

PRIVACY POLICY

Please take the time to read the following information carefully so that you fully understand our views and practices regarding your personal data and how we will use it.

1. WHO DOES THIS PRIVACY POLICY APPLY TO?

This privacy policy applies to:

- people who simply visit www.montysbakehouse.co.uk (our Site);
- people who purchase our products (including people who create an account to enable them to access and/or use certain areas or features of our Site, and/or register to attend any of our events and/or webinars) (whether or not a fee is payable);
- people who supply products and/or services to us (including people who register to attend any of our events and/or webinars via our Site) (whether or not a fee is payable); and/or
- people who make enquiries about our products, request information or a quote, or give us feedback, via our Site or offline.

We do not collect any personal data about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, or genetic or biometric data. Nor do we collect any information about criminal convictions and/or offences.

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

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

2. WHO WE ARE

You can read about who we are and what we do here ABOUT US.

For the purposes of the UK's Data Protection Act 2018 and the EU General Data Protection Regulation ((EU) 2016/679) (**DP Laws**), Monty's Bakehouse (UK) Ltd of Orchard Barn, Sandy Lane, South Nutfield, Surrey RH1 4EL is the controller and responsible for your personal data. We are registered as a controller with the Information Commissioner's Office (registration number ZA249943). If you have any questions regarding this privacy policy or believe we have breached DP Laws, please contact us at privacy@montysbakehouse.co.uk or write to us at the above address (marked for the attention of the HR Manager).

You have the right to make a complaint at any time to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority. Contact details for data protection authorities in the UK and European Economic Area are available here. We would, however, appreciate the chance to deal with your concerns before you approach a data protection authority so please contact us in the first instance.

3. ABOUT THIS POLICY

This privacy policy, together with our <u>TERMS OF USE</u> (and any other documents referred to in it) (this **Policy**) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. By using our Site, you accept the practices described in this Policy.



This Policy is effective on and from 1st November 2021. We may amend this Policy at any time, and whenever we do so we will notify you by posting a revised version on our Site or emailing you. Please review this Policy each time you visit our Site as it may have been updated since your last visit.

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 (see **Who we are**). If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

This Policy is provided in a pdf version including:

- Visitors to our Site
- Purchasing our products
- · Supplying to us
- Making enquiries and requesting other information from us
- Transferring personal data outside the UK or EEA
- Your rights
- · How we protect your personal data
- Marketing
- · Links to third party websites

4. VISITORS TO OUR SITE

Personal data we collect: With regard to each of your visits to our Site, we will automatically collect:

- Technical information, including the Internet Protocol (IP) address used to facilitate your connection to the Internet, browser type and version, time zone setting, browser plug-in types, versions and hardware information; and
- Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and time); services, products, publications and articles you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate information about how you use our Site 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 Policy.

Cookies: Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of our Site and to compile statistical reports on website activity. You can read more about how we use cookies in our COOKIE POLICY. You can enable or disable cookies by modifying the settings in your browser. You can find out how to do this, and find more information on cookies, at https://www.allaboutcookies.org/.

Using your personal data: We will use this information for the following legitimate interests (whether ours or a third party's):

- to maintain our Site and keep it safe and secure;
- to protect the rights, property or safety of Monty's, our customers, suppliers, contacts or others (we will also use you information where we are required by law to do so);
- to improve our Site and ensure that content is presented in the most effective manner for you and for your device(s)







- for internal operations (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- to measure or understand the effectiveness of our Site and/or any marketing we serve to you and others, and to deliver relevant marketing to you; and/or
- to deal with any issues you have reported with our Site.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us (see **Who we are**).

Sharing your personal data: We will only share personal data with third parties in the following instances:

- our employees, contractors, consultants, freelancers and agents (but their use shall be limited to the performance of their duties and in line with the reason for processing) who are based in the UK;
- our third-party IT support provider (acting as a processor) for the purposes of providing IT support to us who is based in the UK;
- analytics and search engine providers, and food and drink marketing agencies (acting as processors) that assist us in the improvement and optimisation of our Site who are based in the UK; and/or
- our website hosting supplier and digital marketing agency provider (acting as processors) to enable them to maintain and host our Site who are based in the UK.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Retaining your personal data: This information is kept for 24 months and will then be deleted automatically. However:

- if we are required by law to retain it for longer, we will retain it for the required period; and/or
- where the information is being used in connection with legal proceedings (including prospective legal proceedings) it will be retained for the duration of those legal (and any enforcement) proceedings.

Your rights: Please see Your rights

5. PURCHASING OUR PRODUCTS

Personal data we collect: If you contact us or we contact you (by phone, email or otherwise) in connection with your purchase of our products, we will hold your name, job title/profession, employer details, email address(es), phone number(s), location and any other details that you choose to give us or that appear on your business card which you provide to us. If you visit our offices, you will be asked to sign our visitors book and provide your name, employer details and vehicle registration number.

If you create an account online via our Site, we will also collect profile data (including your username and password, purchases or orders made by you and your interests, preferences, feedback and survey responses) and your preferences in receiving marketing from us (including third party content, events and/or webinars we think might be of interest to you) and other communications.

We may also collect:

copies of your passport, dietary requirements and any other information/documentation that you give to us to enable
us (at your or your employers request) to arrange flights, accommodation and itineraries if you are accompanying
any of our employees on trips;



- information and documentation that we obtain about you and your business from publicly available information (e.g. your website, social media and Companies House) when we carry out research (this is to ensure that we understand you and your business);
- information you give us when you attend any of our events and/or webinars, whether hosted by us or a third party, (including when you register to provide feedback);
- information about you from social media platforms including when you interact with us on those platforms or access our social media content (the information we may receive is governed by the privacy settings, policies, and/or procedures of the applicable social media platform, and we encourage you to review them); and/or
- information about you on CCTV cameras if you visit our offices (CCTV cameras are used for crime prevention and public safety

We do not record calls.

Using your personal data: We will use this information for the following legitimate interests (whether ours or a third party's):

- to enable us to perform our contract with the company who is purchasing our products, or to take steps to enter into such contract;
- to process and deliver the company's order including managing payments, fees and charges, and collecting and recovering money owed to us;
- to provide and manage your online account which you set up to access and/or use certain areas or features of our Site:
- to manage our relationship with the company who is purchasing our products including notifying changes to our terms or this Policy, keeping our records updated and to study how customers use our products;
- to arrange flights, accommodation and itineraries if you are accompanying any of our employees on trips that you or your employer asks us to arrange;
- to enable us to know who has visited our offices (when you sign the visitors book) for security, and health and safety purposes;
- the organisation of, and to follow up, events and/or webinars that you have registered to attend;
- notifying you about any other events, products and/or webinars we think you might be interested in;
- to send you marketing communications (see *Marketing*);
- to conduct market research that will help us better understand our target market and tailor our marketing communication;
- to make introductions to other relevant individuals (customers, suppliers or other contacts) where there is mutual benefit; and/or
- to study preferences and/or known company challenges to inform our product development.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us (see **Who we are**).

Sharing your personal data: We will only share personal data with third parties in the following instances:

- our employees, contractors, consultants, freelancers and agents (but their use shall be limited to the performance of their duties and in line with the reason for processing) who are based in the UK;
- third parties who we use to manufacture and deliver our products (acting as controllers or processors) who are based around the World;
- our third-party IT support provider (acting as a processor) for the purposes of providing IT support to us who is based in the UK;
- third parties who own, host and support (acting as processors) CRM tools that we use in our business and who are based in the UK;
- third parties who own, host and support (acting as processors) accounting software that we use in our busines and who are based in the UK;



- our website hosting supplier (acting as a processor) to enable them to maintain and host our Site who is based in the UK;
- various third parties who provide tools and cloud solutions to enable our business to operate (including email, instant messaging, document management and file-sharing) (acting as processors) and who are based in the United Kingdom;
- various third parties who we use in connection with trips (acting as controllers or processors) that you or your employer ask us to arrange and who are based around the world;
- third parties who provide credit reference checks for us and/or who assist us to recover monies owed to us (acting as controllers or processors) and who are based in the United Kingdom;
- professional advisers (acting as controllers or processors) including lawyers, bankers, auditors and insurers based in the UK who provide legal, banking, accounting and insurance;
- HM Revenue & Customs, regulators and other authorities (acting as controllers or processors) based in the United Kingdom who require reporting of processing activities in certain circumstances;
- third parties who help us to arrange and/or host events and/or webinars that you have registered to attend (acting
 as controllers or processors) and who are based in the United Kingdom and the Netherlands;
- potential buyers (and their agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Policy;
- · where we are required by law to do so; and/or
- our telephony supplier (which would get to see phone numbers if we call you) and our broadband supplier (which could see email addresses (but not the content of what you send us, if you encrypt it)) (acting as processors).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Retaining your personal data: This information will be kept for the duration of our contract with the company who is purchasing our products and then for 7 years thereafter in the event of legal claims. However:

- if we are required by law to retain it for longer, we will retain it for the required period; and/or
- where the information is being used in connection with legal proceedings (including prospective legal proceedings) it will be retained for the duration of those legal (and any enforcement) proceedings.

Your rights: Please see Your rights.

If you have also visited our Site, please see *Visitors to our Site*.

6. SUPPLYING TO US

Personal data we collect: If you contact us or we contact you (by phone, email or otherwise) in connection with supply services, goods and/or software to us, we will hold your name, job title/profession, employer details, email address(es), phone number(s), location and any other details that you give to us or that appear on your business card which you provide to us. If you visit our offices, you will be asked to sign our visitors book and provide your name, employer details and vehicle registration number.

We may also collect:

- copies of your passport, dietary requirements and any other information/documentation that you give to us to enable
 us (at your or your employers request) to arrange flights, accommodation and itineraries if you are accompanying
 any of our employees on trips;
- information and documentation that we obtain about you and your business from publicly available information (e.g. your website, social media and Companies House) when we carry out research (this is to ensure that we understand you and your business);
- information you give us when you attend any of our events and/or webinars, whether hosted by us or a third party (including when you register to provide feedback);



- information about you from social media platforms including when you interact with us on those platforms or access our social media content (the information we may receive is governed by the privacy settings, policies, and/or procedures of the applicable social media platform, and we encourage you to review them); and/or
- information about you on CCTV cameras if you visit our offices (CCTV cameras are used for crime prevention and public safety).

We do not record calls.

Using your personal data: We will use this information for the following legitimate interests (whether ours or a third party's):

- to enable us to perform our contract with the company who is supplying services, goods and/or software to us, or to take steps to enter into such contract;
- to manage payments, fees and charges due under our contract;
- to manage our relationship with the company who is supplying services, goods and/or software to us including notifying changes to our terms or this Policy and keeping our records updated:
- to arrange flights, accommodation and itineraries if you are accompanying any of our employees on trips that you or your employer asks us to arrange;
- to enable us to know who has visited our offices (when you sign the visitors book) for security, and health and safety purposes;
- the organisation of, and to follow up, events and/or webinars that you have registered to attend;
- notifying you about any other events, products and/or webinars we think you might be interested in;
- to send you marketing communications (see Marketing);
- to conduct market research that will help us better understand our target market and tailor our marketing communication;
- to make introductions to other relevant individuals (customers, suppliers or other contacts) where there is mutual benefit: and/or
- to study preferences and/or known company challenges to inform our product development.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us (see **Who we are**).

Sharing your personal data: We will only share personal data with third parties in the following instances:

- our employees, contractors, consultants, freelancers and agents (but their use shall be limited to the performance of their duties and in line with the reason for processing) who are based in the UK;
- our third-party IT support provider (acting as a processor) for the purposes of providing IT support to us who is based in the UK;
- third parties who own, host and support (acting as processors) CRM tools that we use in our business and who are based in the UK;
- third parties who own, host and support (acting as processors) accounting software that we use in our business and who are based in the UK;
- our website hosting supplier (acting as a processor) to enable them to maintain and host our Site who is based in the UK;
- various third parties who provide tools and cloud solutions to enable our business to operate (including email, instant messaging, document management and file-sharing) (acting as processors) and who are based in the United Kingdom;
- various third parties who we use in connection with trips (acting as controllers or processors) that you or your employer ask us to arrange and who are based around the world;
- professional advisers (acting as controllers or processors) including lawyers, bankers, auditors and insurers based in the UK who provide legal, banking, accounting and insurance;



- HM Revenue & Customs, regulators and other authorities (acting as controllers or processors) based in the United Kingdom who require reporting of processing activities in certain circumstances;
- third parties who help us to arrange and/or host events and/or webinars that you have registered to attend (acting as controllers or processors) and who are based in the United Kingdom;
- potential buyers (and their agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Policy:
- where we are required by law to do so; and/or
- our telephony supplier (which would get to see phone numbers if we call you) and our broadband supplier (which could see email addresses (but not the content of what you send us, if you encrypt it)) (acting as processors).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Retaining your personal data: This information will be kept for the duration of our contract with the company who is supplying services, goods and/or software to us and then for 7 years thereafter in the event of legal claims. However:

- if we are required by law to retain it for longer, we will retain it for the required period; and/or
- where the information is being used in connection with legal proceedings (including prospective legal proceedings) it will be retained for the duration of those legal (and any enforcement) proceedings.

Your rights: Please see Your rights.

If you have also visited our Site, please see Visitors to our Site.

7. MAKING ENQUIRIES AND REQUESTING OTHER INFORMATION FROM US

Personal data we collect: If you contact us or we contact you (by phone, email or otherwise) to make an enquiry about our products, request information from us, or give us feedback, we will hold your name, job title/profession, employer details, email address(es), phone number(s), location, social media ID (if you provide feedback via social media) and any other details you give us (such as the details you complete if you use a form on our Site to contact us or any other details that appear on your business card which you provide to us).

We may also collect:

- information and documentation that we obtain about you and your business from publicly available information (e.g. your website, social media and Companies House) when we carry out research (this is to ensure that we understand you and your business);
- information you give us when you attend any of our events and/or webinars, whether hosted by us or a third party, (including when you register to provide feedback); and/or
- information about you from social media platforms including when you interact with us on those platforms or access our social media content (the information we may receive is governed by the privacy settings, policies, and/or procedures of the applicable social media platform, and we encourage you to review them).

We do not record calls.

Using your personal data: We will use this information for the following legitimate interests (whether ours or a third party's):

- respond to your enquiry about our products;
- provide you with the information you have requested from us and that we think might be of interest to you e.g., where you may purchase our products;
- · the organisation of, and to follow up, events and/or webinars that you have registered to attend;
- notifying you about any other events, products and services and/or webinars we think you might be interested in
- to send you marketing communications (see *Marketing*); and/or



• to conduct market research that will help us better understand our target market and tailor our marketing communication.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us (see **Who we are**).

Sharing your personal data: We will only share personal data with third parties in the following instances:

- our employees, contractors, consultants, freelancers and agents (but their use shall be limited to the performance of their duties and in line with the reason for processing) who are based in the UK;
- our third-party IT support provider (acting as a processor) for the purposes of providing IT support to us who is based in the UK;
- third parties who own, host and support (acting as processors) CRM tools that we use in our business and who are based in the UK;
- third parties who own, host and support (acting as processors) accounting software that we use in our business and who are based in the UK;
- our website hosting supplier (acting as a processor) to enable them to maintain and host our Site who is based in the UK;
- professional advisers (acting as controllers or processors) including lawyers, bankers, auditors and insurers based in the UK who provide legal, banking, accounting and insurance;
- potential buyers (and their agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Policy:
- where we are required by law to do so; and/or
- our telephony supplier (which would get to see phone numbers if we call you) and our broadband supplier (which could see email addresses (but not the content of what you send us, if you encrypt it)) (acting as processors).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Retaining your personal data: This information will be kept for the duration of your enquiry or request and up to 24 months thereafter. However:

- if we are required by law to retain it for longer, we will retain it for the required period; and/or
- where the information is being used in connection with legal proceedings (including prospective legal proceedings) it will be retained for the duration of those legal (and any enforcement) proceedings.

Your rights: Please see Your rights.

If you have also visited our Site, please see Visitors to our Site.

8. COMPLETING OUR CONTACT FORM





Personal data we collect: If you contact us via the contact form on our website to make an enquiry about our products, request information from us, or give us feedback, we will hold your name, email address, and any other details you give us in the contact form. You may also choose to give us further personal data when we respond to your enquiry.

We may also collect information and documentation that we obtain about you and your business from publicly available information (e.g. your website, social media and Companies House) when we carry out research (this is to ensure that we understand you and your business).

We do not record calls.

Using your personal data: We will use this information for the following legitimate interests (whether ours or a third party's):

- · respond to your enquiry;
- · provide you with the information you have requested from us; and/or
- to send you marketing communications (see *Marketing*).

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us (see **Who we are**).

Sharing your personal data: We will only share personal data with third parties in the following instances:

- our employees, contractors, consultants, freelancers and agents (but their use shall be limited to the performance of their duties and in line with the reason for processing) who are based in the UK;
- our third-party IT support provider (acting as a processor) for the purposes of providing IT support to us who is based in the UK;
- our third-party marketing agency for the purposes of marketing who is based in the UK (see Marketing);
- third parties who own, host and support (acting as processors) CRM tools that we use in our business and who are based in the UK;
- our website hosting supplier and digital marketing agency provider (acting as processors) to enable them to maintain and host our Site who are based in the UK;
- professional advisers (acting as controllers or processors) including lawyers, bankers, auditors and insurers based in UK who provide legal, banking, accounting and insurance;
- potential buyers (and their agents and advisers) in connection with any proposed purchase, merger or acquisition
 of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes
 disclosed in this Policy; and/or
- where we are required by law to do so.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Retaining your personal data: This information will be kept for the duration of your enquiry or request and up to 24 months thereafter. However:

- if we are required by law to retain it for longer, we will retain it for the required period; and/or
- where the information is being used in connection with legal proceedings (including prospective legal proceedings) it will be retained for the duration of those legal (and any enforcement) proceedings.

9. TRANSFERRING PERSONAL DATA OUTSIDE THE UK OR EEA

We may transfer your personal data to various jurisdictions to perform our obligations under this Policy and related agreements. The applicable data protection laws of those jurisdictions may differ from the data protection laws of your





country of residence and, in some cases, may not be as protective. Whenever we transfer your personal data outside your country of residence, we will ensure a similar degree of protection is afforded to it as the data protection laws of your country of residence. For example, if you are based in the UK or EEA, your personal data may be transferred to countries that have been deemed to provide an adequate level of protection for personal data by (as applicable) the UK Government or the European Commission. In other instances, we will ensure at least one other lawful safeguard is implemented, which may include the use of specific contracts approved by (as applicable) the UK Government or the European Commission.

If you have questions about, or need further information concerning, international data transfers, please contact us (see **Who we are**).

10. YOUR RIGHTS

In relation to personal data we hold about you, you have the right to:

- where we process your personal data based on your consent, to withdraw your consent easily and at any time;
- get access to your personal data that we hold and receive information about our processing of it;
- ask us to correct the record of your personal data maintained by us if it is inaccurate or to complete incomplete personal data;
- · ask us, in certain instances, to erase your personal data or cease processing;
- object to us processing your personal data for direct marketing purposes (see *Marketing*);
- · challenge us processing your personal data which has been justified on the basis of our legitimate interests;
- ask us, in certain instances, to restrict processing personal data to merely storing;
- ask us, in certain limited instances, to transfer your personal data to another online provider;
- not to be subject to automated decision making (including profiling) in certain circumstances;
- prevent processing that is likely to cause damage or distress to you and seek compensation from us for any damages caused to you by us breaching DP Laws;
- be notified of a personal data breach which is likely to result in high risk to your rights and freedoms; and
- complain to a data protection authority (contact details for data protection authorities in the UK and European Economic Area are available here) (you may complain to a data protection authority in the EU Member State of your residence, your place of work or of the alleged breach of DP Laws).

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.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

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

We try to respond to all legitimate requests within one calendar month (starting from the day after we receive your request). Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. HOW WE PROTECT YOUR PERSONAL DATA

To help protect the privacy of personal data you transmit, we maintain physical, technical and administrative safeguards and require the same of any third parties we share your personal data with. We update and test our security technology







on an ongoing basis. In addition, we train our staff about the importance of confidentiality and maintaining the privacy and security of your personal data.

As you will be aware the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Site; any transmission is at your own risk. Once we have received your personal data, we will use physical, technical and administrative safeguards to prevent unauthorised access to your personal data.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

12. MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

<u>Promotional offers from us</u>: We may use your first name, surname, email address and subject of enquiry 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).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us and you have not opted out of receiving that marketing.

<u>Third-party marketing:</u> We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out: You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us (see **Who we are**) any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions. Please note that if you ask us not to contact you by email at a certain email address, we will retain a copy of that email address on a "suppression list" in order to comply with your no-contact request.

You are free to change your marketing choices at any time.

13. LINKS TO THIRD PARTY WEBSITES

Our Site may, from time to time, contain links to and from the websites of third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Our Site uses interfaces with social media sites such as Facebook, LinkedIn, Twitter, Instagram and YouTube. If you choose to "like" or share information from our Site through these services, you should review the privacy policy of that service. If you are a member of a social media site, the interfaces may allow the social media site to connect your Site visit to your personal data.

