

# Feedsy Privacy Policy

## 1. Why do we need a privacy policy and what do the terms used in it mean?

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### 1.1 Who is Feedsy?

Feedsy Pty Ltd ACN 606 000 426 (**Feedsy, we, us** and **our**) respects privacy rights and is committed to protecting the Personal Information it holds.

This Privacy Policy explains how we look after the Personal Information we collect from i) people who visit our website (regardless of where they visit it from) and through our events, sales and marketing activities; ii) customers who use the Feedsy Products and their Feedsters; and iii) those customers' Subscribers who view and receive content via the Feedsy Channels.

### 1.2 Purpose of this Privacy Policy

This Privacy Policy aims to provide information on how we collect and process Personal Information through people' use of this website, including any data they may provide through this website when they sign up to our newsletter, purchase a Feedsy Product, view or interact with content delivered by a Feedsy Channel or respond to a survey.

### 1.3 Changes to the Privacy Policy and your information

**Your duty to update us:** It is important that the Personal Information we hold about people is accurate and current. We ask you to keep us informed if your Personal Information changes.

**Our changes:** We will be changing this Privacy Policy from time to time and will inform you by a notice on our website when we do so. The changes take effect from the date we post the change, or we tell you about it in some other way or when you next visit the website.

### 1.4 We are not responsible for others who may be linked to the Feedsy website

This website and the Feedsy Products may include links to third-party websites, plug-ins and applications through which third parties may collect or share data.

We do not control these third-party websites and are not responsible for their privacy statements.

When visitors leave our website, those other websites will be responsible for you instead and we encourage people to read the Privacy Policy of every website they visit.

### 1.5 No children

This website is not intended for children and we do not knowingly collect data relating to children.

### 1.6 What we mean when we use capitalised terms

In this Privacy Policy we use the word "**user**" when we mean to refer collectively to both:

- our own customers who use the Feedsy Products (the "**Feedsters**"); and
- to our own customers' customers and website visitors (their "**Subscribers**").

See also our definitions listed at the end of this Privacy Policy which sets out the meaning of some of the terms used in this Privacy Policy. Capitalised terms which are not defined in this Privacy Policy will have the meaning given to them instead in our Terms and Conditions ([feedsy.co.uk/terms-and-conditions](https://feedsy.co.uk/terms-and-conditions))

## 2. What is Feedsy's role in your privacy and how you can get in touch

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### 2.1 Controller

Feedsy is the controller and so we are responsible for the Personal Information collected when people visit the Feedsy website.

However we also provide Feedsy Products and Feedsy Content via Feedsy Channels to our own customers who use them. When they use them, then they are the controller and are responsible for the Personal Information collected by us on their behalf when users visit, use and interact with the Feedsy Products and Feedsy Content via the Feedsy Channels.

### 2.2 Contact details

We have appointed a data protection officer (**DPO**) who is responsible for overseeing our compliance with and any questions about us and this Privacy Policy.

If you have any questions about this Privacy Policy or you want to exercise your legal rights under applicable privacy laws, then you should contact our DPO using the details set out below.

Full name of legal entity: Feedsy Pty Ltd

Email address: [privacy@feedsy.info](mailto:privacy@feedsy.info)

Postal address: PO Box 76, Aldgate, South Australia, Australia 5154

People have the right to make a complaint at any time to their local data protection authority.

**EEA residents:** For people who are resident in the European Economic Area or the United Kingdom, this is likely to be the UK's Information Commissioner's Office (**ICO**) [link to <https://ico.org.uk/>]

**Australian residents:** For people who are resident in Australia, the Office of the Australian Information Commissioner (**OAIC**) [link to at <https://www.oaic.gov.au>]

However, we would appreciate the chance to deal with any concerns first and ask that you contact us to give us a chance to address your concerns or queries.

## 3. What Personal Information do we or our customers collect about users?

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### 3.1 Data we collect

**Personal Information**, or **personal data**, 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).

We may collect, use, store and transfer different kinds of Personal Information about people and users which we have grouped together follows:

- (a) **Identity Data** includes first name, last name, username or similar identifier, job title, organisation name.
- (b) **Contact Data** includes billing address, email address and telephone numbers.
- (c) **Financial Data** includes our customers' bank account or payment card details.
- (d) **Transaction Data** includes details about payments to and from our customers and other details of the Feedsy Products purchased from us.

- (e) **Technical Data** includes internet protocol (IP) address, Wi-Fi information, login data, browser type and version, time zone setting and location, browser plug-in types and versions, connection information (for example, mobile operator name or internet service provider, browser type, language and time zone, and mobile phone number), operating system and platform and other technology on the devices (including unique device identifiers and characteristics) used to access this website and the Feedsy Products and Feedsy Channels.
- (f) **Log Data** includes log files that record data each time a device accesses our servers or our third party service providers' servers and those log files contain data about the nature of each access, including originating IP addresses. We may also access metadata and other information associated with files that users upload into our Feedsy Products, such as images.
- (g) **Profile data** includes username and password, purchases or orders made by customers, interests, preferences, feedback and survey responses.
- (h) **Feedsy Product Use Data** includes data collected whenever users interact with the Feedsy Products and Feedsy Content, which may include the dates and times users access the Feedsy Products or Feedsy Content, page views, which activities and features are used of our Feedsy Products, crash logs, storage configuration settings, and technical data relating to the device(s) users are using to access and use the Feedsy Products and the performance of the Feedsy Products in doing so.
- (i) **Subscriber Lists Data** includes Personal Information provided to us by our customers about their users in connection with the customers' use of the Feedsy Products—for example, when a customer imports and/or collects email addresses and other Personal Information about their users.
- (j) **Email Engagement Data** includes posts published and emails sent by or on behalf of our customers through the Feedsy Products and Feedsy Channels including information collected via page tags (also known as web beacons) that allow the sender to collect information about who opened those emails. Additionally, user engagement with any links in emails sent using the Feedsy Products and Feedsy Channels (for example, when users click a link) may be reported to our customer. Our use of cookies and other tracking technologies is discussed in our Cookie Policy ([feedsy.co.uk/cookie-policy](https://feedsy.co.uk/cookie-policy))
- (k) **Marketing and Communications Data** includes user preferences in receiving marketing from us or our customers and user communication preferences.
- (l) **Survey Data** includes when we offer our customers or their users opportunities to participate in surveys.

We also collect, use and share **Analytics Data** such as statistical or demographic data for any purpose. Analytics Data may be derived from Personal Information but is not considered Personal Information as this data does not directly or indirectly reveal the identity of an individual. However, if we combine or connect Analytics Data with Personal Information so that it can directly or indirectly identify an individual, we treat the combined data as Personal Information which will be used in accordance with this Privacy Policy. Please see our Cookie Policy ([feedsy.co.uk/cookie-policy](https://feedsy.co.uk/cookie-policy)) for further details.

We do not solicit any sensitive information or special categories of Personal Information about (this includes details about a person's race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health and genetic and biometric data). We do not solicit any information about criminal convictions and offences.

### 3.2 What happens if you do not provide your Personal Information?

Where we need to collect Personal Information to comply with our legal obligations or under the terms of a contract we have with our customers and that information is not provided when requested, we may not be

able to perform the contract we have or are trying to enter into (for example, to provide the Feedsy Products).

In this case, we may have to terminate our customers' Subscription to use the Feedsy Products and will notify our customers of such termination.

#### 4. How is Personal Information collected?

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We use different methods to collect data from and about people including through:

- (a) **Direct interactions.** People may give us their Personal Information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Information provided when people:
  - (i) purchase the Feedsy Products;
  - (ii) subscribe to receive Feedsy Content and Customer Content via the Feedsy Channels;
  - (iii) provide a business card;
  - (iv) make a request to receive marketing;
  - (v) complete survey; or
  - (vi) give us some feedback.
- (b) **Automated technologies or interactions.** As website visitors, customers and users interact with our website, we may automatically collect Personal Information about their equipment, browsing actions and patterns. We collect this Personal Information by using cookies, server logs and other similar technologies. We may also receive Personal Information about visitors or other users who visit other websites employing our cookies. Please see our Cookie Policy ([feedsy.co.uk/cookie-policy](https://feedsy.co.uk/cookie-policy)) for further details.
- (c) **Third parties or publicly available sources.** We may receive Personal Information from various third parties and public sources as set out below:
  - (i) our customers;
  - (ii) technology service providers such as Campaign Monitor based in the US;
  - (iii) hosting service providers such as Cloudways with cloud-based servers in the United Kingdom;
  - (iv) analytics providers such as YouTube and Google based outside Australia and the United Kingdom or European Economic Area;
  - (v) advertising networks such as Facebook or Google Adwords based outside Australia and the United Kingdom or European Economic Area;
  - (vi) providers of technical, payment and delivery services such as Stripe and Chargify based outside Australia and the United Kingdom or European Economic Area;
  - (vii) data brokers or aggregators based outside Australia and the United Kingdom or European Economic Area; and
  - (viii) publicly available sources based inside or outside Australia and the United Kingdom or European Economic Area.

## 5. How do we and others use Personal Information which we and they collect and why?

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### 5.1 When we will use Personal Information

We will only use Personal Information as the law allows us to. Most commonly, we will use Personal Information in the following circumstances:

- (a) Where we need to perform the contract we are about to enter into or have entered into with our customers.
- (b) Where it is necessary for our legitimate interests (or those of a third party) and the individuals' interests and fundamental rights do not override those interests.
- (c) Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing Personal Information other than in relation to sending third party direct marketing communications to users via the Feedsy Channels.

People have the right to withdraw consent to marketing at any time by [contacting us](#) ( or by following the opt out options available in the Feedsy Channels.

### 5.2 Purposes for which we will use Personal Information

We have set out below in a table format a description of all the ways we plan to use Personal Information, and which of the legal bases (for United Kingdom or European Economic Area residents only) we rely on to do so. We have also identified what are our legitimate interests where appropriate.

We may process Personal Information for more than one lawful ground depending on the specific purpose for which we are using the data. People can [contact us](#) to find out more details about the specific legal ground we are relying on to process Personal Information.

<b>Purpose/Activity</b>	<b>Type of data (as defined in section 3.1 above)</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To register a new customer	(a) Identity (b) Contact	Performance of a contract with our customers
To process and deliver orders including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with our customers  (b) Necessary for our legitimate interests (to recover debts due to us)
To provide the Feedsy Products and Feedsy Content via the Feedsy Channels	(a) Identity (b) Contact (c) Financial (d) Transaction (f) Profile	Performance of a contract with our customers

	<ul style="list-style-type: none"> <li>(g) Feedsy Product Use</li> <li>(h) Subscriber Lists</li> <li>(i) Email Engagement</li> <li>(j) Survey Data</li> </ul>	
<p>To manage our relationship with customers and users which will include:</p> <ul style="list-style-type: none"> <li>(a) Notifying customers and users about changes to our terms or Policies</li> <li>(b) Asking people to leave a review or take a survey</li> </ul>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(d) Marketing and Communications</li> <li>(e) Survey</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with our customers</li> <li>(b) Necessary to comply with a legal obligation</li> <li>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</li> </ul>
<p>To enable customers and users to complete a survey</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(e) Marketing and Communications</li> <li>(e) Survey</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with our customers</li> <li>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</li> </ul>
<p>To administer and protect our business, this website and the Feedsy Products (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Technical</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>(b) Necessary to comply with a legal obligation</li> </ul>
<p>To deliver relevant website content and advertisements to customers and their users on their behalf and measure or understand the effectiveness of the advertising we serve to customers and users</p>	<ul style="list-style-type: none"> <li>(a) Identity</li> <li>(b) Contact</li> <li>(c) Profile</li> <li>(e) Marketing and Communications</li> <li>(f) Technical</li> <li>(g) Email Engagement</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with our customers</li> <li>(b) Necessary for our legitimate interests (to operate a business that provides marketing products and services to customers and for customers to use our products/services, to develop them, to grow our business and to inform our marketing strategy)</li> </ul>
<p>To use data analytics to improve our website, Feedsy Products,</p>	<ul style="list-style-type: none"> <li>(a) Technical</li> </ul>	<p>Necessary for our legitimate interests (to define types of customers for our</p>

Feedsy Channels, Feedsy Content, marketing, customer and user relationships and experiences	(b) Feedsy Product Use	products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To market to our customers make suggestions and recommendations to customers about goods or services that may be of interest to them	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing	Necessary for our legitimate interests (to develop our products/services and grow our business)
To infer users' geographic location based on users' IP address; to track behaviour level to identify and understand trends in the various interactions with our Feedsy Products and Feedsy Content and to conduct analysis based on such data about usage, feature adoption and forecasting	(a) Identity (b) Contact (c) Financial (d) Transaction (f) Profile (g) Feedsy Product Use (h) Subscriber Lists (i) Email Engagement (j) Survey Data	Performance of a contract with our customers
To screen for and prevent undesirable or abusive activity  For example, we have automated systems that screen content for phishing activities, spam, and fraud	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical (f) Feedsy Product Use	(a) Necessary to comply with a legal obligation  (b) Necessary for our legitimate interests (to protect our information security and that of our customers and their users)
To identify who our customers are, including both identification and authentication purposes, to carry out our obligations and enforce our rights arising from any contracts entered into between us and our customers (including for billing and collection) and to respond to legal requests or prevent fraud	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary to comply with a legal obligation

If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond		
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### 5.3 Promotional offers from us or our customers

We may use Personal Information to form a view on what we think users may want or need, or what may be of interest to users. This is how we decide which products, services and offers may be relevant for users (we call this marketing).

Users will receive marketing communications from us if they have requested information from us or our customers or purchased Feedsy Products from us or our customers and, in each case, they have not opted out of receiving that marketing.

We do not market our products to our customers' Subscribers but we do send our customers' marketing communications to their Subscribers on their behalf.

See section 6 below for information on how you can control marketing.

### 5.4 Change of purpose

We will only use Personal Information 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 related with the original purpose. If an individual wishes to get an explanation as to how the processing for the new purpose is compatible with the original purpose, they should [contact us](#).

If we need to use Personal Information for an unrelated purpose, we will notify the people concerned and we will seek their consent or explain the legal basis which allows us to do so.

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

## 6. How you can control the use of Personal Information

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### 6.1 How you can opt out from marketing

People can ask us or third parties to stop sending them marketing messages at any time or by following the opt-out links on any marketing message by us or by [contacting us](#).

Where people opt out of receiving these marketing messages, this will not apply to Personal Information provided to us as a result of their purchases or other transactions.

### 6.2 Cookies

People can set their browser to refuse all or some browser cookies, or to alert them when websites set or access cookies. If people disable or refuse cookies, some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see ([feedsy.co.uk/cookie-policy](https://feedsy.co.uk/cookie-policy))

## 7. Disclosures of Personal Information

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We may have to share Personal Information with the parties set out below for the purposes set out in the table in section 5:



- (a) our customers on whose behalf we may collect and process (in accordance with their instructions) the Personal Information of their users pursuant to the Terms and Conditions of their Subscription;
- (b) technology providers acting as processors or joint controllers based in the US and Serbia whose technology we use or licence to provide our website, the Feedsy Products and the Feedsy Content via the Feedsy Channels;
- (c) service providers acting as processors based in the US who provide data processing, billing, analytic, hosting, customer support, online and offline marketing, IT and system administration services to us;
- (d) sub-contractors and agents acting as processors based in the United Kingdom, Malaysia, India and China who we outsource certain business functions such as sales, administration and software development activities to;
- (e) professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based Australian and United Kingdom who provide consultancy, banking, legal, insurance and accounting services;
- (f) regulators and other authorities acting as processors or joint controllers based in Australia and the United Kingdom who require reporting of processing activities in certain circumstances;
- (g) legal bodies or enforcement agencies based in Australia and the United Kingdom as required by applicable law, such as to comply with any court order, subpoena or other law or legal process, when we believe in good faith that disclosure is necessary to protect our rights, protect people safety or the safety of others, investigate fraud, or respond to a governmental or regulatory request;
- (h) debt collectors to enforce our rights arising from any contracts entered into between us and our customers and for billing and collection; and
- (i) 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 Personal Information in the same way as set out in this Privacy Policy.

We aim to ensure that all third parties to agree to respect the security of Personal Information and to treat it in accordance with applicable law.

## **8. International transfers**

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We are an Australian company and as such transfer the Personal Information of people who are residents of other countries to Australia.

Many of our external third parties are based outside Australia, United Kingdom, European Union and the European Economic Area (**EEA**) so their processing of Personal Information will involve a transfer of data outside Australia, the United Kingdom, European Union and the EEA.

Whenever we transfer Personal Information of people ordinarily resident in the United Kingdom, European Union or the EEA, we aim to ensure a similar degree of protection is afforded to it as may be required under applicable law such as through one of the following safeguards is implemented:

- (a) Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Information the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of Personal Information to third countries: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en)

- (b) 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 Information shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/eu-us-data-transfers\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/eu-us-data-transfers_en)

## 9. How we manage data security

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- (a) We have put in place security measures aimed to prevent Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we endeavour to limit access to Personal Information to those employees, agents, contractors and other third parties who have a business need to know. We seek to require them to agree to only process Personal Information on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected or actual Personal Information breach and will notify the people concerned and any applicable regulator of a breach where we are legally required to do so.

## 10. How long we keep data for

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We will retain Personal Information 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.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of Personal Information, the purposes for which we process Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

We have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) including for reasons under applicable law and generally this means we will be keeping the data for least six years after they cease being customers for tax purposes.

In some circumstances people ordinarily resident in the United Kingdom of the European Union can ask us to delete their data: see *Request erasure* under the definitions below for further information.

In some circumstances we may anonymise Personal Information (so that it can no longer be associated with an individual) for research or statistical purposes in which case we may use this information indefinitely without further notice to the individual concerned or to our customers.

## 11. Individual Legal Rights in relation to Personal Information and how to exercise them

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### 11.1 United Kingdom and European Economic Area residents

If you are an individual who is ordinarily resident in the United Kingdom or the European Economic Area, under certain circumstances, you will have the following Individual Legal Rights under Applicable Data Protection Legislation in relation to your Personal Information. These are the right to:

- (a) Request access to Personal Information
- (b) Request correction of Personal Information
- (c) Request erasure of Personal Information
- (d) Object to processing of Personal Information

- (e) Request restriction of processing Personal Information
- (f) Request transfer of Personal Information
- (g) Right to withdraw consent

More information about these rights is provided in the definitions section below.

If you, as an individual, wishes to exercise any of the rights set out above, please [contact us](#).

### 11.2 Australian residents

If you are an individual who is ordinarily resident Australia, under certain circumstances, you will have the following rights under Applicable Data Protection Legislation in relation to your Personal Information. These are the right to:

- (a) Request access to Personal Information
- (b) Request correction of Personal Information
- (c) Right to withdraw consent

More information about these rights is provided in the definitions section below.

If you, as an individual, wishes to exercise any of the rights set out above, please [contact us](#).

### 11.3 No fee usually required

People will not have to pay a fee to access their Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if a request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with a request in these circumstances.

### 11.4 What we may need to respond to your requests

We may need to request specific information to help us confirm the identity and validate the right to access the Personal Information (or to exercise any of their other rights). This is a security measure to ensure that Personal Information is not disclosed to someone who has no right to receive it. We may also contact other people to ask for further information in relation to their request to speed up our response.

### 11.5 When we will respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if a request is particularly complex, involves multiple requests or if our customers cause delays to our response to you. If appropriate our customers may respond to requests from users. In this case, we will notify the individual concerned and keep them updated.

## 12. Definitions

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Capitalised terms used in this Privacy Policy and not defined in the relevant clause or set out below are defined in our Terms and Conditions ([feedsy.co.uk/terms-and-conditions](https://feedsy.co.uk/terms-and-conditions))

### 12.1 Lawful basis

**Comply with a legal or regulatory obligation** means processing Personal Information where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give customers and users the best service/product and the best and most secure experience. We

make sure we consider and balance any potential impact on people (both positive and negative) and their rights before we process Personal Information for our legitimate interests. We do not use Personal Information for activities where our interests are overridden by the impact on people (unless we have consent or are otherwise required or permitted to by law). People can obtain further information about how we assess our legitimate interests against any potential impact on them in respect of specific activities by [contacting us](#)

**Performance of Contract** means processing data where it is necessary for the performance of a contract to which our customers are a party or to take steps at our customers' request before entering into such a contract.

## 12.2 Individual Legal Rights

Individual legal rights in the European Economic Area and the United Kingdom have the right to:

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

**Request access** which means access to their Personal Information (commonly known as a "data subject access request" in the United Kingdom). This enables them to receive a copy of the Personal Information we hold about them and to check that we are lawfully processing it.

**Request correction** of the Personal Information that we hold about them. This enables people to have any incomplete or inaccurate data we hold about them corrected, though we may need to verify the accuracy of the new data they provide to us.

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

**Request restriction of processing** which means processing of their Personal Information. This enables people to ask us to suspend the processing of their Personal Information in the following scenarios:

- (a) if they want us to establish the data's accuracy;
- (b) where our use of the data is unlawful but they do not want us to erase it;
- (c) where they need us to hold the data even if we no longer require it as they need it to establish, exercise or defend legal claims; or
- (d) they have objected to our use of their data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** which means transfer of their Personal Information to them or to a third party. We will provide them with, or a third party they have chosen, their Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which they initially provided consent for us to use or where we used the information to perform a contract with our customers.

**Withdraw consent at any time** which means withdraw consent where we are relying on consent to process their Personal Information. However, this will not affect the lawfulness of any processing carried out before an individual withdraws their consent. If an individual withdraws their consent, we may not be able to provide certain products or services to them. We will advise the individual concerned if this is the case at the time they withdraw their co