



Algebra Group Limited

Privacy Policy

Last updated on 12 December 2022

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1. PRIVACY POLICY

- 1.1. Albra Group Limited (“Albra”) is committed to protecting and respecting your privacy. This policy notice (together with our terms and conditions) aims to give you information on how Albra protects, collects, shares and uses your personal information when you visit our website, the Albra app or any other Albra service.
- 1.2. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. It is important that you read this privacy notice together with any other privacy notice or fair processing notice 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 data.
- 1.3. This Privacy Policy applies to Albra’s website and App and all products and services offered by Albra and by entering our site you are agreeing to the policies described herein.
- 1.4. This privacy notice supplements any other policies or notices you may be provided with and is not intended to override them.

2. WHO WE ARE

- 2.1. For the purpose of the General Data Protection Regulation, the data controller is Albra Group Limited with registered address of Squire Patton Boggs (UK) LLP (Ref: CSU) No.1 Spinningfields, Hardman Square, Manchester, England, M3 3EB | Tel.+44 (0) 20 3744 4900 | Email: info@albra.com.
- 2.2. References in this privacy notice to “we” or “us” are references to the controller.

3. PERSONAL DATA PROCESS

- 3.1. 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).
- 3.2. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:
 - 3.2.1. Information you give us: This is information about you that you give us when you:
 - 3.2.1.1. fill in any forms;
 - 3.2.1.2. correspond with us;
 - 3.2.1.3. register to use the Albra app;
 - 3.2.1.4. open an account or use any of our services;
 - 3.2.1.5. take part in online discussions, surveys or promotions;
 - 3.2.1.6. speak or interact with a member of our customer support team (either on the phone or through the Albra app);
 - 3.2.1.7. enter a competition; or
 - 3.2.1.8. contact us for other reasons.
 - 3.2.2. We will collect the following information:
 - 3.2.2.1. Your name, address, and date of birth;
 - 3.2.2.2. Your email address, phone number and details of the device you use (for example, your phone, computer or tablet);

- 3.2.2.3. Your Algebra username (this is random and is automatically assigned to you when you first join but you will be able to change it), password and other registration information;
 - 3.2.2.4. Details of your bank account, including the account number, sort code and IBAN;
 - 3.2.2.5. Details of your Algebra debit cards and credit cards (or other debit or credit cards you have registered with us), including the card number, expiry date and CVC (the last three digits of the number on the back of the card);
 - 3.2.2.6. Identification documents (for example, your passport or driving licence), copies of any documents you have provided for identification purposes, and any other information you provide to prove you are eligible to use our services;
 - 3.2.2.7. Information you provide when you apply for credit, including details about your income and financial obligations;
 - 3.2.2.8. Records of our discussions, if you contact us or we contact you (including records of phone calls);
 - 3.2.2.9. Your image in photo or video form (where required as part of our Know-Your-Client (KYC) checks or where you upload a photo to your Algebra account).
 - 3.2.2.10. If you give us personal data about other people (such as your spouse or family), or you ask us to share their personal data with third parties, you confirm that you have brought this policy to their attention beforehand.
- 3.2.3. Information from your device. Whenever you use our website or the Algebra app, we collect the following information:
- 3.2.3.1. Technical information, including the internet protocol (IP) address used to connect your computer to the internet, your log-in information, the browser type and version, the time-zone setting, the operating system and platform, the type of device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system, the type of mobile browser you use.
 - 3.2.3.2. Information about your visit, including the links you have clicked on, through and from our site (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling and clicks), and methods used to browse away from the page.
 - 3.2.3.3. Information on transactions (for example, payments into and out of your account), including the date, time, amount, currencies, exchange rate, beneficiary details, details of the merchant or ATMs associated with the transaction (including merchants' and ATMs' locations), IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, details of device used to arrange the payment and the payment method used.
 - 3.2.3.4. Information stored on your device, including if you give us access to contact information from your contacts list. The Algebra app will regularly

collect this information in order to stay up to date (but only if you have given us permission).

3.2.4. Other data we collect:

- 3.2.4.1. 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.
- 3.2.4.2. We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data).

4. HOW WE USE YOUR DATA

- 4.1. 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:
 - 4.1.1. where we need to execute the contract, we are about to enter into or have entered into with you;
 - 4.1.2. 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; and
 - 4.1.3. where we need to comply with a legal or regulatory obligation.
- 4.2. Examples of the purposes for which we may process your personal data include:
 - 4.2.1. to register you as a new client and to carry out our obligations arising from any contracts entered into between you and us;
 - 4.2.2. to communicate with you;
 - 4.2.3. carrying out mandatory and regulatory checks, including but not limited to anti-money laundering checks;
 - 4.2.4. notifying you about changes to our service or terms or privacy policy;
 - 4.2.5. to promote our services, including by sending alerts, updates, event invitations etc.;
 - 4.2.6. to comply with our legal, regulatory and risk management obligations, including establishing, exercising or defending legal claims;
 - 4.2.7. to ensure that content from our site is presented in the most effective manner for you and for your computer; and
 - 4.2.8. to administer and protect our business and keep our website secure (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).

5. COOKIES AND USE OF OUR WEBSITE

- 5.1. Our websites may use tools such as Google Analytics, a service provided by Google, Inc. that tracks and reports on the manner in which our websites are used. Google Analytics does this by placing small text files called “cookies” on your computer or other device. Cookies collect information about the number of visitors to the websites, the pages visited and the time spent on the websites.

- 5.2. 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 our website may become inaccessible or not function properly.

6. EMAILS

- 6.1. We may use your name and e-mail address(es) obtained from you to send you alerts, updates, event invitations and other information by e-mail. If you wish to receive marketing communications from us you have to opt-in to marketing communications. If you no longer wish to do so, you may unsubscribe at any time by following the link included in these e-mails.

7. WE MAY SHARE YOUR PERSONAL INFORMATION WITH THIRD PARTY ORGANISATIONS

- 7.1. We may disclose your personal information:
 - 7.1.1. in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
 - 7.1.2. if Algbra substantially or all of its assets are acquired by a third party, in which case personal data held by us will be one of the transferred assets;
 - 7.1.3. if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Algbra, our customers, or others;
 - 7.1.4. to fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found in Appendix 1 of this document;
 - 7.1.5. in the event that we need to contact credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
 - 7.1.6. if required by professional advisers including lawyers, bankers, auditors and insurers some based UK and some based outside EEA, who provide consultancy, banking, legal, insurance and accounting services; necessary to the performance of our contractual obligations to you;
 - 7.1.7. if we are under a duty to HM Revenue & Customs, Fraud prevention agencies, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.
 - 7.1.8. if we engage with companies we have a joint venture or agreement to co-operate with; or
 - 7.1.9. where required by companies you ask us to share your data with.
- 7.2. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and our Cookie Policy; and that those we share data with adhere to similar exacting standards.

8. TRANSFER OF PERSONAL DATA OUTSIDE OF THE EEA

- 8.1. Although we are a business based in the UK, due to the international nature of Algebra's operations and for the purposes of providing the services to you, any personal information that we hold and the data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA). By submitting your Personal Data, you agree to this transfer, storing and processing by us. We will take all steps reasonably necessary to ensure that such transfers comply with applicable data protection law and that your data is treated securely and in accordance with this Privacy Policy and our Cookie Policy. This may include entering into data transfer agreements with recipients.

9. DATA ABOUT THIRD PARTIES

- 9.1. If, and to the extent, you provide personal data relating to any third party to us, you confirm that they have appointed you to act on their behalf, you have obtained their consent to pass their personal data to us and for us to process that personal data in the manner and for the purposes described in this Privacy Policy.

10. HOW WE RETAIN YOUR DATA

- 10.1. 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 but we may retain information after the closure of the relevant file for as long as permitted and or required for legal, regulatory, fraud and other financial crime prevention and for legitimate business purposes. In addition, we are required by law to retain certain types of information for specified time periods.

11. YOUR RIGHTS

- 11.1. Under the UK Data Protection law, you have rights as an individual which you can exercise in relation to the information we hold about you. You are entitled to ask for details of the personal data we hold about you and how we process it and to receive a copy of your personal data. You may also have your data rectified or deleted, restrict our processing of that information, and object to the processing of your personal data. You may also choose to withdraw your consent. You can read more about these rights here;
<https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>
- 11.2. You have the right to be told about how we use your personal data
- 11.2.1. We provide this Privacy Policy to explain how we use your personal data.
- 11.2.2. If you ask, we will provide a copy of the personal data we hold about you. We can't give you any personal data about other people, personal data which is linked to an ongoing criminal or fraud investigation, or personal data which is linked to settlement negotiations with you. We also won't provide you with any communication we've had with our legal advisers.

- 11.3. You can ask us to correct your personal data if you think it's wrong. You can have incomplete or inaccurate personal data corrected. Before we update your file, we may need to check the accuracy of the new personal data you have provided.
- 11.4. You can ask us to delete your personal data if:
 - 11.4.1. there's no good reason for us to continue using it;
 - 11.4.2. you gave us consent (permission) to use your personal data and you have now withdrawn that consent;
 - 11.4.3. you have objected to us using your personal data;
 - 11.4.4. we have used your personal data unlawfully; or
 - 11.4.5. the law requires us to delete your personal data.
- 11.5. We may in some cases not be able to agree to your request for us to delete certain of your personal data. As a regulated financial services provider, we must keep certain customer personal data even if you ask us to delete it (we've explained this in more detail below). If you've closed your Algebra account, we may not be able to delete your entire file because our regulatory responsibilities take priority. We will always let you know if we can't delete your information.
- 11.6. You can object to us processing your personal data for marketing purposes and can tell us to stop using your personal data for marketing.
- 11.7. You can object to us processing other personal data (if we are using it for legitimate interests)
 - 11.7.1. If our legal basis for using your personal data is 'legitimate interests' and you disagree with us using it, you can object.
 - 11.7.2. However, if there is an overriding reason why we need to use your personal data, we will not accept your request.
 - 11.7.3. If you object to us using personal data which we need in order to provide our services, we may need to close your account as we won't be able to provide the services.
- 11.8. You can ask us to restrict how we use your personal data. You can ask us to suspend using your personal data if:
 - 11.8.1. you want us to investigate whether it is accurate;
 - 11.8.2. our use of your personal data is unlawful but you do not want us to delete it;
 - 11.8.3. we no longer need the information, but you want us to continue holding it for you in connection with a legal claim; or
 - 11.8.4. you have objected to us using your personal data (see above), but we need to check whether we have an overriding reason to use it.
- 11.9. You can ask us to transfer personal data to you. If we can, and the regulatory requirements that apply to us allow us to do so, we will provide your personal data in a structured, commonly used, machine-readable format.
- 11.10. You can withdraw your permission
 - 11.10.1. If you have given us any consent we need to use your personal data, you can withdraw your consent at any time by changing your privacy settings in the Algebra app.
- 11.11. You can ask us to carry out a human review of an automated decision we make about you. If we make an automated decision about you that significantly affects you, you can ask us to carry out a manual review of this decision.
- 11.12. Your ability to exercise these rights will depend on a number of factors. Sometimes, we will not be able to agree to your request (for example, if we have a legitimate

reason for not doing so or the right does not apply to the particular information we hold about you).

11.13. How do I exercise my rights?

11.13.1. To exercise any of your rights set out in the previous section, you can contact us via the Algebra app.

11.13.2. For security reasons, we can't deal with your request if we are not sure of your identity, so we may ask you for proof of your ID.

11.13.3. Algebra will usually not charge you a fee when you exercise your rights.

However, we are allowed by law to charge a reasonable fee or refuse to act on your request if it is manifestly unfounded or excessive.

11.13.4. If you are unhappy with how we have handled your personal data you can complain to your local data protection authority. In the United Kingdom, this is the ICO ([website](#)).

12. CHANGES TO OUR PRIVACY POLICY

12.1. Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you.

13. CONTACT

13.1. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to:

Algebra Group Limited
Registered Address: Squire Patton Boggs (UK) LLP (Ref: CSU) No.1 Spinningfields,
Hardman Square, Manchester, England, M3 3EB
Tel.+44 (0) 20 3744 4900
Email: info@algebra.com

Transact Payments Limited Privacy Policy

This policy explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others and how we keep it secure. TPL is committed to safeguarding the privacy of your information. By “your data”, “your personal data”, and “your information” we mean any personal data about you which you or third parties provide to us.

We may change this Policy from time to time so please check this page regularly to ensure that you’re happy with any changes.

Who are we?

Transact Payments Limited (“TPL”, “we”, “our” or “us”) is the issuer of your card and is the Data Controller for the personal data which you provide to us in relation to the card only. TPL is an e-money institution, authorised and regulated by the Gibraltar Financial Services Commission. Our registered office address is 6.20 World Trade Centre, 6 Bayside Road, Gibraltar, GX11 1AA and our registered company number is 108217.

Algebra Group Limited (“Algebra”) is the Program Manager for your card program and is the Data Controller for any personal data which you provide which is not related to the card. Algebra is incorporated and registered in England & Wales with company number 12629086 and registered address of Squire Patton Boggs (UK) LLP (Ref: CSU) No.1 Spinningfields, Hardman Square, Manchester, England, M3 3EB.

How do we collect your personal data?

We collect information from you when you apply online or via a mobile application for a payment card which is issued by us. We also collect information when you use your card to make transactions. We also obtain information from third parties (such as fraud prevention agencies) who may check your personal data against any information listed on an Electoral Register and/or other databases.

On what legal basis do we process your personal data?

Contract

Your provision of your personal data and our processing of that data is necessary for each of us to carry out our obligations under the contract (known as the Cardholder Agreement or Cardholder Terms & Conditions or similar) which we enter into when you sign up for our payment services. At times, the processing may be necessary so that we can take certain steps, at your request, prior to entering into that contract, such as verifying your details or eligibility for the payment services. If you fail to provide the personal data which we request, we cannot enter into a contract to provide payment services to you or will take steps to terminate any contract which we have entered into with you.

Legal/Regulatory

We may also process your personal data to comply with our legal or regulatory obligations.

Legitimate Interests

We, or a third party, may have a legitimate interest to process your personal data, for example:

- To analyse and improve the security of our business;
- To anonymise personal data and subsequently use anonymized information.

What type of personal data is collected from you?

When you apply for a card, we, or our partners on our behalf, collect the following information from you: full name, physical address, email address, mobile phone number, phone number, date of birth, gender, login details, IP address, identity and address verification documents.

When you use your card to make transactions, we store that transactional and financial information. This includes the date, amount, currency, card number, card name, account balances and name of the merchant, creditor or supplier (for example a supermarket or retailer). We also collect information relating to the payments which are made to/from your account.

How is your personal data used?

We use your personal data to:

- set up your account, including processing your application for a card, creating your account, verifying your identity and printing your card.
- maintain and administer your account, including processing your financial payments, processing the correspondence between us, monitoring your account for fraud and providing a secure internet environment for the transmission of our services.
- comply with our regulatory requirements, including anti-money laundering obligations.
- improve our services, including creating anonymous data from your personal data for analytical use, including for the purposes of training, testing and system development.

Who do we share your information with?

When we use third party service providers, we have a contract in place that requires them to keep your information secure and confidential.

We pass your information to the following categories of entity:

- identity verification agencies to undertake required verification, regulatory and fraud prevention checks;
- information security services organisations, web application hosting providers, mail support providers, network backup service providers and software/platform developers;
- document destruction providers;

- Mastercard, Visa, digital payment service providers or any third parties involved in processing the financial transactions that you make;
- anyone to whom we lawfully transfer or may transfer our rights and duties under this agreement;
- any third party as a result of any restructure, sale or acquisition of TPL or any associated entity, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us.
- regulatory and law enforcement authorities, whether they are outside or inside of the EEA, where the law requires us to do so.

Sending personal data overseas

To deliver services to you, it is sometimes necessary for us to share your personal information outside the European Economic Area (EEA), e.g.:

- with service providers located outside the EEA;
- if you are based outside the EEA;
- where there is an international dimension to the services we are providing to you.

These transfers are subject to special rules under European and Gibraltar data protection law.

These non-EEA countries do not have the same data protection laws as Gibraltar and EEA. We will, however, ensure the transfer complies with data protection law and all personal information will be secure. We will send your data to countries where the European Commission has made an adequacy decision, meaning that it has ruled that the legislative framework in the country provides an adequate level of data protection for your personal information. You can find out more about this here.

When we send your data to a country where the European Commission has not made an adequate decision, our standard practice is to use standard data protection contract clauses that have been approved by the European Commission. To obtain a copy of those clauses, please go to the European Commission's website.

If you would like further information please contact our Data Protection Officer on the details below.

How long do we store your personal data?

We will store your information for a period of five years after our business relationship ends in order that we can comply with our obligations under applicable legislation such as anti-money laundering and anti-fraud regulations. If any changes to applicable legislation require us to retain your data for a longer period of time, we shall retain it for that period. We will not retain your data for longer than is necessary.

Your rights regarding your personal data?

- You have certain rights regarding the personal data which we process:
- You may request a copy of some or all of it.

- You may ask us to rectify any data which we hold which you believe to be inaccurate.
- You may ask us to erase your personal data.
- You may ask us to restrict the processing of your personal data.
- You may object to the processing of your personal data.
- You may ask for the right to data portability.
- If you would like us to carry out any of the above, please email the Data Protection Officer at DPO@transactpaymentsltd.com.

How is your information protected?

We implement security policies and technical measures in order to secure your personal data and take steps to protect it from unauthorised access, use or disclosure.

While we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Complaints

We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your personal information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in Gibraltar is the Gibraltar Regulatory Authority. Their contact details are as follows:

Gibraltar Regulatory Authority,
2nd floor, Eurotowers 4, 1 Europort Road, Gibraltar.
(+350) 20074636/(+350) 20072166
info@gra.gi

Other websites

Our website may contain links to other websites. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

Changes to our Privacy Policy

We keep our Privacy Policy under review and we regularly update it to keep up with business demands and privacy regulation. We will inform you about any such changes. This Privacy Policy was last updated on 14th December 2021.

How to contact us

If you have any questions about our Privacy Policy or the personal information which we hold about you or, please send an email to our Data Protection Officer at DPO@transactpaymentsltd.com.

Fair Processing Notices for the National Fraud Database

GENERAL

1. Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you.
2. The personal data you have provided, we have collected from you, or we have received from third parties will be used to prevent fraud and money laundering, and to verify your identity.
3. Details of the personal information that will be processed include, for example: name, address, date of birth, contact details, financial information, employment details, device identifiers including IP address and vehicle details.
4. We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime
5. We process your personal data on the basis that we have a legitimate interest in preventing fraud and money laundering, and to verify identity, in order to protect our business and to comply with laws that apply to us. Such processing is also a contractual requirement of the services or financing you have requested.
6. Fraud prevention agencies can hold your personal data for different periods of time, and if you are considered to pose a fraud or money laundering risk, your data can be held for up to six years.

AUTOMATED DECISIONS

7. As part of the processing of your personal data, decisions may be made by automated means. This means we may automatically decide that you pose a fraud or money laundering risk if our processing reveals your behaviour to be consistent with money laundering or known fraudulent conduct, or is inconsistent with your previous submissions, or you appear to have deliberately hidden your true identity. You have rights in relation to automated decision making: if you want to know more please contact us using the details above.

CONSEQUENCES OF PROCESSING

8. If we, or a fraud prevention agency, determine that you pose a fraud or money laundering risk, we may refuse to provide the services or financing you have requested, or to employ you, or we may stop providing existing services to you.
9. A record of any fraud or money laundering risk will be retained by the fraud prevention agencies, and may result in others refusing to provide services, financing or employment to you. If you have any questions about this, please contact us on the details above.

DATA TRANSFERS

10. Fraud prevention agencies may allow the transfer of your personal data outside of the UK. This may be to a country where the UK Government has decided that your data will be protected to UK standards, but if the transfer is to another type of country, then the fraud prevention agencies will ensure your data continues to be protected by ensuring appropriate safeguards are in place.

YOUR RIGHTS

11. Your personal data is protected by legal rights, which include your rights to object to our processing of your personal data, request that your personal data is erased or corrected, and request access to your personal data.
12. For more information or to exercise your data protection rights, please contact us using the contact details above.
13. You also have a right to complain to the Information Commissioner's Office, which regulates the processing of personal data.