

# External Privacy Notice

Burnham Physiotherapy and Sports Injury Clinic (Burnham Physio) 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. Burnham Physio 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.

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This Privacy Notice is provided in a layered format so you can click through to the specific areas set out above. This Privacy Notice is designed to be comprehensive

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.

## Short-form summary for patients

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We collect personal data provided by you and your referring specialist / company.

For example:

- We collect personal details (name, address, date of birth, email address, telephone etc)
- We collect financial information (insurance company membership / authorisation numbers) if you choose to pay via a third party
- We collect medical information relevant to your presenting complaint

How we use your information

When we collect your data, we will ask for your consent to use it in different ways. We will only use your personal data in ways you have given us permission to do so.

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We may also use your data in order to:

- enter into, or perform, a contract with you;
- comply with a legal duty;
- to protect the vital interests of the data subject or of another natural person;
- for our own (or a third party's) lawful interests, provided your rights don't override these.

There may be occasions where we want to contact you about something that you have not explicitly signed up for. We will only do this if you have given your consent for us to contact you about similar activities, or if the communication is for a closely related purpose.

### Disclosing and sharing data

We will never sell your personal data.

We may share personal data with suppliers who provide us with services. For example, in order to provide you with exercise videos, your name, year of birth and email address will be shared with a provider, who will email you a link to your exercises on our behalf. However, these activities will be carried out under a contract which imposes strict restrictions in it.

## Important information about us

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Burnham Physio is a physiotherapy clinic.

We can provide treatment for:

- Sports Injuries
- Back and Neck pain
- Orthopaedic Conditions
- Neurological Conditions
- Respiratory Conditions
- Women's & Men's Health including Antenatal and Postnatal
- Facial (Bell's) Palsy
- Paediatric (Children's) Conditions

Burnham Physio 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 "Burnham Physio", "we", "us" or "our" in this privacy notice). Burnham Physio is the data controller which is responsible for this particular website.

We have appointed a data protection officer (DPO) 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 DPO using the details set out below.

Contact details	
Name or title of DPO:	Practice Manager
Email address:	dataprotection@burnhamphysiotherapy.co.uk
Postal address:	Burnham Physiotherapy & Sports Injury Clinic Ltd 107 High Street Burnham Bucks SL1 7JZ
Telephone number:	01628 664757
ICO registration number	Z1728270

## 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 [insert date].

## 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](http://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.

## 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 may collect, store, use and transfer	
Generally	
Identity Data	This includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender, title or office held within any other organisation.
Contact Data	This includes billing address, email address and telephone numbers.
From patients in particular	
Financial Data	This includes bank account details and details of transactions.
Transaction Data	This includes details about payments to and from you, and details of services you have purchased from us.
Profile Data	This includes your purchase of our services, preferences, feedback and survey responses.
Usage Data	This includes information about how you use our website and software.
Events Data	This includes your preferences in receiving information about (or invites to) events and your communication preferences.
Patient Data	This includes your age, medical history, details of any condition(s), Special Category Data, details of any disability, details of treatment
Special Category Data	This includes data relating to information about health.
From suppliers in particular	
Identity Data	This includes first name, last name, title, title or office held within any other organisation.
Contact Data	This includes billing address, delivery address, email address and telephone numbers.
Financial Data	This includes bank account details and details of transactions.
From members of the public, to include patients and suppliers	
Technical Data	This includes internet protocol (IP) address, 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.
Marketing and Communications Data	This includes your preferences in receiving marketing from us and our third parties and your communication preferences.

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.

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 weight, size and the like) simply by interacting with you regarding modelling roles. We may also collect information about criminal convictions and offences if you reveal these to us. 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 and Relevant 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"><li>• use our services;</li><li>• provide a medical history;</li><li>• participate in a process whereby a medical report is requested of you;</li><li>• give us some feedback.</li></ul>
Third parties	<p>We may receive Identity, Contact, Relevant Financial Data and Medical Information about you from various third parties as set out below</p> <ul style="list-style-type: none"><li>• Insurance Companies and related Intermediary Companies.</li><li>• Other Health Care Professionals</li></ul>

### Further information about cookies

Our website does not currently use cookies.

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.

## 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 protection officer.

## Purposes for which we use your personal data

We use your personal data when undertaking the following activities.

Type of activities which we engage in, and corresponding purposes	
Type of Activity	Purpose of processing personal data
<b>Patients</b>	
Engaging you as a client/patient	Processed to see if we can help by offering services and what services we would need to offer.
Initiating our client-engagement process	Processed to form a contract.
Setting up of our service	Processed to register you as a patient of the clinic
Diagnosing conditions	Processed to achieve this aim.
Administering appropriate treatment	Processed to achieve this aim.
Follow up review of treatment given	Processed to achieve this aim.
Producing a medical report upon request	Processed to achieve this aim, provided consent is provided.
Responding to referrers	Processed to respond to legitimate referrer enquiries, provided that consent is provided.
Responding to employers	Processed to respond to legitimate employer enquiries, provided that consent is provided.
Responding to insurance company	Processed to respond to legitimate insurer enquiries, provided that consent is provided.
Storing patient data	Processed to safely and securely store your patient data.
Creating and sending on invoices	Processed to manage our commercial relationship.
Taking and managing payments	Processed to manage our commercial relationship.
<b>Suppliers</b>	
Managing commercial relationship(s)	
<b>Members of the public, to include patients and suppliers</b>	
Marketing	To market our products and services.
Managing website enquiries	Processed as part of answering those enquiries and, where appropriate, offering 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 Burnham Physio 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	Lawful basis for processing personal data (Article 6 GDPR)	Lawful basis for processing special data (Article 9 GDPR)
Patients			
Engaging you as a client/patient	Identity and Contact Data.	Necessary for performance of our contract with you, or as part of steps requested by you prior to entering into a contract (Contract)	N/A
Initiating our client-engagement process	Identity and Contact Data and Patient Data	Contract, as described above.	N/A
Diagnosing conditions	Identity and Contact Data and Patient Data	Contract, as described above.	Preventative or occupational medicine exception (Article 9 (h))
Administering appropriate treatment	Identity and Contact Data and Patient Data	( a) Performance of a contract with you (b) Necessary for our legitimate interests (to provide services promised)	Preventative or occupational medicine exception (Article 9 (h))
Follow up review of treatment given	Identity and Contact Data and Patient Data	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to provide services promised)	Preventative or occupational medicine exception (Article 9 (h))
Producing a medical report upon request	Identity and Contact Data and Patient Data	Express consent	Express consent
Responding to referrers	Identity and Contact Data and Patient Data	Express consent	Express consent
Responding to employers	Identity and Contact Data and Patient Data	Express consent	Express consent
Responding to insurance company	Identity and Contact Data and Patient Data	Express consent	Express consent
Storing patient data	Identity and Contact Data and Patient Data	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to maintain medical records to aid future treatment)	Preventative or occupational medicine exception (Article 9 (h))
Creating and sending on invoices	Identity Data Contact Data Financial Data	a) Necessary for our legitimate interests (for running our business)	N/A

Taking and managing payments	Identity Data Contact Data Financial 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
Suppliers			
Managing commercial relationship(s)	Identity Data Contact 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
Members of the public, to include patients and suppliers			
Marketing	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data Technical 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
Managing website enquiries	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data Technical Data	Necessary for our legitimate interests (to develop our products/services and grow our business)	N/A
Emergency situations			
Management of a situation involving a serious crime	Identity and Contact Data and Patient Data	Vital interests of the data subject or another and/or public interest.	Vital interests of the data subject or another and/or public interest.
Management of a situation involving risks to the public or our staff	Identity and Contact Data and Patient Data	Vital interests of the data subject or another and/or public interest.	Vital interests of the data subject or another and/or public interest.
Management of a situation involving the protection of vulnerable children or adults	Identity and Contact Data and Patient Data	Vital interests of the data subject or another and/or public interest.	Vital interests of the data subject or another and/or public interest.

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 Client Data. The decision to upload data or use personal data for the purpose of administering an accountancy or tax practice remains with our client.

## Disclosing your personal data to others

Burnham Physio 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 page 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	Accounting services
Insurers	United Kingdom	Insurance services
Employers	United Kingdom	Employer
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
Your bank or banking agent	United Kingdom	To get Relevant Tax Data or manage accountancy issues.
GP Practices	United Kingdom	To assist with the provision of care services
Lawyers acting for/against you in a legal case	United Kingdom	To assist with the provision of care services
Social care organisations	United Kingdom	To assist with the provision of care services
Mental Health Trusts	United Kingdom	To assist with the provision of care services
Community services such as district nurses, rehabilitation services, telehealth and out of hospital services	United Kingdom	To assist with the provision of care services
Urgent care organisations	United Kingdom	To assist with the provision of care services
Palliative care hospitals	United Kingdom	To assist with the provision of care services
Care Homes.	United Kingdom	To assist with the provision of care services
Hospitals	United Kingdom	To assist with the provision of care services
NHS	United Kingdom	To assist with the provision of care services
111 and out of hours services	United Kingdom	To assist with the provision of care services

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 Burnham Physio 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

We do not transfer any data out of the EEA.

# Data security

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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

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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 [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 Burnham Physio'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 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 below 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
<b>Finance</b>				
	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
<b>Health &amp; safety</b>				
	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
<b>Internal governance</b>				
	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
<b>Operations</b>				
	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
<b>Patient records</b>				
	Patient records	Adults: Last treatment + 8 Children: 18th birthday + 8 or until 25 years of age	Destroy securely	Records Management Code of Practice for Health and Social Care 2016

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

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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

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As mentioned above, we have appointed a Data Protection Officer (DPO) 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 DPO using the contact details provided [above](#).