

## CODESSE LIMITED

### PRIVACY NOTICE

This privacy notice sets out how we look after your personal data and tells you about your privacy rights and how the law protects you. **Personal data** is any information about you from which you can be identified. It does not include data where your identity has been removed.

This privacy notice applies where we are acting as data controller in respect of the personal data of our website users and users of our service. A data controller is a person who determines the purposes and means of processing of personal data.

Please read this privacy notice in full, so that you understand how your personal data is used by us. You can also go straight to the Section you need by clicking on the links below.

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In this privacy notice:

- a **Developer** is a person who is registered as a software developer on our site, and has passed any evaluation required by us in connection with such registration;
- an **Applicant** is a person who is registered as a software developer on our site, but has not yet taken and passed that evaluation;
- an **Uber Developer** is a Developer who has been accepted by us as an Uber Developer. Uber Developers set and evaluate code challenges (i.e. technical tests to test coding skill);
- a **Hirer** is an employer who has contracted with us to use our services for the purposes of evaluating Candidates;
- a **Candidate** is a person invited by a Hirer to take a code challenge (i.e. a technical test to test coding skill)
- **Geektastic Hirer(s)** are Third Republic Limited and their subsidiaries who are the exclusive providers of recruitment services accessed through the Site. Further details are available [\[here\]](#).

Please see our Developer Terms, Code Challenge Terms and Candidate Terms for further details.

#### 1. **WHO WE ARE AND WHO TO CONTACT**

##### **Who we are**

Codesse Limited (company number: 9603051) is responsible for your personal data (referred to as "**Codesse**", "**we**", "**us**" or "**our**" in this privacy notice).

##### **Who to contact**

We have appointed a data privacy manager 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 data privacy manager using the details set out below.

Codesse Limited

Data privacy manager: Rick Brownlow

Email address: [rick@codesse.com](mailto:rick@codesse.com)

## IMPORTANT INFORMATION

### Other privacy notices

We may also provide you with other privacy notices on specific occasions when we are collecting or processing personal data about you, to make sure that you are fully aware of how and why we are using your personal data. This privacy notice is in addition to those other notices and is not intended to override them.

### Important information for Candidates

If you are a Candidate and you have been invited by a Hirer to take one of our challenges, we may be provided with personal data about you by the Hirer. We process this personal data as a data processor and the Hirer is the data controller. The Hirer is responsible for your personal data. Please ensure that you read and understand any privacy notice issued by the Hirer. We will only use your personal data for the purposes of the challenge.

### Important Information for Developers and Hirers about data sharing with Geektastic Hirers

Recruitment services accessed through our site are offered exclusively by the Geektastic Hirers and not by Codesse. Further details on the Geektastic Hirers and their privacy notices are available here [<https://www.thirdrepublic.com/candidate-privacy-notice>].

- **Developers:** If you provide consent we will share your identity, code challenge results, contact details and personal data on the site with the Geektastic Hirers so that they can assess your suitability for any roles and contact you to discuss their recruitment services. You give your consent when you either:-
  - Opt in to share your data with Third Republic on the registration form when you join Geektastic.
  - Set your developer profile to either Actively Looking, Passively Looking or Looking Later

You can request to stop sharing your data with Geektastic Hirers by setting yourself to not looking in your developer profile (if it is set to anything other than not looking for a job) and sending an email to [hello@geektastic.com](mailto:hello@geektastic.com) requesting we stop sharing your data, we will then stop sharing your data. To request your data is deleted from the Geektastic Hirers please send an email to [GDPR@thirdrepublic.com](mailto:GDPR@thirdrepublic.com).

- **Hirers/employers:** If you wish to run a hiring campaign on the site, you can only do so through the Geektastic Hirers. We will share your identity and contact data with the Geektastic Hirers when you complete a Talent Request and Select 'Send to Hiring Team', so that they can contact you to discuss their recruitment services and terms. You can withdraw your consent to us sharing your personal data with the Geektastic Hirers by sending an email to [hello@geektastic.com](mailto:hello@geektastic.com). To request your data is deleted from the Geektastic Hirers please send an email to [GDPR@thirdrepublic.com](mailto:GDPR@thirdrepublic.com).

If you are a Developer and you respond to a campaign or approach from the Geektastic Hirers on our site, please note that we are not responsible for any personal data you provide to the Geektastic Hirers or for any third party profile of you (such as your GitHub or Stackoverflow profile) which we make available through our service and the use the Geektastic Hirers makes of such personal data. You should ensure that you read and understand any privacy notice issued by the Geektastic Hirers.

### Third-party links

Our 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 third-party websites and are not responsible for their privacy statements or notices. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### Changes to the privacy notice

We may update this privacy notice from time to time by publishing a new version on our website. You should check this page occasionally for updates. We may also notify you of changes to this notice by

email or through any messaging system on our site.

This version was last updated on 31<sup>st</sup> January 2020 and historic versions can be obtained by contacting us.

## Children

This website and our service is not intended for children. We do not knowingly collect personal data relating to children. We may delete any personal data where we believe it relates to a child.

## 2. PERSONAL DATA WE COLLECT ABOUT YOU

### The types of personal data we collect

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

- **Identity Data** may include first name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** may include postal address, billing address, email address and telephone numbers.
- **Financial Data** may include bank account and payment card details.
- **Transaction Data** may include details about payments to and from you and other details of services you have purchased from us or which you have provided to us.
- **Profile Data:** This refers to information included in your personal profile on our website or which is provided through our service (including any profile data from any third party profile, such as GitHub or Stackoverflow) and may include your name, geographical location, email address, profile picture, gender, date of birth, interests, employment details and history;
- **Evaluation Data:** this refers to any personal information collected or generated in respect of any evaluation of any code challenge or coding or other test undertaken by you as a Candidate, Applicant or Developer, or submitted by you as an Uber Developer;
- **Usage Data:** This refers to data about your use of our website or services. This data may include IP address, your log in data, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use;
- **Marketing and Communications Data** may include your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Recruitment preferences:** this refers to your consent to sharing data with the Geektastic Hirers for recruitment purposes.

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.

We do not collect any **Special Categories of Personal Data** about you. Special Categories of Personal Data 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.

### 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 or to receive services from you). In this case, we may have to cancel an order for a service you have with us but we will notify you if this is the case at the time.

### Telling us if your personal data changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed by changing your account details (or by contacting us directly) if your personal data changes during your relationship with us (for example, if your contact details have changed).

## Other people's personal data

Please do not provide us with any other person's personal data, unless we ask you to do so.

### 3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect personal data from and about you, as follows

**Direct interactions.** You may give us your Identity, Contact, Profile and Financial Data by filling in forms, posting information to your account on the site or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply to be a Developer or Uber Developer;
- join the platform as a Hirer;
- create and register an account on our website as a Developer, Uber Developer or Hirer;
- fill in any form or provide any information on our site;
- subscribe to our service or any publications we provide;
- use our service;
- request marketing to be sent to you;
- enter a competition, promotion or survey;
- communicate with us (including by telephone); or
- give us some feedback.

**Automated technologies or interactions.** As you interact with our website or use our services, we may automatically collect Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, third party tracking pixels such as Facebook and LinkedIn to allow us to optimise our advertising, server logs and other similar technologies. Please see our cookie policy for further details.

**Third parties or publicly available sources.** We may receive personal data about you from various third parties (which may include public sources) as set out below:

- Identity and Contact Data in respect of Candidates from Hirers;
- Evaluation Data from Uber Developers;
- Profile Data from publicly accessible third party providers, such as GitHub and Stackoverflow. Developers can choose to add such Profile Data to their personal profile on the Service.
- Usage Data from the following parties:
  - (a) analytics providers, such as Google Analytics or Heap Analytics based inside or outside the EU;
  - (b) advertising networks such as Facebook and LinkedIn based inside or outside the EU; and
  - (c) search information providers such as Google based inside or outside the EU.
- Identity, Contact, Financial and Transaction Data from providers of technical, payment and accounting services.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### 4. HOW WE USE YOUR PERSONAL DATA

#### Introduction

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

- Where we need to perform the **contract** we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a **legal or regulatory obligation**.

Generally we do not rely on **consent** as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message or where

we are required to have your consent by law. We also ask for your consent before sharing any personal data with the Geektastic Hirers for recruitment purposes. You have the right to withdraw consent at any time.

### 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register and open an account for you as a Hirer, Developer or Uber Developer	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (the proper administration of our website and service; keeping our records up to date)
Where you are an Applicant, to assess whether you are to be accepted as a Developer	(a) Identity (b) Contact (c) Evaluation	Necessary for our legitimate interests (the proper administration of our website and service; keeping our records up to date, the maintenance of standards in our Developer community and service)
Where you are a Developer, to assess whether you are suitable for any job vacancies	(a) Identity (b) Contact (c) Evaluation (d) Recruitment Preferences	(a) Consent (for disclosing personal data to the Geektastic Hirers) (b) Necessary for our legitimate interests (the proper administration of our website and service; keeping our records up to date, the maintenance of standards in our Developer community and service)
Where you are a Developer, to assess whether you are to be accepted as an Uber Developer	(a) Identity (b) Contact (c) Evaluation	Necessary for our legitimate interests (the proper administration of our website and service; keeping our records up to date, the maintenance of standards in our Developer community and service)
Making our services available and providing services through our site	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Profile (g) Evaluation (h) Recruitment preferences	(a) Performance of a contract with you (b) Necessary for our legitimate interests (the proper administration of our website and service; keeping our records up to date; providing our services; running our business; being efficient about how we fulfil our contractual duties; being efficient in matching Developers to Hirer's requirements; maintaining standards of our Developer community)
To process, receive and make payments in relation to services ordered through our site or service: (a) Manage payments, fees and	(a) Identity (b) Contact (c) Financial	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

charges (b) Collect and recover money owed to us	(d) Transaction (e) Salary	
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) Recruitment preferences	(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 customers use our products/services)
To enable you to take part 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 customers use our products/services, to develop them and grow our business)
To administer and protect our business and our website (including troubleshooting, data analysis, back-ups, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Usage (d) Profile (e) Transaction (f) Financial	(a) Necessary for our legitimate interests (for running our business, operating our website and IT systems, provision of administration and IT services, network security, enforcement of our legal rights and defending of legal claims; insuring our business; protection of our business against risks; prevention of fraud and in the context of a business reorganisation or group 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	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To determine what goods, services or offers may be of interest to you	(a) Identity (b) Contact (c) Usage (d) Profile (e) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
To make suggestions and recommendations to you about the	(a) Identity	(a) Necessary for our legitimate interests (to develop our products/services and grow

goods or services that may be of interest to you	(b) Contact (c) Usage (d) Profile (e) Marketing and Communications	our business) (b) Consent (where required by law)
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## Marketing

### What can we do?

We are only allowed to use your personal data to send you marketing messages if:

- you have specifically requested that information from us (such as a request for a brochure or further information), or:
- in respect of **unsolicited marketing messages** (i.e. marketing information you have not specifically requested), if you have given your consent; or we have a legitimate interest in doing so (which is not overridden by your interests or fundamental rights). Our legitimate interest here is to develop and grow our business.

We are required by law to follow special rules for sending unsolicited marketing messages by electronic means, such as email or text. Generally we cannot do this without your specific consent. We do not need your specific consent if:

- you are a business user; or
- we obtained your personal data:
  - in the course of a sale of our services to you; or
  - when you contacted us in connection with purchasing our services (e.g. you have asked us for details of our services);

and our marketing messages are for similar products or services and we have given you the opportunity to refuse or opt out of the marketing.

### Third-party marketing

We will not share your personal data with any other company for third party marketing purposes without your express opt-in consent.

### Opting out

You have the right at any time to ask us to stop sending you marketing messages. You can do this by:

- logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences; or
- by following the opt-out links on any marketing message sent to you; or
- by contacting us at any time.

If you opt out of receiving some or all of our marketing, we will retain your Marketing and Communications Data for our records in order to ensure that we know that you have opted out.

If you change your mind after opting out, you can update your choices at any time by contacting us or logging into the website and adjusting your marketing preferences.

## 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. For more information about the cookies we use, please see our Cookies Policy.

## Change of purpose

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

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the

legal basis which allows us to do so.

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

## 5. DISCLOSING YOUR PERSONAL DATA

### Disclosing your personal data to others

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

- Service providers who provide:
  - IT hosting services. Currently we host our data on dedicated servers with OVH in France (further details here: <https://www.ovh.co.uk/personal-data-protection>)
  - IT systems administration services and logging tools;
  - Cloud based accounting software services for invoicing;
  - Online payment services for management of card payments;
  - Payment processing for fees payable to Uber Developers and our suppliers;
  - CRM system services for managing user data, communications and contact preferences;
  - Management of our advertising and marketing communications, including email
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities
- The Geektastic Hirers for recruitment services;
- 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.

Our carefully selected partners and service providers may process personal information about you on our behalf as described below:

#### Digital Marketing Service Providers

We periodically appoint digital marketing agents to conduct marketing activity on our behalf, such activity may result in the compliant processing of personal information. Our appointed data processors include:

- (i) Geeky Tech Ltd Co. 11059399. You can contact Geek Tech and view their privacy policy here: [www.geekytech.co.uk](http://www.geekytech.co.uk), Data Protection Officer can be emailed at: [team@geekytech.co.uk](mailto:team@geekytech.co.uk)

#### Requirements for our third party service providers

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.

#### Other disclosures we may make

We may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure



## 6. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

We generally do not transfer your personal data outside the European Economic Area (EEA).

However if at any time, any 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, we will ensure at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/eu-us-privacy-shield_en)

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

Please note that personal data you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

## 7. HOW WE KEEP YOUR PERSONAL DATA SECURE

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We do not permit Uber Developers to see any personal data (such as Identity or Contact data) of any Applicant, Developer or Candidate when evaluating code challenges. All code challenges are provided to Uber Developers for evaluation on an anonymised basis.

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.

## 8. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

### How long will you use my personal data for?

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

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

We will retain your personal data as follows:

- Personal data held by our third party suppliers of our system administration and logging tools will be held for a maximum of one month;
- Personal data held by our other third party suppliers shall only be held for such period as they are providing their services to us (subject to any longer retention period required for legal, regulatory, and/or reporting reasons);
- Personal data of Applicants, Developers, and Hirers will be retained by us for so long as you are using our service and for a minimum period of one year and maximum period of 6 years afterwards in order to:
  - Respond to questions or complaints
  - demonstrate that we treated your personal data fairly and in accordance with the law;
  - maintain our records for the proper administration of our business;

Please note that we expect to retain personal data of unsuccessful Applicants for no longer than one year after the unsuccessful Applicant ceases using our service.

We will determine the period of retention based on 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. Where we have not specified a specific retention period, we will use these criteria to determine the period of retention of your data.

### Exceptions

In some circumstances you can ask us to delete your data: see **Erasure of Data** below for further information.

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.

We may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another person.

## 9. YOUR LEGAL RIGHTS

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data. A summary of those rights is set out below.

### Your rights

- **Access to data:** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Correction of data:** 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.
- **Erasure of data (right to be forgotten):** This enables you in some circumstances to require 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. In particular we do not have to comply with your request and can continue to retain your personal data for the establishment, exercise or defence of legal claims;
- **Object to processing:** This enables you to object to processing of your personal data where we are relying on our legitimate interests (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.
- **Restriction of processing:** 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.
- **Transfer of data (data portability):** In certain cases you have the right to request the transfer of your personal data to you or to a third party. Where this applies, 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 that this right only applies (i) to data you provided to us (ii) which is processed by automated means; and (iii) which you provided consent for us to use or where we used the personal data to perform a contract with you.
- **Withdraw consent:** You may 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.

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). We may charge a reasonable fee, however:

- to provide you with additional copies of your personal data; or
- if your request to exercise any of your rights is unfounded 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.

#### **Your right to complain**

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**). The ICO is 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.