

DATA PROTECTION ACT 1998

SUPERVISORY POWERS OF THE INFORMATION COMMISSIONER

UNDERTAKING

Data Controller: National Westminster Bank plc
Company Reg. No: 929027
Registered Office: 135 Bishopsgate
London
EC2M 3UR

National Westminster Bank plc of 135 Bishopsgate London EC2M 3UR hereby acknowledges the details set out below:

1. national Westminster Bank plc is the data controller as defined in section 1(1) of the Data Protection Act 1998 ("the Act"), in respect of the processing of personal data carried on by The Royal Bank of Scotland plc and is referred to in this Undertaking as the "data controller". Section 4(4) of the Act provides that, subject to section 27(1) of the Act, it is the duty of a data controller to comply with the data protection principles in relation to all personal data in respect of which it is a data controller.
2. The data controller is advised that the Information Commissioner (ICO) has received complaints raising questions surrounding the processing of items of personal data recovered from refuse bins outside branches in Manchester and Southampton. The material referred to comprised fax copies of two insurance application forms, advantage gold account transaction details and details of products sold at a customer meeting (Manchester); and two cut up Nat West debit cards, a list of a customer's standing orders and direct debits and a copy email showing a customer's name and account details (Southampton).
3. The data controller is advised that the ICO has considered the data controller's compliance with the provisions of the Act in the light of this matter. The relevant provision of the Act is the Seventh Data Protection Principle. This Principle is set out at Part 1 of Schedule 1 to the Act. A copy of the Data Protection Principles is attached.
4. By a letter dated 28th November 2006, the data controller responded to the ICO.

The data controller undertakes to comply with the terms of the following undertaking:

The data controller shall, as from the date of this undertaking and for so long as similar standards are required by the Act or other successor legislation from data controllers in similar circumstances, ensure that personal data processed by it are processed in accordance with the Seventh Data Protection Principle in Schedule 1 Part 1 of the Act, and in particular that,

- *the data controller's data protection procedures are regularly reviewed so as to ensure that appropriate procedures are in place for the handling and disposal of confidential waste which is personal data as defined in the Act, and*
- *appropriate data protection training is given to all of its relevant employees regarding the secure disposal of personal data.*

Dated..... 23.02.07

Signed...
Group Secretary and General Counsel
For National Westminster Bank plc

Signed...
For the Information Commissioner