

# Privacy & Data Protection Policy

Oxygen Finance Limited is committed to protecting your data and respecting your privacy

## Introduction

Welcome to Oxygen Finance Limited's privacy policy.

Oxygen Finance Limited (**Oxygen**) respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data (i) when you visit our website [www.oxygen-finance.com](http://www.oxygen-finance.com) (regardless of where you visit it from); or (ii) when sending us an email or otherwise when communicating with us; (iii) when you interact with us such as when you (whether for yourself or on behalf of the organisation you work for) purchase products and services from us or supply products and services to us; (iv) when you visit our premises and will tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here: <https://www.oxygen-finance.com/uploads/Oxygen%20Finance%20-%20Privacy%20Policy.pdf>. 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. APPLICANTS**

**3. THE DATA WE COLLECT ABOUT YOU**

**4. HOW IS YOUR PERSONAL DATA COLLECTED?**

**5. HOW WE USE YOUR PERSONAL DATA**

**6. DISCLOSURES OF YOUR PERSONAL DATA**

**7. INTERNATIONAL TRANSFERS**

**8. DATA SECURITY**

**9. DATA RETENTION**

**10. YOUR LEGAL RIGHTS**

**11. GLOSSARY**

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

**Purpose of this privacy policy**

This privacy policy aims to give you information on how Oxygen collects and processes your personal data:

- through your use of this website, including any data you may provide through this website when you complete the 'Contact Us' form;
- when we otherwise communicate or meet with you, including communication by email or other media; and
- when you attend our premises.

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.

This privacy policy is not applicable to personal data we collect and process in respect of our personnel or individuals who apply for roles with us as part of our recruitment activities. We will collect and process such personal data in accordance with separate privacy notices.

When we refer to 'your organisation' in this privacy policy, we are referring to your employer or organisation you work for.

## **Controller**

This privacy policy is issued on behalf of Oxygen Finance Limited (collectively referred to as "Oxygen", "we", "us" or "our" in this privacy policy). Oxygen is the data controller in respect of data collected through this website and in other ways and responsible for your personal data as set out in this privacy policy. We are a company registered in England and Wales under company number 05288899 and have our registered office at 1st Floor, Enterprise House, 115 Edmund Street, Birmingham, B3 2HJ.

We are registered with the Information Commissioner's Office under registration number Z271609X.

## **Processor**

Please note that where we provide services to a customer, Oxygen is the data processor, and customer is the data controller, of any third-party personal data the customer provides to us (such as a supplier's representatives' name and contact details) to enable us to provide certain features the Services ("Third-Party Data"). The data processing provisions governing our use of such personal data and our duties as a data processor will be governed by the terms of our agreement with each customer, which will be compliant with applicable data protection laws. The customer must not input, upload, provide or otherwise make available to or through the services any Third-Party Data unless you have a legal right to do so

## **Contact details**

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 or our privacy practices, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Full name of legal entity: Oxygen Finance Limited

Email address: [info@oxygen-finance.com](mailto:info@oxygen-finance.com)

Postal address: 1st Floor, Enterprise House, 115 Edmund Street, Birmingham, B3 2HJ.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

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

We keep our privacy policy under regular review. This version was last updated in April 2021.

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. Please use the contact details above.

## Third-party links

This website and other communications may include links or references 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 or policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. APPLICANTS

We collect personal data concerning applicants who apply for roles with Oxygen. If you apply for a position with Oxygen, we will collect and use your personal data in accordance with a separate privacy policy, a copy of which will be provided to you on receipt of your application, either direct from you or your recruitment agent.

## 3. 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 name, username or similar identifier and title and your image on CCTV if you visit our premises or recording meetings via internet platforms such as Teams or Zoom.
- **Contact Data** includes address, email address and telephone numbers.
- **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 our services.
- **Profile Data** includes your username and password, purchases or orders made by you or us, your preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Third Party User Data** includes email message bodies (including attachments), metadata, headers, and settings when using our email integration services. For further information on this see Additional Restrictions on the use of Third Party User Data.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you are an individual customer or supplier (where you act in your personal capacity and not on behalf your employer or other organisation), we may also collect, use, store and transfer the following additional kinds of personal data about you:

- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from or supplied to us.

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 or your organisation, 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 or your organisation (for example, to provide you or your organisation with products or services). In this case, we may have to cancel a product or service you or your organisation have with us but we will notify you or your organisation if this is the case at the time.

#### **4. 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, Financial Data and Marketing and Communications Data by filling in forms or by corresponding with us by post, phone, email, through our website or social media accounts or otherwise. This includes personal data you provide when you or your organisation:
  - purchase our products or services;
  - sell your products or services to us;
  - subscribe to our publications;
  - post messages or participate in discussions through our social media accounts;
  - request marketing to be sent to you;
  - enter a promotion or participate in a survey;
  - give us feedback or contact us; or

- administer and/or manage any interaction, relationship or contract between the organisation you work for and us.
- **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 and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy <https://dragonfly.oxygen-finance.com/assets/docs/OxygenDragonfly-CookiePolicy.pdf> for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as:
  - Technical Data from the following parties:
    - analytics providers such as Google
    - 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 such as Companies House and the Electoral Register based inside the UK or EU.
  - Third Party User Data from parties such as Google, including Gmail, and Microsoft, including Office365/Outlook.
- **Visitors to our premises.** We will collect and process Identity and Contact Data when you visit our premises for our visitor records and primarily for security and safety reasons. This will include capturing your image on CCTV footage.
- **Use of our Wi-Fi network.** We may collect and process Technical and Usage data when you use our Wi-Fi network.
- **Telephone recordings.** We may record your phone call or Teams/Skype/Zoom or other similar internet platform meetings for training purposes, to ensure quality customer service and/or to provide a permanent record of the call.

## 5. 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 the contract we are about to enter into or have entered into with you or your organisation.
- 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.

Please refer to the Glossary below to find out more about the types of lawful basis that we will rely on to process your personal data.

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

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

When collecting and using personal data, our policy is to be transparent about why and how we process personal data. We have set out below 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you or your organisation as a new customer	(a) Identity (b) Contact	Performance of a contract with you or your organisation.
To provide products/services to you or your organisation	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Third Party User Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To purchase products/services from you or your organisation	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Third Party User Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests
To process and deliver your or your organisation's order including:	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you or your organisation

<p>(a) Manage payments, fees and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(d) Transaction</p> <p>(e) Marketing and Communications</p>	<p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you or your organisation which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p> <p>(c) Asking to provide feedback or comment in connection with your use of our website or products and services</p> <p>(c) providing you with information about the products/services we provide to you or your organisation, including changes to our products or 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 or your organisation</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 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 or your organisation</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)</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>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p>	<p>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)</p>

	(e) Marketing and Communications (f) Technical	
To operate interactions such as forms and flows in regard to the product/service you or your organisation operates with us	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you/your organisation  (c) Necessary for our legitimate interests (to allow us to interact with you in respect of the product/service your organisation operates with us)
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 you of our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you or your organisation	(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)
To manage our business contact list	(a) Identity (b) Contact (c) Marketing and Communications (d) Transaction	Necessary for our legitimate interests (to develop our products/services and grow our business)
By using the names and other personal data of representatives of corporate customers and suppliers in order to manage our interactions with those customers and suppliers	(a) Identity (b) Contact (c) Marketing and Communications (d) Transaction	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)  (b) performance of a contract with you or your organisation
By using the names and contact details of individuals who are our suppliers	(a) Identity (b) Contact (c) Marketing and Communications	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)  (b) performance of a contract with you or your organisation

	(d) Transaction	
For security purposes	(a) Identity	Necessary for our legitimate interests (to ensure the safety of our staff, premises and visitors to our premises)
To provide Wi-Fi access	(a) Technical (b) Usage	Necessary for our legitimate interests (to provide you with access to the internet)
To record your phone call or Teams/Skype/Zoom or similar internet platform meetings for training purposes, to ensure quality customer service and/or to provide a permanent record of the call	(a) Identity (b) Contact (c) Technical (d) Financial (e) Transaction	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)  (b) performance of a contract with you or your organisation
To comply with our legal obligations including the prevention of financial crime.	(a) Identity (b) Contact (c) Transaction (d) Third Party User Data	To comply with a legal obligation

### Additional restrictions on the use of third party user data

Notwithstanding anything else in this Privacy Policy, if you provide us with access to Third Party User Data, then the use of that data will be subject to these additional restrictions:

- **Use:** We will only use access to read, write, modify, or control email message bodies (including attachments), metadata, headers, and settings (**Third Party User Data**) to provide a web email client that allows users to compose, send, read, and process emails.
- **Transfer:** We will not transfer Third Party User Data to any third party unless doing so is:
  - necessary to provide and improve email integration features,
  - to comply with applicable laws, or
  - as part of a merger, acquisition, or sale of our assets.
- **Advertising:** We will not use Third Party User Data for marketing or advertising purposes and we will not share Third Party User Data with any third party for marketing or advertising purposes.
- **Human Interaction:** We will not allow humans to read Third Party User Data unless:

- we have your specific prior consent to humans reading specific messages (for example for tech support),
- doing so is necessary for security purposes such as investigating abuse,
- to comply with applicable laws, or
- for our internal operations and even then only when the Third Party User Data have been aggregated and anonymized.

Further to the above, we will adhere to [Google's Limited Use Requirements](#) for any information received from Gmail APIs.

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **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 following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not prevent us using your personal data to contact you other than for marketing purposes (e.g. where we need to contact you or your organisation in connection with your or your organisations purchase or use of our products/services and your or your organisation's contract with us).

## **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://dragonfly.oxygen-finance.com/assets/docs/OxygenDragonfly-CookiePolicy.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.

## **6. 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 *Purposes for which we will use your personal data* above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *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.

All personal data will only be transferred where there is a need to do so (for use in the course of providing services to us or you or your organisation) and these third parties will also be subject to agreements regarding the handling and use of your data. We require all third parties to respect the security and confidentiality of your personal data and to treat it in accordance with the law. We do not allow these third-parties 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.

We will not sell, distribute or lease your personal information to third parties unless we are required to do so by law, a regulator, the rules of any applicable stock exchange or in the course of legal proceedings.

## 7. International transfers

We may share your personal data with a group company, Oxygen Finance Americas, Inc., based in the USA. This may involve transferring your data outside the United Kingdom.

In addition, some of our External Third Parties may be based or have servers outside the United Kingdom so their processing of your personal data may involve a transfer of data outside the United Kingdom.

Whenever we transfer your personal data out of the United Kingdom, we do our best to 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 by the UK Supervisory Authority.
- Where we use certain service providers, we may use specific contracts or certification methods approved by UK Supervisory Authority which give personal data the same protection it has in the United Kingdom..
- Where we use providers or transfer data to organisations based in the US, we may transfer data to them if they are part of a recognised scheme which requires them to provide similar protection to personal data shared between the United Kingdom and the US or where our contractual arrangements with such providers or organisations otherwise provide an adequate level of protection for personal data as approved by the UK Supervisory Authority.

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

If any of the above safeguards or mechanisms are not available or implemented for a specific transfer outside the United Kingdom, we will obtain your explicit consent to the transfer, which you can refuse or withdraw at any time in your absolute discretion.

## 8. Data security

Some of your account information may be protected by a password for your privacy and security. To help prevent unauthorized access to your account, you should select and protect your password appropriately and limit access to your computer and browser by signing out after you have finished accessing your account

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.

## **9. 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. 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.

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 your personal

data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity and Transaction Data) for six years after they cease being customers for tax purposes.

Details of retention periods for different aspects of your personal data are available and if you would like more information, please contact us.

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

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.

## 10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*
- *Request the removal from marketing lists*

If you wish to exercise any of the rights set out above, please contact us at [info@oxygen-finance.com](mailto:info@oxygen-finance.com).

### **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.

## **11. 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). 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.

### **THIRD PARTIES**

#### **Internal Third Parties**

Other companies in the Oxygen Group and who provide business services to Oxygen.

#### **External Third Parties**

- Service providers who provide IT and system administration services and other business services to us.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services to us.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom.
- Analytics and search engine providers who assist us in the improvement and optimisation of our website.
- Subcontractors, partners, agents and other persons who need access to and will use your data in the course of providing services to you or your organisation and for the purposes we specify.

## 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.

**Request the removal** at any time from marketing lists or change your marketing preferences.