

Privacy Notice

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1 ABOUT THIS POLICY

Nene Valley Rock Festival (“NVRF”) respects your privacy and is committed to protecting your personal data.

Personal data is any information that can be used to identify a living person, including names, delivery details, IP addresses, or HR data such as payroll details. Most organisations use personal data in their daily operations.

This Privacy Notice explains who we are, what personal data we hold, how we got it, why we need it, how it is used, and your rights with respect to it.

It covers all of NVRF Ltd’s activities, including but not only our web site, online ticket purchasing and merchandise sales, volunteers and staff administration and operations.

It aims to give you information about how NVRF collects and processes your personal data through your use of our website, including any data you may provide through our website, for example if you sign up to our newsletter, or purchase or enquire about a ticket, service or product. It also covers the personal data we hold and use about our volunteers and staff, suppliers and contractors.

It explains how we comply with the General Data Protection Regulation (GDPR) as it is implemented in data protection law within the UK (the ‘UK GDPR’), and other regulations on privacy and data protection.

Personal data provided to and processed by NVRF is governed by UK law, specifically the Data Protection Act 2018 and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019, which enact the requirements of the EU GDPR to form a data protection regime in the UK after 31 December 2020, known as the ‘UK GDPR’.

It is important to read this Privacy Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we and our contractors 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 Notice supplements the other notices and is not intended to override them.

Changes to the privacy notice

This version was issued on 23 February 2023.

Your duty to inform us of changes

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.

Third-party links

Our 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 policies. When you leave our website, we encourage you to read the privacy notice of each website you visit.

2 WHO WE ARE

Data Controller

NVRF Ltd trading as Nene Valley Rock Festival is the Data Controller and is responsible for your personal data.

In this document, NVRF Ltd is referred to as 'Nene Valley Rock Festival', 'NVRF', 'the festival', 'event' or 'our events', 'we', 'us' or 'our'.

We have nominated a Data Privacy Manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the details set out below.

Contact details

Our full details are:

Full name of legal entity: **NVRF LTD** trading as Nene Valley Rock Festival ('**NVRF**')

Company Registration number: 14603358 registered in England and Wales

Name of Data Privacy Manager: Andrew Little

Registered office address: 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ

Website: www.nvrf.rocks

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

3 THE DATA WE COLLECT ABOUT YOU

Personal information

Personal data, or personal information, means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data); or requires an index key to identify individuals (pseudonymous data), in which case the index key is personal data.

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

(a) Identity data includes first name, last name, maiden name, username or similar identifier, marital status, title, gender and date of birth or age.

(b) Contact data includes contact address, billing address, delivery address, email address and telephone numbers.

(c) Financial data includes bank account and payment card details.

(d) Transaction data includes details about payments to and from you, and details of services and products that you have purchased from us, or been provided to you by us, including details of purchases including discount code redemption, clothing sizes, and dates for which you buy tickets.

(e) Volunteer and Staff data includes details of your past experience and involvement with our events; your availability to support us; relevant experience, capabilities, skills, qualifications and certificates; Driving Licence details (if driving a vehicle for us); your preferences for duties; persons with whom you prefer to work; clothing size; vehicle registration number (for site access and parking); your accommodation arrangements and food preferences.

(f) Employment data (where a person is employed) in addition to the information for Volunteers and Staff (see (e) above) includes your application file, identification evidence, personal references, proof of eligibility to work in the UK,

personnel file, payroll information, National Insurance number, tax code, bank account details, leave and medical records, and other information necessary to administer employment.

(g) 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.

(h) Profile data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

(i) Usage data includes information about how you use our website, email, products and services.

(j) Marketing and Communications data includes your preferences in receiving marketing from us and third parties, your communication preferences, what communications we have sent and your responses.

(k) Operational data includes data we may gather in the course of our events. It includes ticket check-in; counts of people at specific locations and times; notes about issues such as lost property; vehicle registration number, model and colour; type of camping equipment; photography, video and CCTV images and recordings; services and products supplied.

Special Categories of Personal Data

Some of the data about our volunteers and people working for us that we collect and hold are defined within GDPR as Special Categories of Personal Data.

(l) Information about your health and medical conditions, insofar as these might affect you whilst volunteering or working for us in connection with our events. This is information that you provide to us. It includes for example medical conditions that could require treatment, in order that appropriate treatment can be given to you more rapidly; and your ability to undertake certain activities, so that you are assigned appropriate duties.

In the event that you are affected by an accident or illness while at one of our events, we will record details of the incident, your injury or medical condition, the treatment provided, and the outcome. These records will be subject to review, analysis and statutory reporting as required by law, and to process insurance claims.

(m) Emergency Contact information. If you volunteer or work for us, we will ask you to provide the name, telephone number, address and email of a person you nominate who we should contact in the event of an emergency.

Personal data relating to criminal convictions and offences

NVRF does not routinely undertake Disclosure and Barring Service (DBS) checks (previously known as CRB checks) or Police National Computer (PNC) checks on volunteers or staff, nor holds personal data relating to criminal convictions and offences, but may take this information into account when considering the suitability of a person to volunteer or work at an event. If you work for a subcontractor, they may require a DBS check. If you apply for an SIA licence, the SIA will always obtain a criminal record check on anyone who applies for a licence.

Young people

Our website is not intended to be used by children. Tickets can be purchased by adults for use by children to attend our events. In some cases, the ticket buyer may enter a name and other data for the attendee, who might be a child. Children attending the festival are required to be accompanied by a responsible adult.

Volunteer helpers could be under 18, and are normally over 13, in which case the data held and processing applied will be the same as that for an adult volunteer.

If a child were to be involved in an incident, we would record the necessary information required for its resolution in accordance with the law, taking particular care to protect and respect the child's wellbeing, safety and privacy.

We do not otherwise process personal data relating to children under the age of 18.

Personal data we do not collect or hold

We do not collect or hold any personal information about race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, genetic and biometric data, nor (except as stated above) criminal convictions and offences.

Derived Data

We may collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does 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 notice.

Anonymous and pseudonymous data

Where practicable, we will aim to process and use personal data in ways that do not identify individuals. For example, by removing individuals' identities (anonymisation); or by replacing them with codes that require an additional index (or 'key') that is held separately and securely (pseudonymisation).

If you do not provide personal data

Where we need to collect personal data under the terms of a contract we have with you, or by law, and you do not 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 services or goods). In this case, we may have to cancel a service or product contract you have with us but we will notify you if this is the case at the time.

4 HOW PERSONAL DATA IS COLLECTED

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

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 or otherwise. This includes personal data you provide when you:

- apply for or enquire about our services or products;
- create an account on our website;
- purchase tickets, services, merchandise or products;
- pledge support or make a donation;
- attend an event;
- volunteer to work at an event;
- work for us as an employee or subcontractor;
- supply services or products to our events, including performances, hire or sale of equipment, supply of food, drink and consumables;
- subscribe to our publications or newsletter;
- request marketing information be sent to you;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies.

Third parties or publicly available sources

We may collect or receive personal data about you from various third parties and public sources as set out below:

- Technical Data from the following parties:

- analytics providers such as Google;
- advertising networks such as Facebook; and
- search information providers.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Experian, Credit Call, PayPal, Visa, etc.
- Identity and Contact Data from data brokers or aggregators or insurers.
- Identity and Contact Data from publicly available sources such as your website, published directories, Companies House or the Electoral Register.
- Identity and Contact Data made available by you, or companies or organisations for which you work or with which you are associated, for the purposes of commercial activity e.g. your contact details made available on a commercial website.

5 HOW WE USE YOUR PERSONAL DATA

Lawful basis for using 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 you have clearly given your consent for us to hold and process your personal data.
- Where we need to perform the 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 it is necessary to protect somebody's life and safety (vital interests).
- Where we need to comply with a legal or regulatory obligation.
- Where it is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law (public task).

Generally, we will seek your consent before processing your personal data. However, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw your consent at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of the ways we plan to use your personal data, and which of the legal grounds 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a customer or prospective customer	(a) Identity (b) Contact	<ul style="list-style-type: none"> ● Consent from you to process your data ● Performance of a contract with you
To process and deliver your order including: <ul style="list-style-type: none"> ● Manage payments, fees and charges ● Collect and recover money owed to us 	(a) Identity (b) Contact (c) Financial (d) Transaction (j) Marketing & Communications	<ul style="list-style-type: none"> ● Consent from you to process your data ● Performance of a contract with you ● Necessary for our legitimate interests (to recover debts due to us)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To administer events that you attend	(a) Identity (b) Contact (c) Financial (d) Transaction (h) Profile (j) Marketing & Communications (k) Operational	<ul style="list-style-type: none"> • Consent from you to process your data • Performance of a contract with you • Necessary for our legitimate interests (to recover debts due to us) • Necessary to comply with a legal obligation (including health and safety, statutory reporting, licensing) • Necessary to protect life and safety
To manage our relationship with you which may include: <ul style="list-style-type: none"> • Notifying you about changes to our terms • Asking you to leave a review or take a survey 	(a) Identity (b) Contact (h) Profile (j) Marketing & Communications (k) Operational	<ul style="list-style-type: none"> • Consent from you to process your data • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (h) Profile (i) Usage (j) Marketing & Communications	<ul style="list-style-type: none"> • Consent from you to process your data • Performance of a contract with you • Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer you as a volunteer or staff member	(a) Identity (b) Contact (e) Volunteer & Staff (h) Profile (j) Marketing & Communications (k) Operational (l) Health & Medical (m) Emergency Contact	<ul style="list-style-type: none"> • Consent from you to process your data • Necessary for our legitimate interests (running our events, recruiting and managing volunteer staff, assigning duties) • Necessary to comply with a legal obligation (including health and safety, statutory reporting, payment of tax, licensing) • Necessary to protect life and safety
To administer you as an employee or subcontractor	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Volunteer & Staff (f) Employment (h) Profile (j) Marketing & Communications (k) Operational (l) Health & Medical (m) Emergency Contact	<ul style="list-style-type: none"> • Consent from you to process your data • Performance of a contract with you • Necessary for our legitimate interests (running our events, recruiting and managing staff, assigning duties, carrying out payroll and HR functions) • Necessary to comply with a legal obligation (including health and safety, statutory reporting, licensing) • Necessary to protect life and safety
To administer you as a supplier, contractor or artist	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Volunteer & Staff (f) Employment (h) Profile (j) Marketing & Communications (k) Operational (l) Health & Medical (m) Emergency Contact	<ul style="list-style-type: none"> • Consent from you to process your data • Performance of a contract with you • Necessary for our legitimate interests (running our events, assigning duties, paying suppliers) • Necessary to comply with a legal obligation (including health and safety, statutory reporting, payment of tax, licensing) • Necessary to protect life and safety
To administer and protect our business and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (g) Technical	<ul style="list-style-type: none"> • Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud) • Necessary to comply with a legal obligation
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 (g) Technical (h) Profile (i) Usage (j) Marketing & Communications	<ul style="list-style-type: none"> • 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)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(g) Technical (i) Usage	<ul style="list-style-type: none"> • 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 services or goods that may be of interest to you or to keep you up to date with news and developments at NVRF and in our market place by sending emails and mailshots.	(a) Identity (b) Contact (g) Technical (i) Usage (h) Profile (k) Operational data (j) Marketing & Communications	<ul style="list-style-type: none"> • Consent from you to process your data • Necessary for our legitimate interests (to develop our products/services and grow our business)
To assist government infectious disease contact tracing	(a) Identity (b) Contact (k) Operational data	<ul style="list-style-type: none"> • Necessary to comply with a legal obligation • Necessary to protect life and safety • Necessary in the public interest

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms.

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 services, products and offers may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or purchased services or goods from us or if you provided us with your details for commercial purposes and, in each case, you have not opted out of receiving that marketing. In addition, we may collect data from publicly available sources, especially commercial websites and use this to contact you if we think you may be interested in our services and products.

Third-party marketing

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

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us, or by using an 'unsubscribe' link included in an email.

Legitimate interests

Where we have decided that we can contact you in the furtherance of our legitimate interests, we will have identified the legitimate interest, shown that the processing is necessary in order to achieve it and considered how these interests are balanced against your data subject rights. We will not use data in ways that you would not reasonably expect without a good reason.

We consider that the furtherance of NVRF's lawful business (to develop our services and products, and grow our business) is a sufficient legitimate interest to justify communications of the type that NVRF sends out.

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, some parts of our website may become inaccessible or not function properly.

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 we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis that 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

Third Parties

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

- Service providers acting as processors and subprocessors who provide business, IT and system administration services (see below for further details).
- 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.
- Law enforcement bodies, government agencies, courts or other third parties where we think it's necessary to comply with applicable laws or regulations, or to exercise, establish or defend our legal rights, including the Police, fraud prevention agencies and criminal investigators, or when disclosure is required by law, regulation or order of a competent authority (including the Courts, financial services providers, Health and Safety Executive, public health authority, infectious disease contact tracing, or any regulatory or governmental body or securities exchange).
- 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 notice.

Service providers acting as processors

Service providers that act as processors for us may include the following companies, whose UK or EU offices for the purposes of GDPR are given below:

- **Crowdfunder** – crowdfunding platform – Crowdfunder Limited, C-Space 5-7 The Crescent, Newquay, Cornwall, TR7 1DT. Contact in relation to personal information is support@crowdfunder.co.uk
- **Google** – email, internet, search and advertising services – Google LLC, Google Data Protection Office, 1600 Amphitheatre Pkwy, Mountain View, California 94043
- **Mailchimp** – email services – The Rocket Science Group LLC doing business as Mailchimp, 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA. EEA Data Protection Officer can be contacted at dpo@mailchimp.com
- **PayPal** – payment processing services – PayPal (Europe) S.à.r.l. et Cie, S.C.A., 22-24 Boulevard Royal L-2449, Luxembourg.
- **QuickFile** – accounting services – Quick File Ltd, 219 Kensington High Street, Kensington, London, W8 6BD
- **Stripe** – payment processing services – Stripe Payments Europe, Ltd, 1 Grand Canal Street Lower, Grand Canal Dock, Dublin.
- **Square** – payment processing services – Squareup International Ltd, Fumbally Square, Fumbally Lane, Dublin 8, Ireland. EU Data Protection Officer can be contacted at privacy-eu@squareup.com
- **SumUp** – payment processing services – SumUp Payments Limited, 32-34 Great Marlborough Street, W1F 7JB, London. Data Protection Officer can be contacted at dpo@sumup.com

- **Wix.com** – website hosting, ticket processing and online commerce services – Wix Online Platforms Limited, 1 Grant’s Row, Dublin 2 D02HX96, Ireland. Data Protection Officer can be contacted at privacy@wix.com

Some processors state that they use subprocessors that are authorized to process customer data to support the services that they provide to us. These are listed in the Privacy Policies of the respective processors.

Each company based in the US has stated that it participates in and has certified its compliance with the EU-U.S. Privacy Shield framework with respect to international transfers of personal data.

Additionally, we may use internet service providers for web hosting, virtual private server (VPS) and content delivery network (CDN) services for delivery of web and video content.

We may use a third party for fulfilment of orders and deliveries, including:

- **Cambridge Recycled Books** – order fulfilment – Brook Farm, Barton Road, Haslingfield, Cambridge CB23 1LN
- **Royal Mail** – delivery services – Royal Mail Group Limited, 100 Victoria Embankment, London EC4Y 0HQ

We may use other delivery services from time to time.

Nene Park Trust uses a third-party parking system provided by:

- **Scheidt & Bachmann** – parking systems – Scheidt & Bachmann (UK) Limited, Unit 7 Silverglade Business Park, Leatherhead Road, Chessington, Surrey, KT9 2QL. Head office: Scheidt & Bachmann GmbH, Breite Straße 132, 41238 Mönchengladbach, Germany. Data Protection Officer can be contacted at datenschutzbeauftragter@scheidt-bachmann.de

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.

7 INTERNATIONAL TRANSFERS

NVRF Ltd is registered in England and Wales and operates Nene Valley Rock Festival in the United Kingdom.

Some of NVRF’s service providers operate multinationally, including in the EEA, US and so-called ‘third countries’.

We will aim not to transfer your personal data outside of the UK except where we can ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed under the UK GDPR to provide an adequate level of protection for personal data.
- UK GDPR permits personal data to flow freely from the UK to the European Economic Area (EEA).
- We may transfer data to service providers in ‘third countries’ that the European Commission has deemed provide an adequate level of protection for personal data (‘adequacy decisions’).
- Where we use service providers based in the US, we may transfer data to them if they have agreed to accept the EU-U.S. Privacy Shield framework (www.privacyshield.gov) that requires them to provide similar protection to personal data shared between Europe and the US.

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

8 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, volunteers 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.

Ultimately, the transmission of information via the Internet cannot be completely secure. While we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

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 we use your personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

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

In accordance with your preferences, we will keep you informed about our events for up to 7 years since we last heard from you.

Information related to financial transactions is required by HMRC to be retained for at least 7 years.

Information related to any health and safety incident is required to be retained for at least 10 years.

In some circumstances we may anonymise or pseudonymise your personal data (so that it can no longer be associated directly 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. These rights include 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. We want the information we hold to be as accurate as possible.
- **Request erasure** of your personal data (commonly known as your "right to be forgotten"). 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 that 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 that 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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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 (your "right to portability"). 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.

If you wish to exercise any of the rights set out above, please contact us.

Where data is held by a third party service provider that acts as processor for us, it may be necessary to approach the service provider in order to exercise your rights.

The lawful basis for processing can affect which rights are available to individuals.

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 may 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 does not have a right to receive it. We may also contact you to ask you for further information in relation to your request to clarify your request or speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. It may take us longer than a month if you do not provide the information we need from you, or your request is unclear or particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.