

Wealth Management

Annex: Purposes and Legal Basis



Effective date: 26 April 2026

The table below provides an overview of the purposes for which we process your personal data and the lawful bases and conditions that we rely upon under Article 6 and Article 9/10 GDPR.

What we use your information for	Data types	The legal basis on which we can use your information	
		Article 6 Legal Basis	Article 9 or 10 Conditions (as applicable)
To understand the requirements and financial goals of prospective and existing clients; to provide tailored information on our offerings and to market our services to prospective and existing clients.	Name, address, date of birth, financial plans, financial situation, family circumstances; investment holdings, portfolio planning information, risk appetite, account type, account balance, health information; risk tolerance/ appetite.	It is in our legitimate business interests to develop, improve and grow our business, including through marketing and promoting our products and services. Where necessary, we process this data based on your consent.	Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations, assessing suitability, and protecting vulnerable customers. Where necessary, we process this data based on your consent.
To set up, facilitate or assist in the provision of accounts, products or services and related agreements, including administering and operating contractual arrangements with you, providing investment management and financial planning services.	Name, address, date of birth, copy of passport, account number, transaction history, account type, account balance, financial income, assets; investment holdings, health information, sources of wealth and funds; financial plans; ID documentation and numbers; risk tolerance/appetite; personal and family circumstances; ethnic origin, sexual preferences, marital status, religious and philosophical beliefs, political opinions; health information.	We process this information to enter into and perform our contract with you, including providing our products and services. It is in our legitimate business interests to develop, improve and grow our business, including through marketing and promoting our products and services. Where necessary, we process this data based on your consent.	Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations, assessing suitability, and protecting vulnerable customers. Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients. Where necessary, we process this data based on your consent.
To complete: (i) our 'Know Your Client' procedures (e.g., for client onboarding purposes) including verification of identity, credit checks with third parties including credit reference agencies (and relevant anti-money laundering screening) and/or (ii) payee checks carried out by third-party service providers to reduce the risk of making misdirected payments.	Name, address, date of birth, copy of passport, criminal records; account numbers, transaction history, financial income, assets; payee details; sources of wealth and funds; family circumstances; financial plans; ID documentation and numbers; credit check data.	We need to process this data to comply with our legal and regulatory obligations, including verifying your identity, carry out fraud prevention and make credit, fraud and anti-money laundering checks. It is in our legitimate business interests to ensure that payments are made to and from the correct person.	Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations, assessing suitability, and protecting vulnerable customers. Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients.

What we use your information for	Data types	The legal basis on which we can use your information	
		Article 6 Legal Basis	Article 9 or 10 Conditions (as applicable)
To assess the suitability and appropriateness of products and services for you, in accordance with our legal and regulatory obligations.	Financial plans, family circumstances; investment holdings, account type, account balance, health information, risk tolerance/appetite.	<p>We process this information to comply with our legal and regulatory obligations, including assessing the suitability and appropriateness of our products and services.</p> <p>We process this information to enter into and perform our contract with you, including providing our products and services.</p> <p>Where necessary, we process this data based on your consent.</p>	<p>Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations, assessing suitability, and protecting vulnerable customers.</p> <p>Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients.</p> <p>Where necessary, we process this data based on your consent.</p>
To carry out marketing activities which may involve the use of segmentation tools provided by third parties. To advertise our products and services using digital channels on the internet and social media.	Name, telephone number, email address, home address, communication preferences, marketing preferences, consent records and opt-out choices.	<p>It is in our legitimate business interests to develop, improve and grow our business, including through marketing and promoting our products and services.</p> <p>Where necessary, we process this data based on your consent.</p>	
We may collect personal data from third parties where you have authorised them to share your information with us for marketing purposes.	Name, telephone number, email address, marketing preferences, consent records and opt-out choices.	We process this data based on your consent.	
To maintain marketing and other communication preferences.	Communication preferences, name, telephone number, email address, address(es), marketing preferences, consent records, and opt-out choices.	We process this information to comply with our legal and regulatory obligations, including maintaining records of your marketing and communication preferences and ensuring that your preferences are respected.	
To process children's personal data where they are named on a portfolio or account as dependents or beneficiaries, or with regards to trusts and succession planning.	Children's personal data including; Name, address, date of birth, copy of passport.	We process this to meet our contractual obligations, including administering products or services where a child is named as a dependent or beneficiary.	
To service any of your other relationships with RBC, where appropriate.	Name, telephone number, email address, address(es).	We process this information where you have provided your consent for us to contact you in relation to your other relationships with us.	
To make referrals between RBC service lines.	Name, telephone number, email address, address(es).	<p>We process this information where necessary for our legitimate business interests, including introducing you to other relevant products or services within the business.</p> <p>Where required by law, we will obtain your consent before such referrals are made.</p>	

What we use your information for	Data types	The legal basis on which we can use your information	
		Article 6 Legal Basis	Article 9 or 10 Conditions (as applicable)
To manage and administer pensions or transfer your pension to or from a third-party pension provider	Name, telephone number, email address, address(es), pension account information.	<p>We process this information where necessary to enter into and perform our contract with you, including administering your pension and processing transfers to or from third-party pension providers.</p> <p>We also process this information to comply with our legal and regulatory obligations relating to pension administration and transfers.</p>	
<p>To record telephone and video calls to comply with regulatory monitoring requirements, and record communications for training, quality and products and service development and improvement. These recordings may also be used as evidence in the event of a dispute in court.</p> <p>How we do this: We may use Artificial Intelligence tools to assist with the above, including to transcribe calls for these existing purposes.</p>	Call recording data, voice recordings, transcripts, call metadata, and any information disclosed during the call.	<p>We record telephone and video calls to comply with our legal and regulatory obligations, including monitoring communications where required.</p> <p>We also process this information where necessary for our legitimate business interests, including training our staff to aid development of our business and improve the services for our clients.</p> <p>In addition, we may use recordings where necessary for our legitimate interest in establishing, exercising or defending a legal claim.</p> <p>Where necessary, we process this data based on your consent.</p>	<p>Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations and maintaining appropriate records, and establishing, exercising or defending legal claims.</p> <p>Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p> <p>Where necessary, we process this data based on your consent.</p>
To monitor the use of copyrighted material and comply with internal policies and procedures.	Name, username, role information; usage and access logs and history; subscription information.	We process this information where necessary for our legitimate business interests, including protecting copyrighted material and ensuring compliance with our internal policies and procedures.	
To maintain records relating to your relationship with us, including information obtained from or about you or records of your interactions with our products and services.	Any data set out here or otherwise in this notice is subject to processing for these purposes, including, identity information, contact details, account and transaction information, records of communications, and information provided by or generated through your interactions with us and any other information relevant to your relationship with us.	<p>It is in our legitimate business interests to record information to aid development of our business and improve the services for you. It is also in our legitimate interests to be able to refer to the information if needed in the event of a dispute.</p> <p>We may also process this data where necessary for our legitimate interest in establishing, exercising or defending a legal claim.</p> <p>Where necessary, we process this data based on your consent.</p>	<p>Where required by applicable financial services regulations, we process criminal conviction data to comply with anti-money laundering and Know Your Client obligations.</p> <p>Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations and maintaining appropriate records, and establishing, exercising or defending legal claims.</p> <p>Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations and maintaining appropriate records, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p> <p>Where necessary, we process this data based on your consent.</p>

What we use your information for	Data types	The legal basis on which we can use your information	
		Article 6 Legal Basis	Article 9 or 10 Conditions (as applicable)
To prevent, detect and investigate fraud, money laundering, terrorist financing and other criminal activity, including, without limitation, compliance with our internal ‘know your client’, AML and anti-bribery and corruption policies.	Any data set out here or otherwise in this notice is subject to processing for these purposes, including identity information, contact details, financial and transactional information, account information, device and usage data, and information obtained from fraud prevention agencies or other sources, as well as other information relevant to preventing and detecting financial crime and information required for regulatory reporting and monitoring and other information required to meet legal and regulatory obligations.	<p>We process this information to comply with our legal and regulatory obligations, including preventing and detecting financial crime.</p> <p>We also process this information where necessary for our legitimate business interest, including protecting our business and customers from fraud and other criminal activity.</p>	<p>Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p> <p>Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations and maintaining appropriate records, and establishing, exercising or defending legal claims.</p> <p>Where necessary, we process this data based on your consent.</p>
To maintain the accuracy and integrity of information held by a credit reporting agency and to perfect any security interest granted over an account with us.	Name, address history, account numbers, transaction history, IP address; contact information; account data; address history, fraud information, credit reports, delinquency information, credit rating, account balance, account type, lending facility information.	<p>We process this information to comply with our legal and regulatory obligations, including maintaining accurate information with credit reporting agencies.</p> <p>It is in the legitimate interests of the public to be able to borrow, and for accurate credit information to be available for lenders to enable this.</p> <p>It is also in our legitimate interests including enforcing our rights, recovering debts, and managing risks and outstanding obligations.</p>	<p>Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p>
To recover debts and manage outstanding obligations	Name, address history, account numbers, transaction history, IP address; contact information; account data; address history, fraud information, credit reports, delinquency information, credit rating, account balance, account type, lending facility information.	<p>We process this information to comply with our legal and regulatory obligations, including maintaining accurate information with credit reporting agencies.</p> <p>It is in our legitimate interests including enforcing our rights, recovering debts, and managing risks and outstanding obligations.</p>	<p>Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p>
To monitor and protect our systems and networks against security threats, including identifying, investigating and responding to security incidents.	Information about your use of our systems and services, including websites you visit, documents accessed or downloaded, activity logs, and information relating to security incidents and our response.	<p>We process this information where necessary for our legitimate business interests, including protecting our systems and networks, detecting and responding to security threats, and maintaining the security of our services.</p> <p>It is also in our legitimate business interests to develop, improve and maintain our systems and services.</p>	

What we use your information for	Data types	The legal basis on which we can use your information	
		Article 6 Legal Basis	Article 9 or 10 Conditions (as applicable)
To comply with our legal, regulatory and reporting obligations, including transaction monitoring and reporting in the UK, Ireland, the Channel Islands, and other applicable jurisdictions.	Any data set out here or otherwise in this notice is subject to processing for these purposes, including, identity information, contact details, financial and transactional information, account information, and information required for regulatory reporting and monitoring and other information required to meet legal and regulatory obligations.	We process this information to comply with our legal and regulatory obligations, including transaction monitoring and reporting requirements.	Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations and maintaining appropriate records, and establishing, exercising or defending legal claims. Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.
To establish, exercise or defend any legal claims, and to handle any disputes, complaints, data breaches and data protection rights requests.	Any data set out here or otherwise in this notice is subject to processing for these purposes, including, identity information, contact details, account and transaction information, records of communications, and any other information relevant to the claim, complaint, dispute, or request.	We may need to process your personal data to comply with our legal obligations where you make a request or exercise a right under data protection law. We process this information where necessary for our legitimate business interests, including establishing, exercising or defending legal claims and managing disputes. We also process this information to comply with our legal and regulatory obligations, including responding to complaints, data breaches, and where you make a request or exercise a right under data protection law.	Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations and maintaining appropriate records, and establishing, exercising or defending legal claims. Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims. Where necessary, we process this data based on your consent.
To comply with applicable laws and regulations, and to respond to legal processes, including pre-litigation requests, court orders in any jurisdiction (whether or not the same is strictly binding or capable of being enforced against us) and requests from authorities in any applicable jurisdiction.	Any data set out here or otherwise in this notice is subject to processing for these purposes, including, identity information, contact details, account and transaction information, records of communications, financial and investment data, and any other data processed as part of advice, suitability, risk, security or compliance and regulatory purposes.	We process this information to comply with our legal and regulatory obligations, including responding to legal processes, court orders and requests from authorities.	Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations and maintaining appropriate records, and establishing, exercising or defending legal claims Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims. Where necessary, we process this data based on your consent.

What we use your information for	Data types	The legal basis on which we can use your information	
		Article 6 Legal Basis	Article 9 or 10 Conditions (as applicable)
<p>To capture and review CCTV footage at our premises for monitoring and security, including protecting our premises, assets, staff, and visitors.</p>	<p>Your image, appearance, and movements while on our premises. Time and location data: The date, time, and specific location where the footage was recorded.</p>	<p>We process this information where necessary for our legitimate business interests, including maintaining the security of our premises, to protect our assets, staff and visitors.</p>	
<p>We use artificial intelligence (AI) and automated tools to support innovation, improve operational efficiency, enhance our products and services, and manage risks. AI is used as a tool to carry out existing processing for purposes described in this notice and in alignment with the associated legal bases. These tools support our decision-making processes and do not replace human judgement.</p>	<p>The specific data being processed depends on the existing purpose the automation supports. Data is limited to what is already processed for that purpose and will normally include: Identity information, contact details, account and transaction information, records of communications, financial and investment data, data already processed for advice, suitability, risk, security or compliance and regulatory purposes.</p>	<p>The legal basis will be that of the underlying purpose we rely on for the existing processing, and will normally be one of the following: We process this information to enter into and perform our contract with you, including providing our products and services. We process this information for our legitimate business interests, including improving our products and services, enhancing operational efficiency, supporting innovation, and managing risks. We process this information to comply with our legal and regulatory obligations.</p>	<p>Article 9 and 10 conditions will be those of the underlying purpose of the existing processing, including: Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations, assessing suitability, and protecting vulnerable customers. Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p>
<p>We use automated tools (including AI) to protect individuals and RBC from fraud, security threat and criminal activities and to support decision-making in relation to credit or loan application. These tools support our decision-making processes and do not replace human judgement.</p>	<p>The specific data being processed depends on the existing purpose the automation supports. Data is limited to what is already processed for that purpose and will normally include: Identity information, contact details, account and transaction information, records of communications, financial and investment data, data already processed for advice, suitability, risk, security or compliance and regulatory purposes.</p>	<p>The legal basis will be that of the underlying purpose we rely on for the existing processing, and will normally be one of the following: We process this information to comply with our legal and regulatory obligations, including preventing and detecting fraud and financial crime. We also process this information where necessary for our legitimate business interests, including protecting our business and customers, managing risk, and supporting decision-making process.</p>	<p>Article 9 and 10 conditions will be those of the underlying purpose of the existing processing, including: Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations and maintaining appropriate records, and establishing, exercising or defending legal claims. Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p>
<p>To develop new products and services, operate and manage our systems (including system back-up, data recovery and risk evaluation), and to understand how you use our services in order to analyse, test and enhance our systems and services.</p>	<p>Login information, system logs, security alerts; Browser History, IP Address, cookies ID; usage and activity information; communication information and history; name, address, post code.</p>	<p>It is in our legitimate business interests to record information to aid development of our business and improve the services for you. We process this information where necessary for our legitimate business interests, including developing and improving our products and services, managing and operating our systems, and analysing how our services are used.</p>	

What we use your information for	Data types	The legal basis on which we can use your information	
		Article 6 Legal Basis	Article 9 or 10 Conditions (as applicable)
To enable share issuing companies, including RBC's clients and others, to identify and communicate with their shareholders.	Name, address, date of birth, number of shares you own, share ownership records, account information related to your shareholdings.	<p>It is in the legitimate interests of shareholders to receive communications from the relevant companies.</p> <p>We need to process this information to meet our contractual obligations.</p> <p>We process this information to comply with our legal and regulatory obligations, including maintaining shareholder records and facilitating communications between issuing companies and their shareholders.</p> <p>We may also process this information where necessary to perform our contractual obligations to our clients.</p>	
To verify your identity; authenticate you on our systems and operate multi-factor authentication procedures.	Biometrics data (signature, facial), passwords, mobile numbers, email addresses.	<p>We process this data to comply with our legal and regulatory obligations to verify your identity, make credit, fraud prevention and anti-money laundering checks.</p> <p>We process this information where necessary for our legitimate business interest, including verifying your identity, ensuring that payments are made to and from the correct person, maintaining the security of our systems and preventing unauthorised access.</p>	<p>We may process biometric data where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p> <p>Where necessary, we process this data based on your consent.</p>
In connection with a potential or actual sale, merger, reorganisation or restructuring of the business or if RBC sell or buy any business or any assets.	Name, address, date of birth, financial plans, family circumstances; Investment holdings, portfolio planning information, risk appetite, account type, account balance, health information; risk tolerance/appetite.	We process this information where necessary for our legitimate business interest, including facilitating corporate transactions and ensuring business continuity during reorganisations or the acquiring or selling parts of our business.	<p>We need to process this data to comply with our legal and regulatory obligations relating to safeguarding and vulnerable clients (substantial public interest).</p> <p>Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations relating to safeguarding and vulnerable clients, maintaining appropriate records, and establishing, exercising or defending legal claims.</p> <p>Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p> <p>Where necessary, we process this data based on your consent.</p>

What we use your information for	Data types	The legal basis on which we can use your information	
		Article 6 Legal Basis	Article 9 or 10 Conditions (as applicable)
To assess, monitor, manage and reduce our operational, financial and insurance risks, and risks that may impact our clients.	Name, address, date of birth, copy of passport, criminal records; account numbers, transaction history, financial income, assets; payee details; Sources of wealth and funds; family circumstances; financial plans; ID documentation and numbers; credit check data.	<p>It is in our legitimate interests to conduct our business in a responsible way to ensure ongoing operations and manage risk.</p> <p>We process this information where necessary for our legitimate business interests, including managing and mitigating risks to our business and our clients.</p>	<p>Where we process special category data, we do so for reasons of substantial public interest, including managing risks and protecting clients, and for reasons of establishing, exercising or defending legal claims.</p> <p>Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p> <p>Where necessary, we process this data based on your consent.</p>
To comply with health, education, social work, or other applicable regulatory requirements, and to carry out research, historical or statistical analysis, including preparing anonymised or aggregated reports.	Financial plans, family circumstances; Investment holdings, account type, account balance, health information, risk tolerance/appetite.	<p>We need to process this information to meet our contractual obligations.</p> <p>We process this information to comply with our legal and regulatory obligations.</p> <p>We may also process this information where necessary for our legitimate business interests, including carrying out research and analysis to improve our services.</p>	<p>Where we process special category data, we do so for reasons of substantial public interest, including complying with legal and regulatory obligations relating to safeguarding and vulnerable clients, managing risks and protecting clients.</p> <p>Where we process data relating to criminal conviction or offence, we do so where permitted by applicable law, to comply with legal and regulatory obligations, or where there is a substantial public interest in doing so, including maintaining records, managing risks and protecting clients, or for reasons of establishing, exercising or defending legal claims.</p> <p>Where necessary, we process this data based on your consent.</p>

Contact us

If you have any queries about how we handle your personal data, the contents of this Privacy Notice or your data protection rights, our Data Protection Officer can be contacted as follows:

UK Entities

RBC Europe Limited

RBC London Branch

Royal Bank of Canada Trust Corporation Limited

Data Protection Office

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Email: dpo@rbc.com

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RBC Trust Company (International) Limited

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Data Protection Office

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Updates to this Privacy Notice

From time to time, we may need to make changes to this Privacy Notice, for example, as the result of changes to applicable law, technologies, our services, or other developments. Please check rbcwealthmanagement.com for the most recent information on how we process your personal data.



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