

Storybased Privacy Notice

Last updated: March 2020

1. Introduction

- This privacy notice (“notice”) applies to the processing of personal data by Storybased in connection with any:
- “client services”: provision of products and services by Storybased to actual and prospective clients;
- “supplier services”: provision of products and services to Storybased by suppliers or service providers;
- “visitor services”: provision by Storybased of facilities, including conference rooms, local area networking (for instance, WiFi) and other relevant facilities and services to visitors to any Storybased’ offices;
- “recruitment activities”: provision of the personal data of a candidate or individual (whether by such candidate or individual or by a third party, such as a recruitment agency) for a position at Storybased.
- References in this notice to “you” or “your” are references to individuals whose personal data Storybased processes in connection with client services, supplier services, or visitor services. For the avoidance of doubt:
- any reference in this policy to our “clients” or “suppliers” includes their employees or other staff whose personal details we process;
- this privacy notice also applies to Storybased’ processing of personal data of individuals who could be (or could be the employees or staff of) transaction counterparties or rival bidders to, or litigants in legal proceedings involving, our actual or prospective clients; and
- if you have provided your personal data to Storybased for recruitment activities (whether directly or through a third party) this notice is only designed to provide you with information about how we will process your personal data up to the point that you apply for a position or placement with Storybased. Details of the processing undertaken for recruitment activities are set out in Clause 15. If you have any questions about the processing of your personal data for recruitment

purposes please contact emilie@storybased.net and we will direct you to our recruitment privacy notice.

- References in this notice to “Storybased”, “we”, “us” or “our” are references to Storybased.

2. Importance of personal data protection

- Storybased recognises that the use and disclosure of personal data has important implications for us and for the individuals whose personal data we process. Most of our offices operate in countries which regulate the use, and impose restrictions on overseas transfers, of personal data. To ensure that Storybased handles personal data properly, Storybased has adopted an approach to privacy compliance, as evidenced by our different document released in our privacy portal, which a copy of each is available on our website.

3. Purpose of this notice

- This notice aims to give you information about how Storybased collects and processes your personal data. It is important that you read this notice together with any other notices we may provide on specific occasions when we are collecting or processing your personal data, so that you are fully aware of how and why we are using your personal data. This notice supplements the other notices and is not intended to override them.
- This notice can be accessed on our website but is not our website privacy notice or cookie policy.
- Our website privacy notice and cookie policy are accessible from the privacy section of our website.

4. Who is the controller for the personal data processed?

- A “controller” is a person or organisation who alone or jointly determines the purposes for which, and the manner in which, any personal data is, or is likely to be, processed. This notice is issued on behalf of Storybased as controller. Unless we notify you otherwise Storybased is the controller for your personal data.
- Our Global Head of Law & Compliance oversees compliance with data protection within Storybased. If you have any questions about

this notice, including any requests to exercise your rights, please contact our Global Head of Law & Compliance using the contact details set out below:

Global Head of Law & Compliance
Email: emilie@storybased.net

[5. How to make a complaint about the use of your personal data by Storybased](#)

If you have any concerns or would like to make a complaint about our processing of your personal data, please refer to our Data Protection Complaints Procedure, which is available on the privacy section of our website.

You may raise your concerns with your local data protection authority directly, without going through our Data Protection Complaints Procedure.

However, Storybased would encourage you to contact us in the first instance as we aim to promptly, efficiently and satisfactorily resolve any concerns or complaints you may have in relation to Storybased' processing of your personal data.

[6. Changes to the notice or to your personal data](#)

The first version of this notice was issued in March 2020.

[7. The personal data we collect about you](#)

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

Special categories of personal data 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. In limited circumstances, we collect special categories of personal data about you. Please see below Section 7 ([The personal data we collect about you](#)) for details of these circumstances and Section 10 ([How we use your personal data](#)) for further details.

In limited circumstances, we will collect information about your criminal convictions and offences. This happens where we are required to do so for legal or regulatory purposes (for example, where required pursuant to anti-money laundering laws) or where you have provided us with such information as it is necessary for a specific service we are providing.

We collect, use, store and transfer different kinds of personal data about you. We have grouped together the following categories of personal data to explain how this type of information is used by us. These terms are used throughout this notice:

- “Identity Data”: including your first name, middle names, maiden name, last name, marital status, title, date of birth, passport number, photographic identification and gender;
- “Contact Data”: including your billing address, delivery address, email address and telephone number;
- “Financial Data”: including your bank account and payment card details;
- “Services Data”: including details about payments to and from you and other details of services you have purchased from us or we have purchased from you;
- “Profile Data”: including your usernames and passwords, purchases or orders made by you, your interests, feedback and survey responses;
- “Usage Data”: includes information about your use of our website, our client knowledge portal, our local area networking facilities (including WiFi) and similar electronic services. Additional information about personal data we process based on your usage of our website is available in the privacy notice for our website (which can be accessed from the privacy portal of our website);
- “Technical Data”: includes information collected when you access our website or client knowledge portal, your 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 are using;
- “Marketing and Communications Data”: including your marketing and communication preferences. We also track when you receive and read marketing communications from us and which of our events you

attend, which information we use to improve our marketing services, provide you with more relevant information and improve the quality of our marketing materials. Additional information about the personal data we process in connection with marketing is included with the marketing communications we send you;

- “Professional Information”: including your job title, email address, phone number and addresses;
- “Special Categories of Personal Data”: includes personal data listed in Section 7 above, which we process in limited circumstances, for example, where required to do so for legal or regulatory purposes or where you have provided us with such information as it is necessary for a specific service we are providing to you. We will process this personal data for the following reasons:
 - (i) for legal and regulatory purposes, for example, we may need to verify whether you are a politically exposed person;
 - (ii) we may need to know about your trade union membership to assist you with an employment law matter; or
 - (iii) we may ask you for your dietary requirements if we are arranging catering for you.
- "CCTV Data" including CCTV footage and other information obtained through electronic means such as swipecard records.

Our services are neither aimed at nor intended for children. However, we may process children’s personal data when we act for you in relation to certain private matters (for instance, when we are advising you regarding your inheritance taxes). We process such personal data only where necessary for the specific client services we are providing. In such cases, we act on behalf of the parent or guardian. If the specific client service for which we need children’s personal data is not entirely clear, please contact your relationship partner, who will be able to explain further.

[8. If you fail to provide personal data to us](#)

Where we need to collect personal data by law (for instance, in relation to anti-money laundering or other “*know your customer*” checks) or under the terms of a contract we have with you and you fail to provide the personal 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). In this case, we may have to decline to provide or receive the relevant services, but we will notify you if this is the case at the time the personal data is collected.

9. How your personal data is collected

We use different methods to collect personal data from and about you, including through the channels set out below.

Direct interactions: You give us your personal data in your direct interactions with us. Such personal data includes Identity Data, Contact Data, Financial Data, Services Data, Profile Data, Usage Data, Technical Data, Marketing and Communications Data, Professional Information, and/or Professional History which you give us from time to time (i) by filling in forms on our website or our client knowledge portal; (ii) through other electronic platforms which we offer or which we have agreed with you to use, (iii) by corresponding with us by email or post, (iv) by speaking to us in person or over the telephone, or (v) whilst visiting our offices.

Such direct interactions include, for example, instances when you:

- enquire about or apply for our client services (for instance, when you sign up to our client knowledge portal);
- market or provide your supplier services to us;
- give us personal data necessary for a specific client service we are performing for you, or for the purposes of our “*know your customer*” processes and other background checks. In the certain limited circumstances, for example to enable us to comply with anti-money laundering and terrorism purpose we may also collect this information about suppliers;
- give us your business card at an event or a meeting, or otherwise personally give us your personal data (for example, by leaving your contact details at the reception of one of our offices or with our switchboard);
- give us your personal data via an electronic platform which we make available or which we have agreed with you to use in connection with our client services (for instance, any e-billing system which you require us to use) or in connection with your supplier services (for example, an electronic platform that you supply to us);

- subscribe to our publications or otherwise ask for our marketing;
- participate in our marketing, recruitment or other promotional events;
- participate in our client seminars and similar events; or
- give us feedback (for example, by completing a survey).

Website, cookies and marketing: You give us your personal data, which includes Profile Data, Usage Data, Technical Data, Professional Information and/or Marketing and Communications Data, when you use our website, our client knowledge portal or review the publications or marketing we send you. Please refer to the privacy notice for our website which can be accessed from our website for further information about the use of your personal data on our website.

Third-party sources: We receive Identity Data, Contact Data, Financial Data, Professional Information and Special Categories of Personal Data about you from third parties, when we:

- provide our client services or other parties send us your personal data to enable the provision of those service;
- conduct our “*know your customer*” and other background checks;
- you provide your personal data to a third party for the purpose of sharing it with us, for instance recruitment agencies and consultants may provide your personal data to us for recruitment activities; and
- we interact with governmental or regulatory bodies or other authorities (for instance, HM Revenue and Customs) in relation to you or on your behalf.

Publicly available sources. We collect Identity Data, Contact Data, Financial Data, Professional Information, Professional History from publicly available sources, including from:

- public registers of individuals (for instance, electoral registers);
- public registers of companies, charities, law firms, chartered accountants, stock or commodities exchange participants, mutuals and other entities (for instance, Companies House in the United Kingdom);
- public registers of sanctioned persons and entities ; and

- other public sources including any services accessible on the Internet which you are using for professional networking purposes for example Linked-In.

10. How we use your personal data

We will only process (i.e. use) your personal data when the law allows us to, that is, when we have a legal basis for processing. Section 11 (Purposes and legal basis for which we will use your personal data) below sets out further information about the legal bases that we rely on to process your personal data.

We use your personal data in the following circumstances:

- “performance of a contract”: where we need to perform a contract which we are about to enter into or have entered into with you as a party or to take steps at your request before entering into such a contract;
- “legal or regulatory obligation”: where we need to comply with a legal or regulatory obligation that we are subject to;
- “legitimate interests”: where necessary for our interests (or those of a third party), provided that your fundamental rights do not override such interests. This can mean, for instance, that it is in our interest, to monitor how you are using any client portals or access to systems to ensure that the security of such portals or systems is maintained. 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; and
- “consent and explicit consent”: where you have provided your consent or explicit consent to processing your personal data.

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 at emilie@storybased.net.

With limited exceptions (for instance, in relation to some of our electronic marketing), generally we do not rely on consent as the legal basis for processing your personal data.

You have the right to withdraw consent to electronic marketing at any time by following the unsubscribe instructions in such marketing materials or by contacting us at emilie@storybased.net.

Please refer to Section 16 for more information about how we use your personal data for marketing purposes and your rights.

11. Purposes and legal basis for which we will use your personal data

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

We may process your personal data for more than one legal basis depending on the specific purpose for which we are using your personal data. Please contact us at emilie@storybased.net if you need details about the specific legal basis we are relying on to process your personal data where more than one ground has been set out in the table below.

In relation to our client services or visitor services:

Purpose and/or activity	Type of data	Legal basis for processing
prospective) client, or could be a transaction counterparty or rival bidder to, or a litigant in proceedings involving our (actual or prospective) client, to check whether we would have a conflict of interest in acting for such client	<ul style="list-style-type: none">Contact DataFinancial DataServices DataProfessional Information	<ul style="list-style-type: none">contractLegal or regulatory obligationLegitimate interests: ensuring we (and all other parties concerned) understand any conflict of interest

	<ul style="list-style-type: none"> • Special Categories of Personal Data 	in a matter
client or to open a new matter for you, including performing anti-money laundering, anti-terrorism, sanction screening, fraud and other background checks	<ul style="list-style-type: none"> • Contact Data • Financial Data • Services Data • Professional Information • Professional History • Special Categories of Personal Data 	<p>contract</p> <ul style="list-style-type: none"> • Legal or regulatory obligation • Legitimate interests: ensuring we do not deal with proceeds of criminal activities or assist in any other unlawful or fraudulent activities for example terrorism • Public interest
and visitor services to you, including (among others) to provide you client services, technology solutions, access to our website, our client knowledge portal, and conference facilities	<ul style="list-style-type: none"> • Contact Data • Financial Data • Services Data • Profile Data • Usage Data • Technical Data • Marketing and Communications Data • Professional Information 	<p>contract</p> <ul style="list-style-type: none"> • Legal or regulatory obligation • Legitimate interests: ensuring that you are provided with the best client services and visitor services we can offer, and securing a prompt payment of any fees, costs and debts in respect of our services
and charges and to collect and recover money owed to us	<ul style="list-style-type: none"> • Contact Data • Financial Data • Professional Information 	<p>contract</p> <ul style="list-style-type: none"> • Legitimate interests: ensuring we can manage payments, fees and charges and to collect and recover money owed to us

<p>funding or funds in a matter we are acting on</p>	<ul style="list-style-type: none"> • Contact Data • Financial Data • Professional Information • Professional History 	<p>contract</p> <ul style="list-style-type: none"> • Legal or regulatory obligation <p>Public Interests</p>
<p>with you which will include notifying you about changes to our terms of business or this notice</p>	<ul style="list-style-type: none"> • Contact Data • Profile Data • Marketing and Communications Data • Professional Information 	<p>contract</p> <ul style="list-style-type: none"> • Legal or regulatory obligation • Legitimate interests: ensuring we can notify you about changes to our terms of business or this notice
<p>governmental or regulatory bodies or other authorities in relation to you</p>	<ul style="list-style-type: none"> • Contact Data • Financial Data 	<p>contract</p> <ul style="list-style-type: none"> • Legal or regulatory obligation <p>Public interest</p>
<p>business, including improving data security, troubleshooting data and systems, system maintenance and testing, data hosting, managing our offices and other facilities</p>	<ul style="list-style-type: none"> • Contact Data • Profile Data • Usage Data • Technical Data • Marketing and Communications Data • Professional Information 	<p>obligation</p> <ul style="list-style-type: none"> • Legitimate interests: ensuring the efficient and secure running of our business, including through office and facilities administration, maintaining information technology services, network and data security, fraud prevention and improving or reorganising our infrastructure or the Linklaters group
<p>marketing or other</p>		<p>our client records are up-to-</p>

<p>client seminars or similar events, and to manage your participation in them</p>	<ul style="list-style-type: none"> • Profile Data • Usage Data • Technical Data • Marketing and Communications Data • Professional Information • Professional History 	<p>services and visitor services, receiving feedback, improving our services and identifying ways to grow our business</p>
<p>(including paper and electronic marketing communications) or to contact you by other means to offer you our client services or visitor services</p>	<ul style="list-style-type: none"> • Contact Data • Profile Data • Usage Data • Technical Data • Marketing and Communications Data • Professional Information • Professional History 	<p>promoting our client services and visitor services, identifying ways to grow our business</p>
<p>instance, in a survey) about our client services or visitor services, and to manage, review and act on the feedback we are getting</p>	<ul style="list-style-type: none"> • Contact Data • Profile Data • Marketing and Communications Data • Professional Information 	<p>how clients use, and what they think of, our client services and visitor services, improving them and identifying ways to grow our business</p>

In relation to supplier services:

Purpose and/or activity	Type of data	Legal basis for processing
To manage payments, fees and charges and to collect and recover money owed to us	<ul style="list-style-type: none">• Identity Data• Contact Data• Financial Data• Professional Information	<ul style="list-style-type: none">• Performance of a contract• Legitimate interests: ensuring we can manage payments, fees and charges and to collect and recover money owed to us
access to our client's systems we need to manage and protect our business, including improving data security, troubleshooting data and systems, system maintenance and testing, and data hosting	<ul style="list-style-type: none">• Contact Data• Profile Data• Usage Data• Technical Data	<ul style="list-style-type: none">• Legitimate interests: ensuring the efficient and secure running of our business, including maintaining information technology services, network and data security

- "CCTV data" will be used for the following purposes: detection and prevention of crime; detection and prevention of safety incidents; detection and prevention of unauthorised access to Storybased' premises and restricted areas; detection and prevention of gross misconduct; supporting safety, security and internal investigations; supporting criminal investigations; and for reviewing security & safety incidents, including security training exercises.

12. Change of purpose

We will only use your personal data for the purposes for which we collected it as detailed in Section 10 and Section 11, 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 receive an explanation as to how the

processing for the new purpose is compatible with the original purpose, please contact us at emilie@storybased.net

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.

[13. How we use personal data relating to other individuals collected from you](#)

On certain occasions, in the course of our client services, you may provide us with personal data of individuals who are not aware of our involvement or of our processing of their personal data (for instance, personal data of employees of the target in a corporate acquisition in which you are the purchaser). In such situations, we are likely to not have direct contact with individuals whose personal data we are processing, or it may for other reasons (for instance, to maintain confidentiality) not be appropriate for us to provide them with a privacy notice setting out how we process their personal data. Before you pass any such personal data to us, you must therefore ensure that the relevant individuals have received any requisite privacy notices in connection with the performance of our client services.

[14. Processing your personal data if you are not our client](#)

If you are not our client, we may need to process your personal data in order to provide client services to our client, including the provision of legal advice. This personal data may be provided to us through the course of the matter for example, provided to us as part of a disclosure process or provided by another third party. Where this is the case your personal data may be used in legal proceedings on behalf of our client.

We will process your personal data in these circumstances as:

- this is in our legitimate interests, our client's legitimate interests or those of another third party; and/or
- we may be required to process that personal data to comply with our legal or regulatory obligations.

If you have any questions about how we will process your personal data please contact us at emilie@storybased.net

15. Processing your personal data for recruitment activities

When your personal data is passed to us for recruitment activities, we will only use this personal data in order to contact you about recruitment and other opportunities which may you have requested. If you apply for any role within Storybased for example a position or vacation scheme your personal data will be processed which can be obtained by contacting us at emilie@storybased.net

16. Marketing and exercising your right to opt-out of marketing

We will not use your personal data to send you marketing materials if you have requested not to receive them. If you request that we stop processing your personal data for marketing purposes, we shall stop processing your personal data for those purposes.

We would encourage you to make such requests via the forms and links provided for that purpose in the marketing materials we send you or by contacting our Marketing team at emilie@storybased.net.

You may alternatively make any such request to your usual contact at the firm or to the Global Head of Law & Compliance (using the contact details set out in section 4) In any event, such request can be made at any time free of charge.

17. Third-party marketing

We do not share your personal data with any organisations outside of Storybased for marketing purposes.

18. Disclosures of your personal data

We may have to share your personal data with the entities and persons set out below for the purposes for which we collected the personal data, as detailed in Section 10 and Section 11.

- Your personal data will be shared within Storybased in accordance with the laws and regulations.
- Where required, we will disclose your personal data to:
 - (i) any person or entity to whom we are required or requested to make such disclosure by any court of competent jurisdiction

or by any governmental, taxation or other regulatory authority, law enforcement agency or similar body ;

- (ii) our professional advisers or consultants, including lawyers, bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services to us;
 - (iii) any financial institutions providing finance to us;
 - (iv) service providers who provide information technology and system administration services to us; and
 - (v) any external auditors who may carry out independent checks of your file as part of our accreditations.
- If you ask us to do so in relation to the client services or visitor services we are providing or the supplier services you are providing, Storybased may disclose your personal data to other persons or entities as instructed.
 - We may share your personal data with persons or entities outside of Storybased to whom we may sell or transfer parts of our business or assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, the part of our business that is (as the case may be) sold, acquired or is the merged entity may use your personal data in the same way as set out in this notice.
 - We may share your personal data with persons or entities outside of Storybased for the purposes of obtaining feedback or references in relation to client services provided to you. For example, we may share your corporate contact details with legal directories for the purpose of obtaining a reference in relation to client services provided to you. Where appropriate, we will confirm with you that you are willing to be contacted for this purpose.

We require any person or entity to whom we disclose personal data pursuant to this Section 18 to respect the confidentiality and security of your personal data and to treat it in accordance with applicable laws and regulations. We do not allow such recipients of your personal data to use it for their own purposes, and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

19. International transfers

When we share your personal data within Storybased, this could involve transferring your personal data outside the European Economic Area (“EEA”).

Whenever we transfer your personal data out of the EEA, 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 by the European Commission;
- where we use certain service providers, we may use specific contracts approved by the European Commission which gives personal data the same protection it has within the EEA; and
- where we use providers based in the US, we may transfer personal data to them if they are certified under the EU-US Privacy Shield which requires certified providers to have in place and maintain a similar level of protection to the personal data as if it was processed within the EEA.

20. Data security

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, we implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of processing, including:

- the pseudonymisation and encryption of personal data;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident; and
- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

We ensure that those who have permanent or regular access to personal data, or that are involved in the processing of personal data, or in the development of tools used to process personal data, are trained and informed of their rights and responsibilities in when processing personal data.

21. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for. This includes for example the purposes of satisfying any legal, regulatory, accounting, reporting requirements, to carry out legal work, for the establishment or defence of legal claims.

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.

If you would like to know more about the retention periods we apply to your personal data, please contact us.

In some circumstances we may 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.

22. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Storybased will act promptly and in accordance with any applicable law, rule or regulation relating to the processing of your personal data.

Details of your rights are set out below:

- right to be informed about how personal data is used – you have a right to be informed about how we will use and share your personal data. This explanation will be provided to you in a concise, transparent, intelligible and easily accessible format and will be written in clear and plain language;

- right to access personal data – you have a right to obtain confirmation of whether we are processing your personal data, access to your personal data and information regarding how your personal data is being used by us;
- right to have inaccurate personal data rectified – you have a right to have any inaccurate or incomplete personal data rectified. If we have disclosed the relevant personal data to any third parties, we will take reasonable steps to inform those third parties of the rectification where possible;
- right to have personal data erased in certain circumstances – you have a right to request that certain personal data held by us is erased. This is also known as the right to be forgotten. This is not a blanket right to require all personal data to be deleted. We will consider each request carefully in accordance with the requirements of any laws relating to the processing of your personal data;
- right to restrict processing of personal data in certain circumstances – you have a right to block the processing of your personal data in certain circumstances.
- right to data portability – in certain circumstances you can request to receive a copy of your personal data in a commonly used electronic format. This right only applies to personal data that you have provided to us (for example by completing a form or providing information through a website). Information about you which has been gathered by monitoring your behaviour will also be subject to the right to data portability. The right to data portability only applies if the processing is based on your consent or if the personal data must be processed for the performance of a contract and the processing is carried out by automated means (i.e. electronically);
- right to object to processing of personal data in certain circumstances, including where personal data is used for marketing purposes – you have a right to object to processing being carried out by us if (a) we are processing personal data based on legitimate interests or for the performance of a task in the public interest (including profiling), (b) if we are using personal data for direct marketing purposes, or (c) if information is being processed for scientific or historical research or statistical purposes. You will be informed that you have a right to object at the point of data collection and the right to object will be explicitly brought to your attention and be presented clearly and separately from any other information; and

- right not to be subject to automated decisions where the decision produces a legal effect or a similarly significant effect – you have a right not to be subject to a decision which is based on automated processing where the decision will produce a legal effect or a similarly significant effect on you.

You may exercise any of your rights at any using the contact details set out in section 4. 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.

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.

We try to respond to all legitimate requests within one calendar month. Occasionally it may take us longer than one calendar 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.