

## SINGAPORE GP PTE LTD DATA PROTECTION POLICY

### INTRODUCTION

This document ("DPP") is issued subject to and pursuant to the Singapore Personal Data Protection Act (No. 26 of 2012) ("the Act") and explains how Singapore GP Pte Ltd collects, uses, discloses, and protects information (which includes "Personal Data", i.e. Data whether true or not, about any individual who can be identified from that data or from that data and other information to which we would have or are likely to have access to) that we learn about you as a result of your interaction with us whether through the website (on which this DPP is posted) or in conjunction with any other transaction offline or otherwise. Please take a moment to read this DPP so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

This DPP supplements but does not supersede nor replace any other consents you may have previously provided to Singapore GP Pte Ltd in respect of your Personal Data, and your consents herein are additional to any rights which to any of the Companies (as defined below) may have at law to collect, use or disclose your personal data.

Singapore GP Pte Ltd may from time to time update this DPP to ensure that this DPP is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the DPP as updated from time to time on our website (<http://www.singaporegp.sg>).

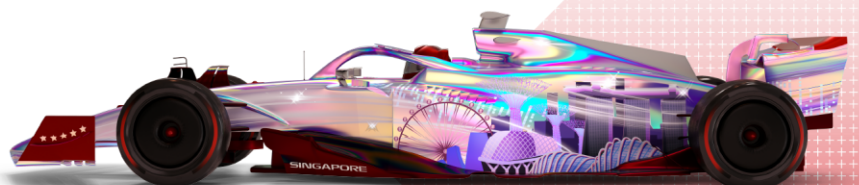
If you are resident in the European Union / European Economic Area and we offer or provide products or services to you, additional information regarding how your Personal Data may be processed can be found at section 7.

Please check back regularly for updated information on the handling of your Personal Data. This DPP was last updated in Aug 2018.

### HOW YOU GIVE YOUR CONSENT / AGREEMENT TO THIS DPP

By interacting with us, submitting information to us, or (for our employees) by your continued employment with us, you agree and consent to Singapore GP Pte Ltd (including its related corporations and business units) (collectively, the "Companies"), as well as their respective agents (collectively referred to herein as "SGPPL", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies' authorised service providers and relevant third parties in the manner set forth in this DPP.

This DPP (i) is integrated and forms a part of any agreements governing your relationship with us (and so should be read in conjunction with those agreements), or (ii) is a condition under which we interact with you generally outside any agreement (including, in particular, where you provide or we collect Personal Data from you).



Hence, for example, where you interact with us through our website, you are, by (i) accessing any part of the website, (ii) submitting information to us, or (iii) using any features of the website, agreeing to this DPP and giving us your consent to the collection, use and disclosure of your information (including Personal Data) to us as well as our respective agents, representatives and authorised third party vendors, partners and service providers including (where relevant) ticketing agents, webmaster, courier, etc. as set out in this DPP.

If you are resident in the European Union / European Economic Area and we offer or provide products or services to you, please refer to section 7 for information on the lawful grounds on which we collect and process your Personal Data.

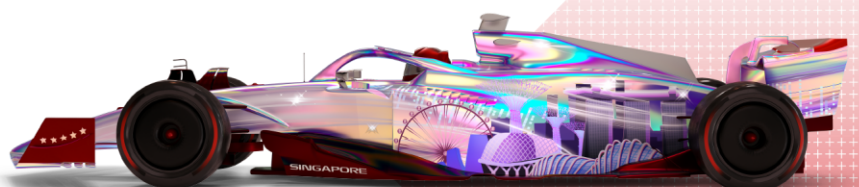
## HOW WE COLLECT, USE OR DISCLOSE YOUR PERSONAL DATA

### 1. Personal Data

- 1.1 In this DPP, "Personal Data" refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.
- 1.2 Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC number, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us, in any forms you may have submitted to us, or via other forms of interaction with you.

### 2. Collection of Personal Data

- 2.1 Generally, we collect Personal Data in the following ways:
  - (a) when you contact us;
  - (b) when you submit forms or applications to us;
  - (c) when you submit queries or requests to us;
  - (d) when you submit complaints or provide feedback;
  - (e) when you respond to our request for additional Personal Data;
  - (f) when you subscribe to our e-newsletter to receive latest information on the upcoming race or ask to be included in an email or other mailing list;
  - (g) when you respond to our initiatives;
  - (h) when you participate in our contests;
  - (i) when you make bookings for tickets or hospitality packages;



- (j) when you receive customer or technical support from us;
- (k) when you visit our websites (note: when you browse our website, you generally do so anonymously – but please see the section below on cookies – we do not at our website automatically collect Personal Data, including your email address unless you provide such information or login with your account credentials if we enable such features on our websites); and
- (l) when you submit your Personal Data to us for any other reasons.

2.2 If you provide us with any Personal Data relating to a third party (e.g. information of your dependent, spouse, children and/or parents), by submitting such information to us, you represent to us that you have obtained the consent of that third party to you providing us with their Personal Data for the respective purposes.

2.3 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to fulfil your requests and/or applications.

### 3. What information do we collect?

3.1 We will take reasonable steps to ensure that the collection of such other types of information will be only where you have voluntarily provided this to us, and where such collection is reasonable and not excessive for the purposes for such collection.

3.2 We may, for example, collect and keep a record of your name, mailing address, email address, telephone number, gender and preferences, credit card details (and other related payment information), and other information which may be associated with your Personal Data. Some further details for specific types of personal data collected are identified in our sections on specific purposes for collection, use or disclosure of Personal Data as set out in section 4 below.

#### *Minors*

3.3 We do not knowingly collect, use or disclose personally-identifiable information from persons who are under 14 years of age. No Personal Data should be submitted to us, or posted / circulated on / through our websites or other forums managed by us. If a minor under the age of 14 has provided us with Personal Data without parental or guardian consent, the parent or guardian may request a description of the Personal Data that has been collected from or about that child and either limit or restrict any further maintenance or use of such information from that child and/or direct us to remove or unsubscribe them.

3.4 If you are under 18 years of age, you may only use our website and services with the permission of your parent and guardian. We further encourage all parents and legal guardians to participate in or supervise their child or children's use of the Internet and involvement in the website, and in their interactions with us.



### *IP Addresses*

- 3.5 An IP address is a number that is automatically assigned to your computer when you signed up with an Internet Service Provider.
- 3.6 When you visit our website, your IP address is automatically logged in our server. We use your IP address to help diagnose problems with our server, and to administer our website. From your IP address, we may identify the general geographic area from which you are accessing our website however, we will not be able to pinpoint the exact geographic location from which you are accessing our website. Generally we do not link your IP address to anything that can enable us to identify you unless it is required by applicable laws and regulations.

### *Cookies*

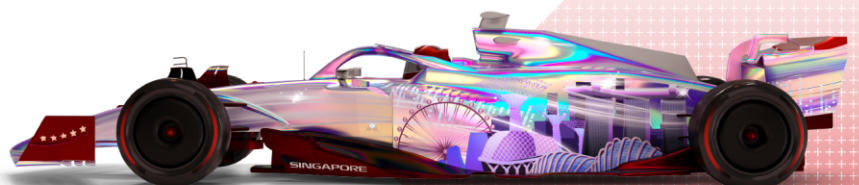
- 3.7 A cookie is an element of data that a website can send to your browser, which may then store it on your system. We use cookies in some of our pages to store visitors' preferences and record session information. The information that we collect is then used to ensure a more personalised service level for our users. You can adjust settings on your browser so that you will be notified when you receive a cookie. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. Please refer to your browser documentation to check if cookies have been enabled on your computer or to request not to receive cookies.

### *Telephone numbers*

- 3.8 If you have provided your telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your telephone number(s), then from time to time, we may contact you using such telephone numbers (including voice calls, text, fax or other means) with information about our products and services (including discounts and special offers).

## **4. Purposes for the Collection, Use and Disclosure of Your Personal Data**

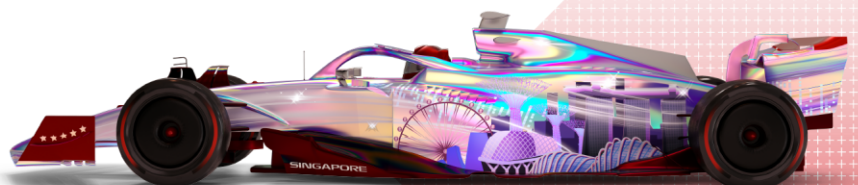
- 4.1 **Generally**, SGPPL collects, uses and discloses your Personal Data for the following purposes:
- (a) responding to your queries and requests;
  - (b) processing your instructions including processing your purchases or signups for services;
  - (c) managing the administrative and business operations of SGPPL and complying with internal policies and procedures;
  - (d) verification of identity;
  - (e) communicating with you;
  - (f) matching any Personal Data held which relates to you for any of the purposes listed herein;



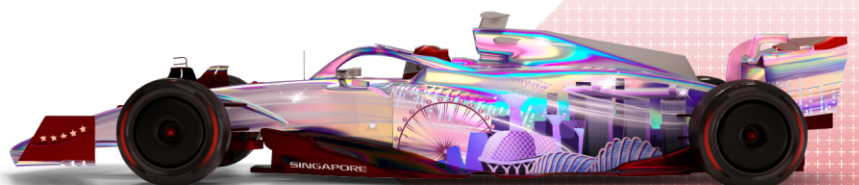
- (g) resolving complaints and handling requests and enquiries;
- (h) maintaining the security of SGPPL premises (including but not limited to CCTV surveillance);
- (i) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on SGPPL (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation) and to assist in law enforcement and investigations by the relevant authorities;
- (j) detecting, preventing, investigating, or otherwise addressing fraud, security or technical issues associated with the services;
- (k) managing our lost-and-found services;
- (l) record keeping purposes where there are legal or business reasons for retaining such records;
- (m) legal purposes (including but not limited to drafting and reviewing documents, obtaining legal advice and facilitating dispute resolution); and
- (n) purposes which are reasonably related to the aforesaid.

4.2 In addition, SGPPL collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship with you:

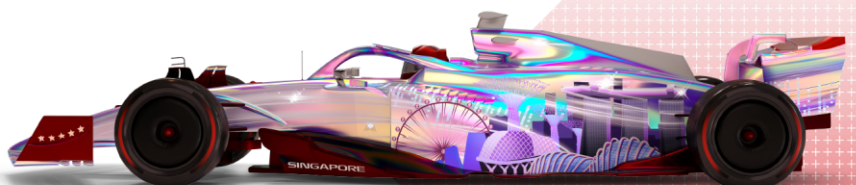
- (a) If you are a journalist / media representative or other person seeking accreditation SGPPL collects, uses and discloses your Personal Data such as your name, job title, contact number, email address, passport photo, your vehicle numbers, your employing editor's name and contact particulars (or that of a relevant person in charge – "PIC"), for the following purposes:
  - (i) to apply for passes to grant you access to media centres during race weekend / media events and to take your photograph for the production of the access pass;
  - (ii) to disclose to and secure accreditation with Federation Internationale de l' Automobile ("FIA");
  - (iii) to arrange and conduct accreditation briefings;
  - (iv) to upload and enable the use of the accreditation portal or other tools by a PIC, as well as ancillary processes such as the creation and administration of login / accounts for such portal / tools;
  - (v) to ensure and facilitate secure access to Circuit Park (eg. during Event week), and to meet / support security requirements;
  - (vi) to make disclosures to the law enforcement and security agencies for screening to grant access to high-security areas in Circuit Park; and



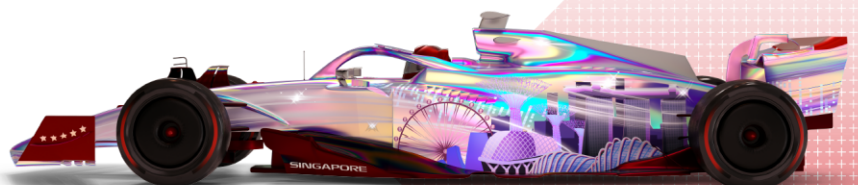
- (vii) purposes which are reasonably related to the aforesaid.
- (b) If you are a member of the public who wishes to participate in our community initiatives (e.g. by signing up through our website for such purposes), SGPPL collects, uses and discloses your Personal Data such as your name, NRIC number, contact number (and your next of kin etc) for the following purposes:
  - (i) ensuring we can contact next of kin in the case of an emergency / accidents and for safeguarding your well being and safety;
  - (ii) balloting for participation in the initiatives and campaigns and contacting successful balloters;
  - (iii) providing vendors with the Personal Data so as to issue e-tickets to successful balloters, for which fields such as NRIC number or similar fields are used to ensure that e-tickets (which are non-transferable) are properly used; and
  - (iv) purposes which are reasonably related to the aforesaid.
- (c) If you are participating in a Community Engagement Programme ("CEP") Survey, SGPPL collects, uses and discloses your Personal Data such as your name, contact number / email address for the following purposes:
  - (i) generating a report for survey findings for, and meeting requirements by, relevant government regulators, ministries, statutory boards, authorities or related associations, in connection with gauging interest level and reception for CEP initiatives;
  - (ii) (as part of voluntary opt-in via participation in the survey) inclusion of Personal Data for electronic direct mailers ("EDMs"); and
  - (iii) purposes which are reasonably related to the aforesaid
- (d) If you are an entertainer, artiste or any other performer providing music and entertainment services for our off-track events, SGPPL collects, uses and discloses your Personal Data such as your name, NRIC number, passport details and contact number for the following purposes:
  - (i) providing remuneration to you
  - (ii) providing logistical and administrative support (including but not limited to booking hotels, providing transportation and airport concierge services and privileges, managing accreditations to provide you with access to our premises, administering work pass exempt activities and applying for public performance rights and other licenses; and
  - (iii) purposes which are reasonably related to the aforesaid.



- (e) If you are a member of the public who is a customer of SGPPL, SGPPL collects, uses and discloses your Personal Data such as your name, contact number, email address and credit card details (via, e.g. the booking forms at point of purchase of tickets) for the following purposes:
- (i) processing purchase, sale, and collection of tickets or merchandise;
  - (ii) establishing a record of purchases in databases such as Salesforce for the purposes of supporting customer service requests, facilitating the provision of services requested and maintaining our records and database so as to optimise work productivity;
  - (iii) issuing service recovery tickets in the event that your tickets or merchandise are defective;
  - (iv) facilitating the sending of newsletters / updates; and
  - (v) purposes which are reasonably related to the aforesaid.
- (f) If you are a representative / employee of a corporate customer, SGPPL collects, uses and discloses your Personal Data such as your name, contact number, email address, address of you or your PIC (via, e.g. the booking forms at point of purchase of tickets) for the following purposes:
- (i) processing purchase, sale, and collection of tickets;
  - (ii) issuing invoices to the corporate customer;
  - (iii) establishing a record of purchases in databases such as Salesforce for the purposes of supporting customer service requests, facilitating the provision of services requested and maintaining our records and database so as to optimise work productivity;
  - (iv) facilitating corporate suite customisation (including disclosures to, e.g. our vendors and service providers); and
  - (v) facilitating the sending of newsletters / updates; and
  - (vi) purposes which are reasonably related to the aforesaid
- (g) If you are a contractor or service provider supplying products and services to / in connection with our F&B operations or providing contract services for hospitality services (e.g. suite ambassadors, suite managers, guest support officers, guest support managers, jetty crew etc), SGPPL collects, uses and discloses Personal Data such as names, NRIC numbers, passport numbers:
- (i) of food handlers (and their certification), to meet and comply with regulatory certifications and other food and safety requirements;



- (ii) mobile numbers, photographs, vehicle numbers of your staff for creating staff access passes or establishing security, including security clearance, authentication of credibility of staff, handling emergencies and police screening (including security auxiliary services);
  - (iii) mobile numbers and signatures of staff handling logistics (including deliveries) to confirm / facilitate deliveries, attend to accounting and billing requirements;
  - (iv) CVs, photographs and bank account numbers for persons providing hospitality services (suite ambassadors, suite managers, guest support officers, guest support managers, jetty crew etc) (and particulars of PICs) to administer contracts for / of services, handle payroll processes, facilitate registration of staff and manage accreditation for access to circuit park such as during race event days; and
  - (v) for purposes which are reasonably related to the aforesaid.
- (h) If you are a volunteer or a temporary hire who is providing services for the Singapore F1 race, SGPPL collects, uses and discloses your Personal Data for the following purposes:
- (i) to process your application and provide you with relevant training;
  - (ii) to manage the relationship between you and SGPPL including applying for any licences which may be necessary for you to provide your services, conducting background checks and due diligence, processing payments to be which are to be made to you; and
  - (iii) purposes which are reasonably related to the aforesaid.
- (i) If you submit an application to us as a candidate for an employment or representative position, SGPPL collects, uses and discloses your Personal Data such as your NRIC number, contact details, curriculum vitae details (e.g. education and employment history), family background, banking information, for the following purposes:
- (i) conducting interviews;
  - (ii) providing you with technical support to assist you in completing your application;
  - (iii) processing your application (including pre-recruitment checks involving your qualifications);
  - (iv) providing or obtaining employee references and for background screening;
  - (v) processing employment pass applications, visa applications and offer of employment;
  - (vi) facilitating payroll processes;





- (vii) evaluating and assessing your suitability for the position applied for; and
  - (viii) purposes which are reasonably related to the aforesaid.
  - (j) If you are a dependent of an existing employee of SGPPL, SGPPL collects, uses and discloses your Personal Data for the following purposes:
    - (i) applying for dependent passes;
    - (ii) applying for long term social visit passes; and
    - (iii) purposes which are reasonably related to the aforesaid.
  - (k) If you are a member of public who signs up for newsletters with our participating partners and other affiliates through our services, SGPPL may collect personal data such as your name, email address, country of residence, preferences (e.g. as to events / concerts) for the purposes of forwarding concert / event related content, news, contests or promotions (which may be handled through a digital agency) – in each case, the terms and conditions (or any privacy policy) of our participating partners and other affiliates would be handled by such parties, and our role is to act as their data intermediary;
  - (l) Further to (k), to the extent that the sign up to newsletters with our participating partners and other affiliates are for SGPPL's purposes, or to result in your personal data being collected, used or disclosed by SGPPL, please refer to 4.3(a) for more information on the purposes for which SGPPL handles such personal data;
  - (m) If you are a member of the public, participating in photographs and videography (whether on site at the circuit or at events), and the photo is taken at an event which is accessible to the public / or subject to invitation or attendance conditions which provide that consent is given for the taking of such photographs or videos, such photos and videos (and any other Personal Data which may be given to us by you), would be used for development / use in marketing collaterals (including brochures, electronic direct mailers, commercials etc).
- 4.3 Members of the public may also have opted in and participated or interacted with SGPPL's marketing activities and initiatives such as signing up for e-newsletter subscription, participating in marketing contests, participating in our street videos / "activations". If so, SGPPL may collect your Personal Data and for purposes as follows:
- (a) (for newsletters) your name and email address so as to manage subscriptions and forward news and updates;
  - (b) (for marketing contests) your name, email address, country of residence (for fulfilment, profiling and to assist in verification of transactions), NRIC / passport number, mailing address, photos, other information submitted as part of the contest terms so as to facilitate the administration of the contest,



including verifying eligibility / compliance with contest terms, determining and contacting winners, and delivering prizes; and

- (c) (for street videos / on the ground "activations") your name, email address, telephone number, photos or recordings submitted as part of the activation / videos for use in promotion (including publicity purposes), so as to market appropriate products, send you newsletters, facilitate exclusive previews to their context and maintain contact with you.

4.4 Where you have purchased tickets to SGPPL organised / related events, SGPPL may collect your Personal Data such as your bank account details, NRIC / passport number, phone numbers, email addresses, credit card details, delivery address, nationality, country of residence, personal profiles such as gender and year of birth for purposes of the purchase, sale, invoicing, delivery, of tickets. In respect of some of the information requested such as nationality / country of residence, the purposes include to assist in fraud detection, and meeting legal and reporting requirements to relevant Singapore authorities.

4.5 In addition, where permitted under the Act, SGPPL may also collect, use and disclose your Personal Data as follows:

- (a) conducting analytics of our products and services;
- (b) organising promotional and corporate events;
- (c) (only when you have subscribed to them) sending you newsletters / e-newsletters;
- (d) (only when you have opted in to receive such updates) sending you updates about products, special offers, rewards, upcoming events, promotions, rewards, including those which we have identified may be of interest to you (including via telemarketing to such numbers as you may have provided to us, subject to your clear consent);
- (e) leads generation and management;
- (f) (in aggregate and therefore anonymously) for market research purposes, including to:
  - (i) track activity on our websites, to publish trends and/or to improve usefulness and content;
  - (ii) understand and determine customer location, preferences and demographics;
  - (iii) review, develop and improve our products, services and also develop special offers and marketing programmes;
  - (iv) conduct internal analysis of the event demographics to tailor our marketing efforts in the different territories the following year; and



(g) for any other purpose that we may notify to you and have your consent.

4.6 In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

## 5. Disclosure of Personal Data

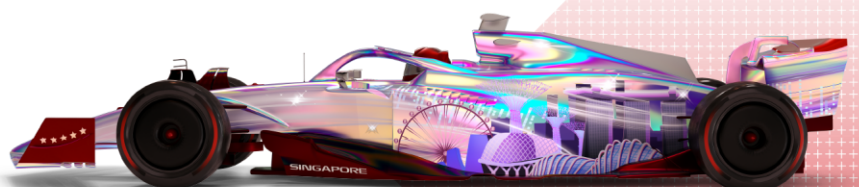
5.1 We have identified recipients to whom we disclose Personal Data in our sections on specific purposes for collection, use or disclosure of Personal Data. Generally, though, your Personal Data held by us shall be kept confidential. However, in order to provide you with effective and continuous products and services, and for the purposes listed above (where applicable), your Personal Data may be disclosed to the following:

- (a) entities within SGPPL and our related corporations;
- (b) agents, contractors or third party service providers who provide operational services to SGPPL, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival or other services to SGPPL;
- (c) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving SGPPL;
- (d) external banks, credit card companies and their respective service providers;
- (e) our professional advisers such as financial advisors, auditors and lawyers;
- (f) relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority;
- (g) counterparties, billing organisations and their respective banks in relation to fund transfers and payments; and
- (h) any other party to whom you authorise us to disclose your Personal Data.

## 6. Contacting Us – Withdrawal of Consent, Access to and Correction of your Personal Data

6.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our DPP;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this DPP; or



- (c) would like to obtain access and make corrections to your Personal Data records, please contact SGPPL as follows:

Call: +65 6731 4982  
Write in: Singapore GP Pte Ltd  
50 Cuscaden Road  
#06-02 HPL House  
Singapore 249724  
OR  
[dpo@singaporegp.sg](mailto:dpo@singaporegp.sg)

6.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, SGPPL may not be in a position to continue to provide its products or services to you, administer any contractual relationship in place, may be considered a termination by you of any contractual relationship which you may have with SGPPL, and your being in breach of your contractual obligations or undertakings, and SGPPL's legal rights and remedies in such event are expressly reserved.

7. **If you are resident in the European Union (EU) / European Economic Area (EEA)**

7.1 Where we are offering or providing products or services to you and you are resident in a member state of the European Union (EU) or European Economic Area (EEA), we will observe the EU General Data Protection Regulation ("GDPR") and other applicable data protection laws when we collect, use or disclose your Personal Data.

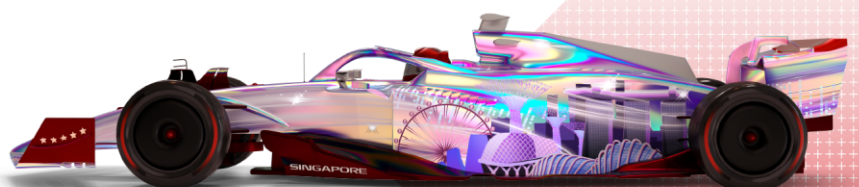
7.2 If you are an EU/EEA resident and we offer or provide products or services to you, the following additional provisions apply in relation to how we handle your Personal Data.

7.3 The types of Personal Data collected, the means of collection and purposes of processing remain the same as those set out at section 1 above, save that we will only provide marketing by email where we have your consent in accordance with applicable law or are sending you information about goods or services that are the same as those you have previously purchased, and subject to you being able to opt-out of further direct marketing at any time.

7.4 **The lawful grounds on which we collect data**

7.5 We process your Personal Data for the purposes relying on one or more of the following lawful grounds:

- (a) where you have freely provided your specific, informed and unambiguous consent for particular purposes;
- (b) where we agree to provide product(s) and/or services to you, in order to take any pre-contract steps at your request and/or to perform our contractual obligations to you;



- (c) where we need to use your Personal Data for legitimate purposes relevant to us being able to manage the administration and business operations of SGPPL (and keep records of the same), to make sure we follow internal policies and procedures so we can deliver the best service to you, to prevent and detect criminal activity that could be damaging for you or us, to make sure we can keep in touch regarding orders and offers, and to promote our business to existing and former customers. We will always seek to pursue these legitimate interests in a way that does not unduly infringe on your other legal rights and freedoms and, in particular, your right of privacy;
- (d) where we need to protect your vital interests or those of someone else (such as in a medical emergency); and/or
- (e) where we need to collect, process or hold your Personal Data to comply with a legal obligation.

7.6 If you provide us with any 'special category' Personal Data about you in relation to health, religious/ political or philosophical beliefs, ethnic origin and/or sex life/ sexual orientation, in addition to the above, we will only use this special category Personal Data in the following circumstances:

- (a) where we have your explicit consent;
- (b) where needed to comply with applicable social security or social protection laws;
- (c) to protect your vital interests (or those of someone else) in an emergency;
- (d) where you have already publicised such information; and/or
- (e) where we need to use such special category Personal Data in connection with a legal claim that we have or may be subject to.

#### 7.7 **When your Personal Data may be disclosed to third parties**

7.8 We only allow our service providers (as described at section 5 above) to handle your Personal Data on our behalf if we are satisfied they take appropriate measures to protect it. We impose contractual obligations on service providers to ensure they can only use your Personal Data to provide services to us and to you.

7.9 If we need to share some Personal Data with other parties, such as potential buyers of some or all of our business or during a re-structuring usually information will be anonymised but this may not always be possible. The recipient of the information will however be bound by confidentiality obligations.

7.10 Other than as set out in this DPP, we will treat your Personal Data as private and will not disclose it to third parties without you knowing it. The exceptions are in relation to legal proceedings or where we are legally required to provide your data to a court, regulator or someone else and can't tell you.

7.11 In all cases we always aim to ensure that your Personal Data is only used by third parties for lawful purposes and in compliance with application data protection law.



7.12 **Transferring your Personal Data**

7.13 You acknowledge that your Personal Data will be transferred to SGPPL, and processed and stored in the Singapore. Please note that the Act is not at present considered to meet the same legal standards of protection for Personal Data as European Union law.

7.14 However, in order to safeguard your Personal Data, we only transfer data from the EU/EEA to Singapore under a contract or another appropriate mechanism that is approved under applicable law and that protects that data to the same standards that you would expect in Europe.

7.15 **Keeping your Personal Data**

7.16 SGPPL retains your Personal Data you for as long as you have a relationship with us; as necessary to perform our obligations to you (or to enforce or defend legal claims); or, as is required by applicable law.

7.17 The criteria we use for determining data retention periods is based on various legislative requirements; the purpose for which we hold data and whether retaining the data is needed in connection with that purpose; and further specific guidance issued by relevant regulatory authorities on data retention/erasure including, but not limited to, EU regulatory authorities.

7.18 Personal Data that we no longer need is either erased and/or anonymised so that you can no longer be identified from it.

7.19 We employ appropriate technical and organizational security measures to protect your Personal Data from being accessed by unauthorized persons and against unlawful processing, accidental loss, destruction and damage. We also endeavour to take all reasonable steps to protect Personal Data from external threats such as malicious software or hacking. However, there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of all data sent to us.

7.20 **Your Personal Data rights**

7.21 Under the GDPR, those EU/EEA residents with whom we deal have various data protection rights, which are as follows:

7.22 you can request information about the Personal Data that we hold about you, what we use that Personal Data for; who it may be shared with as well as certain other information (this is called a 'subject access right'). Usually we will have a month to respond to a 'subject access right' request although where we have a complex request, we may require a further two months to respond. We may also charge for administrative time in dealing with any manifestly unreasonable or excessive requests. We may also require further information to locate specific information you seek and you should note that certain legal exemptions may also apply to what we can disclose in response;

- (a) you can ask that we correct Personal Data that we hold about you which is inaccurate or incomplete;
- (b) you can object to us conducting any automated processing in relation to your Personal Data (if applicable), for example if we conduct any automated credit scoring;



- (c) you can object to us continuing to use your Personal Data to send you direct marketing;
- (d) you can request that we erase your Personal Data if we no longer need to hold it;
- (e) you can object or ask us to restrict the use of your Personal Data for any purpose unless we have a compelling legitimate reason for doing so (e.g. a legal obligation); or
- (f) you can ask us to transfer your electronically held Personal Data to another party where it has been collected with your consent or is being used by us to perform contact.

7.23 If you would like to exercise any of the rights set out above, please contact us using the contact details above. We may need to ask for evidence to verify your identity before we can fully respond.

7.24 If you make a request and are not satisfied with our response, or believe that we are illegally processing your Personal Data, you have the right to complain to a data protection supervisory authority in your EU country of residence.

