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1. Important information and who we are

A. Purpose of this privacy notice

This document sets out how we will collect, process and look after data and information about you ('personal data') and how the law protects you. Personal data means any information about an individual from which that person can be identified (so does not include data where the identity has been removed).

This document sets out how we manage privacy generally. We may provide more specific notices about privacy as we collect and process your personal data (if the circumstances require us to do so). Such specific notices may over-ride what is stated in this document (not the other way round), but all documents are intended to be read together.

B. Who we are and Data Privacy Partner

Porter Dodson LLP is the data controller, responsible for protecting your personal data (referred to as Porter Dodson, "we", "us" or "our" in this privacy notice).

We have appointed a Data Privacy Partner, who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, or any request to exercise your legal rights, please contact our Data Privacy Partner at Porter Dodson LLP, The Quad, Blackbrook Park Avenue, Taunton, TA1 2PX (privacy@porterdodson.co.uk).

C. How your privacy is protected

You are protected not just by the law but by our professional duty of confidentiality. This means that all our dealings with you and any personal data we have about you is confidential (and may be the subject of legal professional privilege). Therefore we can promise:

- To keep your personal data safe and confidential;
- Not to sell your personal data.

D. Your duty to inform us of changes

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.

E. Complaints about privacy

You have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator (www.ico.org.uk). However, we would like to resolve complaints ourselves if possible, so please contact us in the first instance.

2. Why we need your data

A. Principal purpose

The principal purpose of collecting, processing and holding your personal data is **to allow us to provide you with legal services and other incidental services.**

B. 'Legal basis' for processing

By law, we must have a good reason ('legal basis') to do this, which can be one or more of the following:

- **Contractual:** the processing is necessary to carry out work you have asked us to do;
- **Legal obligation:** we need to fulfil a legal or regulatory duty which we have;
- **Legitimate interest:** we have a legitimate interest;
- **Consent:** you have given us your consent.

C. Our 'legitimate interests'

A **legitimate interest** is where we have a business or commercial reason to use your data, such as for administrative purposes or to promote our services. However, we must not rely on this legal basis unfairly. If we do rely on it for obtaining your personal data, we will tell you what our legitimate interest is.

D. If you withhold data or consent

Much of the data we ask for is needed to carry out the work you have asked us to do or to meet our legal/regulatory obligations, so **it is likely we will be unable to continue working for you if you do not provide it.** If so, we will tell you at the time.

In general, we do not rely on obtaining your consent as the legal basis for collecting and processing your personal data. If we do, we will make clear that we are seeking your consent, which you will be entitled to withdraw at any time. However, if you do, this may restrict what we are able to do for you.

3. Obtaining data about you

A. What data do we collect?

We may collect, use, store and transfer different kinds of personal data about you. **Further details can be found in Appendix 2.**

We also collect and use anonymous data about clients and potential clients for a variety of purposes. This may be derived from your personal data but is not considered personal data in law as it does not reveal your identity. However, if we combine this with other data about you so that you can be identified (directly or indirectly), the combined data is personal data, which will be used in accordance with this privacy notice.

B. Particularly sensitive data

We may collect and process data which is treated in law as 'special category data' (that is, it is particularly sensitive). If relevant to work we are doing for you, this may include the following:

- **Health** details (physical or mental);
- **Racial/ethnic origin**;
- **Political opinions, religious/other beliefs and sexual life**;
- **Trade union membership**.

The law says that we need to have further justification for handling this type of data. Of the ten permitted reasons, the ones on which we will most commonly rely (if need be) will be these:

- **Legal claims** – where we are pursuing, defending or establishing a legal claim for you;
- **Employment and social security law** – where this is relevant to the work we are doing for you;
- **Health** – where this is relevant to the work you ask us to do;
- **Already public** – where you have already made the data public;
- **Consent** – where we have obtained your explicit written consent.

Similar provisions apply in law to criminal offence data (details of criminal proceedings, actual/alleged offences, and outcomes/sentences). We have to have specific legal authority to handle such data.

C. Sources of data on you

Most of the personal data we obtain about you will come from direct interactions between us, such as:

- Engaging us to do work for you;
- Corresponding with us (by post/phone/email etc.) and filling in forms we provide (including online);
- Subscribing to our marketing updates;
- Giving us feedback.

However, **we may need to obtain information about you from outside sources** (including but not limited to public ones). **A list of examples of such sources is provided in Appendix 3.**

4. How we may use your data

A. Legal basis for processing your data

See Appendix 4 for details of all the ways in which we may use your data, which permitted legal reasons we have for doing so, and what legitimate interests we may have for processing.

Note that we may process your data for a variety of purposes. If you wish to know which legal basis we are relying on in any particular circumstances, please ask.

B. Change of purpose

We will only use your data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If you would like us to explain how we have arrived at such a decision, please ask.

If we need to use your data for an unrelated purpose, we will tell you and explain the legal basis for this.

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

5. Sharing your data with others

A. Why this may be necessary

We only share your data with others in the following circumstances:

- **Fulfilling a contract:** in connection with work we are doing for you; or
- **Legal requirement** (such as anti-money laundering and tax laws); or
- **Professional duty:** to meet our regulatory/legal obligations as solicitors; or
- **Legitimate interest:** we have a legitimate interest in doing so (in running our business).

We would also need to share your data in the unlikely event that the 'data controller' changes. Such a situation would arise if we decided to sell, transfer, or merge parts of our business, or if we acquired/merged with another business. If this happened, the new owner/organisation would become the 'data controller' in law and would be able to use your data in the same way as set out in this document.

B. Categories of people and organisations with whom we may share your data

Please see **Appendix 5** for a list of examples of the types of people and organisations with whom we may share your personal data **if necessary**.

C. Safeguards

If we have to share your data with external organisations, they will be required to keep it confidential and to treat it in accordance with the law. Unless they are a 'data controller' in their own right, **they are not allowed to use the data for their own purposes – in particular for marketing** – but only in accordance with our instructions and for specified purposes. Examples of others who might be a 'data controller' themselves would be a law enforcement agency or a professional/other supplier assisting us with work we are doing for you. Professionals/suppliers who need to be in direct contact with you as part of the work (such as barristers and other experts) will normally provide you with their own privacy notice.

D. If you wish to object

If you do not wish us to share your data with a particular organisation or individual(s), please tell us (in writing). We will respect your wishes unless our legal obligations prevent us from doing so, but **this may limit the work we can do for you**.

E. Electronic identity checks and other checks to prevent/detect crime

In order to comply with the law on money laundering, terrorist financing, and the proceeds of crime, we have to obtain certain information about you in order to:

- Verify your identity;
- Understand the nature and purpose of what you are asking us to do;
- Establish if the work you want us to do is for your benefit or someone else's;
- Establish the source of money to be provided by you/anyone else in connection with the work.

In doing this, **we may need to share your data with companies providing electronic ID verification services**. We may also consult public sources of data on you. **See Appendix 5 for further details**.

F. Sharing your data with law enforcement agencies

In the unlikely event that anything you ask us to do leads us to suspect criminality, we may have to inform law enforcement agencies and pass to them personal data we have about you. An example of this would be the National Crime Agency, to whom we are obliged to report any knowledge or suspicion of money laundering or terrorist financing. **Further details about this can be found in Appendix 5.**

G. Credit checks on you

We may carry out a credit check on you or your business(es) (using a Credit Reference Agency). **Further details about this can be found in Appendix 5.**

6. Using your data for marketing

We may send you marketing information from time to time. However, we will apply the principles below.

A. Marketing where it is in your best interests

- We have a professional duty to act in your best interests (for which we are accountable to our regulator). This means that we will sometimes tell you about a particular product/service/event if we believe it is in your best interests to do so – or a risk to you if we did not tell you.
- An example would be marketing to you about Wills following a major event in your life, such as a conveyancing transaction or divorce, as a new Will is often needed in such circumstances.

B. Other ethical marketing to you

- Sometimes we may tell you about a particular service/product/event even if it is not closely related to work we have done/are doing for you.
- The law allows us to market to you in this way because, as a client of ours (or someone who has shown an interest in our services), you may buy other services from us or through us. So, we have a financial interest in offering you other services/products/events.
- Even with this 'legitimate interest' in marketing to you, we will try to do so only where we think you might be genuinely interested.
- **You can always say no to such marketing if you wish (see below).**

C. Marketing products, services and events not provided by us

- Our marketing may refer to products, services or events offered by others outside Porter Dodson. However, we will simply tell you about their product/service/event and leave you to contact them yourself if you are interested in it.
- **We will never sell or share your data for marketing purposes with others outside this firm.**

D. Saying no to marketing

- If you do not wish to be told about other products and services (whether offered by Porter Dodson or by others), please write to our Data Privacy Partner (address in section 1).

7. Keeping hold of your data and documents

Data and documents which you give us will be held in both electronic and paper form. Anything held electronically will be stored either in the UK or somewhere within the European Economic Area (EEA).

The key points about our approach to holding data and documents for you are set out below. **Further details of our policies on this can be found in Appendix 6.**

A. Important documents/papers

- Apart from Wills, we usually return to you at the end of our work any important/original documents (such as title deeds and share certificates), but we may agree to keep these for you if you ask us to.

B. Work files and other records containing your data

- We will keep these only for as long as necessary. **Normally this will be for at least 7 years** (in case there is a query or complaint about the work we did and in order to comply with various laws).

C. Charging for storage, retrieval and destruction

- We may make a reasonable charge (where relating to documents/papers you ask us to hold for you).

8. Safeguarding your data

As required by law, we take appropriate technical and organisational measures to keep your data secure, such that it is not accessed, altered, used or disclosed in an unauthorised way, or lost. However, this will never entirely eliminate the security risk – in particular when we are communicating with you electronically.

A. Risks of email and other unencrypted forms of communication

- We have to point out that ordinary email, as well as other forms of unencrypted electronic communication (including file transfer tools such as Dropbox), cannot be relied upon as secure.
- **If you choose to use ordinary email to communicate with us – or if you simply provide us with an email address – we will assume you accept the risks of communicating by email and are happy to do so. The same applies if you use another insecure method of communication.**
- **As stated in section 3 of our Terms of Business, we will not be held liable if communications between you and us (in either direction) are intercepted and/or hacked.**

B. Where you choose to share our communications to you with others

Any communication from us to you is meant for you only, and if you choose to share it with anyone else, you may lose the legal professional privilege that normally protects communications between you and us.

C. Security breaches

In the event of a breach of security which could affect your data, we have in place procedures to minimise the effects. The law and our professional obligations require us to consider the possible impact on you and tell you if there is a significant risk to your privacy. We also have obligations to tell the ICO and SRA about security breaches unless the risk to your privacy is minimal.

D. Transfers of your data overseas

It may be necessary to transfer your data overseas. If so, it will only be shared within the European Economic Area (EEA). Such transfers will be made in full compliance with data protection law.

9. Your legal rights

The law on data protection is designed to put you in control of your data, and as such the following rights will apply (in addition to your overall right to be informed):

- **Right of access** to your data;
- **Right to rectification** (to correct any inaccurate/incomplete data we hold about you);
- **Right to erasure** (commonly known as 'right to be forgotten');
- **Right to request restriction** of processing;
- **Right to object** to processing of your data.

Further information on these rights is provided in Appendix 7.

If you wish to exercise any of these rights, please write to our Data Privacy Partner (whose address is provided in section 1). **We will usually process your request (which must be in writing and include proof of your identity) without charge and within 30 days.** However, we are allowed by law to charge a reasonable administration fee and extend the timescale by up to two months if your request is very complex and/or is clearly unfounded, excessive or solely intended to cause a nuisance.

Appendices

1. Definitions

- We' and 'our' refers to Porter Dodson LLP, a limited liability partnership incorporated in England & Wales. We are a 'data controller' within the meaning of the law on Data Protection.
- 'Personal information', 'personal data', or 'data' is information which identifies you or is about you and includes what you tell us about yourself and information about you which others provide to us.
- Abbreviations used:
 - Regulators: **SRA** (Solicitors Regulation Authority); **CILEx** (Chartered Institute of Legal Executives); **FCA** (Financial Conduct Authority);
 - **LeO** (Legal Ombudsman, the official complaints body for firms of solicitors);
 - **HMRC** (HM Revenue & Customs).

2. Types of data we might collect

Category	Examples
• Identity data	• Names, title, gender, maiden name, marital status, date of birth
• Contact data	• Postal address(es), email address(es) and telephone number(s) • Your preferred method(s) of communication
• Financial & tax data	• Bank account and payment card details • National Insurance (NI) & Unique Taxpayer Reference (UTR) numbers
• Business data	• Details of any businesses with which you are connected
• Transaction/usage data	• Details about payments to and from you and details of products/services you have purchased from us
• Marketing & profile data	• Your preferences in receiving marketing from us and your interests, preferences, lifestyle, family, feedback.

3. Outside sources which might provide data about you

- **Persons/organisations directly involved in the work you ask us to do**, such as:
 - Professionals and organisations who introduce you to us (such as financial advisors, estate agents, accountants, bankers, etc.)
 - Anyone representing you (such as attorneys, trustees, agents and intermediaries);
 - Your family, friends, business associates or anyone else linked to the work we are doing;
 - Financial organisations (such as banks/building societies and insurers);
 - Courts/tribunals;
 - Government agencies (such as HM Revenue and Customs (HMRC) and the Land Registry);
 - Healthcare professionals, social and welfare organisations;
 - Your employers (current, past or prospective);
 - Fraud prevention agencies;
 - Technical data providers associated with visits to our website (such as Google/other search providers, advertising networks which link you to our website etc).

Privacy policy for clients and potential clients

- **Organisations with which we work** in order to run our business, such as:
 - Credit reference agencies (see Appendix 5D);
 - Debt collection, tracing agencies and private investigators;
 - Market researchers (such as for obtaining feedback on client satisfaction).

4. Our legal bases for processing

We have set out in the table below a description of all the ways in which we may use your personal data and which reasons allowed in law we have for doing so. The table also shows what our legitimate interests for processing are (where appropriate).

How we will use your information	Types of data	Legal basis for processing <i>(including what our legitimate interest is, if any)</i>
1. To record you as a client/potential client.	<ul style="list-style-type: none"> • Identity • Contact 	<ul style="list-style-type: none"> • Fulfilling a contract with you.
2. To carry out your instructions and deliver the work you ask us to do, including: <ol style="list-style-type: none"> a. Providing advice tailored to your circumstances; b. Instructing professionals/others to act for you; c. Introducing you to others who can help you to achieve what you want; d. Obtaining data about you from others; e. Managing on your behalf any payments and fees you have to pay; f. Collecting money owed to you; g. Bringing/defending legal claims for you; h. Liaising with official bodies on your behalf (such as courts, tribunals, registries, government bodies, tax authorities); i. Identifying and managing risks for you which come to light. 	<ul style="list-style-type: none"> • Identity • Contact • Financial/tax • Business • Transaction/usage • Marketing & profile 	<ul style="list-style-type: none"> • Fulfilling a contract with you. • To comply with regulations which apply to us.
3. To manage our relationship with you or your business, including: <ol style="list-style-type: none"> a. Asking you to provide feedback; b. Responding to complaints and seeking to resolve them; c. Notifying you about relevant changes to the way in which we work (such as who is involved in your work, our basis of charging, and our terms of business); d. Collecting money you owe us. 	<ul style="list-style-type: none"> • Identity • Contact • Profile • Marketing & profile 	<ul style="list-style-type: none"> • Fulfilling a contract with you. • To comply with a legal obligation. • In our legitimate interests (to recover money owed to us). • In our legitimate interests (to keep our records updated and to study how clients use our products/ services).
4. To run our business properly and efficiently, including: <ol style="list-style-type: none"> a. Maintaining accounts and records; b. Managing risk for our business; c. Managing our financial position and business capability; d. Business planning; e. Corporate governance and audit; f. To obey applicable laws/regulations; g. Communications & training. 	<ul style="list-style-type: none"> • Identity • Contact • Technical 	<ul style="list-style-type: none"> • In our legitimate interests (for running our business). • To comply with the law and regulations which apply to us.

Privacy policy for clients and potential clients

How we will use your information	Types of data	Legal basis for processing (including what our legitimate interest is, if any)
<p>5. To tell you about relevant products/ services:</p> <p>a. Suggest other products/services that you may need (to manage risk for you) or may be of interest to you;</p> <p>b. Provide advice or guidance about our products/services and those of other organisations (where relevant);</p> <p>c. Otherwise carry out marketing activities to promote our services.</p>	<ul style="list-style-type: none"> • Identity • Contact • Usage • Marketing & profile 	<ul style="list-style-type: none"> • Fulfilling a contract with you. • To comply with our professional obligation to act in your best interests. • In our legitimate interests (to grow our business and develop our products/services).
<p>6. To prevent/detect financial crime, such as:</p> <p>a. Money laundering;</p> <p>b. Terrorist financing;</p> <p>c. Property & mortgage fraud;</p> <p>d. Tax evasion;</p> <p>e. Financial sanctions.</p>	<ul style="list-style-type: none"> • Identity • Contact • Financial/tax • Business • Transaction/usage 	<ul style="list-style-type: none"> • To comply with the law and regulations which apply to us.
<p>7. To improve our business by:</p> <p>a. Developing our own products/ services and the way we deliver them;</p> <p>b. Managing how we work with other organisations that provide products/ services that our clients need;</p> <p>c. Developing new ways to meet our clients' needs and to grow our business.</p>	<ul style="list-style-type: none"> • Identity • Contact • Business • Transaction/usage • Marketing & profile 	<ul style="list-style-type: none"> • In our legitimate interests (to develop products and services, and what we charge for them).

5. Examples where we might share your data with others

A. Categories of people and organisations with whom we may share your data

- **Persons/organisations directly involved in the work you ask us to do**, such as:
 - Other professionals (such as barristers, medical experts, estate agents, bankers, accountants, surveyors, financial advisors);
 - Organisations that introduce you to us or to which we introduce you;
 - Anyone representing you (such as attorneys, trustees, agents and intermediaries);
 - Your family, friends, business associates or anyone else linked to the work we are doing;
 - Financial organisations (such as banks/building societies and insurers);
 - Courts/tribunals;
 - Government agencies (such as HMRC and Land Registry);
 - Healthcare professionals, social and welfare organisations;
 - Your employers (current, past or prospective);
- **Regulatory authorities**, such as:
 - The SRA (our regulator) and CILEx (the regulator for Legal Executives);
 - Information Commissioner's Office (ICO – the data protection regulator);
 - Legal Ombudsman (LeO – the complaints body for solicitors);
 - Financial Conduct Authority (FCA – the financial services regulator);
- **Law enforcement authorities**, such as:
 - National Crime Agency (NCA – if we suspect money laundering or terrorist financing);
 - HM Treasury (in connection with UK and international financial sanctions);
 - The Police or HMRC (if fraud is suspected);

- **Organisations with which we work** in order to run our business, such as:
 - Our suppliers and service providers;
 - Other professionals (such as our own advisors, auditors, insurers and bankers);
 - Trade associations and professional bodies (such as The Law Society, Resolution);
 - Credit reference agencies (see below);
 - Debt collection, tracing agencies and private investigators;
 - UK Financial Services Compensation Scheme;
 - Market researchers (such as for obtaining feedback on client satisfaction).

B. Electronic identity checks and other checks to prevent/detect crime

a) Legal requirement to check your identity

In order to comply with the law on money laundering, terrorist financing, and the proceeds of crime, we need to obtain evidence of your identity. We do this when you first ask us to work for you and we will usually repeat the process for each piece of work you ask us to do in future.

b) Electronic checks on your identity

We will request ID documents from you but in many situations we will also carry out an electronic check on your identity, using an electronic verification provider ('EV provider'). This will involve us sharing your personal data with the EV provider.

c) Other checks the law requires us to do

The law requires us to ask questions and obtain data/documents (from you, others or public sources) – as much as we reasonably need – to be able to do the following:

- To understand the nature and purpose of what you are asking us to do;
- To establish if the work you want us to do is for your benefit or someone else's;
- To establish the source of money to be provided by you/anyone else in connection with the work.

d) The data we will need

These are some of the kinds of personal data that we will need in order to confirm your identity:

- Name;
- Date of birth;
- Address(es) (current and recent);
- Contact details (such as email addresses and phone numbers);
- Unique numbers from ID documents (such as passport number, driving licence number).

Where you have asked us to assist you with a transaction, we will need to understand how you are funding it. This means we will need:

- Details of your financial circumstances (including employment);
- Proof of the existence and source of each part of the funding;
- Proof of the identity of anyone other than you who is providing money.

We have to keep all of this information under review as work progresses.

e) If we are unable to complete our checks

If we are unable to obtain all of the information we need (whether to prove your identity or carry out any of the other procedures required), we will not be able to work for you.

f) What we will do with the data we obtain

- Confirm your identity;
- Help prevent fraud, money-laundering and terrorist financing;
- Comply with UK and international financial sanctions;
- Carry out the work you have asked us to do (that is, to fulfil our contractual obligations to you).

C. Sharing your data with law enforcement agencies

If we know or suspect that any legal work for you may involve money laundering, terrorist financing or a similar offence, we may be required by law to disclose your data to the National Crime Agency. Similarly if the work will breach UK or international sanctions, or involves fraud/other criminal offences, we may be required to tell other law enforcement agencies, who will then have access to your data. This is to support their duty to detect, investigate, prevent and prosecute crime. If this happens, we will not be able to tell you that we have told them and we may have to stop working for you without being able to say why.

D. Credit Reference Agencies (CRAs)

We may carry out a credit check on you or your business. If we do, we will share your data with the CRA and they will give us information about you. The data we exchange can include:

- Name, address and date of birth;
- Unique numbers from ID documents (such as passport number, driving licence number);
- Public information (from sources such as the electoral register and Companies House).

We will use this data to:

- Make sure what you've told us is true and correct;
- Assess whether you or your business is able to afford to pay our fees;
- Help detect and prevent financial crime;
- Manage your relationship with us;
- Trace and recover debts.

Other points to note:

- We may share your personal data with CRAs for as long as you are a client;
- If we do a credit search on you or your business, the CRA will note it on your credit file;
- You can find out more about the main CRAs (Experian, Equifax and Callcredit) on their websites.

6. Data retention: how we hold your data and documents

A. Keeping important/original documents and papers

Apart from Wills, we usually return to you at the end of our work any important/original documents (such as title deeds and share certificates), but we may agree to keep these for you if you ask us to.

If we agree to hold an important/original document for you, in some cases this may only be for a certain length of time (agreed in advance). In other cases no such fixed period will be put in place, so we may end up holding the document for many years. If so, there will come a point when it is no longer appropriate for us to keep it, either because it is no longer valid, important or useful, or because we are no longer willing to store it. In such cases we will try to return it to you, but if we cannot, we may decide to destroy it. In reaching such a decision, we would take into account the date of the document, its contents, and any later documents, as well as your date of birth.

B. Keeping our work files and other records containing your personal information

We will keep our work files (and other records containing your data) only for as long as necessary after finishing our work. Normally this will be for **at least 7 years** (in case there is a query/complaint about the work and to comply with various laws). In some cases we will keep it for much longer (such as for Wills).

When we no longer need to retain a file (or other record containing your data), we will destroy it without telling you, so if there is anything in any of our files or records that you want to keep, please tell us (in writing) before we close the file/record and put it into storage.

C. Charging for storage and destruction

Where we agree to hold any important/original documents for you (such as title deeds, wills and share certificates), we may make a reasonable charge for storage, copying or retrieval. We will not make a charge, though, if the copying or retrieval is part of new work we have agreed to do for you.

For all other documents which we hold (on the files we create whilst doing your work), even though some of these may legally belong to you, we do not charge for their storage or destruction.

7. Your legal rights

A. Right of access (commonly known as a “data subject access request”)

- This enables you to obtain a copy of the data we hold about you and to check our processing is lawful.

B. Right to rectification

- 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.

C. Right to erasure (commonly known as ‘right to be forgotten’)

- 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:
 - a) Where you have successfully exercised your right to object to processing (see below);
 - b) Where we may have processed your information unlawfully; or
 - c) Where we are required to erase your personal data to comply with the law.
- **Note that we may not always be able to comply with your request**, such as where we need the information to complete the work we are doing for you, or to fulfil our legal/regulatory obligations, or to make or defend legal claims. If this is the case, we will tell you at the time of your request.

D. Right to request restriction of processing

- This enables you to ask us to stop processing your 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.

E. Right to object to processing

- This applies in situations where we are relying on having a legitimate interest in processing your data, but where 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.**
- Note that in some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.