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## **Introduction**

Welcome to the privacy policy of **Data Candy (UK) Limited** trading as “SmartTrace”, incorporated and registered in England and Wales with company number 13102481 whose registered office is at Unit 3, Varley Business Centre, James Street, Manchester, M40 8EL, UK.

SmartTrace will be referred to as “SmartTrace”, “Company”, “we”, “us” or “our” in this privacy policy.

We respect your privacy and are committed to protecting your personal data.

This privacy policy will inform you as to how we collect, look after and process your personal data when you visit our website purchase a product or service and it will also tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

**1. [IMPORTANT INFORMATION AND WHO WE ARE]**

**2. [THE DATA WE COLLECT ABOUT YOU]**

**3. [HOW IS YOUR PERSONAL DATA COLLECTED?]**

**4. [HOW WE USE YOUR PERSONAL DATA]**

**5. [DISCLOSURES OF YOUR PERSONAL DATA]**

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**7. [DATA SECURITY]**

**8. [DATA RETENTION]**

**9. [YOUR LEGAL RIGHTS]**

**10. [GLOSSARY]**

## **1. Important information and who we are**

### **Purpose of this privacy policy**

This privacy policy aims to give you information on how SmartTrace collects and processes your personal data through your use of this website, including any data you may provide through this website when you purchase a product or service.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

### **Controller**

SmartTrace is the controller and responsible for your personal data and this website. We may also act as a joint controller and/or processor of your data with a third party.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

We run an online retail business, specialising in microchips for pets. Further information is available on our website <https://smartrace.org.uk>

We have a close relationship with SmartBreeder, an online retailer of our produces, who also provide related products to pet owners. Further information on SmartBreeder is available on their website <https://smartbreeder.com>

The businesses work together with SmartTrace providing the microchip technology and an online administration tool for pet owners, and SmartBreeder distributing these products as an online retailer. Operating in this manner requires both entities to work together as “joint controllers”, meaning that we make joint decisions on how personal data is processed.

### **Contact details**

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

Full name of legal entity: Data Candy (UK)

Email address: [hello@smartrace.org.uk](mailto:hello@smartrace.org.uk)

Postal address: Unit 3, Varley Business Centre, James Street, Manchester, M40 8EL, UK

Telephone number: +44 (0) 1208 420 999

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

If your complaint relates to services provided by SmartBreeder, you should review their complaint handling procedures and privacy policy, which should be available on their website.

## Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

We encourage you to review this Policy whenever you access or use our website to stay informed about our information practices and the choices available to you. If you do not agree to the revised Policy, you should discontinue your use of our website. By continuing to access or use our website after the effective date of a change, you confirm your acceptance of any revised Privacy Policy or policies.

## Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Below is a broad selection of social media applications that we may, currently use, or potentially use in the future, and links to their privacy policies. This list is not exhaustive:

Slack channel: <https://slack.com/privacy-policy>

Facebook: <https://www.facebook.com/policy.php>

Twitter: <https://twitter.com/privacy>

Reddit: <https://www.redditinc.com/policies/privacy-policy>

Medium: <https://medium.com/policy/medium-privacy-policy-f03bf92035c9>

Please refer to their privacy policies on the above links, noting however that they may be changed without notice by those social media service providers. We are not responsible for the privacy policies and practices of other organisations and you should check with the relevant organisation as to how they manage Personal Data and any updates they may make to their privacy policies, notices and practices

## 2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.

This information shall be securely stored in accordance with this Privacy Policy for as long as you have an active account with us. We offer alternative payment options (such as Klarna, PayPal and ApplePay) that do not require us to process Personal Data relating to your payment and financial information and will only record the method of payment used in such circumstances.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website or any of our newsletters and emails.
- **Profile Data** includes your username and password, SmartTrace account and/or microchip number, purchases or orders made by you (even though the purchase may be handled by SmartBreeder), your interests, preferences, feedback and survey responses. Please note, although your password related to your account, it will not be visible to SmartTrace and cannot be used to identify you as it is encrypted data.

We will produce an account number (and, where relevant, a microchip number) for your account with us, so it can be distinguished from accounts of other users and to ensure we can associate the microchip(s) you purchase with this account or to transfer microchip(s) to other accounts with the consent of pet owners.

- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences. We may choose to use a marketing email management system (such as MailChimp) to send out newsletters to subscribers, allowing us to prepare customised emails and manage our subscriber base. Where we use such services, we will not store any information collected by our mailing list provider, other than the association of a name to an email address.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email, meeting with us or attending our events in person. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - request information, place an order or arrange a meeting;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us.

Please note, we record all phone calls made to our dedicated customer service line +44 (0) 1208 420 999, and our advisors will provide you with a warning that calls are being recorded. Data from these calls is converted to audio files and stored securely in accordance with this Privacy Policy and as set out under the heading 'Data retention'.

- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy <https://smartrace.org.uk/cookie-policy.pdf> for further details.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties as set out below.

Technical Data from the following parties:

- (a) analytics providers;
- (b) advertising networks;
- (c) search information providers;
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
- Identity and Contact Data from data brokers or aggregators;
- Identity and Contact Data from publicly available sources;
- Identity, Contact Data and Technical Data from social networking sites such as Twitter, Medium, Facebook, Instagram etc.

For example, if you login to a site or app using Facebook Connect you will be asked if you wish to share information from your Facebook account with us. If you use a "like" or a "share" button feature in relation to one of our adverts or posts on a third-party website, then the third party will share information with us such as your name or IP address. If you participate in activities outside of our website, such as participating in a Facebook application, you may allow us to have access to personal data held by Facebook, or other site or app owners.

#### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform a contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Non-exhaustive examples of when we may need your consent are:

- To enable a feature on a mobile device application or on a microchip;
- To allow us to transfer the association (alignment) of microchip data with your account, to another user account;
- To enable us to place cookies and similar technologies in accordance with our Cookie Policy. Our Cookie Policy can be accessed at <https://smattrace.org.uk/cookie-policy.pdf>

#### Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register you as a new customer. This also any requests made by you before entering into a contract with us e.g. at the time you open an account on our website.	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests

<p>(b) Renewing your monthly or annual subscriptions with SmartTrace</p> <p>(c) Collect and recover money owed to us</p> <p>Please note, this also applies to services offered by SmartBreeder.</p>	<p>(e) Marketing and Communications</p>	
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Notifying you of any updates, delays or disruptions to our services</p> <p>(c) Asking you to leave a review or take a survey</p> <p>(d) Communicating with you and providing you with material relevant to the administration of events, competitions, meetings and other interactions with you, including our arrangement with SmartBreeder</p> <p>(e) Corresponding with you in relation to your lost pet or with regards to finding your missing pet by using our services</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data, investigating complaints, responding to customer queries)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>



To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

**Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. If you have any questions or specific requests in relation to this, please contact us.

**Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

**Third-party marketing**

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

**Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see <https://smartrace.org.uk/cookie-policy.pdf>

## **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the table above.

- Third Parties as set out in the [Link to *Glossary*].
- External Third Parties as set out in the [Link to *Glossary*].
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions or as otherwise notified to you.

## **6. International transfers**

We may transfer your data outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- ❖ We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

- ❖ Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.
- ❖ Working with entities that have Privacy Shield certification under the US or Swiss Privacy shield frameworks.
- ❖ Ensuring transfers are to third countries that it subject to an adequacy decision by the European Commission.
- ❖ Use of Binding Corporate Rules (note: given the size of our organisation, we do not transfer Personal Data subject to Binding Corporate Rules) Certain third country transfers are exempted transfers, meaning that they are allowed under the specific derogations in the law and are used where “appropriate safeguards” above are not available. We may rely on these exemptions and transfer data to third countries:
  - with your explicit consent;
  - where necessary for the performance of a contract, or for pre-contractual steps taken at your request;
  - where necessary for the conclusion of a contract between us and a third party which is in your interest;
  - where necessary for important reasons of public interest;
  - where necessary for the establishment, exercise or defence of legal claims; or
  - where necessary to protect your vital interests (or those of another), if you are physically or legally incapable of giving consent. As a measure of last resort, we may also make a third country transfer where we cannot rely on any of the above reasons, but only if the transfer fulfils the following criteria
    - the transfer must not be repetitive;
    - the transfer must concern only a limited number of data subjects;
    - the transfer must be necessary for compelling legitimate interests we pursue which are not overridden by your interests and freedoms (as well as those of affected data subjects);
    - we must have assessed all the circumstances and provided suitable safeguards (e.g. encryption measures) to protect the Personal Data;
    - we inform the relevant supervisory authority of the transfer; and
    - we provide you with (i) confirmation of the transfer, (ii) the information in this Privacy Policy, and (iii) the compelling legitimate interests we seek to rely on.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

How long will you use my personal data for? We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. Records can be held on a variety of media (physical or electronic) and formats. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Retention periods are determined based on the type of record, the nature of the data and activity and the legal or regulatory requirements that apply to those data. To determine the appropriate retention period for Personal Data, we consider:

- the amount, nature, and sensitivity of the Personal Data;
- the potential risk of harm from unauthorised use or disclosure of the Personal Data;
- the purposes for which we process the Personal Data and whether we can achieve those purposes through other means; and
- the applicable legal requirements that may require us to retain or destroy it. However, we may retain your Personal Data for a longer period of time where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. Finally, we may retain your Personal Data where we have a legitimate interest to do so e.g. for the establishment, exercise, or defence of legal claims.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for 6 years after they cease being customers. In some circumstances you can ask us to delete your data.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

## **6. Your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out above, please contact us.

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 7. Glossary

### LAWFUL BASIS

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

We may process any of your Personal Data where it is necessary to establish, exercise, or defend legal claims. The legal basis for this processing in this case will also be our legitimate interests; namely, the protection and assertion of our legal rights, your legal rights and the legal rights of others.

Preventing fraud, keeping our staff and our premises secure, and disclosing criminal acts We generally have a legitimate interest to keep our business going and ensuring that criminals do not take advantage or otherwise exploit any potential vulnerabilities of our business. If you use a credit or debit card as payment, we also use third parties to check the validity of the sort code, account number and card number you submit in order to prevent fraud. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to. For example, certain record keeping requirements may apply to us by statute and prescribe minimum period for us to retain data. Other laws and regulations (e.g. those relating to anti-money laundering and counter-terrorism/ counter- terrorist financing) may require us to properly identify our customers, or to ensure that our microchips are not used for an unlawful purpose. Processing may also be necessary where it is in response to requests by government or law enforcement authorities conducting an investigation.

**Vital interests** means the processing necessary to protect someone's life. We very rarely rely on this as a lawful basis to process your Personal Data, as usually another lawful basis will be more suitable.

Non-exhaustive examples of where we need to rely on this are:

- Where we believe there may be an immediate threat of harm or potential harm to you or another person (such as in cases where pet ownership is disputed), we may need to advise the persons concerned as well as authorities
- If an event we host is catered or we are responsible for food/refreshment we will collect information on any allergies and/or disabilities you may have. Information on allergies and/or disabilities will be deleted as it is a more sensitive type of data known as "special category data" that relates to your health.

- We may also need to process details relating to criminal convictions and offences of persons in relation to ownership of animals and/or violent behaviour. Such data, like “special category data” are also a sensitive type of data category, and is subject to stricter controls and security measures. Such data may be retained as long as we are required to do so by law or where we reasonably believe vital interests may be engaged.

## THIRD PARTIES

### Third Parties

Other companies acting as joint controllers or processors and who are based in the United Kingdom including but not limited to:

- ❖ **Lenken Limited**, trading as ‘**SmartBreeder**’, incorporated and registered in England and Wales with company number 08585205 whose registered office is at Unit 3, Varley Business Centre, James Street, Manchester, M40 8EL, UK; and
- ❖ **Dynamic Manchester Limited** incorporated and registered in England and Wales with company number 12267924 whose registered office is at Unit 3, Varley Business Centre, James Street, Manchester, M40 8EL, UK.

### External Third Parties

- Service providers acting as processors who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

Please remember to refer to the relevant third-party’s privacy policy.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.