



## **PRIVACY POLICY AND PRIVACY NOTICE**

### **1. Introduction**

- 1.1 This document sets out the privacy policy and privacy notice of Stoneware Consultants Ltd.
- 1.2 We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data we collect from you both when you visit our website (regardless of where you visit it from) and where we carry out services for you. This privacy notice tells you about your privacy rights and how the law protects you.
- 1.3 Please use the Glossary to understand the meaning of some of the terms used in this notice.
- 1.4 This document has been approved and issued by the firm on 12<sup>th</sup> January 2020 to be published on our website on or shortly after this date.
- 1.5 This policy is a working document and we reserve the right to update it at any time without informing you. We intend to review our Privacy Policy and approve it annually. Please always refer to our website for the most current version of our privacy policy at [www.stonewareconsultants.com/privacy.htm](http://www.stonewareconsultants.com/privacy.htm).

### **2. Purpose of this Privacy Notice**

- 2.1 This privacy notice aims to give you information on how Stoneware Consultants Ltd collects and processes personal data:
  - 2.1.1 through your use of our website, including any data you may provide through our website;
  - 2.1.2 when you purchase our services or contact us in respect of our services through the website or in person;
  - 2.1.3 when we gather data provided by third parties with whom we deal in order to provide our services; when you sign up to our newsletter
  - 2.1.4 when you agree to attend any of our events.
- 2.2 We do not knowingly collect data relating to children and this privacy notice does therefore not apply to any person under the age of 13.
- 2.3 It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 notice supplements the other notices and is not intended to override them.

### **3. Data Controller**

- 3.1 Stoneware Consultants Ltd, a limited liability company incorporated and registered in England and Wales under Companies House number 12391501 and whose registered office is situated at 9 Althorp Road, London SW17 7ED United Kingdom is the data controller which is responsible for personal data (collectively referred to as “Stoneware”, the “Company”, the “Firm”, “we”, “us” or “our” in this privacy notice).
- 3.2 Stoneware is a data controller because we hold personal data about the firm’s past and present employees, directors/members, existing or prospective clients, plus people or firms who may or

may not have a current relationship with the firm but are employed in or have been employed in the financial services industry or have an interest in financial services products.

#### **4. Responsibilities and Contact Details**

4.1 The GDPR requires the appointment of a Data Protection Officer if a firm meets any of the following criteria:

4.1.1 it is a public authority (except for courts acting in their judicial capacity);

4.1.2 core activities require large scale, regular and systematic monitoring of individuals (for example, online behaviour tracking); or

4.1.3 core activities consist of large scale processing of special categories of data or data relating to criminal convictions and offences.

4.2 The form does not meet any of the above criteria and therefore the firm is not required to appoint a Data Protection Officer. Richard Rothwell is the firm's Managing Partner and Compliance Officer, responsible for adherence to this policy.

4.3 Our full contact details are:

Firm: Stoneware Consultants Ltd  
Address: 9 Althorp Road, London SW17 7ED, United Kingdom  
Tel: +44 77 1433 9939  
E-mail: [richard.rothwell@stonewareconsultants.com](mailto:richard.rothwell@stonewareconsultants.com)

4.4 You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO" - [www.ico.org.uk](http://www.ico.org.uk)). However, we would appreciate the chance to deal with your concerns before you approach the ICO, so please contact us directly in the first instance.

#### **5. Changes to the Privacy Notice**

5.1 The data protection law in the UK changed on 25<sup>th</sup> May 2018 as a result of the General Data Protection Regulation ("GDPR") coming into effect across the EU from this date. The GDPR aims to remove a divergence of rules, requirements and practices from across the EU, while also strengthening individuals' fundamental data protection rights.

5.2 Stoneware's privacy policy may be updated from time to time with any revised policy being published on our website.

5.3 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.

#### **6. GDPR Principles**

6.1 Under the GDPR, the data protection principles set out the main responsibilities for organisations. Article 5 of the GDPR requires that personal data shall be:

6.1.1 processed lawfully, fairly and in a transparent manner in relation to individuals;

6.1.2 collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

- 6.1.3 adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
  - 6.1.4 accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
  - 6.1.5 kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
  - 6.1.6 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.
- 6.2 Article 5(2) of the GDPR requires that: “the controller shall be responsible for, and be able to demonstrate, compliance with the principles.”

## 7. Website Third-Party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections through our website 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.

## 8. The Data We Collect About You

- 8.1 Personal data, or personal information, means 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).
- 8.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

**Identity Data:** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

**Contact Data:** includes your email address, home address and telephone numbers.

**Financial Data:** includes bank account and payment card details. We may also collect details about your wealth and source of wealth.

**Transaction Data:** includes details of services you have received from the Company.

**Technical Data:** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

**Employment Data:** includes details of previous employers and references from them, your curriculum vitae and other evidential documentation about your work experience and professional qualifications.

**Profile Data:** includes preferences, feedback and survey responses.

**Usage Data:** includes information about how you use our website.

**Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- 8.3 We also collect, use and share Aggregated 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.
- 8.4 We do not collect any 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). Nor do we collect any information about criminal convictions and offences.

## 9. 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 the service you require but we will notify you if this is the case at the time.

## 10. How is Your Personal Data Collected?

- 10.1 We use different methods to collect data from and about you, including through:
- 10.2 **Direct interactions:** you may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
- 10.2.1 request information about our services including proposals and quotations;
  - 10.2.2 subscribe to our service or publications;
  - 10.2.3 request marketing to be sent to you;
  - 10.2.4 complete a request to allow a third party to undertake a background credit check or criminal record check, the results of which will be shared with us;
  - 10.2.5 complete a survey; or
  - 10.2.6 give us some feedback.
- 10.3 **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.
- 10.4 **Third parties or publicly available sources:** we may receive personal data about you from various third parties and public sources as set out in paragraphs 10.5 to 10.9 below.
- 10.5 **Technical Data** from the following parties:
- i) analytics providers such as Google based inside the EU; and

- ii) search information providers and credit providers based inside the EU.
- 10.6 **Identity and Contact Data** from publicly available sources such as the FCA register, Companies House and the Electoral Register.
- 10.7 **Identity and Employment Data** from other publicly available sources such as LinkedIn, Bloomberg, Reuters and other third-party data controllers and processors which may be available via the internet.
- 10.8 **Identity and Employment Data** from other sources to enable us to perform background checks, such as obtaining verbal or written references from prior employers or other contacts.
- 10.9 **Transaction Data** from our internal systems or external systems of data controllers and processors used to enable the firm to perform its services to you in accordance with a contract.

## **11. How We Use Your Personal Data**

- 11.1 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:
  - 11.1.1 where we need to perform the contract which we are about to enter into or have entered into with you.
  - 11.1.2 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. Our legitimate interests are in performing services to you or promoting or furthering our services.
  - 11.1.3 where we need to comply with a legal or regulatory obligation.

## **12. Website Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

## **13. Lawful Bases and Purposes for Which We Will Use Your Personal Data**

- 13.1 We have set out below, in Table 1, a description of the ways we plan to use your personal data, and which of the lawful bases we rely on to do so. Where appropriate, we have also identified the nature of our legitimate interests.
- 13.2 Given the nature of our business, it is considered unlikely that the lawful basis for us to process your Personal Data will be by reason of vital interests or public task.
- 13.3 We will use your Personal Data to deliver services to you and/or to work or act for you. We may also use your Personal Data to inform you about us and our services.
- 13.4 Please note that we may use or disclose Personal Data if we are required by law to do so or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.
- 13.5 Note that we may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific lawful basis we are relying on to process your personal data where more than one basis has been set out in Table 1 below.

**Table 1**

<i>Purpose/Activity</i>	<i>Type of Data</i>	<i>Lawful basis for processing including basis of legitimate interest</i>
To enable us to categorise a customer appropriately as a Professional Client or to give you a different category according to the relevant type of investment product, service or financial promotion which you receive from us.	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Transaction</li> <li>• Technical</li> <li>• Profile</li> <li>• Marketing &amp; Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated and to study how customers use our products and services)</li> <li>• Consent</li> </ul>
To register an FCA-approved Person or Appointed Representative who undertakes regulated activities on behalf of the firm	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Financial</li> <li>• Employment</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (for Business Purposes)</li> </ul>
To manage our relationship with you which may include: (a) Notifying you about changes to our terms or privacy policy; (b) Keeping in touch with you; (c) Asking you to leave a review or take a survey	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Marketing &amp; Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary to comply with a legal obligation</li> <li>• Necessary for our legitimate interests (to keep our records updated and/or to study how you use our products and services)</li> <li>• Consent</li> </ul>
To enable you to complete a survey	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Profile</li> <li>• Usage</li> <li>• Marketing &amp; Communications</li> </ul>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests</li> </ul>
To administer and protect our business and our website (including trouble-shooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	<ul style="list-style-type: none"> <li>• Identity</li> <li>• Contact</li> <li>• Technical</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for Business Purposes)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
To use data analytics to improve our website, products and services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>• Technical</li> <li>• Usage</li> </ul>	<ul style="list-style-type: none"> <li>• 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)</li> </ul>

#### **14. Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing. You may receive marketing communications, newsletters, updates or other promotions from us if you have not opted out of receiving such communications.

#### **15. Opting Out**

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

## **16. Change of Purpose**

- 16.1 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.
- 16.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so.
- 16.3 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.

## **17. Disclosures of Your Personal Data**

- 17.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 11 above.
  - 17.1.1 Internal Third Parties as set out in the Glossary.
  - 17.1.2 External Third Parties as set out in the Glossary.
  - 17.1.3 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.
- 17.2 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 only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **18. International Transfers**

- 18.1 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.
- 18.2 In performing our services, we may transfer personal data outside of the EEA. We may for example use IT service providers in the Netherlands or third-party providers based in the US as part of our normal business procedures.
- 18.3 Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
  - 18.3.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or where we are satisfied of the adequacy of the level and protection for personal data;
  - 18.3.2 We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe;
  - 18.3.3 Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

- 18.4 Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **19. Data Security**

- 19.1 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.
- 19.2 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.

## **20. Data Retention**

- 20.1 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.
- 20.2 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.
- 20.3 Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.
- 20.4 In some circumstances you can ask us to delete your data: see “Request erasure” below for further information.
- 20.5 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **21. Your Legal Rights**

- 21.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out below after the Glossary please contact us.
- 21.2 No fee usually required: You will not usually 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.
- 21.3 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.
- 21.4 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.

## GLOSSARY

### 22. Personal Data

**Personal Data:** The term “Personal Data” as used in this Privacy Notice means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. This definition provides for a wide range of personal identifiers to constitute personal data, including name, date of birth, residential address, identification number, location data or online identifier. We may also gather data about an individual’s phone number, email address, educational background, financial and pay details, details of certificates and diplomas, education and skills, marital status, nationality, job title, and CV.

Personal Data does not include data from which you can no longer be identified such as anonymised aggregate data.

### 23. Lawful Basis (as applicable to Stoneware)

**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 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.

**Comply 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.

**Consent:** means processing your personal data where you have given your consent. If consent has been requested and granted, individuals must give unambiguous consent for their personal data to be processed; implied consent is no longer acceptable. Consent must be as easy to withdraw as it is to give and must also be recorded and able to be demonstrated if requested.

### 24. Data Controller

**Data Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data where the purposes and means of such processing are determined by law.

### 25. Data Processor

**Data Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

## 26. Processing

'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## 27. Special Categories of Personal Data

*Special categories of personal data* include information about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings, and genetic and biometric information. Any use of special categories of personal data should be strictly controlled in accordance with this policy.

## 28. Business Purposes

**Business Purposes:** The purposes for which personal data may be used by us include but are not limited to functions to maintain a consulting business such as: personnel; administrative; financial; regulatory; payroll and business development purposes. Business purposes may include the following:

- 28.1 Compliance with our legal, regulatory and corporate governance obligations and good practice;
- 28.2 Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests;
- 28.3 Gathering information about individuals and entities as part of our obligations to Know Your Client ("KYC") and undertake Anti-Money Laundering ("AML") checks;
- 28.4 Ensuring business policies are adhered to (such as policies covering email and internet use);
- 28.5 Ensuring individuals are competent to perform functions for the firm;
- 28.6 Operational reasons, such as recording transactions, training and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring and checking;
- 28.7 Investigating complaints;
- 28.8 Checking references, ensuring safe working practices, monitoring and managing staff access to systems and facilities and staff absences, administration and assessments;
- 28.9 Monitoring staff conduct, disciplinary matters;
- 28.10 Reporting illegal or suspicious activities to the appropriate regulator or supervisory authority;
- 28.11 Marketing our business; and
- 28.12 Improving services.

**29. Third Parties**

*Internal Third Parties*

- 29.1 Other companies in the Stoneware Group acting as joint controllers or processors and who are based outside the EEA.

*External Third Parties*

- 29.2 Service providers acting as processors based inside and outside the EEA who provide IT and system administration services.
- 29.3 Professional advisers or service providers acting as processors or joint controllers including lawyers, bankers, brokers, auditors and insurers based in the United Kingdom who provide consultancy, banking, broking, administrative, legal, insurance and accounting services.
- 29.4 The Financial Conduct Authority (“FCA”) acting as processors or joint controllers based in the United Kingdom who require reporting of activities in certain circumstances or to whom it is necessary to provide information as part of our services.
- 29.5 Other regulators or national authorities such as the National Crime Agency acting as processors or joint controllers based in the United Kingdom who require reporting of activities in certain circumstances or to whom it is necessary to provide information as part of our services.
- 29.6 Other regulated entities such as the London Stock Exchange or affiliates of the London Stock Exchange acting as processors or joint controllers based in the United Kingdom who require reporting of activities such as securities transactions or to whom it is necessary to provide information as part of our services.
- 29.7 HM Revenue & Customs (“HMRC”), regulators and other authorities acting as processors or joint controllers based in the United Kingdom or the EEA.

## **YOUR LEGAL RIGHTS**

30. You have the legal right to:

- 30.1 **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.
- 30.2 **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.
- 30.3 **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.
- 30.4 **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.
- 30.5 **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.
- 30.6 **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.
- 30.7 **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.
- 30.8 **Your right to make a complaint** about how we process your personal data to the Information Commissioner <https://ico.org.uk/concerns/>  
*Information Commissioner's Office*  
*Wycliffe House*  
*Water Lane*  
*Wilmslow*  
*Cheshire SK9 5AF*  
Tel: 0303 123 1113