



Data Protection Policy

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INTRODUCTION

Welcome to the National Police Healthcare Scheme's Privacy Policy.

The National Police Healthcare Scheme respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your Personal Data and tell you about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND WHO WE ARE

1.1 Purpose of this privacy policy

This privacy policy aims to give you information on how the National Police Healthcare Scheme collects and Processes your Personal Data, including any data you may provide through this website when you sign up to our services.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

1.2 Controller

The National Police Healthcare Scheme Trust is the Controller and responsible for your Personal Data (collectively referred to as "**The National Police Healthcare Scheme**", "**we**", "**us**" or "**our**" in this privacy policy).

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise *your legal rights*, please contact the DPO using the details set out below.

1.3 Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO in the following ways:

Full name of legal entity:	James Gray
Email address:	healthcare@npf.polfed.org
Postal address:	National Police Healthcare Scheme, 11-14 Apex Business Village, Annitsford, Cramlington, Northumberland, NE23 7BF
Telephone number:	0191 437 3000

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

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

We keep our privacy policy under regular review. This version was last updated on 18th September 2024.

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.

1.5 Third-party links

The scheme's 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 those third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

2.1 Personal data

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

- 2.1.1 **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- 2.1.2 **Contact Data** includes billing address, delivery address, email address and telephone numbers, details of General Practitioner and other healthcare providers.
- 2.1.3 **Financial Data** includes bank account and payment card details.
- 2.1.4 **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- 2.1.5 **Technical Data** (whilst using the scheme's website) 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 used to access the scheme's website.
- 2.1.6 **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- 2.1.7 **Usage Data** includes information about how you use our website and services.

- 2.1.8 **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 2.1.9 **Health Data** includes information about your health and wellbeing.
- 2.1.10 **Racial Data** includes information about your race and ethnicity.
- 2.1.11 **Equal opportunities** include information about your upbringing and education history.
- 2.1.12 **Professional Data** includes collar / warrant or employee number, rank and/or role, police force or organisation, date of joining the police force or organisation, and date of retirement (if applicable).

2.2 Aggregated Data

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing, for example, a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy policy.

2.3 Special Category Data

- 2.3.1 This sets out how we will protect Special Categories of Personal Data.
- 2.3.2 This document meets the requirement of the Data Protection Act 2018 that an appropriate policy document be in place where Processing Special Categories of Personal Data and Criminal Convictions Data in certain circumstances
- 2.3.3 We collect **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). We do not collect any information about criminal convictions or offences.
- 2.3.4 We Process Special Categories of Personal Data for the following purposes:
 - (a) assessing an employee's fitness to work;
 - (b) complying with health and safety obligations;
 - (c) assessing treatment funding;
 - (d) considering eligibility for the healthcare scheme.

- 2.3.5 The UK GDPR requires Personal Data to be Processed in accordance with the six principles set out in Article 5(1). Article 5(2) requires controllers to be able to demonstrate compliance with Article 5(1).
- 2.3.6 We comply with the principles relating to Processing of Personal Data set out in the UK GDPR which require Personal Data to be:
- (a) Processed lawfully, fairly and in a transparent manner (Lawfulness, Fairness and Transparency);
 - (b) collected only for specified, explicit and legitimate purposes (Purpose Limitation);
 - (c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is Processed (Data Minimisation);
 - (d) accurate and where necessary kept up to date (Accuracy);
 - (e) 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); and
 - (f) 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).
- 2.3.7 We are responsible for and must be able to demonstrate compliance with the data protection principles listed above (Accountability).

We do not we collect any information about criminal convictions and offences.

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

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

3.1 **Direct interactions.** You may give us your Identity, Contact, Financial and Health Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:

- 3.1.1 apply for membership of the scheme;
- 3.1.2 apply for funding for medical assessment, treatment or cash benefit;

- 3.1.3 make an enquiry to the scheme via any means, including post, email, telephone, website, or in person;
 - 3.1.4 subscribe to the scheme;
 - 3.1.5 request marketing to be sent to you;
 - 3.1.6 enter a competition, promotion or survey; or
 - 3.1.7 give us feedback or contact us via any means.
- 3.2 **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies.
- 3.3 **Third parties or publicly available sources.** We may receive Personal Data about you from various third parties as set out below:
- 3.3.1 Technical Data from analytics providers such as Google based outside the UK;
 - 3.3.2 Contact, Financial and Transaction Data from providers of technical, payment and delivery services;
 - 3.3.3 Identity and Contact Data from data brokers or aggregators based inside or outside the UK;
 - 3.3.4 Identity and Contact Data from publicly available sources.

4. **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:

- 4.1 Where we need to perform the contract we are about to enter into or have entered into with you.
- 4.2 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.
- 4.3 Where we need to Comply with a Legal Obligation.

Generally, we do not rely on consent as a legal basis for Processing your Personal Data although we will get your consent before 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 contacting us.

- 4.4 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 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.

We will only Process Personal Data fairly and lawfully and for specified purposes. The UK GDPR restricts our actions regarding Personal Data to specified lawful purposes. We can Process Special Categories of Personal Data and Criminal Convictions Data only if we have a legal ground for Processing and one of the specific Processing conditions relating to Special Categories of Personal Data applies. We will identify and document the legal ground and specific Processing condition relied on for each Processing activity.

Purpose/Activity	Type of data	Lawful basis for Processing including basis of legitimate interest
To register you as a new member	(a) Identity (b) Contact (c) Professional	Performance of a Contract with you
To Process and deliver your membership including: (a) Manage payments, fees, and charges (b) Deliver membership benefits (c) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a Contract with you (for example, to facilitate healthcare provision) (b) Necessary for our Legitimate Interests (for example, to recover debts due to us)
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	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Professional	(a) Performance of a Contract with you (b) Necessary to Comply with a Legal Obligation (c) Necessary for our Legitimate Interests (to keep our records updated and to study how members use our services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a Contract with you (b) Necessary for our Legitimate Interests (to study how members use our services, to develop them, to grow our scheme, and to inform our marketing strategy)
To administer and protect the scheme and its website (including troubleshooting, data analysis, testing, system	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our scheme, provision of administration and IT services, network security, to

maintenance, support, reporting, and hosting of data)		prevent fraud, and in the context of a business reorganisation or scheme restructuring exercise) (b) Necessary to Comply with a Legal Obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our Legitimate Interests (to study how members use our services, to develop them, to grow our scheme, and to inform our marketing strategy)
To use data analytics to improve the scheme website, services, marketing, member and potential member relationships and experiences	(a) Technical (b) Usage	Necessary for our Legitimate Interests (to define types of members for our services, to keep our website updated and relevant, to grow and develop our scheme, and to inform our marketing strategy)
To make suggestions and recommendations to you about services and/or benefits that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications (g) Professional	Necessary for our Legitimate Interests (to develop our services and to develop / grow our scheme)
Necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the Controller or the Data Subject in connection with employment, social security or social protection. <i>(Paragraph 1(1)(a), Schedule 1, DPA 2018.)</i>	(a) Identity (b) Health (c) Professional	Compliance with a legal obligation (Article 6 (1)(c)) or necessary for the Performance of a Contract with the Data Subject (Article 6(1)(b)). And: Explicit consent Health or social care (with a basis in law). This condition is met if the Processing is necessary for health or social care purposes, which means the purposes of: preventive or occupational medicine; the assessment of the working capacity of an employee; medical diagnosis; the provision of health care or treatment; the provision of social care; and the management of health care systems or services, or social care systems or services.
Compliance with a legal obligation (Article 6(1)(c)).	(a) Racial or Ethnic Origin Data	Necessary for the purposes of performing or exercising obligations

		or rights which are imposed or conferred by law on the controller or the Data Subject in connection with employment, social security or social protection. (Paragraph 1(1)(a), Schedule 1, DPA 2018.)
In the organisation's Legitimate Interests (Article 6(1)(f)) which are not outweighed by the fundamental rights and freedoms of the Data Subject.	(a) Equal Opportunities Data	Necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained. (Paragraph 8(1)(b), Schedule 1, DPA 2018.)

4.4.1 Marketing

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

4.4.2 Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services 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 made use of services from us and you have not opted out of receiving that marketing.

4.4.3 Third-party marketing

We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

4.4.4 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 purchase, service experience or other transactions.

4.4.5 Cookies

How we use cookies on the scheme's website.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you

visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to member and user needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

4.4.5 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.

Personal Data must be accurate and, where necessary, kept up to date. It must be corrected or deleted without delay when inaccurate.

We will strive to ensure that the Personal Data we hold and use is accurate, complete, kept up to date and relevant to the purpose for which it is collected by us. We check the accuracy of any Personal Data at the point of collection and at regular intervals afterwards. We take all reasonable steps to destroy or amend inaccurate or out-of-date Personal Data.

Personal Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is Processed.

We will only collect or disclose the minimum Personal Data required for the purpose for which the data is collected or disclosed. We will ensure that we do not collect excessive data and that the Personal Data collected is adequate and relevant for the intended purposes.

Personal Data shall be Processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful Processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

We will implement and maintain reasonable and appropriate security measures against unlawful or unauthorised Processing of Personal Data and against the accidental loss of or damage to Personal Data.

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.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may share your Personal Data with the parties set out below for the purposes set out in the table *Purposes for which we will use your Personal Data* above:

- 5.1 Internal Third Parties;
- 5.2 External Third Parties;
- 5.3 Specific third parties such as HEALTHCARE ORGANISATIONS.
- 5.4 Third parties to whom we may choose to sell, transfer or merge parts of our scheme or our assets to. Alternatively, we may seek to acquire other schemes, businesses or merge with them. If a change happens to our scheme, then the new Trustees or owners may use your Personal Data in the same way as set out in this privacy policy.

All third parties are required in law to respect the security of your Personal Data and to comply with relevant legislation. We do not authorise third-party service providers or entities to use your Personal Data for their own purposes and only permit them to process your Personal Data for the ultimate delivery of scheme membership benefits.

6. INTERNATIONAL TRANSFERS

We do not transfer your Personal Data outside the UK.

7. 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. We do not empower them to process your Personal Data for anything other than for the management of your membership, the collection of subscriptions and the delivery of membership benefits; all third parties must manage and process your data in accordance with relevant legislation.

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.

We will ensure, where Special Categories of Personal Data or Criminal Convictions Data are Processed, that the Processing is recorded, and the record sets out, where possible, a suitable time period for the safe and permanent erasure of the different categories.

Where we no longer require Special Categories of Personal Data or Criminal Convictions Data for the purpose for which it was collected, we will delete it or render it permanently anonymous as soon as possible.

Where records are destroyed we will ensure that they are safely and permanently disposed of.

8. DATA RETENTION

How long will you use my Personal Data for?

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we Process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

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

Request access to your Personal Data.

Request correction of your Personal Data.

Request erasure 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, and you will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your

request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

9.2 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.

9.3 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

Comply with a Legal Obligation means processing your Personal Data where it is necessary for compliance with a legal obligation that we are subject to.

Controller: the person or organisation that determines when, why and how to Process Personal Data.

Criminal Convictions Data: Personal Data relating to criminal convictions and offences, including Personal Data relating to criminal allegations and proceedings.

Data Protection Officer (DPO): the person required to be appointed in specific circumstances under the UK GDPR. Where a mandatory DPO has not been appointed, this term means a data protection manager or other voluntary appointment of a DPO or refers to the organisation's data privacy team with responsibility for data protection compliance.

Data Retention Policy: explains how the organisation classifies and manages the retention and disposal of its information.

Data Subject: a living, identified or identifiable individual about whom we hold Personal Data. Data Subjects may be nationals or residents of any country and may have legal rights regarding their Personal Data.

DPA 2018: the Data Protection Act 2018.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of a 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.

Personal Data: any information identifying a Data Subject or information relating to a Data Subject that we can identify (directly or indirectly) from that data alone or in combination with other identifiers we possess or can reasonably possess. Personal Data includes Special Categories of Personal Data.

Privacy Notice: a separate notice setting out information that may be provided to Data Subjects when the organisation collects information about them.

Processing or Process: any activity that involves the use of Personal Data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transmitting or transferring Personal Data to third parties.

Special Categories of Personal Data: information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data.

UK GDPR: the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR).

10.1 THIRD PARTIES

10.1.1 Internal Third Parties

There are currently no internal third parties in the scheme;

10.1.2 External Third Parties

- (a) Service providers acting as processors based in the United Kingdom who provide IT and system administration services.
- (b) Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- (c) HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- (d) Local Police Federations, Police Forces, Police and law enforcement related organisations and charities, related Staff Associations, Police Treatment and Rehabilitation Centres, which assist in the delivery of the scheme and its benefits to members and prospective members, both administratively and financially, for members and prospective members. All such entities and organisations are bound by the law in relation to their processing of your personal data.

10.2 YOUR LEGAL RIGHTS

You have the right to:

Request access to your Personal Data (commonly known as a "data subject access request"). This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to Process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have Processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Data where we are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to Process your information which override your rights and freedoms.

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the Processing of your Personal Data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to Process your Personal Data. However, this will not affect the lawfulness of any Processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.