

# Ulydien Trust Privacy Notice

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## **1. Who we are**

- 1.1 This privacy notice (the “Privacy Notice”) is effective from the 24<sup>th</sup> June 2024 and applies to all personal information processing activities carried out by Ulydien Trust Company Limited (“UlydienTrust”).
- 1.2 Ulydien Trust is a subsidiary of UBI DAC (“the Bank”), a private company set up to manage unclaimed repayable funds owing to former UBI DAC customers following the closure of their accounts and/or products with the Bank. Ulydien Trust is a data controller in respect of personal information that we process in connection with our activities. In this notice, references to “we”, “us”, “our” or “the trust” are references to Ulydien Trust.
- 1.3 Our principal address is Ulydien Trust, Block B, Central Park, Leopardstown, Dublin 18, D18 N153 and our website is [www.ulsterbank.ie/ulydientrustcompany](http://www.ulsterbank.ie/ulydientrustcompany)
- 1.4 We are a member of NatWest Group plc (“the NatWest Group” or “NWG”). More information about the NatWest Group can be found at [www.natwest.com](http://www.natwest.com) by clicking on ‘About Us’.
- 1.5 The purpose of this Privacy Notice is to explain how we collect and use personal information in connection with our activities. “Personal information” means information about a living individual who can be identified from that information (either by itself or when it is combined with other information). “Beneficiary”, “Beneficiaries” or “Beneficial Owner” is a natural person who has a vested interest in the Trust and the details of individual beneficial owners of a trust are required on the Central Register of Beneficial Ownership of Trusts (CRBOT) as outlined below.

## **2. The information we process**

- 2.1 We collect and process various categories of personal information in order to operate as a Trust. We will limit the collection and processing of this information to information necessary to achieve one or more legitimate purposes as identified in this Privacy Notice. Personal information may include:
  - a. basic personal information, including name and address, date of birth and contact details;
  - b. your Personal Public Service Number (PPSN and/or your Tax Reference Number);

- c. financial information, including account information received by us from other financial institutions;
  - d. information to perform checks to prevent and detect crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, and international sanctions;
  - e. Information about your next of kin and;
  - f. visual images such as copies of passports.
- 2.2 We may also collect and process certain special categories of information, which could include physical or psychological health details or medical conditions, in order to process and manage unclaimed repayable funds owing to former UBI DAC customers following the closure of their accounts and/or products with the Bank.

### **3. How we obtain information**

- 3.1 Beneficiaries of Ulydien Trust are former customers of the Bank who had unclaimed repayable balances in their account(s) and/ or product (s) at the time of closure. As a result, the majority of personal information processed by us is historic data received from the Bank.
- 3.2 We may also collect additional personal information from beneficiaries at the point where funds are reclaimed by them.

### **4. Purposes of Processing**

- 4.1 We may process your personal information where we have identified that you may be a beneficiary of Ulydien Trust. We have described how we will use this information below.
- 4.2 We have a legal obligation to process the personal information. When we identify that someone may be a beneficiary of the trust, we are required by law to collect and process certain personal information about you. This may include processing to:
- a) confirm your identity;
  - b) validate your Personal Public Service Number (PPSN) or your Tax Reference Number;
  - c) comply with record keeping obligations under the Consumer Protection Code 2018;
  - d) share beneficiary data with the Irish Revenue Commissioners;
  - e) share beneficiary data with AIB, as our banking partner, to enable it to comply with tax reporting obligations under FATCA and CRS as outlined

below;

- f) share beneficiary data with the Central Bank of Ireland, An Garda Síochána, law enforcement, statutory bodies, the Courts and those appointed by the Courts, or other government and fraud prevention agencies where we have a legal obligation, including reporting suspicious activity and complying with production and court orders;
- g) investigate and resolve complaints and errors and;
- h) manage contentious regulatory matters, investigations, appeals and litigation.

4.3 We may process your information where we have a legitimate interest to do so to support the day to day running of the Trust. This is to ensure that our processes and systems operate effectively and without prejudicing your interests or fundamental rights and freedoms. This may include processing to:

- a) monitor, maintain and improve internal business processes, information and data, technology and communications solutions and services;
- b) ensure business continuity and disaster recovery and responding to information technology and business incidents and emergencies;
- c) ensure network and information security, including monitoring authorised users' access to our information technology for the purpose of preventing cyber-attacks, unauthorised use of our telecommunications systems and websites, prevention or detection of crime and protection of your personal data;
- d) perform general, financial and regulatory accounting and reporting;
- e) protect our legal rights and interests.

## **5. Your rights**

5.1 We want to make sure you are aware of your rights in relation to the personal information we process about you. We have described those rights and the circumstances in which they apply in the table below.

<p><b>Access</b> - You have a right to get access to the personal information we hold about you.</p>	<p>For more information on how to get access to your information, please use this link;</p> <p><a href="https://digital.ulsterbank.ie/personal/gdpr-triage-page.html">https://digital.ulsterbank.ie/personal/gdpr-triage-page.html</a></p> <p>The form above is the most efficient way for you to request access to your information but you can also write to us at;</p> <p>Subject Access Requests Mailroom Manager 1 Hardman Boulevard, Manchester, M3 3AQ, Depot 049</p> <p>Or email <a href="mailto:dataprotectionoffice@ulsterbank.com">dataprotectionoffice@ulsterbank.com</a></p>
<p><b>Rectification</b> – You have a right to rectification of inaccurate personal information and to update incomplete personal information.</p>	<p>If you believe that any of the information that we hold about you is inaccurate, you have a right to request that we restrict the processing of that information and to rectify the inaccurate personal information.</p> <p>Please note that the objective of Ulydien Trust is to return money owed to beneficiaries and we acknowledge that out of date and incomplete information is a primary factor resulting in funds being held by us.</p>
<p><b>Erasure</b> - You have a right to request that we delete your personal information.</p>	<p>You may request that we delete your personal information if you believe that we no longer need to process your information for the purposes for which it was provided or we are not using your information in a lawful manner</p> <p>Please note that the right to erasure is subject to certain exemptions.</p>
<p><b>Restriction</b> – You have a right to request us to restrict the processing of your personal information.</p>	<p>You may request us to restrict processing your personal information if you believe that we no longer need to process your information for the purposes for which it was provided but it is still required for other legitimate reasons or we are not using your information in a lawful manner.</p> <p>Please note that the right to restriction is subject to certain exemptions.</p>

<p><b>Portability</b> – You have a right to data portability.</p>	<p>We process very limited personal information and do not envisage any circumstance where this right would apply differently to your right to access. However, should a circumstance arise we will respond to your request if it is technically feasible to do so.</p>
<p><b>Objection</b> – You have a right to object to the processing of your personal information.</p>	<p>You have a right to object to us processing your personal information.</p>
<p><b>Lodge complaints</b> – You have a right to lodge a complaint with us or with the Data Protection Commissioner</p>	<p>If you wish to raise a complaint in relation to how we handled your personal information, please contact us in any of the following ways:</p> <p>In Writing – address your letter to  Ulster Bank Ireland DAC  Customer Care  2nd Floor, Block B  Leopardstown  Dublin 18</p> <p>Online at <a href="http://www.ulsterbank.ie">www.ulsterbank.ie</a> – submit a complaint using our Online Complaint Submission form.</p> <p>We hope to address your concerns through our normal complaints process, however, we may escalate your complaint to our Data Protection Officer for further investigation.</p> <p>You have the right to complain to the Data Protection Commissioner. You can contact; the Data Protection Commissioner, 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland. Phone +353 (1) 7650100; LoCall 1800 437 737; contact form <a href="https://forms.dataprotection.ie/contact">https://forms.dataprotection.ie/contact</a>. For more information, visit <a href="http://www.dataprotection.ie">www.dataprotection.ie</a></p>

## **6. Sharing your information**

- 6.1 Ulydien Trust will share your information with other parties where it is necessary for us to lawfully carry out our activities.
- a. We will share your information within NatWest Group so that they may provide a range of support services such as data security, technology support, data subject access requests etc.
  - b. We will share your data with our banking partner AIB so that they can maintain the funds owed to Beneficiaries and return claimed amounts. AIB must comply with the United States FATCA (“The Foreign Account Tax Compliance Act”) and/or CRS (“Common Reporting Standard”) collection and reporting obligations to the Irish Revenue Commissioners relating to the tax residence or citizenship status of beneficiaries. The following information will be reported to the Irish Revenue Commissioners (to comply with the above); name, address, tax identification number (TIN), date of birth, place of birth (where present in our records), the account number, the account balance or value at year end, and payments made with respect to the account during the calendar year. This data may be exchanged by the Irish Revenue Commissioners with other tax authorities; further information is available on the Automatic Exchange of Information portal on the Irish Revenue website;
  - c. We will share your data with the Irish Revenue Commissioners as required under The Central Register of Beneficial Ownership of Trusts (“CRBOT”) established to help prevent money laundering and terrorist financing. Ulydien Trust is legally obliged to submit information in relation to each beneficial owner of the Trust to the Irish Revenue Commissioners.
  - d. We will share your information where it is permitted by law, it is necessary for our legitimate interest or those of a third party and it is not inconsistent with the purposes listed above.
  - e. We will share your information where we or NWG are required by law and by law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies around the world and

f. We will share your information with data processors, such as a mailing service provider who will issue correspondence to you to enable us to process your reclaim.

## **7. Communications with you**

7.1 Ulydien Trust will attempt to contact beneficiaries in order to release funds and beneficiaries may also contact us. When communicating with beneficiaries we will take steps to identify them and validate their reclaim. We may monitor or record calls, emails, text messages or other communications in accordance with applicable laws.

## **8. How long we keep your information**

8.1 Ulydien Trust will keep records of all beneficiaries and any funds returned to them to comply with legal and regulatory requirements. The retention period is 7 years from the date the funds are reclaimed. If the funds remain unclaimed, they will be transferred to the National Treasury Management Agency and records will continue to be retained by us to process any reclaims sent to us by the National Treasury Management Agency.

## **9. Security**

9.1 We are committed to ensuring that your information is secure with us and with the third parties who act on our behalf. For more information about the steps we are taking to protection your information, please visit [insert link].

## **10. Changes to this notice**

10. We will update this privacy notice from time to time on our website. Any material changes to this privacy notice will be notified to you by SMS/e-mail or other communication channel we deem appropriate.