



# Above Deck Privacy Policy

We take the privacy of our website users very seriously. We ask that you read this Privacy Policy ('the Policy') carefully as it contains important information about how we will use your personal data. This Policy is updated from time to time so you are encouraged to review it regularly to stay abreast of new revisions.

For the purposes of the Data Protection Act 1998, Above Deck ('we' or 'us') is the 'data controller' (i.e. the company who is responsible for, and controls the processing of, your personal data).

This Policy is incorporated into and forms part of our Terms of Use, which outline the terms and conditions you agree to when accessing and using this website. By accessing and using this website and providing personal information to us, or by booking any services with us, you agree and consent to the collection, use and disclosure of your personal information as outlined in this Policy.

The words including, include, in particular, for example or any similar expression shall be construed as illustrative and shall not limit the sense of the words, description, definition, phrase or term preceding those terms.

## GENERAL

1. Above Deck Ltd, a company incorporated and registered in the United Kingdom with company number 11000896 (trading as Above Deck), we are committed to safeguarding and preserving the privacy of our visitors.
2. This Privacy Policy explains what happens to any personal data that you provide to us or that we collect from you when you visit [www.above-deck.com](http://www.above-deck.com) and any affiliate and associate websites (Website).
3. By using our Website, you agree to the Policy
4. This Policy is subject to the law of England and Wales and disputes can be determined by the courts of England and Wales
5. We will only use and retain your personal data with your consent or other lawful basis. We ask for your consent on those occasions and in those places where we specify what we will use your personal data for.
6. Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. We will retain documents (including electronic documents) containing personal data:
  - a. To the extent that we are required to do so by law;

- b. If we believe that the documents may be relevant to any on-going or prospective legal proceedings; and
  - c. In order to establish, exercise or defend our legal rights (including providing information to others for the purpose of fraud prevention and reducing credit risk).
7. This Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our Website, we encourage you to read the privacy notice of every website you visit.
8. 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.

## INFORMATION WE COLLECT

9. We will obtain personal data about you (such as your name, address, and payment details) whenever you complete an online form.
10. We include in this Policy, personal data processed relating to:
- a. individuals who are making any enquiry or booking with us or through us, and individuals in respect of whom any enquiry or booking is made (such as friends, family members, and tour group members, and officers and employees of businesses and organisations booking with or through us);
  - b. individuals in respect of whom any enquiry or booking is made with us by an agent;
  - c. where you are a business or organisation, employees or individuals who are acting as representatives of that business or other organisation, and individuals connected to that business or other organisation, such as owners, partners, shareholders, and directors;
  - d. individuals whose personal data from other companies in our group (such as where you have consented to your personal data being disclosed to other group companies for marketing purposes).
11. 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).
12. By visiting and using our Website, you or your computer may provide personal data. This includes: information which is automatically provided by your browser to our servers; information recorded on our web servers about your interaction with our Website and pages viewed; information we capture or place on your computer or generate using cookies or other technologies on our Website; and information you input into forms and fields on our Website.

13. In running and maintaining the Website we may collect and process the following data about you:
  - a. Information about your use of the Website including details of your visits such as pages viewed and the resources that you access, traffic data, location data, IP address, browser type, and other communication data;
  - b. Information concerning you as an individual/business provided voluntarily by you, for example, when you register for information, subscribe to our email notifications, make a purchase, sign up to a service or enter a competition;
  - c. Information that you provide when you communicate with Above Deck (AD) by any means or medium whatsoever; and,
  - d. Information received from AD's Facebook application, Facebook comments, generic comment system, Twitter application, WordPress stats, mailing list, Google Analytics and geolocation.
14. We may also obtain sensitive personal data about you if you volunteer it during the completion of an online form. If you volunteer such information, you will be consenting to our processing it for the purposes mentioned below.
15. We will obtain personal data about you from correspondence with you, verbally, by email, whenever you complete an online form, submit any details to us or participate in a survey of competition that we may choose to run. This includes when you register for any service or account, make an enquiry or booking, send us comments or suggestions, subscribe to any newsletter or other publication and request sales and advertising information. We may also record telephone calls with you.
16. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
  - a. Identity Data includes first and last name, username or similar identifier, marital status, title, passport number or other forms of proof of identity, nationality, email, date of birth, gender, next of kin name, phone number, social networking contact details;
  - b. Contact Data includes home and billing address, email address and telephone numbers and any other correspondence, communication or messaging information;
  - c. Financial Data includes bank account and payment card details;
  - d. Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us;
  - e. Technical Data includes your device details, internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, any web-page you came from, cookies, page response times, download errors, pages and parts of pages you visit, usage you make of our Website, services and product you viewed, length of your visit to the Website and pages, page interaction information (including

- as scrolling, mouse clicks, touches) operating system and platform and other technology on the devices you use to access this Website;
- f. Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
  - g. Usage Data includes information about how you use our Website, products and services; and
  - h. Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
17. If you are an individual associated with a business or other organisation that is our customer, then your personal data may include the following information that we link to you:
- a. business or organisation details (such as name, address, telephone numbers, payment arrangements, financial information, etc.);
  - b. your relationship with that business or organisation (such as an owner, partner, director, shareholder, employee, or agent); and
  - c. your contact details within that business (such as a work address, work telephone and mobile numbers, work fax number, and work email address).
18. We may monitor your use of this website through the use of cookies and similar tracking devices. For example, we may monitor how many times you visit, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually. Please see the section on 'Use of Cookies'.
19. We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.
20. We do not collect any Special Categories of Personal Data about you (this includes details about your religious or philosophical beliefs, sex life, sexual orientation, political opinions, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.
21. We will not share your opt-in to an SMS campaign with any third party for purposes unrelated to providing you with the services of that campaign. We may share your Personal Data, including your SMS opt-in or consent status, with third parties that help us provide our messaging services, including but not limited to platform providers, phone companies, and any other vendors who assist us in the delivery of text messages. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.



## INFORMATION ABOUT OTHER INDIVIDUALS

22. If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:
- a. give consent on his/her behalf to the processing of his/her personal data; and
  - b. receive on his/her behalf any data protection notices.

## HOW WE USE AND COLLECT YOUR PERSONAL DATA

22. We use different methods to collect data from and about you including through:
- a. Direct interactions. You may give us your Identity, Contact, Financial or Profile Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
    - i. apply for or buy our products or services;
    - ii. create an account on our Website or mobile app;
    - iii. use our mobile app;
    - iv. subscribe to our service or publications;
    - v. request marketing materials to be sent to you;
    - vi. enter a competition, promotion or survey;
    - vii. give us some feedback; or
    - viii. apply for a job.
  - b. Automated technologies or interactions. As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
  - c. Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:
    - i. Technical Data from analytics providers such as Google, advertising networks and search information providers based outside the EU;
    - ii. Contact, Financial and Transaction Data from providers of technical, payment and delivery services; and
    - iii. Identity and Contact Data from data brokers or aggregators.
23. 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:
- a. Where we need to perform the contract we are about to enter into or have entered into with you.
  - b. 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.
  - c. Where we need to comply with a legal or regulatory obligation.
24. Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications



to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## **PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA**

25. We use the information that we collect from you to provide our services to you. These purposes include:
- a. Helping us identify you and any accounts you hold with us;
  - b. Administration, provision of information and responding to enquiries;
  - c. Enable your use of the services on our website;
  - d. Record keeping;
  - e. Deal with enquiries and complaints made by you;
  - f. Supply to you services/goods purchased through our website;
  - g. Send you email notifications/newsletters that you have specifically requested;
  - h. Research, statistical and behavioural analysis;
  - i. Customer profiling and analysing your purchasing preferences;
  - j. Send you non-marketing commercial communications;
  - k. Marketing (see 'Marketing and Opting Out' below);
  - l. Fraud prevention and detection;
  - m. Send statements, invoices and payment reminders to you, and collect payments from you;
  - n. Billing and order fulfillment;
  - o. Customizing this website and its content to your particular preferences;
  - p. Notifying you of any changes which may affect you;
  - q. Improving our services;
  - r. Informing you of any changes to our website, services, goods or products.
26. If you have previously purchased goods or services from us, we may provide you with details of similar goods or services, or other goods or services, that you may be interested in.

## **MARKETING**

27. Where your consent has been provided in advance, in addition to providing you with information on our (including our group companies) offers, forthcoming events, new routes/products etc, we may also allow selected third parties to use your data to enable them to provide you with information regarding unrelated goods and services that AD believes may be of interest to you. Where you have provided such consent you may withdraw such consent and opt out of any marketing services at any time.
28. We may use your Identity, Contact, Technical, Usage and 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 which products, services and offers may be relevant for you (we call this marketing).

29. From time to time, we may disclose your contact details (i.e. your name, email address, postal address, telephone number, mobile number, fax number and preferences) to:
  - a. other companies which offer services that may enhance your experience or be able to help you to finalise your arrangements (**'third parties'**). Such third parties may then contact you directly with marketing information about services and products offered by them, third parties will only contact you in the manner you agreed to (e.g. email, text) when providing your consent.
  - b. other companies affiliated with Above Deck.
30. You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.
31. We will get your express opt-in consent before we share your personal data with any company outside the Above Deck Ltd group of companies for marketing purposes.

## OPTING OUT

32. You can ask us or any third parties to stop sending you marketing messages at any time by following the opt-out link on any marketing message sent to you or by contacting us at any time. You can opt out, at any time, by contacting us as detailed in this Policy or by following the instructions set out in our marketing communications.
33. You are also free, at any time, to notify any third party to whom we have previously passed your contact details to, that you no longer wish to receive marketing communications from them.

## COOKIES

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

## CHANGE OF PURPOSE

35. 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.



36. 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.
37. 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.

## **DATA SECURITY, RETENTION & STORING YOUR PERSONAL DATA**

38. We take appropriate technical and organizational measures to secure your information and to protect it against unauthorized or unlawful use and accidental loss or destruction, including:
  - a. only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymized basis wherever possible;
  - b. using secure servers to store your information; and
  - c. using Secure Sockets Layer (SSL) and Transport Layer Security (TLS) software or other similar encryption technologies to encrypt your personal and payment transactions.
39. Whilst we will use all reasonable efforts to safeguard your personal data, you acknowledge and understand that the sending of information via the Internet and by email is not secure. We cannot therefore guarantee the security of any personal data, including payment card information, that you choose to send electronically and the sending of such information is entirely at your own risk which you freely assume. We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by email.
40. For your own privacy protection, we encourage you to maintain anti-virus and other malware protection software on your computers and other devices, and to maintain your own measures to protect your personal data. We encourage you to be careful about who you give personal data to. Please let us know if you someone purports to contact you in our name.
41. 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. 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 it, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
42. 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.



43. By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers. In some circumstances you can ask us to delete your data.
44. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **INTERNATIONAL TRANSFERS**

45. We (and any affiliate, subcontractor or other person processing your personal data on our behalf) may transfer, store and otherwise process your personal data anywhere within the European Economic Area ('EEA').
46. In operating our Website and providing our services to you, it may become necessary to transfer data that we collect from you to locations outside of the European Economic Area for processing and/or storing. By providing your personal data to us you agree to this transfer, processing and/or storing. Whenever we transfer your personal data out of the EEA, we shall use reasonable endeavours to ensure that all reasonable steps are taken to store your data securely.
47. We will only send your personal data outside the EEA to companies either within our group or to parties with whom we have a contract. We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. This means within our group and for those other organisations with whom we have contracts we ensure we have in place adequate safeguards in respect of such transfers outside the EEA. You can find out about what adequate safeguards these are by contacting us.

## **MONITORING**

48. We may monitor and record communications with you (such as telephone conversations, emails, Facebook chats etc.) for the purpose of quality assurance, training, fraud prevention and compliance.

## **DISCLOSING YOUR INFORMATION**

49. We will not disclose your personal information to any other party other than in accordance with this Privacy Policy – we may disclose your personal data:
  - a. to other companies within our group and third parties and suppliers with whom we engage or sub-contract to perform any booking, contract or part of the contract;
  - b. to our employees, agents and service providers/suppliers;
  - c. to third parties (including intermediaries) as necessary to deal with any booking enquiry being made by or for you, to make any booking requested by or for you, to perform and administer any booking for you or other contract



with or in respect of you – this may include to collect payments to be made by you, investigate and respond to complaints and enforce any booking or other contract with you;

- d. for insurance purposes;
- e. in the event that we sell the whole or part of its business;
- f. where we use third parties to host, provide, operate or supply any part of our Websites, databases, systems, business, or services, or carry out on our behalf any of our business functions or actions (including sending mail, processing payments, providing marketing assistance, providing customer and advertising analysis, and providing customer services);
- g. to our business partners in accordance with the 'Marketing' section above;
- h. where we are legally required to disclose your personal information to law enforcement agencies in connection with any investigation;
- i. in connection with any on-going or prospective legal proceedings;
- j. to third parties, which may change from time to time, (including intermediaries) to carry out any checks regarding your financial standing, further fraud protection and reduce the risk of fraud, including for the purposes of credit checks.

#### **HOW THIRD PARTIES HANDLE YOUR PERSONAL DATA**

- 50. AD may from time to time include links to third parties on its website. Where AD provides a link it does not mean that AD endorses or approves that website's policy towards visitor privacy. You are therefore encouraged to review that website's privacy policy before sending them any personal data.
- 51. Where we provide your personal data to a third party one of the following circumstances will apply:
  - a. In some cases, your personal data may be held and otherwise processed by others on our behalf. We have not included the names of our service partners as these will change over time. We will remain responsible for what they do with your personal data, and your personal data will only be held and processed by them in accordance with our instructions and this Policy. The sharing of your data is necessary for the performance of any contract with you and for the efficient provision of our services.
  - b. In other cases, your personal data may need to be provided to them to be held and processed by them in their own right and on their own account. In such case, they will have their own responsibility for your personal data, subject to their own privacy policy, and we will not be responsible for what they do with it following disclosure. This will only be done to perform the contract.

#### **ACCESS TO INFORMATION**

- 52. In accordance with the Data Protection Act 1998, you have the right to access any information that we hold relating to you. In the event you exercise this right AD

reserves the right to charge a £10 administrative fee to cover the costs incurred by AD in providing you with the requested information.

53. If you wish to exercise this right, you should:
- a. put your request in writing
  - b. include proof of your identity and address (e.g. a copy of your driving licence or passport, and a recent utility or credit card bill)
  - c. attach a cheque for £10 made payable to Above Deck LTD.
  - d. specify the personal data you want access to, including any account or reference numbers where applicable.
54. You have the right to require us to correct any inaccuracies in your data free of charge. If you wish to exercise this right you should:
- a. put your request in writing
  - b. provide us with enough information to identify you (e.g. account number, username, registration details)
  - c. specify the information that is incorrect and what it should be replaced with.
55. You also have the right to ask us to stop processing your personal data for direct marketing purposes. If you wish to exercise this right you should:
- a. put your request in writing (an email sent to [info@above-deck.com](mailto:info@above-deck.com) with a header that says 'Unsubscribe' is acceptable)
  - b. provide us with enough information to identify you (e.g. account number, username, registration details).

## CONTACTING US

56. Do not hesitate to contact us regarding any matter relating to this Policy at [info@above-deck.com](mailto:info@above-deck.com)

## DISCLAIMER

57. The Website may contain links to other sites or may frame material from other sites. Such material has been created by or for the respective owners of those sites and is not under AD's control. AD has not undertaken to verify the truth or accuracy of any such material and makes no representation or warranty with respect to the links or the contents thereof. AD has compiled the information on this site for the use of yacht charterers, prospective yacht charterers and their travel professionals. All information is subject to change without notice and is without warranty.
58. The Website is provided by AD on an 'as is' basis. No warranties or representations of any kind expressed or implied are given (and if any such warranties and representations arise by operation of law or otherwise they are hereby disclaimed to the fullest extent permitted by law) in connection with the Website or its content including the completeness or accuracy of any of its contents.
59. AD shall not be liable for any loss, damages or expenses of any kind including compensatory, direct, indirect or consequential damages, loss of data, income or

profit, loss of or damage to property or claims by third parties howsoever arising in connection with the copying or use of any information or material contained in or referred to on the Website or otherwise from the use of the Website (including information in respect of the yachts described on the Website).

60. AD shall not be liable for any damages or injury of any kind caused by any error, omission, delay, computer virus, unauthorised access to, alteration for use relating to the Website or any other website.

## USE OF COOKIES

61. Cookies provide information regarding the computer used by a visitor. AD may use cookies where appropriate to gather information about your company in order to assist us in improving our website.
62. A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. We use cookies on this website to:
- a. keep track of the items stored in your shopping basket and take you through the checkout process;
  - b. recognise you whenever you visit this website (this speeds up your access to the site as you do not have to login each time);
  - c. target our marketing and advertising campaigns more effectively; and
  - d. make your online experience more efficient and enjoyable.
63. Cookies all work in the same but, but have minor discrepancies and differences between them. We may use the following types of cookies:
- a. Session cookies. These last only for the duration of your visit and are deleted when you close your browser. These facilitate various tasks including allowing a website to identify that a user of a particular device is navigating from page to page, supporting website security or basic functionality.
  - b. Persistent cookies. These last after you have closed your browser, and allow the Website to remember your actions and preferences. Sometimes they are used by websites to provide targeted advertising based upon the browsing history of the device. We use them to allow us to analyse customer visits to our site. They help us to understand how customers arrive at and use our site so we can improve the overall service.
  - c. Strictly necessary cookies. These cookies are essential in order to enable you to move around the Website, use its features, and ensuring the security of your experience. Without them, services you have asked for, such as booking holidays and managing your accounts, cannot be provided. These cookies don't gather information about you for the purposes of marketing.
  - d. Performance cookies. These cookies collect information about you use a web site, for instance which pages visitors go to most often, and if they get error messages from web pages. All information these cookies collect is only used to improve how the Website works, the user experience and to optimise our advertising. By using the Website you agree that we can place these types of

cookies on your device, however you can block these cookies using your browser settings.

- e. Functionality cookies. These allow websites to remember choices you make (including your username). The information they collect is anonymized (meaning it does not contain your name, address etc.) and they do not track your browsing activity across other websites. By using the Website, you agree that we can place these types of cookies on your device, however you can block these cookies using your browser settings.
  - f. Targeting cookies. These collect several pieces of information about your browsing habits. They are usually placed by third party advertising networks. They remember that you have visited a website and this information is shared with other organisations. These organisations do this in order to provide you with targeted adverts relevant to you and your interests.
  - g. Third party cookies. Please note that third parties may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.
64. We may gather information about your general Internet use by using cookies. Where used, these cookies are downloaded to your computer and stored on the computer's hard drive. Such information will not identify you personally as this information is statistical data. This statistical data will not identify any personal details whatsoever. Although we may obtain information about your computer or other electronic device such as your IP address, your browser and/or other Internet log information. In certain circumstances we may collect personal information about you – but only where you voluntarily provide it (e.g. by completing an online form).
65. If you visit our website when your browser is set to accept cookies and you accept the Use of Cookies Notification, we will interpret this as an indication that you consent to our use of cookies as described in this Policy. If you change your mind in the future about letting us use cookies, you can modify the settings of your browser to reject cookies or disable cookies completely.
66. Our third-party suppliers (for example, Facebook, Twitter, YouTube and Adobe Flashplayer) and advertisers may also use cookies; over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.

## **YOUR LEGAL RIGHTS**

This Policy is not intended to create a contract or form part of any contract. You have certain non-contractual rights, summarised below. If you contact us about these rights, we may ask for proof of your identity before we act, and may refuse to act if you do not provide this or your identity is not established by you. This is to ensure that your data is protected



and kept secure. More information about your rights and our obligations can be found on <https://ico.org.uk>.

**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 the 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 products or services to you. We will advise you if this is the case at the time you withdraw your consent.