

M i L K

M A N A G E M E N T

Welcome

Milk Management Limited (MILK) is strongly committed to protecting personal data. This privacy statement describes why or how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided by us, both by individuals themselves or by others.

Personal data is any information relating to an identified or identifiable living person. MILK processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure and retention periods for each purpose may differ.

This Privacy Notice tells you how we look after your personal data when you visit our website and at other points at which we collect your personal data. It tells you about your privacy rights and how the law protects you. This Privacy Notice may be presented separately in order to describe how we will use personal data in specific scenarios.

We may use personal data provided to us for any of the purposes described in this privacy notice or as otherwise stated at the point of collection. This document may also be described as a Fair Processing Notice.

Finding your way around this privacy statement

This Privacy Notice is set out as follows.

- Important information about us
- The data we collect about you
- How is your personal data collected?
- How we use your personal data
- Disclosures of your personal data
- International transfers
- Data security
- Data retention
- Your legal rights

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

Important information about us

MILK acts as a controller of personal data in its own right and is responsible for your personal data in connection with its activities (collectively referred to as "MILK", "we", "us" or "our" in this privacy notice). MILK is the data controller which is responsible for this particular website.

We have appointed a Data Manager (DPM) 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 the DPM using the details set out below.

Name DMP: Grace McGrath

Postal Address: 43-45 Charlotte Street, London, W1T 1RS

Telephone No: 0203 857 3694

Changes to this privacy statement

We recognise that transparency is an ongoing responsibility so we will keep this privacy notice under regular review. This privacy notice was last updated on 24th May 2018.

Making a complaint

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.

A request we would like to make of you

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.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. We will notify you if this is the case at the time.

Letting you know about our events

MILK may invite potential clients and existing clients to events. You may receive such invitations if you have requested information from us where you have not opted out of receiving such invitations. If we seek to share your personal data with any company other than our own, for the purpose of assisting us with offering invitations and organising events, we will request your express 'opt-in' consent. 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 events may be relevant for you.

Opting out

You can ask us or third parties to stop sending you such invitations at any time by logging into the website and checking or unchecking relevant boxes to adjust your contact preferences or by following the opt-out links on any invitations sent to you or by [contacting us](#) at any time.

The type of personal data that we collect and use

When we refer to collecting or using personal data, or personal information, we are referring to 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 in this table.

Types of personal data that we collect, store, use and transfer	
Identity Data	This includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, title or office held within any other organisation, residency status.
Contact Data	This includes billing address, delivery address, email address and telephone numbers.
Financial Data	This includes bank account and payment card details.
Transaction Data	This includes details about payments to and from you, and details of services you have purchased from us.
Technical Data	This 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 our website or operate our software or the platform it is hosted on.
Profile Data	This includes your username and password, purchase of services, your interests, preferences, feedback and survey responses.
Usage Data	This includes information about how you use our website and software.
Onboarding Data	This includes data given by any referees, the outcome of any Vetting Data, CV data which may contain Special Data, details of any company or umbrella company through which your services are provided.
Project Data	This includes details of any overproduction payments paid or owed, performance data whilst working on any project (to include times logging in and out of the systems used on a project and arrival and departure times), timesheets.
Offboarding Data	This includes off-boarding requests and associated details, correspondence, emails or documents, reasons for voluntarily leaving, reference requests.
Historic Project Data	This includes the nature and duration of any role performed in the past through MILK, any end-user client feedback if you were placed on a project through MILK in the past.
Client Data	This includes Financial Data, Profile Data, Transactional Data provided by clients.
Model Data	This includes Identity Data, Contact Data, Special Category Data, Historic Project Data, Project Data, Onboarding Data.
Special Category Data	This includes data relating to race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health, size, weight, physical appearance and genetic and biometric data.
Children's Data	This may include Identity Data, Contact Data, education history in relation to people under 16.
Marketing and Communications Data	This includes your preferences in receiving marketing from us and our third parties and your communication preferences.
Travel Data	This includes Identity Data, Contact Data, Transaction Data and the data available on a copy of your passport.

We may also collect, use and share Aggregated Data (i.e. Anonymous 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.

If you are a potential model or existing model, we may collect Special Categories of Personal Data about you (this may include 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 as well as details about your appearance, weight, size and the like) simply by interacting with you regarding modelling roles. We may also collect information about criminal convictions and offences. Details of the data we collect, why we collect it and what we use it for are listed below.

Where do we get your personal data from?

We use different methods to collect data from and about you. We have set this out in the table below.

How we collect personal data	
Direct Interactions	<p>You may give us your Identity, Contact, Relevant Tax Data 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:</p> <ul style="list-style-type: none"> • apply for our services; • apply for representation; • manage bookings; • request that details of events be sent to you; • give us some feedback.
Automated technologies or interactions.	<p>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, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.</p>
Third parties or publicly available sources.	<p>We may receive personal data about you from various third parties and public sources as set out below</p> <p>Technical Data from the following parties:</p> <ul style="list-style-type: none"> • analytics providers such as Google based outside the EU; • search information providers such Google based outside the EU. • Contact, Financial and Transaction Data from providers of technical, payment and delivery services. Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

Further information about cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies. We may allow a third party IT professional to help us upgrade, improve and maintain our website so it is conceivable that we will use cookies as part of this process.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We may use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Except for essential cookies, all cookies will expire after a period which will be advertised once our web-developer has progressed our website.

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.

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 have your consent to do so.
- Where we need to perform a contract which we are about to enter into, or have entered into, with you.
- Where we need to comply with a legal or regulatory obligation.
- 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.

Click [\[here\]](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

The standards we employ when using personal data

We adhere to the principles relating to Processing of Personal Data set out in the GDPR which require Personal Data to be:

- Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency).
- Collected only for specified, explicit and legitimate purposes (Purpose Limitation).
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation).
- Accurate and where necessary kept up to date (Accuracy).
- Not kept in a form which permits identification of Data Subjects for longer than is necessary for the purposes for which the data is Processed (Storage Limitation).
- Processed in a manner that ensures its security using appropriate technical and organisational measures to protect against unauthorised or unlawful Processing and against accidental loss, destruction or damage (Security, Integrity and Confidentiality).
- Not transferred to another country without appropriate safeguards being in place (Transfer Limitation).
- Made available to Data Subjects; and Data Subjects allowed to exercise certain rights in relation to their Personal Data (Data Subject's Rights and Requests).

We have created our own internal data protection policy which explains in detail how our staff are expected to adhere to these principles in practice. A copy of this policy may be requested of our Data Manager.

Purposes for which we use your personal data

We use your personal data when undertaking the following activities.

your personal data when undertaking the following activities.

Type of activities which we engage in, and corresponding purposes	
Type of Activity	Purpose Description
Model enquiry administration	Preparing to onboard potential models to facilitate the process of models being placed on projects overseen by end-user clients.
Assessment of models wishing to work on projects	So we can determine whether they are suited to the work and likely to be accepted by an end user client
Managing end user client demand or direction during projects	So we can assist end user clients and models to work efficiently and to standards dictated by our end user client.
Administering the supply of personnel during projects	To facilitate the engagement.
Processing timesheets	To facilitate payments to models or their companies
End user client initial engagement	To set up the supply of modelling services in respect of a project by an end-user client
End user client engagement for the purposes of project management	To engage with the management of a project by an end-user client
Marketing	To market our services
Circulating notifications regarding available roles	To facilitate the engagement of personnel on projects, should they so wish.
Circulating Newsletter	To update potential and existing models on developments in the marketplace
Billing of end-user clients	To ensure we are paid for our services.

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 services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, 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 company outside MILK for marketing purposes.

Opting out

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

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service.

Legal basis for using your personal data

We have set out below, in a table format, a description of particular activities in which we engage, and according to which we process personal data. Further, we have set out the legal bases which we rely on in order to do so. We have also identified our legitimate interests for processing personal data, 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.

Legal basis for using your personal data			
Specific purpose or activity	Type of data used (see definitions above or click here)	Lawful basis for processing personal data (Article 6 GDPR)	Lawful basis for processing special data (Article 9 GDPR)
Model recruitment			
Model enquiry administration	Identity Data, Contact Data, Model Data, Special Category Data	Necessary for performance of our contract with you, or as part of steps requested by you prior to entering into a contract (Contract)	Express consent
Liaising with talent scouts	Identity Data, Contact Data, Model Data, Special Category Data	Contract	Express consent
Assessment of models wishing to work on projects	Identity Data, Contact Data, Model Data, Special Category Data	Necessary for our legitimate interests (to work out what projects, if any, we could put models on)	Express consent
Circulating notifications regarding available roles	Identity Data, Contact Data	Necessary for our legitimate interests (to offer up opportunities to models)	N/A
Circulating Newsletter	Identity Data, Contact Data	Necessary for our legitimate interests (to update models and potential models on developments within the industry)	N/A
Project placement			
Approaching end-user clients with a view to placing models	Identity Data, Contact Data, Model Data, Special Category Data as well as Identity Data, Contact Data relating to end user clients	Necessary for our legitimate interests (to work out what projects, if any, we can put models on)	Express consent
Managing end user client demand or direction during projects	Identity Data, Contact Data	Necessary for our legitimate interests (to work out what projects, if any, we can put models on)	N/A
Administering the supply of personnel during	Identity Data, Contact Data, Financial Data, Transactional	Contract	N/A

projects	Data		
Processing timesheets or booking forms	Identity Data, Contact Data, Financial Data, Transactional Data	Contract	N/A
Client and supplier activities			
Billing of end-user clients	Identity Data, Contact Data, Financial Data, Transactional Data	Contract	N/A
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity Data, Contact Data, Technical Data	(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) (b) Necessary to comply with a legal obligation	N/A
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data Technical Data	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)	N/A
Managing website enquiries	Technical Data, Identity Data, Usage Data	Necessary for our legitimate interests in answering queries	N/A
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical Data Usage Data	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)	N/A
To make suggestions and recommendations to you about goods or services that may be of interest to you	Identity Data Contact Data Technical Data Usage Data Profile Data	Necessary for our legitimate interests (to develop our products/services and grow our business)	n/A

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 purpose. This new purpose must be compatible with the original purpose for which we collected your data. If you have any questions concerning this matter, 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 we are required, or permitted to do so by law.

Automated data processing of Client Data

Our software does not take automated decisions in respect of personal data.

Disclosing your personal data to others

MILK may need to share your personal data with the parties set out below. Our purposes for doing so are set out in the table above marked “Types of personal data that we collect, store, use and transfer” (see pg. 6).

External third parties		
Type of professional advisers acting as processors or joint controllers	Country in which company is based	Service provided / need for disclosure
Lawyers	United Kingdom	Legal services
Bankers	United Kingdom	Banking services
Accountants	United Kingdom	Accounting services
Auditors	United Kingdom	Accountancy services
Insurers	United Kingdom	Insurance services
Companies House	United Kingdom	Statutory registration services
HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers	United Kingdom	Require reporting of processing activities in certain circumstances
Third party companies acting as processors or joint controllers		
IT. Email software provider	United Kingdom	Email
Cloud backup services	United Kingdom	Backup services
Google Analytics	USA	Analytic data from website
Accounting Software	United Kingdom	Assists with accounting
Social media (Linkedin, Twitter, Facebook)	USA	Profile raising
Your bank or banking agent	United Kingdom	To get Relevant Tax Data or manage accountancy issues.
Marketing list provider(s)	United Kingdom	To market our services
Model scouts	United Kingdom	To find new talent
End user clients	United Kingdom	To engage talent on projects.
Third party companies supplying models	United Kingdom	To find new talent
Other agencies supplying models	United Kingdom	To find new talent

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and our own specific and stringent security requirements. We do not allow the above 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. In the event that MILK sells, transfers, or merges parts of our operation or assets with a third-party organisation, then the new owners or operators may use your personal data in the same way as set out in this privacy notice.

International data transfers

Many of our external third parties are based outside the European Economic Area (EEA). Therefore, their processing of your personal data will involve a transfer of data outside of the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded 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. For further details, see European Commission: ‘Adequacy of the protection of personal data in non-EU countries’.
- Where we use service providers in countries that have not been deemed to provide an adequate level of protection, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: ‘Model contracts for the transfer of personal data to third countries’.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you wish to receive further information on the specific mechanism which we use when transferring your personal data out of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed and/or processed in an unauthorised manner. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have an operational ‘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.

Data retention

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

To determine the appropriate retention period for personal data, we consider the following criterion: 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; whether we can achieve those purposes through other means; and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available below.

Retention periods

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

To determine the appropriate retention period for personal data, we consider the following criterion: 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; whether we can achieve those purposes through other means; and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are described in this policy.

In some circumstances, you can ask us to delete your data: see [Request Erasure] below for further information.

In some circumstances, we may anonymise your personal data (so that you can no longer be identified through the data) for research or statistical purposes. According to the law, anonymous data is not classed as personal data, as the data cannot be used identify any given individual. As such, we are permitted by law to use anonymous data indefinitely without further notice to any data subject.

Internal guidelines

It is MILK's policy to retain all information only for as long as specified in the Data Retention Schedule below and, in general, no longer than two years plus the current year for staff information and no longer than five years plus the current year for commercial information.

N.B. While this document summarises and clarifies the Data Retention Schedule it does not supersede it. The time limits for those items subject to legislation as specified in detail in the Data Retention Schedule (and outlined in Section 3 below) remain in force and should be referred to in cases of doubt.

Current plus two-year rule

As stated in above, personal data should not be held for more than two years after it ceases to be current, unless there is a specific reason for doing so (see Section 3 for the specific categories requiring different retention periods). The definition of current will vary according to the personal data.

It should be remembered that the 'current plus two years' rule is a maximum period for retention. If there is no need to keep the personal data that long, then it should be disposed of securely before the two-year time-limit.

Exceptions to the two-year rule

This section gives a guide to the categories which have legislation determining the length of time for which personal data within that category should be retained. An indication is given to the main section of the Data Retention Schedule dealing with this category.

Detailed data retention descriptions for personal data

Function	Records held	Period of retention (years)	Action following expiry of retention period	Rationale for retention period
Finance				
	Staff travel/expenses	Current tax year + 1	Destroy securely	In case of contract dispute.
	Internal audit reports	Previous tax year + 2	Archive	Internal policy
	External audit reports	Current tax year + 5	Destroy securely	Internal policy
	BACs prints	Current tax year + 2	Destroy securely	Internal policy
	Invoices	Current tax year + 5	Destroy securely	Internal policy
	Orders	Current tax year + 5	Destroy securely	Internal policy
	Purchasing records	Current tax year + 5	Destroy securely	Internal policy
	Legal cost invoices	Current tax year + 5	Destroy securely	Internal policy
Health & safety				
	Health and safety reports	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
	Legal documentation	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
	Accident book	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
	Correspondence	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
	Safety training records	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
	Associated insurance documentation	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
	Employer's liability and occupiers' liability claims	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
Internal governance				
	Board minutes	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
	Internal management minutes	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
Operations				
	Supplier correspondence	Current year + 6 if retention is warranted.	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
	Supplier contracts	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
	Creditor records	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry

	Model contracts and records	Current year + 6	Destroy securely	In case of contract or regulatory dispute or regulatory enquiry
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In some circumstances, you can ask us to delete your data: see ‘Request Erasure’ below for further information.

In some circumstances, we may anonymise your personal data (so that you can no longer be identified through the data) for research or statistical purposes. According to the law, anonymous data is not classed as personal data, as the data cannot be used identify any given individual. As such, we are permitted by law to use anonymous data indefinitely without further notice to any data subject.

Exercising your legal rights

Under certain circumstances, you have rights under data protection law 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.

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

No fee usually required

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

Description of 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 your data is being lawfully processed.
- **Request correction of the personal data that we hold about you.** This enables you to request that any incomplete or inaccurate data which we hold about you is corrected, though we may need to verify the accuracy of the new data which 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 in the following circumstances: 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 legally required to erase your personal data. Please note, however, that we may not always be able to comply with your request of erasure due to specific legal reasons. If such circumstances arise, you will be notified 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) if our legitimate interest is overridden by your own interests and/or fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **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 you consider 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 yourself 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. Please note, 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 at the time if this is the case.

Contact us

As mentioned above, we have appointed a Data Manager (DPM) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact our DPM using the contact details provided above.