

DATA PROTECTION ACT 1998

SUPERVISORY POWERS OF THE INFORMATION COMMISSIONER

UNDERTAKING

Data Controller: The Royal Bank of Scotland plc
Company Reg. No: SC090312
Registered Office: 36 St Andrew Square
Edinburgh
EH2 2YB

The Royal Bank of Scotland plc of 36 St Andrew Square, Edinburgh EH2 2YB hereby acknowledges the details set out below:

1. The Royal Bank of Scotland 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 Fareham, Manchester, Nottingham and Glasgow. The material referred to comprised three documents relating to individual accounts (Fareham); fifteen documents including application forms and a letter to a customer (Nottingham); a private banking form, computerised printout and a pre-release funds checklist (Glasgow); and a photocopy of a customer's provisional driving licence (Manchester).
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

[Redacted]

Signed...
Group Secretary and General Counsel
For The Royal Bank of Scotland plc

[Redacted]

Signed...
For the Information Commissioner