

Privacy policy

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1. INTRODUCTION

Welcome to the EMCO Group's Privacy Notice.

The EMCO Group respects your privacy and is committed to protecting your personal data. This Privacy Notice will inform you as to how and why we collect and use your personal data and to also inform you about your privacy rights and how the law protects you.

2. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice aims to give you information on how The EMCO Group collects and processes your personal data including any data you may provide through this website.

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

It is important that you read this Privacy Notice together with our Terms and Conditions and any other privacy related notices or fair processing notices we may provide on specific occasions from time to time. Such notices will ensure that you are fully aware of how and why we are using your data. This Privacy Notice supplements all privacy-related notices, which you had previously received and will receive in future, and it is not intended to override them.

CONTROLLER

The EMCO Group is made up of different legal entities which are either law firms or marine consultancy firms,, full details of which can be found here www.emco.org and below. The EMCO Group consists of:

- 1. Elias Marine Consultants Limited Cyprus
- 2. Elias Marine Consultants SAL Lebanon
- 3. Elias Marine Consultants Ltd Egypt



- 4. I. Elias & Co LLC Cyprus
- 5. Elias Law Limited United Kingdom

This Privacy Notice is issued on behalf of the EMCO Group, so when we mention "the Company", "we", "us" or "our" in this Privacy Notice, we are referring to the relevant company in the EMCO Group responsible for processing your data. This website is owned by The EMCO Group who is the data controller of any information gathered through this website.

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: The EMCO Group

Email address: privacy@emco.org

Postal address: P.O. Box 5145, Limassol 3110, Cyprus.

You have the right to make a complaint at any time to the relevant Supervisory Authority. We would, however, appreciate the chance to deal with your concerns before you approach the Supervisory Authority so please contact us first.

In the United Kingdom, the Supervisory Authority for Personal Data Protection is the Information Commissioner's Office (ICO) (www.ico.org.uk).

In Cyprus, the Supervisory Authority for Personal Data Protection is the Office of the Commissioner for Personal Data Protection (www.dataprotection.gov.cy.)

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

Any changes we make to our Privacy Notice in the future will be posted on this page and will be communicated to you when feasible.

THIRD-PARTY LINKS

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

3. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be



identified either by itself or in conjunction with other data likely to be in our possession. It does not include data where the identity has been removed (anonymous data).

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

- **Identity Data** includes company name, first name, maiden name, last name, marital status, title, date of birth, gender, copies of identification documents and address verification documents.
- Contact Data includes telephone and fax numbers, e-mail addresses, postal addresses and visiting addresses.
- **Employment Data** includes job position/title, company/organisation name, and history of employment, qualifications and area of expertise.
- Financial Data includes bank account details and transaction history and records.
- Transaction Data includes details about payments to and from you.
- Technical Data includes internet protocol (IP) address, your login data, cookies, 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. It may also include receipts and clicks on e-mails we send from our automated
 e-mail system.
- Usage Data includes information about how you use our website.
- **Service Data includes** details about services that you have requested or were provided to you or your organisation such as complimentary services.
- Interest and Engagement with the Company includes data gathered at any time from interaction and engagement with the Company including personal and professional interests.
- Marketing and Communications Data includes your preferences in receiving marketing from us and your communication preferences.
- Access and CCTV Data includes a record and images of your entry and exit to and from our premises and your
 movements within our premises.
- Other Data includes data obtained during our provision of services to you or your provision of services or products to us in relation to a matter or incidental to our professional relationship with you (for instance information incidental to witness statements, correspondence, court or transaction documents) or during the provision of complimentary services such as arranging access for you or dietary requirements.
- Special Categories of Personal Data in certain circumstances, we may also have information on your ethnic or racial
 origin, religious or philosophical beliefs and, where relevant, information about individuals' criminal records or
 offences or even details as to sex life or preferences (for instance obtained through a disclosure process during a
 provision of legal services). Biometric data such as fingerprints may also be required for access control to our
 premises.
- Aggregated Data may also be collected, such as statistical or demographic data for any purpose. Aggregated Data may
 be derived from your personal data but is not legally considered as personal data 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 FAIL TO PROVIDE PERSONAL DATA

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

4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you through the following means:

- Direct interactions: You may give us your Identity, Contact, Employment, Service Data, Access and CCTV Data, Financial, Interest and Engagement, Marketing and Communications Data or other data by filling in forms, or by corresponding with us by post, phone email or otherwise. This includes personal data you provide when you:
 - Register to receive our newsletters, alerts and invitations;
 - Contact us about our services by email, telephone or through our website;
 - Send us feedback by email, telephone or through our website;
 - Fill out application forms, telephone or through our website;
 - Send us CVs or resumes;
 - Participate in interviews, meetings and other assessments;
 - Request marketing to be sent to you; and
 - Through any similar interactions in which you provided such data.
- 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, server logs
 and other similar technologies.
- Third parties or publicly available sources: We may receive personal data about you from various third parties as set out below:
 - From the organisation in which you are employed;
 - From other parties involved in a matter which we are dealing with;
 - Information available in the public domain;
 - · Private investigators;
 - Governmental authorities, agencies, departments and organisations;
 - · Recruitment Agencies;
 - Personal references, from ex-employers for instance.;
 - Background check providers;
 - · Credit reference agencies; or
 - .Technical Data: We may receive such data from the following sources:
 - (a) Analytics providers, such as Google and WordPress; MailChimp;
 - (b) Advertising networks, such as Shiparrest.com and International Association of Marine Investigators.



5. HOW WE USE YOUR PERSONAL DATA

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

- Where we need to perform the contract we are about to enter, or have entered, into with you. 'Performance of
 Contract' means processing your data where it is necessary for the performance of a contract to which you are a party
 or to take steps at your request before entering into such a contract.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, where there are no fundamental rights which override these interests. 'Legitimate Interest' means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- Where we need to comply with a legal or regulatory obligation. 'Complying with a legal or regulatory obligation'
 means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that
 we are subject to.

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

Generally, we do not rely on consent as a legal basis for processing your personal data, other than in relation to sending third party direct marketing communications to you, via email or text message. You have the right to withdraw consent to marketing at any time by <u>contacting us.</u>

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

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

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please <u>contact us</u> 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.

Applicable to	Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest	Who we share your Data with
Clients	New client / matter file and carrying out initial and	(a) Identity	Performance of a contract with you.	Your organisation (where you work)
Visitors to our	subsequent checks as required by law and	(b) Contact	Compliance with our legal	Third parties and / or



premises	regulations.	(c) Employment (d) Financial (e) Service (f) Other (g) Access & CCTV Data	obligations. Necessary for our legitimate interest in dealing with matters on behalf of our clients, to protect our business, employees and premises and to prevent fraud. Special category data: (a) In matters relating to legal proceedings or advice, and in establishing, exercising or defending legal rights. (b) Suspicion of terrorist financing or money laundering.	professional advisors, if necessary, when dealing with matters on your behalf. Regulatory and law enforcement bodies.
Clients Third Parties	Fulfilling our contractual and legal obligations, providing advice, services and / or information on payment and fees and to communicate these to you. To develop our business profile.	(a) Identity (b) Contact (c) Service Data (d) Financial Data (e) Interest and Engagement (e) Other (f) Marketing and Communications	Necessary for our legitimate interest: (a) To provide advice and services and handle matters on behalf of our clients. (b) to develop business relationships. (c) to ensure network and information security and to prevent fraud. Special Category Data: (a) In matters relating to legal proceedings or advice and in establishing, exercising or defending legal	Your organisation (where you work) Service providers on behalf of your organisation. Other parties involved in a matter. Third parties and / or professional advisors, if necessary, when dealing with matters on your behalf. Regulatory and law enforcement bodies.



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(b) Suspicion of terrorist financing.

Suppliers and Service Providers Clients Third parties Business Contacts Visitors to our website	To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy. (b) Asking you to leave a review or take a survey. (c) To provide you with complimentary services such as newsletters, updates and alerts. (d) To advise you of new services that may be of interest to you. (e) To update our records for internal use and for auditing purposes. (f) To respond to any complaints.	(a) Identity (b) Contact (c) Marketing and Communications (d) Service Data (e) Interest and Engagement (f) Employment (g) Financial (h) Other	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, and to develop our business and business relationship. Necessary for our legitimate interest to provide complimentary services. Necessary for our legitimate interest to conduct business on behalf of our clients and on our own behalf. Special Category Data: For the purpose of or in connection with representation or in legal proceedings on matters on our client's behalf, exercising, establishing and defending legal rights.	Your organisation. Regulatory and governmental bodies. Our professional advisors.
Suppliers and Service Providers Clients Third	To make and / or receive payments	(a) Contact (b) Financial	Performance of a Contract with you. Necessary for our legitimate interests for providing a service, receive payment and making	Service providers, such as credit agencies, auditors, counsel, local lawyers, debt collectors, our bank.



parties Business contacts			payments on your behalf or to third parties.	
Visitors to our website	To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity(b) Contact(c) Technical	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). Necessary to comply with a legal obligation.	
Visitors to our website Clients Suppliers Third Parties Business Contacts	To comply with legal and professional obligations in relation to our functions as a company.	(a) Identity(b) Contact(c) Employment(d) Financial(e) Marketing and Communications(f) Service Data(g) Other	Necessary to comply with legal obligations. Special category Data: (a) In circumstances such as legal proceedings, legal advice and establishing, exercising and/or defending legal rights. (b) The detecting and/ or prevention of unlawful acts.	Your organisation. Our advisors Governmental Bodies. Law enforcement Regulatory Bodies.
Visitors to our Website	To use data analytics to improve our website, products/services, marketing, client relationships and experiences.	(a) Technical. (b) Usage.	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).	



Third	To allow third party service	(a) Identity	Necessary for our	All service providers
parties	providers to carry out any of the above services or activities on our behalf.	(b) Contact	legitimate interest to appoint suppliers and	engaged on behalf of your organisation or on our behalf.
Service Providers		(c) Employment	service providers in	
Providers		(c) Employment	support of our business.	
Clients		(d) Marketing andCommunications		
		(e) Interests and Engagement		
		(f) Financial		
		(g) Service Data		
		(h) Other Data		
Suppliers	To assess your suitability, or	(a) Identity	legitimate interest to	Our clients
and Service Providers	your organisations suitability, to provide the services we	(b) Contact		Your organisation
Third	require.	(c) Employment		
parties		(d) Financial		
		(e) Service		
		(f) Other		
Suppliers	To appoint you or your	(a) Identity	Compliance with our legal	Your organisation.
and Service Providers	organisation to provide a service on our behalf or on our clients' behalf. To instruct you and communicate with you about what is required.	(b) Contact	obligations.	Our clients.
		(c) Employment	Necessary for our legitimate interest to	To third parties (where
		(d) Financial	appoint supplier and service providers in	required) in relation to a matter.
		(e) Service	support of our business.	Governmental bodies.
		(f) Movement	Special Category Data	Regulatory bodies.
			(a) With explicit consent	- ,



		(g) Special Data		Law enforcement bodies.
		(h) Other	prevent unlawful acts or fraud.	
Clients	To provide you or your	(a) Identity	Necessary for your	Our business contacts.
Suppliers and Service	organisation with references and recommendations.	(b) Contact	legitimate interests or those of your organisation	Your business contacts.
Providers		(c) Employmer	in support of our business. nt	
		(d) Financial		
		(e) Service		
		(f) Other		
		(g)		
Visitors to our	To ensure security of our premises, for the prevention	(a) Identity	Necessary for our legitimate interest to keep	Security service providers.
premises	of unlawful and criminal acts.	(b) Access and CCTV date	our employees, third parties and business safe and to comply with our	Emergency services.
Suppliers		(c) Other	insurance contract obligations.	Law enforcement agencies.
			Special category data:	
Clients			Special category data: (a) Your explicit consent.	
Clients				
Clients			(a) Your explicit consent.(b) To protect personal	
Clients	To ensure compliance with our emergency and health	(a) Identity	(a) Your explicit consent.(b) To protect personal vital interest.(c)Necessary for our	Security service providers.
Visitors to our	To ensure compliance with our emergency and health and safety procedures.	(a) Identity (b) Access and CCTV Data	 (a) Your explicit consent. (b) To protect personal vital interest. (c) Necessary for our legitimate interest to keep 	Security service providers. Emergency services.
Visitors to	our emergency and health	(b) Access and	 (a) Your explicit consent. (b) To protect personal vital interest. (c) Necessary for our legitimate interest to keep our employees, third parties and business safe. To comply with our legal 	providers.
Visitors to our premises	our emergency and health	(b) Access and CCTV Data	 (a) Your explicit consent. (b) To protect personal vital interest. (c) Necessary for our legitimate interest to keep our employees, third parties and business safe. To comply with our legal obligation 	providers.
Visitors to our premises Suppliers and Service	our emergency and health	(b) Access and CCTV Data (c) Special	 (a) Your explicit consent. (b) To protect personal vital interest. (c) Necessary for our legitimate interest to keep our employees, third parties and business safe. To comply with our legal obligation Special category data: 	providers.
Visitors to our premises Suppliers	our emergency and health	(b) Access and CCTV Data (c) Special	 (a) Your explicit consent. (b) To protect personal vital interest. (c) Necessary for our legitimate interest to keep our employees, third parties and business safe. To comply with our legal obligation 	providers.
Visitors to our premises Suppliers and Service Providers	our emergency and health	(b) Access and CCTV Data (c) Special	 (a) Your explicit consent. (b) To protect personal vital interest. (c) Necessary for our legitimate interest to keep our employees, third parties and business safe. To comply with our legal obligation Special category data: (a) Your explicit consent. (b) To protect 	providers.
Visitors to our premises Suppliers and Service	our emergency and health	(b) Access and CCTV Data (c) Special	 (a) Your explicit consent. (b) To protect personal vital interest. (c) Necessary for our legitimate interest to keep our employees, third parties and business safe. To comply with our legal obligation Special category data: (a) Your explicit consent. 	providers.



Applicants	Considering applications for employment at our Company.	(a)	Identity	Necessary for our legitimate interest in recruiting staff for our business.	Recruitment agencies.
		(b)	Contact		Your organisation (for referrals).
		(c)	Employment		, , .
				Maintaining and	Our Human Resources
		(d)	(d) Special promoting equa	promoting equality in the	team
		/ - N	Other	workplace.	
		(e) Other		Senior managers.	
				Special category data:	
					Other employees where
				Criminal records where required by position held	required in performance of their role within the
				within the Company.	Company.

MARKETING

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

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think may be of relevance or interest to you.

You will receive marketing communications from us if you have requested information from us. Should you no longer wish to receive marketing material from us, then please send an e-mail to unsubscribe@emco.org or click on the option found at the bottom of all electronic marketing material.

THIRD-PARTY MARKETING

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

OPTING OUT

You can ask us to stop sending you marketing messages at any time by sending an e-mail to unsubscribe@emco.com or clicking the relevant option at the bottom of each email at.

Where you opt out of receiving these marketing messages, you will no longer receive marketing communication from us. Opting out of third party marketing messages, with whom you consented to opt in through us, should be requested from the relevant third party.

You should note that opting out of marketing communication will only apply to marketing purposes. It does not apply to personal data provided to us as a result of a service or business transactions.

COOKIES AND TRACKING TECHNOLOGIES

Our website utilises cookies. You can set your browser to refuse all or some browser cookies, or to alert you to the use of cookies. If you disable or refuse cookies, please note that some parts of the website may become inaccessible or not



function properly. Information regarding our cookie policy may be found on each company's website within the EMCO Group.

We use tracking technology to collect information on your activities on our webpage. This is done for instance when you open e-mails, view our webpage, through links to webpages when you RSVP to an event and when you unsubscribe. This information is used in order to assess that what is being sent to you is of interest. For events, RSVP's are required to make appropriate event arrangements.

CHANGE OF PURPOSE

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

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

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

6. DISCLOSURE OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below, for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties which are the companies comprising the EMCO Group acting as joint controllers and processors who are based Cyprus, England, Lebanon and Egypt.
- External Third Parties:
- Service providers acting as processors who provide IT and system administration services].
- Professional advisers acting as processors including lawyers, bankers, auditors and insurers based Cyprus, England, Lebanon and Egypt who provide consultancy, banking, legal, insurance and accounting services.
- Revenue & Customs, regulators and other authorities acting as processors based in Cyprus, England, Lebanon and Egypt who require reporting of processing activities in certain circumstances.
- 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.

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 we only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. INTERNATIONAL TRANSFERS



We share your personal data within the EMCO Group. This will involve transferring your data outside the European Economic Area (**EEA**).

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called "binding corporate rules". For further details, see *European Commission: Binding corporate rules*.

Many of our External Third Parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

If the transfer of your data to a service provider is located in a country where adequate personal data protection is not in place, we will only do so if:

- (a) The transfer is necessary for the establishment, exercise and/or defence of legal claims; or
- (b) We have your explicit consent;
- (c) The transfer is necessary for the performance of a contract in your interest and we are a party to the contract; or
- (d) The transfer is necessary in order to perform a contract between us and you, or to carry out pre-contractual measures at your request.
- Where we use providers based in the US, we may transfer data to them if they are part of the EU-US 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 want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

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 and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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

As the transmission of data through the internet is not completely secure and, although we do our best to protect it, the data transmitted to our website is at your own risk. After receiving your data, we will endeavour through procedures and security features to secure the data.

9. DATA RETENTION

HOW LONG WILL YOU USE MY 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.

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

- Request that your data is not processed for marketing purposes to the extent that it is related to direct marketing.
- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or
 inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you
 provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing your personal data (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation, which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides 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. 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 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.

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.

LINKS TO EXTERNAL FILES AND WEBSITES

Our website sometimes contains links to external files and websites. Such links are not a certification or declaration of affiliation in any way and we have no control of any such sites. We encourage you to read the privacy policies or statements of other websites you visit.