Services to you, it is necessary for you to enter into the Service Terms, including the Privacy Policy, which then enable us to collect, process, share and store the personal data as described in this policy to operate those Services.

The following terms take the meaning given to them in the Data Protection Act 2018: **controller, processor, data subject, personal data, personal data breach, data protection officer.**

Any previous version(s) of this policy can be viewed [here](#).

You can also view our Children's privacy policy [here](#).

- 1. Our Role as Controller**
- 2. Information we collect**
- 3. Your children's information**
- 4. Cookies & Tracking**
- 5. Choice and Control**
- 6. International data transfers**
- 7. Security of your personal information**
- 8. Retention**
- 9. Your Rights**
- 10. Privacy policy changes**
- 11. Third party websites**
- 12. Our details**
- 13. Annex A**
- 14. Annex B**

1. Our Role as Controller

We collect certain personal data described below when you and your family use our Services and through other interactions and communications you and they have with us.

We are the party responsible for deciding the means and purposes for processing this personal data, which makes us a "controller" under the Data Protection Act 2018. If you have any questions or concerns at any time about your data or privacy, please email us at privacy@roostermoney.com

We are a member of NatWest Group plc. More information about the NatWest group can be found at [NatWestGroup.com](https://www.natwestgroup.com) by clicking on 'About Us'.

We may collect and/or share your data with the NatWest Group including where you have used the 'sign in with bank' feature to connect your NatWest status with NatWest Rooster Money. Where data is shared with NatWest, they will be classed as a Joint Controller.

Other service providers may also act as controllers in relation to your personal data:

- If you sign up for a subscription through our website or the paid Rooster Card subscription through the app, we use Adyen to process payments. In connection with this service that Adyen provides to NatWest Rooster Money, Adyen will collect your IP address, card details and billing information in order to securely process your subscription payment. If you make a direct payment to your Rooster Account using a debit or credit card, we use Adyen to process this direct payment. In connection with this service that Adyen provides to NatWest Rooster Money, Adyen will collect your billing address, and your first and last name to securely process your direct payment. The information that you provide through Adyen is subject to the Adyen Privacy Policy. You should read the [Adyen Privacy Policy](#) to learn about Adyen's information collection, usage and your rights in that regard.
- If you ask us to, we will share information with any third party that provides you with payment services. If you ask a third-party provider to provide you with payment services, you're allowing that third party to access information relating to your account. We're not responsible for any such third party's use of your account information, which will be governed by their agreement with you and any privacy statement they provide to you.

2. Information we collect

We may collect, store and use the following kinds of personal data for processing on the basis specified in [Annex A](#) at the end of this Privacy Policy.

- Personal data to create your account
- Content you choose to upload to the app

- Email address and email preferences
- Usage information
- Log data and device information
- Cookies and similar technologies

3. Your children's information

Information collected

When adding a child to your NatWest Rooster Money account, we ask for and collect the following personal data:

- Child's first name
- Child's date of birth
- Child's gender

Optional Profile Information. You or your child may choose to provide us with additional personal data which includes:

- Profile photos
- Child's email address (only a parent can add this)
- Child's login details (username and password)
- Images and text they choose to upload to Goals or Chores

This information may be shared with two parents in the app. In order for the child's information to be shared with other family members we request prior full verifiable parental consent.

We collect some information automatically when your child uses our app:

- Location Information. We infer your child's general approximate location down to a city level.
- Device Information. For example operating system version and device identifiers.

- We collect usage information about your and your children’s interactions with NatWest Rooster Money services (e.g. Allowances, Boosts, Removes, Chores and Goals being saved for) as well as the pages or other content you view, length of visit and the date and time of your visits.

For a full list of passively collected data see [Annex A](#)

Service Providers

We work with third party service providers to better understand your child’s use of the service and to improve it. Our contracts with these companies prohibit them from (1) using data collected from our websites or apps for behavioral advertising and (2) sharing data collected from our websites or apps with third parties.

We work with the following service providers in relation to children:

Google Analytics (click to read their [privacy policy](#))

Firebase (click to read their [Privacy Policy](#))

Intercom (click to read their [Privacy Policy](#)) – in app chat support via Intercom is only available to UK children who have access to the Rooster Card product

We do not ask for more personal data than is necessary for a child to participate in an activity.

- We take steps to prevent children from posting or publicly disclosing personal data.
- Parents can review, update or delete their children’s personal data within the app ([this help article shows you how](#)).
- Parents can revoke their consent and refuse the further use or collection of personal data from their child.
- Process for parents accessing, deleting or withdrawing consent:

- Should a parent wish to access or delete the information we've collected about their children (subject to our record-keeping obligations under applicable law) they can do so by deleting their child's profile from within the NatWest Rooster Money app ([see how](#)). Alternatively they can contact us by email at privacy@roostermoney.com.
- The email must contain all of the following:
 1. the parent and account holder's email address
 2. the child's username
 3. The parent's relationship to the child.

How do we notify parents?

- When a parent creates a NatWest Rooster Money account, we obtain consent for the collection, use, or disclosure of any personal information collected about or from the child (the "personal data"), and that we will not collect, use, or disclose any personal data from the child if the parent does not provide such consent;
- We set forth the additional items of personal data that we may collect from the child, or the potential opportunities for the disclosure of personal data;
- We offer a hyperlink to our privacy policy in the email.

4. Cookies & Tracking

When you visit any web site, it may store or retrieve information on your browser or device, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalised web experience.

Because we respect your right to privacy, you can choose not to allow some types of cookies. However, blocking some types of cookies may impact your experience of the site and the services we are able to offer.

We may use the following types of Cookies:

- **Necessary cookies:** those required for the operation of the Service, which do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- **Analytical/performance cookies:** these allow us to collect information about how you use the Service, such as, how you move around our website and if you experience any errors. These cookies do not collect personal data. The information collected is anonymous and is only used to help us improve the way the Service works, understand what interests our users generally and measure how effective our advertising is. Some of the performance cookies we use are issued as part of services provided by third parties, like Google Analytics.
- **Functionality cookies:** these are used to provide services or to recognise you when you return to our website. These would enable us to personalise our content for you, remember your preferences and improve your visit.
- **Targeting cookies:** these record your visit to the Service, the pages you have visited and the links you have followed. They are set by and linked to services provided by third parties, such as “Like” and “Share” buttons. The third party provides these services in return for recognising that you have visited our website. The third party may subsequently use information about your visit to target advertising to you on other websites and present you with advertisements that you may be interested in.

You are able to reject the use of cookies with browsers. Some browsers allow you to reject all cookies; others, only allow to reject third party cookies. You will be able to manage your cookie preferences for your browser by accessing your browser’s Tools section (here are instructions for some commonly used browsers: **Chrome**, **Internet Explorer**, **Firefox**).

The third party services we use are listed below may use Cookies to identify Users or they may use the behavioral retargeting techniques, i.e. displaying messages tailored to the User’s interests and behavior, including those detected outside this

Application. For more information, please check the privacy policies of the relevant services.

1. Google Analytics ([Privacy Policy](#))
2. Firebase ([Privacy Policy](#))
3. Facebook Advertising ([Privacy Policy](#))
4. Google Advertising ([Privacy Policy](#))
5. Intercom ([Privacy Policy](#))
6. Impact ([Privacy Policy](#))
7. Twitter ([Privacy Policy](#))
8. Trustpilot ([Privacy Policy](#))
9. Bing Advertising ([Privacy Policy](#))
10. Amazon ([Privacy Policy](#))
11. Mailchimp / Mandrill ([Privacy Policy](#))
12. TVSquared ([Privacy Policy](#))

Log file information will automatically be reported by your browser or mobile application each time you access our Sites or the NatWest Rooster Money app. For example, when you access our NatWest Rooster Money site, our servers automatically record certain information that your web browser sends whenever you visit any website. These server logs may include information such as your web request, IP address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, pages viewed and other such information.

Web beacons may be used via our third party email service providers Mandrill and Amazon SES, to help us understand whether users have read our email messages and clicked on the links contained within those messages. This allows us to measure the performance and impact of our messages.

5. Choice and Control

We know that our NatWest Rooster Money families value having control over their own information, so NatWest Rooster Money gives you the choice of providing,

editing or removing certain information, as well as choices about how we contact you. You may change or correct your family's account information through your account settings within the NatWest Rooster Money app. You can also request the deletion of the personal information in your account.

You may also control the receipt of certain types of communications from NatWest Rooster Money in your account settings. NatWest Rooster Money may send you messages about the Service or your activity. Some of these messages are required, service-related messages for members (such as major changes to the services that will significantly impact you or legal notices). Other messages are not required, such as newsletters. You can control which optional messages you choose to receive by changing your account settings.

6. International data transfers

We may transfer your information to organisations in other countries (including to other NatWest group companies) on the basis that anyone to whom we pass it protects it in the same way we would and in accordance with applicable laws. 8.2.

In the event that we transfer information to countries outside of the UK and European Economic Area (which includes countries in the European Union as well as Iceland, Liechtenstein and Norway), we will only do so where:

1. a) the UK has decided that the country or the organisation we are sharing your information with will protect your information adequately;
2. b) the transfer has been authorised by the relevant data protection authority; and/or
3. c) we have entered into a contract with the organisation with which we are sharing your information (on terms approved by the UK) to ensure your information is adequately protected.

7. Security of your personal information

The security of your personal data is important to us. We take appropriate security measures to prevent unauthorised access, disclosure, modification, or unauthorised destruction of data collected.

We will take all reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal data. We will store all the personal data you provide on our secure (password- and firewall-protected) servers. You must use Access Codes to log-in to your own Parent Account.

Data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

Your account information is protected by the measures described above, which require you to use the Access Codes to log-in to your Parent Account. We will not ask you for your Access Codes (except when you log in to the Service). It is important that you protect against unauthorised access to your account and information by choosing your Access Codes carefully and by keeping your Access Codes and computer secure, such as by signing out after using the Service.

If you have any questions about the security of your personal data, you can contact us at privacy@roostermoney.com.

8. Retention

NatWest Rooster Money will retain your information only for as long as is necessary for the purposes set out in this policy, for as long as your account is active (i.e. for the lifetime of your NatWest Rooster Money member account), as described in this policy. If a NatWest Rooster Money family account becomes inactive, data will be retained for no longer than 2 years from the date of last activity, except where we are legally obliged to do so. If you no longer want NatWest Rooster Money to use your information to provide the Service to you, you may close your account ([see how](#)).

NatWest Rooster Money will retain and use your information to the extent necessary to comply with our legal obligations. We also retain log files for internal analysis purposes. These log files are generally retained for a brief period of time, except in

cases where they are used for site safety and security, to improve site functionality, or we are legally obligated to retain them for longer time periods.

9. Your Rights

The table in **Annex B** at the end of this Privacy Policy explains the following rights you may have in relation to your personal data under the Data Protection Act 2018 (and any exceptions to those rights) and how you can exercise them:

- Right of access
- Right to rectification
- Right to erasure
- Right to request the restriction of processing concerning you
- Right to data portability
- Right to object to processing
- Right to ask us not to process your personal data for direct marketing purposes
- Right not to be subject to automated individual decision-making, including profiling

Please note that this Privacy Policy provides the confirmation referred to in relation to the Right of Access.

10. Privacy policy changes

We may amend or update this policy from time to time. If we believe that the changes are material, we'll let you know by sending you an email message to the email address provided at registration about the changes. You should check this page occasionally to ensure you are happy with any changes. By using the site and apps, you agree to any amendments we make to this Privacy Policy.

11. Third party websites

The Service may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

12. Our details

World Learning Limited (trading as “NatWest Rooster Money”), is a company incorporated in England and Wales (company number 06830114) with its registered office at 250 Bishopsgate, London, England EC2M 4AA and business offices NatWest Rooster Money, 1 Spinningfields Square, Manchester, M3 3AP. We are registered with the Office of the Information Commissioner (registration number: ZA374824).

Our phone number is +44 (0)203 984 8422.

If you have any questions about this privacy policy or our treatment of your personal information, please email us: privacy@roostermoney.com.

13. Annex A

Personal Data Collected	Purpose	Basis for Processing
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A) Information You Provide to Us

Registration and Profile Information. When you sign up for a NatWest Rooster Money account, we may ask for and collect the following personal data in order to create an account for your family:

- First name
- Last name
- Email address
- Password
- Any “nickname” you provide for identification
- Country and currency

When adding a child to your NatWest Rooster Money account, we ask for and collect the following personal data:

- Child’s first name
- Child’s date of birth
- Child’s gender

- To provide, administer, enhance, and improve our Services ;
- To create your family’s NatWest Rooster Money account;
- To sync the data provided across the family unit you’ve set up in NatWest Rooster Money;
- To provide customer support including to verify your identity when you reach out to NatWest Rooster Money for help or customer support within your family account;
- To help gain a better understanding of the support issue and troubleshoot

The processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into the contract;

The processing is necessary for compliance with a legal obligation to which we are subject;

The processing is necessary for the purposes of the legitimate interests pursued by us or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data;

<ul style="list-style-type: none"> • The currency they will earn and their allowance frequency. <p>Payment Information. If you make a purchase through our Services, your payment-related information, such as credit card or other financial information, is collected by our third-party payment processor on our behalf. If you register for a Rooster Card, we may collect additional information including nationality, residential address, proof of ID, proof of residency, tax residency or source of funds, and transaction data arising from the use of Rooster Cards associated with the Parent Account.</p> <p>Optional Profile Information. You may</p>	<p>the issue with you or provide technical details for bug fixes with our engineers.</p> <ul style="list-style-type: none"> • To send you service related NatWest Rooster Money message (such as those related to transactions, your account, security, or product changes); • To provide you communications you opt-in to such as text messages, Push notifications, or email updates on your family’s account or suggestions to you and other users of our Site and the App about features or services that may of interest 	
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choose to provide us with additional personal data which includes:

- Profile photos
- Child's Email Address
- Child's login details (username and password)
- Images you choose to upload to Goals or Chores

Optional Profile

Information. Your child may choose to provide us with additional personal data which includes:

- Profile photos
- Child's login details (username and password)
- Images you choose to upload to Goals or Chores

Notifications or

Updates. You may choose to opt-in to receiving non-service

- To administer our Site and the App for internal operations, including data analysis, testing, research, statistical and survey purposes; to ensure that content from our site is presented in the most effective manner for you and for your device/computer;
- To understand anonymous usage trends which may be used for internal business purposes or marketing /press purposes or its publication in the press.

For Parents only

(including disclosure to selected third parties):

<p>related messages such as our getting started tips, updates on family activity, and newsletter & offers (which can be opted out from at any time from your email preferences within the app or in the unsubscribe link).</p> <p>You may choose to enable Push notifications for the NatWest Rooster Money app on your device which will send reminders and updates, such as when allowance is delivered.</p> <p>When you subscribe to our website services, email notifications and/or newsletters, we collect your email address. We may also collect any other information that you choose to send to us.</p> <p>Communications. When you contact us through the app, by email or from</p>	<ul style="list-style-type: none"> • To help improve our Marketing by measuring and understanding the effectiveness of our advertising; • To ensure you are not targeted with NatWest Rooster Money advertising as an existing user; <p>To disclose to selected third parties:</p> <ul style="list-style-type: none"> • To make and receive payments to and from you as required under the Service Terms; • To open and maintain the Parent Account, provide Rooster Cards, process payment transactions made by you using the Service, answer 	
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<p>the NatWest Rooster Money website contact form, we collect the information you submit to us.</p> <p>B) Information We Collect When You Use our Services</p> <p>Location Information. We infer your general location information, for example by using your IP address.</p> <p>Device Information. We may receive information about the device and software you use to access our Services, including IP address, web browser type, operating system version, phone carrier and manufacturer, application installations, device identifiers, mobile advertising identifiers, and push notification tokens.</p>	<p>your queries and complaints;</p> <ul style="list-style-type: none"> ● For the personalisation of ads & to help build targeted audiences; ● To comply with a current judicial proceeding, a court order or legal process served on us or our Service, any request by the FCA or any other regulator who may have jurisdiction over us from time to time or for audit purposes and to meet obligations to any relevant regulatory authority or taxing authority; ● To enforce this Privacy Policy or the Service Terms; ● To a service provider to check your identity and to 	
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<p>We collect usage information about your and your children's interactions with NatWest Rooster Money services (e.g. Allowances, Boosts, Removes, Chores and Goals being saved for).</p> <p>1. We track your interactions with our Services like the pages or other content you view, the searches you conduct, purchases you make, any content you post, where you came from, length of visit and the date and time of your visits.</p> <p>We track the communications we send you and your interaction with them.</p> <p>Log Data. We automatically collect log</p>	<p>prevent fraud, (it will also keep a record of your request and use it whenever anyone applies to be authenticated in your name);</p> <ul style="list-style-type: none"> ● To our principal, agents and subcontractors, for the purpose of operating the Service and obtaining the payment of any amount owed by you; and ● For a business deal (or negotiation of a business deal) involving sale or transfer of all or a part of our business or assets (business deals may include, for example, any merger, financing, acquisition, 	
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data and device information when you access and use NatWest Rooster Money services. That information includes, among other things:

- details about how you've used NatWest Rooster Money services
- IP address
- access dates and times
- hardware and software information
- device information

Cookies. We use cookies and other similar technologies on our website that may collect some personal data. You can learn more about how we use cookies and how to disable them in section 4.

divestiture or dissolution transaction or proceeding).

If another company acquires our company, business or assets, that company will possess the personal data collected by us and will assume the rights and obligations regarding your personal data as described in this Policy.

<p>C) Information We Receive from Third Parties.</p> <p>Background Check. We work with third-party partners to perform background checks on job applicants and receive publicly available information such as criminal history.</p> <p>Other Third Parties. We may receive additional information about you, such as publicly available data from marketing partners and combine it with other information we have about you.</p>		
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14. Annex B

Your rights and how to exercise them	Exception
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Right of Access: To obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- c) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular, recipients in third countries or international organisations;
- d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing
- f) the right to lodge a complaint with a supervisory authority
- g) where the personal data are not collected from the data subject, any available information as to their source;
- h) the existence of automated

decision-making, including profiling, referred to in Article 22(1) of the GDPR and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

How to exercise:

This Privacy Policy provides confirmation of the details required in relation to your right of access.

You have a right to access certain personal records that NatWest Rooster Money holds about you. Any access request may be subject to a fee to meet NatWest Rooster Money's costs (as the case may be) in providing you with details of the information they hold about you if the request is unfounded or excessive.

You can exercise the right at any time by contacting NatWest Rooster Money at privacy@roostermoney.com.

Right to rectification: to obtain from us without undue delay the rectification of inaccurate personal data concerning you.

We must communicate to each recipient to whom the rectified personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

We shall inform the data subject about those recipients if the data subject requests it.

You can exercise the right at any time by contacting NatWest Rooster Money at privacy@roostermoney.com.

Right to erasure: to obtain from us the erasure of personal data concerning you without undue delay where:

- a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) you object to the processing based on legitimate interest where there are no overriding legitimate grounds for the processing;
- c) the personal data have been unlawfully processed;
- d) the personal data have to be erased for compliance with a legal obligation to which we are subject.

We must communicate to each recipient to whom the erased personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

We shall inform the data subject about those recipients if the data subject requests it.

You can exercise the right at any time by contacting NatWest Rooster Money at privacy@roostermoney.com.

Processing is necessary for:

- a) compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in us; or
- b) the establishment, exercise or defence of legal claims.

Right to request the restriction of processing concerning you: to obtain from us restriction of processing where:

1. a) the accuracy of the personal data is contested by you, for a period enabling us to verify the accuracy of the personal data;
- b) the processing is unlawful and you oppose the erasure of the personal data and request the restriction of its use instead;
- c) we no longer need the personal data for the purposes of the processing, but it is required by you for the establishment, exercise or defence of legal claims;
- d) you object to the processing based on legitimate interest pending the verification whether our legitimate grounds override yours.

We must communicate to each recipient to whom the erased personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

Where processing has been restricted under this right, such personal data shall, with the exception of storage, only be processed:

- a) with your consent; or
- b) for the establishment, exercise or defence of legal claims; or
- c) for the protection of the rights of another natural or legal person; or
- d) for reasons of important public interest of the Union or of a Member State.

<p>We shall inform the data subject about those recipients if the data subject requests it.</p> <p>You can exercise the right at any time by contacting NatWest Rooster Money at privacy@roostermoney.com.</p>	
<p>The right to data portability: to receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from us, where:</p> <ol style="list-style-type: none">1. a) the processing is based on consent or is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; andb) the processing is carried out by automated means. <p>You have the right to have the personal data transmitted directly from us to another controller, where technically feasible.</p>	<p>That right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.</p>

<p>The exercise of the right referred to in paragraph 1 of this Article shall be without prejudice to the right to erasure.</p> <p>You can exercise the right at any time by contacting NatWest Rooster Money at privacy@roostermoney.com.</p>	
<p>The right to object to processing: to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on processing necessary for the purposes of the legitimate interests pursued by us or a third party (except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data), including profiling.</p> <p>You can exercise the right at any time by contacting NatWest Rooster Money at privacy@roostermoney.com.</p>	<p>Where:</p> <ul style="list-style-type: none">a) we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject; orb) for the establishment, exercise or defence of legal claims.

The right to ask us not to process your personal data for direct marketing purposes:

to object at any time to processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

You can exercise your right to prevent such processing by using the unsubscribe link in NatWest Rooster Money communications or by updating your email preferences in your Account Settings.

You can exercise the right at any time by contacting NatWest Rooster Money at privacy@roostermoney.com.

The right not to be subject to automated individual decision-making, including profiling:

to not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

You can exercise the right at any time by contacting NatWest Rooster Money at privacy@roostermoney.com.

If the decision:

- a) is necessary for entering into, or performance of, a contract between you and us;
- b) is authorised by Union or Member State law to which we are subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests;
- or
- c) is based on the data subject's explicit consent.

In the cases referred to in points (a) and (c) we shall implement suitable measures to safeguard the data subject's rights and freedoms and legitimate interests, at least the right to obtain human intervention on our part, to express his or her point of view and to contest the decision.