



THE WALSINGHAM COLLEGE TRUST ASSOCIATION LTD

Privacy Policy

January 2024

Introduction

This Privacy Policy explains how personal data is collected and used by The Walsingham College Trust Associated Ltd, a charity registered in England and Wales with Charity Number: 215863, and with Company Number: 00318358, and any other entities within our group or under common ownership from time to time, including but not limited to Shrine Trading Limited (Company Number: 05815544) (referred to as “WCTA”, “we”, “us”, “our” throughout this Privacy Policy).

At WCTA, we respect your privacy and are committed to protecting your personal data. We take data protection very seriously and will ensure that we uphold the trust that our customers and others place in us when they provide us with their personal information.

This Privacy Policy will inform you as to how we collect, use, handle and disclose your personal data, as well as telling you about your privacy rights and how the law protects you. If you need any more information about our data protection practices, please contact us using the details below.

This Privacy Policy contains the following sections:

1. Important information
2. Data protection principles
3. How we collect information about you
4. What information we collect and how we use it
5. Disclosures of your personal data
6. International transfers
7. Data security
8. Data retention
9. Your legal rights
10. Glossary

Please use the Glossary to understand the meaning of some of the terms used in this Privacy Policy, including “**personal data**” and “**personal information**”.

1. Important information

1.1 Purpose of this Privacy Policy

1.1.1 This Privacy Policy aims to give you information on how WCTA collects and processes your personal data, including any data you may provide when you:

- (a) contact us via e-mail, telephone, post or through social media or any data that you provide through this website (<https://www.walsinghamanglican.org.uk>) or via our online shop (<https://www.shrineshoponline.co.uk>) (together “**our websites**”);
- (b) when you attend any of our services, or otherwise visit The Shrine of our Lady of Walsingham (the “**Shrine**”);
- (c) when you organise a pilgrimage, or organise a school or other educational visit, to the Shrine or our other facilities;
- (d) when you arrange to stay with us at the Shrine, or to use or stay at any of our other facilities;
- (e) when you attend any events which are organised or otherwise put on by us or third parties on our behalf;

- (f) when you apply to become a member of the Shrine, or otherwise interact with us in administering your membership with the Shrine;
- (g) when you apply for an entry to be made into The Chantry Book, or for a Lamp of the Holy House;
- (h) purchase any products or services from us via our online shop located at (<https://www.shrineshoponline.co.uk>);
- (i) when you access or create an account on any of our websites;
- (j) when you subscribe to our publications, fundraising appeals and/or other materials;
- (k) when you make a donation to the Shrine, or any of our other charitable appeals or initiatives;
- (l) when you volunteer with us, whether at the Shrine, or in any other capacity – please also note our employee and volunteer privacy notice in this respect; or
- (m) when you interact with us in person, or otherwise engage with us or get in contact with us.

1.1.2 Unless expressly stated otherwise, this website is not intended for children, and typically, we do not knowingly collect data relating to children through our website. However, we will on certain occasions collect and process personal data in respect of children (being those under the age of 18) by other means, for example in respect of youth pilgrimages. Where we do collect and process data of those under 18, we will only do this where:

- (a) it is necessary for our legitimate interests (or those of a third party) and the data subjects interests and fundamental rights do not override those interests;
- (b) where we need to comply with a legal obligation; or
- (c) where we have obtained consent to the collection of such personal data – for example, by means of a consent form.

1.1.3 We may collect the following types of personal data in respect of those under 18 in accordance with clause 1.1.2:

- (a) name;
- (b) age;
- (c) photographic and other consents from the data subject or their parents;
- (d) where we have obtained parental consent – certain categories of Special Categories of Personal Data, such as details collected on medical forms for events (such as our Youth Pilgrimage).

If we collect personal data from, or in relation to, those under the age of 18, we will and have put in place additional technical and organisational measure to further increase the security which is afforded to this personal data, to reflect the additional protection we must provide to the personal data belonging to those under the age of 18.

1.1.4 It is important that you read this Privacy Policy 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 Policy supplements the other notices and is not intended to override them.

1.2 Controller

1.2.1 WCTA is the “controller” for the purposes of data protection law, and is therefore responsible for your personal data.

1.2.2 As part of our commitment to you, we have appointed a data compliance manager who is responsible for overseeing questions in relation to this Privacy Policy and WCTA’s data protection compliance in general. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights (see section 9 below), please contact the data compliance manager using the following details:

Contact details

E-mail address: shrineoffice@olw-shrine.org.uk

Telephone number: 01328 824200

- 1.2.3 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.3 Changes to the Privacy Policy and your duty to inform us of changes

- 1.3.1 This version was last updated in January 2024.
- 1.3.2 We keep this Privacy Policy under regular review and may amend it from time to time.
- 1.3.3 Data protection law in the United Kingdom has recently changed following the UK's exit from the European Union, with the UK now directly responsible under its domestic jurisdiction for the implementation of the General Data Protection Regulation (*EU* 2016/679) (“**GDPR**”). This implementation includes, but is not limited to, both the Data Protection Act 2018 and the UK's retained EU law version of the GDPR (“**UK GDPR**”).
- 1.3.4 Although this Privacy Policy sets out your rights under the UK GDPR, there may be some further changes as the UK implements the transition from the GDPR to the UK GDPR, and this Privacy Policy will need to be reviewed and updated on an ongoing basis to ensure compliance. Please check back regularly to view the latest version. Hard copies of this Privacy Policy are available from us on request.
- 1.3.5 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1.4 Third-party links

Our websites 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, save for where these links are to our own websites, information or connected entities, and we are not responsible for their privacy statements. When you leave our websites, we encourage you to read the privacy policy or notice of every website you visit.

2. Data protection principles

2.1 WCTA adheres to the principles set out in data protection legislation when handling personal data. These principles require personal data to be:

- 2.1.1 processed lawfully, fairly and in a transparent manner.
- 2.1.2 collected only for specified, explicit and legitimate purposes.
- 2.1.3 adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
- 2.1.4 accurate and where necessary kept up to date.
- 2.1.5 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.
- 2.1.6 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.
- 2.1.7 not transferred to another country without appropriate safeguards being in place.
- 2.1.8 made available to data subjects and allow data subjects to exercise certain rights in relation to their personal data.

We are also responsible and accountable for ensuring that we can demonstrate compliance with the data protection principles listed above.

3. How we collect information about you

3.1 Collection of personal data

- 3.1.1 We may collect, use, store and transfer different kinds of personal data about you. We collect and process personal data about you when you:
 - Contact us via e-mail, telephone, post, our websites, or via social media, or otherwise submit any enquiry to us via any forum or communication method;
 - register for, or access, an account on any of our websites;

- subscribe to any of our publications, insights, newsletters, fundraising appeals, informative material or other communications (including email communications);
 - provide us with your details at, or in advance of, any event, including providing us with any preliminary information to assist with the provision of our products, services, or initiatives, or us attending to you when you attend one of our events (including any pilgrimages or educational and school visits);
 - liaise with us, or otherwise organise any visit to the Shrine, or any of our other facilities, including any pilgrimages, and any school or educational visits;
 - attend any event organised or run by us, including any services, pilgrimages, school or educational visits, or any other events where we are otherwise involved (including in-person and virtual or remote events), whether at the Shrine or otherwise;
 - enquire about becoming, or become, a member of the Shrine, including where we thereafter need to contact you in respect of your membership, or otherwise administer your membership;
 - make a donation to us, whether in respect of the Shrine or any other charitable causes, appeals or initiatives that we operate from time to time;
 - enquire about an entry in The Chantry Book, or about a Lamp of the Holy House, and (if applicable) when we administer such an entry or the provision of a lamp;
 - enquire about, or place an order for any products which are listed on our online shop from time to time;
 - are billed by us for our products from our online shop, whether this is done separately from you placing your order or otherwise;
 - enquire about, or make a reservation to stay with us at the Shrine or one of our other facilities;
 - actually stay with us, either at the Shrine, or at one of our other facilities;
 - are billed by us when you stay with us at the Shrine, or at one of our other facilities;
 - volunteer with us, whether at the Shrine, at any of our other facilities, or at any other initiative, event or programme which we are involved with from time to time; or
 - otherwise engage with us in any other way which is not listed above.
- 3.1.2 Personal data is usually collected from you through direct interaction with us (either in person, by phone, by e-mail, by post, via social media or through our websites). For example, you will provide your personal information when you enquire about any of our services, pilgrimages, educational visits or memberships through our websites.
- 3.1.3 We may collect personal data from third parties, including through your LinkedIn, Twitter or other online profiles, or from other businesses, agents or sub-contractors that we work with and collect personal data about you, who have provided your personal information to us, either with your consent or on some other lawful basis.
- 3.1.4 We may also collect personal data when you use our websites, through automated technologies, analytics providers or search engine providers. We use cookies to assist the site running as effectively as possible. For further details, please see the Cookies Policy set out on our website.

3.2 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of our contract with you, and you fail to provide that data when requested, we may not be able to provide any contract with you, or provide our services to you. If so, we may have to terminate our contract with you, but we will notify you if this is the case at the time.

4. What information we collect and how we use it

- 4.1 We may collect, use, store and transfer different kinds of personal data about you through the interactions set out above.
- 4.2 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 under data protection law, as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate data about your use of the website to calculate the percentage of users accessing a specific feature on our websites. Likewise, we may aggregate data that we collect through providing our services to you, for example in order to produce benchmarking reports. However, if

we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

4.3 We generally will not collect or process **Special Categories of Personal Data** (as defined in the Glossary) about you at any time. However, we may sometimes need to collect this type of personal data where we require this information in order to perform the contract we are about to enter into, or have entered into, with you. Where we require this information:

4.3.1 we will set out clearly and explicitly in writing what personal data we require from you, and the purposes for which that personal data will be used for;

4.3.2 we will only process that personal data where we have your explicit consent to do so; and

4.3.3 we will not process or otherwise use that personal data for any other purpose unless we have first obtained your explicit consent to do so.

4.4 Lawful basis for using your information

4.4.1 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:

- 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 obligation.
- Where it is necessary in order to protect your vital interests, or those of another natural person.

4.4.2 We may process your personal data for more than one lawful ground depending on the specific purposes 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:

Types of Data	Collection	How we use your data	Lawful basis for processing
Contact details including your name, address, job title, date of birth, telephone number, e-mail address, account log-in details for WCTA websites, and social media details.	Personal data is collected through direct interaction with you, including (but not limited to) where you make an enquiry of us, attend an event organised by us, or with which we are otherwise involved, organise or take part in any pilgrimage, school or educational event, visit the Shrine, place an order for our products, subscribe for any of our informative materials, fundraising appeals or publications, apply for a membership with or become a member of, the Shrine, apply for an entry in The Chantry Book or for a Lamp of the Holy House, make a donation to us or one of our charitable initiatives, volunteer with us, stay at the Shrine or any of our other locations, contact us directly, and additional information (for example, to verify your identity) may be collected from third parties, such as publicly available sources).	Provide you with the events and services you have organised with us or subscribed for, provide you with products you have ordered from us, or information you request from us, contact you by post, e-mail, telephone and via social media, administering your membership with us, administering your donations, administering your application for a Chantry Book entry or Lamp of the Holy House, administer and provide your stay with us, keeping a record of your relationship with us, respond to any enquiries that you submit to us, provide you with access to our relevant materials, publications, insights and newsletters, generally administer our relationship with you, provide support (including investigating complaints), send you information by post or e-mail about new services, offers, updates and news, comply with our legal and regulatory obligations.	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests

<p>Payment information, including credit/debit card details and bank account details.</p>	<p>Personal data is collected through direct interaction with you, either through our websites or otherwise, for example, when you pay for our products and/or any services we provide to you, when you pay for and renew your membership with us, when you make donations to our charitable initiatives and appeals, and when you make specific one-off donations, or donations for a specific purpose, such as The Chantry Book.</p>	<p>Provide you with your membership with us and/or to the Shrine, provide you with the products, services, events, publications and information that you request from, or organise with, us, process any financial transactions (including collection of payments, donations, the management of any additional charges and fees and administration of any refunds), prevent and detect fraud, provide support (including investigating complaints), personalise your experience on our website, comply with our legal and regulatory obligations.</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation</p>
<p>Contact history, such as any communications with us by telephone, e-mail, post, through our websites or via social media.</p>	<p>Personal data is collected through direct interaction with you, including (but not limited to) when you apply for or hold a membership with us, organise and/or attend any event with which we are involved (such as a pilgrimage, or a school or educational event), visit the Shrine, place an order for our products, services or publications, contact us through our websites or social media, subscribe to any of our publications, or by telephone, post or email, when you volunteer with us, or when you make a donation to us or any of our charitable initiatives or appeals.</p>	<p>Keep a record of your relationship with us (including any volunteering record), respond to any enquiries that you submit to us, generally administer our relationship with you, administer your membership with us, administer your donation history with us, review and improve our services, materials and publications, provide support (including investigating complaints), comply with our legal and regulatory obligations, train our staff and carry out quality control.</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (c) Necessary to comply with a legal obligation</p>
<p>Transaction history, including information about any previous products and/or services you have purchased from us, and materials, newsletters or publications to which you have subscribed.</p>	<p>Personal data is collected through direct interaction with you including (but not limited to) when you attend any of our events, organise any event with us (such as a pilgrimage or educational event), or attend events with which we are involved, visit the Shrine, apply to be or become a member with us, make any donation to us or any of our appeals or initiatives, place an order for any of our products and/or services, subscribe or register for our publications, newsletters, insights, email communications, or to receive updates.</p>	<p>Keep a record of your relationship with us, respond to any enquiries that you submit to us, generally administer our relationship with you, contact you by post, e-mail, telephone and via social media regarding your membership or the products, services and information that you have requested from us, review and improve our memberships, services, materials and publications, review any donations you have made to us or our initiatives in the past, review the events you have previously attended, provide support (including investigating complaints), provide you with information in relation to any of our events, personalise your experience on our website, generate customer lists to identify general trends and create generic customer profiles so we can identify similar individuals which may be suitable for our general purposes, and to inform our marketing strategy.</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests</p>
<p>Marketing preferences</p>	<p>Personal data is collected when you register for our materials, publications, newsletters, insights, fundraising appeals, email</p>	<p>Keep a record of your relationship with us, provide you with access to our relevant materials, publications, insights and newsletters, review and improve our services and</p>	<p>(a) Consent (b) Necessary for our legitimate interests</p>

	communications, or to receive updates.	publications, provide you with information in relation to any of our events, send you information by post or e-mail about new services, offers, updates and news, personalise your experience on our website, generate customer lists to identify general trends and create generic customer profiles so we can identify similar individuals which may be suitable for our general purposes, and to inform our marketing strategy.	
Technical data such as internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, session replay data and other technology on the devices you use to access the website	Personal data is collected through automated technologies or interactions, from analytics providers or search information providers.	Create and administer your account on our website, administer and protect the websites and our organisation (including troubleshooting, data analysis, testing and system maintenance and network security), prevent and detect fraud, use data analytics to improve our websites, marketing, customer relationships, user experience and our organisation in general, personalise your experience on our website, allow you to participate in any interactive features on the website.	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud)
Health and safety data such as accident book records, RIDDOR, and any other applicable health and safety data and documentation	Personal data is collected through our interactions with you, when you visit any of our premises, or attend any events hosted, organised or otherwise arranged by us.	Keep a record of your relationship with us, generally administer our relationship with you, provide support (including investigating complaints), comply with our legal and regulatory obligations, contacting you by post, e-mail, telephone and via social media regarding any information that you have requested from us.	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation. (c) protection of your vital interests.

4.5 Generally, we do not rely on consent as a legal basis for processing your personal data other than, where necessary and applicable, in relation to sending direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

4.6 Marketing and fundraising

4.6.1 We may use your identity, contact, technical, usage or 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 what products, services and events may be relevant for you. We may also use such data to provide you with information on our fundraising and other charitable projects, initiatives and programmes from time to time. You will receive marketing and fundraising communications from us:

- (a) where we are permitted to send marketing and/or fundraising communications at law, and it is within our legitimate interests to provide you with such information; and/or
- (b) if you have requested information from us or purchased products or services from us and you have not opted out from receiving that marketing or fundraising information; and/or
- (c) you have otherwise consented to receive marketing and/or fundraising communications from us.

4.6.2 We will not share your information for marketing purposes with any company or other entity outside of WCTA, unless we have your opt-in consent to do so.

4.6.3 You can ask us or third parties to stop sending you marketing messages by contacting us at any time or clicking the “unsubscribe” button in the relevant e-mail.

- 4.6.4 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us:
- (a) as a result of you making a donation;
 - (b) for events with which we are involved, including any pilgrimages or education events, or for products or services that you have with us, or have received from us;
 - (c) when you visit the Shrine;
 - (d) when you apply to become, or actually become, a member with us; and/or
 - (e) when you volunteer with us.

4.7 Change of purpose

- 4.7.1 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.
- 4.7.2 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.
- 4.7.3 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.

4.8 Cookies

For more information about the cookies we use, please see the Cookies Policy set out on our website.

5. Disclosures of your personal data

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

- Any third parties we work with to provide you with events, information, publications, memberships, the products and/or services that you have subscribed to or otherwise purchased from us, or any other items which we are provided to you.
- Any third parties who provide administrative assistance to us in our fundraising appeals and activities.
- Our relevant employees, agents, volunteers and assistants who have a business need to know, for example where they are directly engaged in providing you with the events or services you are coming to us to provide.
- Service and infrastructure providers who provide IT, security, software, marketing, advertising and system administration services, including in respect of our website and our booking portals from time to time.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, experts, accountants, insurers and other third parties who provide legal, banking, consultancy, accounting, insurance and other related services.
- HM Revenue & Customs, law enforcement agencies, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Any other entities in the WCTA group that may subsist from time to time.

5.2 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.

5.3 We do not and will not sell your personal data to any third party.

6. International transfers

6.1 Some of our external third party service providers may be based outside the United Kingdom (UK), in which case, their processing of your personal data may involve a transfer outside the UK.

6.2 Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring that 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 under UK law.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection as it has under UK data protection law.
- We may also transfer your personal data outside of the UK where you have provided us with your explicit consent for us to do so.

6.3 Alternatively, we may transfer your personal data outside the UK where data protection law allows or requires us to do so.

6.4 Please contact us if you would like further information on the specific mechanism used by us when transferring your personal data outside the UK.

7. Data security

7.1 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, when WCTA shares your personal data, we limit access to your personal data to those persons, employees, agents, volunteers, assistants, 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.

7.2 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.

8. Data retention

8.1 How long will you use my personal data for?

8.1.1 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. We may retain your personal data for a longer period in the event of a complaint, or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

8.1.2 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.

8.1.3 Details of retention periods for different aspects of your personal data are available on request by contacting us using the details above.

9. Your legal rights

9.1 Under certain circumstances, you have rights under data protection laws 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.

9.2 If you wish to exercise any of the rights set out above, please contact us.

9.3 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.

9.4 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

9.5 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.

10. Glossary

“**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).

“**Special Categories of Personal Data**” means information revealing racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health conditions, sexual life, sexual orientation, biometric or genetic data, and personal data relating to criminal offences and convictions.

LAWFUL BASIS

“**Legitimate interest**” means the interest of our business in conducting and managing our business to enable us to give you the best service 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 privacy 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.

YOUR LEGAL RIGHTS

You have the right to:

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

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

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

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

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.