

The complaint

Ms G – director of S, a limited company – complains on its behalf that National Westminster Bank Plc generates customer numbers using and including a customer's date of birth.

What happened

S opened an account with NatWest and received a customer number as a part of this. Ms G noticed that the number is in a certain format which starts with a customer's date of birth. She wasn't happy that this personal information was used like this by NatWest and was concerned that if NatWest was hacked, or if someone was watching a customer using an app, then this information could be easily obtained and used to impersonate her and other customers.

NatWest responded to say that information like this was already publicly available for Ms G, where she is a director of S. It said that it prioritised keeping customers and accounts safe and secure and went on to explain what its terms said about a customer's responsibility to do the same.

Ms G wasn't happy about this on behalf of S and brought her complaint to our service, where one of our investigators looked into it. They said that NatWest is allowed to decide the systems and procedures it uses – which includes how it generates customer numbers. Our investigator couldn't see that this had led to an unfair or unreasonable outcome for S either – because there has been no mistake made as a result. Nor had this had any impact on S, beyond Ms G's worries about it.

Ms G remained unhappy with this and so the complaint was passed to an ombudsman to decide.

What I've decided – and why

I've considered all the available evidence and arguments to decide what's fair and reasonable in the circumstances of this complaint.

I'll start by saying that I can understand Ms G's concerns on behalf of S here – she is concerned with the implications of how NatWest generates customer numbers not just on S, but in a wider sense. While I understand and appreciate this – my role is to look into the individual complaint she has on S's behalf with NatWest and decide what's fair and reasonable in the circumstances.

As our investigator explained – the starting point in doing so here is that NatWest is entitled to decide how it generates information like customer numbers and on the criteria and information it uses to do so. It's not for this service to criticise NatWest's policies or systems in a wider sense – nor can we tell it to change them in the way Ms G would like.

What I have considered though is whether NatWest's decision to generate customer numbers in this way has meant that S has experienced an unfair or unreasonable outcome. I can't see that's the case though. Ms G is concerned about the implications of such a practice

and has put forward some hypothetical situations that could occur as a result of NatWest being hacked, or her being observed while using its online app. I've considered what she's said, but none of these things have actually happened here in a way that means there has been a direct or tangible impact on S as NatWest's customer.

NatWest's 'customer number' is a unique number that it uses to identify a customer. It is clear and transparent on its website and in its welcome letter to S about how it generates these numbers. I realise that Ms G views this as a further vulnerability of this practice – but ultimately, it's clear that this is how it would be generating the number, which gave Ms G an opportunity to reflect on the fact this would happen for S.

Ultimately NatWest has an obligation under the relevant data protection rules about how it processes S's data and information and how it keeps this safe and secure. I find the reassurance it's tried to provide Ms G on S's behalf about acting in line with these obligations to be reasonable. Ms G has indicated that she has approached the Information Commissioner's Office about her wider concerns and it may be that they are better placed to help her. But in the circumstances here, I can't see that NatWest has acted unfairly or unreasonably.

My final decision

My final decision is that I do not uphold this complaint.

Under the rules of the Financial Ombudsman Service, I'm required to ask S to accept or reject my decision before 18 October 2024.

James Staples
Ombudsman