

# Privacy Notice

State Bank of India (UK) Limited (“SBIUK”, “we”, “our” or “us”) respect your privacy and are committed to protecting the privacy of our customers and website visitors.

This Privacy Notice will inform you on how we collect, use and safeguard your personal data and the legal basis on which we do so and advise you about how the law protects you and your privacy rights.

*By submitting your data to this website (the “Site”) whether during the registration process or when submitting or uploading your own content or otherwise using our on-line services, you are consenting to the processing of your data by us in accordance with this Policy.*

The content, products or services we provide may change in the future and consequently this Privacy Notice may also change. Any changes we may make to this Privacy Notice, in the future, will be posted on this page and, where appropriate, notified to you by email. We recommend that you re-visit this page regularly to see any updates or changes to our Privacy Notice.

## 1. IMPORTANT INFORMATION AND WHO WE ARE

### Purpose of this Privacy Notice

- This Privacy Notice aims to give you information on how we collect and process your personal data when we provide our services or when you use this Site, including any personal data you may provide when you register to use our services.
- This Site is not intended for children.
- 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 use your data.
- This Privacy Notice supplements other such notices and is not intended to override them.

### Controller

- SBIUK (Company Number 10436460) is a company registered in England and Wales with its registered office at 15 King Street, London, EC2V 8EA, It is the data controller for purposes of the personal data you have provided to us or we have collected from you and responsible for this Site.
- SBIUK is part of the State Bank of India group of companies (the “SBI Group”). Details of the SBI Group can be found at <https://www.sbiuk.com/footer/about-sbi/about-us>. Personal data provided may be stored on a SBI Group database and may be used by us, any SBI Group company or third party for the purposes set out in this Privacy Notice.
- We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below:

State Bank of India (UK) Limited  
Data Protection Officer  
15-17 King Street, London  
EC2V 8EA; or

via email at [dataprotection.sbiuk@statebank.com](mailto:dataprotection.sbiuk@statebank.com)

- You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

### **This Site and third-party links**

- This Site may include links to third-party websites, advertisers and affiliates, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and we do not accept any responsibility or liability for their privacy policies. When you leave our Site, we encourage you to read the privacy notice of every website you visit before you submit any personal data to these websites.

### **Your duty to inform us of changes**

- 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.

## **2. INFORMATION WE MAY COLLECT ABOUT YOU**

- We may collect, use, store and transfer different types of personal data about you (or those associated with you such as dependents, other close family members and joint account holder(s)) which you may provide or which we may collect from other parties. These can broadly be grouped together as follows:

**Identity Data** includes first name, maiden name, last name, user-name or similar identifiers (including reference numbers we have allocated to identify you), marital status, title, date of birth, gender and job title.

**Contact Data** includes billing address, physical address, email address and telephone number(s).

**Enquiry Data** includes Identity, Contact and Financial Data contained in any enquiry you submit to us regarding services and products.

**Financial Data** includes bank accounts details, payment card details, salary and other income, expense, asset and liability details.

**Regulatory Data** includes personal data involving credit and identification checking and validation, money-laundering checks and information about criminal convictions and offences

**Transaction Data** includes details about payments to and from you and other details of services and products we provide to you such as the date, amount, currency and the name and type of supplier (for example, supermarket services, medical services, transactions in assets, retail services) and from the payments which are made to and from your account(s) with us.

**Technical Data** includes internet protocol (IP) address, your log-in data, browser type and version, time zone and location settings, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Site and the online services provided by us.

**Profile Data** includes your username and password, transactions made by you, your interests and preferences.

**Usage Data** includes information about how you use our Site and services, including but not limited to, traffic data, location data, web-logs and other communication data, whether this is required for our own purposes or otherwise, and the resources that you access.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

**Correspondence Data** includes all of the above category groups of personal data which are contained in, or relating to, any communication with you (including

telephone conversations, if applicable, where we notify you such conversations are recorded), which may also include the communication content and metadata associated with the communication.

- We also collect, use and share aggregated data such as statistical or demographic data. 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.
- Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case, at the time.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED

- In order to provide you with bank accounts and other products and services we need to collect, use, share and store personal information about you and your transactions. Personal data includes any information that directly or indirectly identifies you, including any photograph that we take of you, the signature we get from you during the account-opening process for the purpose of verifying your identity or to provide products and services to you. Personal data does not include data where the identity has been removed (anonymous data).
- We use different methods to collect data from and about you including through:
  - Direct interactions with you** - when you give us information during your application process for our products and services, including information you give us by filling in any forms on our Site and using our Site, you correspond with us e.g. emails, telephone calls, letters and conversations held with staff at our premises.
  - Receiving information about you from third parties or publicly available sources** - when data is received by us from third parties, such as employers, joint account holders, credit reference agencies, fraud prevention agencies or other organisations when you apply for an account with us or for any of our other products or services, or which you, or they, give to us; data received by third parties associated with you; data about you from publicly available sources such as social media sites and Government registers; information that you provide on social media websites such as Twitter, LinkedIn and YouTube.
  - Automated technologies or interactions** - as you interact with our Site, we may automatically collect technical data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies and other similar technologies.
  - Analysis and management of your accounts and services** – information we learn from the way in which your accounts with us are administered and managed, from the transactions made, such as the date, amount, currency and the name and type of supplier (for example, supermarket services, medical services, transactions in assets, retail services) and from the payments which are made to, and from, your account(s) with us.
- Where you provide personal and financial information to us about others (such as dependents, other family members and joint account holder(s)), you confirm that you have their consent or are otherwise lawfully entitled to provide this data to us and for it to be used in accordance with this Privacy Notice.

### 4. HOW WE USE YOUR PERSONAL DATA

- We have set out below, in a table format, a description of the ways we and other companies within the SBI Group or providers of Approved Third Party Services may use your data and which of the legal bases we rely on to do so. We have also identified what our legitimate

interests are, where appropriate. Note that we may process your personal data on more than one lawful ground depending on the specific purpose for which we are using your data.

- In order to use and process your personal data, we rely on the following legal bases:
  - processing is necessary for the performance of the services, product or contract we provide to you;
  - processing is necessary in order to comply with a legal obligation to which we are subject;
  - processing is necessary for the purposes of the legitimate business interests pursued by the SBI Group or another third party; and/or
  - you have provided consent to the processing of your personal data for one or more specified purposes.
- We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users. We may also use such aggregate information to help advertisers reach the kind of audience they want to target by displaying their advertisement to that target audience.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer including but not limited to process your application for and set up your accounts and to process your application to use our on-line services	Identity Data Enquiry Data Contact Data Financial Data Profile Data Correspondence Data	Performance of services and products we provide to you (or steps taken on your request prior to entering into a contract for the performance of such services)
<p>To verify your identity and make financial risk assessments including anti-money laundering checks and for crime and fraud prevention purposes. 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 at:</p> <p style="text-align: center;"><a href="https://www.cifas.org.uk/fpn">https://www.cifas.org.uk/fpn</a></p> <p>For more information about how credit referencing agents generally use your personal data, visit the Credit Reference Agency Information Notice (CRAIN) which can be found here:</p> <p style="text-align: center;"><a href="https://www.experian.co.uk/legal/crain/">https://www.experian.co.uk/legal/crain/</a></p> <p>For specific information on how our credit reference agency uses your data, visit:</p> <p style="text-align: center;"><a href="https://www.experian.co.uk/consumer/privacy.html">https://www.experian.co.uk/consumer/privacy.html</a></p>	Identity Data Contact Data Enquiry Data Regulatory Data Financial Data	Performance of services and products we provide to you (or steps taken on your request prior to entering into a contract for the performance of such services); Necessary to comply with a legal obligation; Necessary for our legitimate interests (for running our business, to ensure security, to prevent fraud, to meet our regulatory compliance and reporting obligations) or the legitimate interests of a third party
To deliver the services to you including: to manage your accounts,	Identity Data Enquiry Data	Performance of services and products we provide

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>to give you statements and to provide you with services available through our Site including managing your accounts on- line.</p> <p>to carry out our obligations in respect of the provision of your accounts and the provision of our on-line services.</p> <p>to manage payments, fees and charges</p> <p>to collect and recover money owed to us or to you.</p> <p>to provide content in line with your preferences</p>	<p>Contact Data Transaction Data Financial Data Profile Data Correspondence Data Marketing and Communications Data</p>	<p>to you;</p> <p>Necessary to comply with a legal obligation;</p> <p>Necessary for our legitimate interests (for running our business, to ensure security, to meet our regulatory compliance and reporting obligations, to recover debts due to us) or the legitimate interests of a third party;</p> <p>Consent (to provide content and notifications in line with your preferences)</p>
<p>To manage develop and improve our relationship with you which will include:</p> <p>notifying you about changes to our terms or privacy policy or our services</p> <p>providing you with professional assistance as required</p> <p>developing and improving our services to you</p>	<p>Identity Data Enquiry Data Contact Data Transaction Data Financial Data Profile Data Correspondence Data Marketing and Communications Data</p>	<p>Performance of a contract with you;</p> <p>Necessary to comply with a legal obligation</p>
<p>To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Identity Data Contact Data Technical Data Profile Data Usage Data</p>	<p>Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) or the legitimate interests of a third party;</p> <p>Necessary to comply with a legal obligation</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>Identity Data Contact Data Technical Data Profile Data</p>	<p>Necessary for our legitimate interests (to define types of customers for our</p>

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	Usage Data Financial Data Marketing and Communications Data	products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy) or the legitimate interests of a third party
To enable us to carry out assessment and analysis (including credit and/or behaviour scoring, market and product analysis)	Identity Data Contact Data Technical Data Profile Data Usage Data Financial Data Marketing and Communications Data	Performance of services and products we provide to you; Necessary to comply with a legal obligation; Necessary for our legitimate interests (for running the business, to define types of customers for our products and services, to develop our business and to inform our marketing strategy) or the legitimate interests of a third party
To enforce any of our rights against you	Identity Data Contact Data Technical Data Financial Data Correspondence Data Regulatory Data	Performance of services and products we provide to you; Necessary to comply with a legal obligation; Necessary for our legitimate interests (for running the business, to meet our regulatory compliance and reporting obligations, to recover debts due to us) or the legitimate interests of a third party
To meet our regulatory compliance and reporting obligations including to prevent and detect fraud, money laundering and other crime and carry regulatory checks	Identity Data Contact Data Technical Data Financial Data Correspondence Data Regulatory Data	Necessary to comply with a legal obligation; Necessary for our legitimate interests (for running the business, to meet our regulatory

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
		compliance and reporting obligations) or the legitimate interests of a third party
To provide you or permit selected third parties to provide you with information, products or services that you request from us or which we or they consider may be of interest to you, where you have consented to be contacted for such purposes.	Identity Data Contact Data Marketing and Communications Data	Consent (to provide content and notifications in line with your preferences)

- Any further uses of your information in future - if we determine that your personal data is to be used for a purpose not already notified to you we will provide you with further information prior to processing for that new purpose. We will tell you in writing about any changes and allow you 30 calendar days to raise any objections before we make any change. If you do not give your permission for the change to be made, it may affect our ability to provide the service(s) and, in some instances, we may need to close your account(s).

## 5. USE OF YOUR INFORMATION FOR MARKETING

- We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:
- Promotional offers from us**  
We may use your Identity, Contact, Technical, Usage, Profile Data and Marketing and Communications Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant to you. We call this “marketing”.
- You will receive marketing communications from us if you have requested information from us or requested services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.
- Opting-out** - you can ask us or third parties to stop sending you marketing messages at any time by logging into the relevant website and checking or unchecking relevant boxes to adjust your marketing preferences, by selecting the unsubscribe options in email correspondence received, by following the opt-out links on any marketing message sent to you or by contacting us at 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 request, warranty registration, product/service experience or other transactions.
- Third-party marketing - we will get your express opt-in consent before we share your personal data with any company outside the SBI Group of companies for marketing purposes.

## 6. DISCLOSURES OF YOUR PERSONAL DATA AND POSSIBLE CONSEQUENCES

We may share your data with:

- any member of the SBI Group (which means our subsidiaries, our ultimate holding company and its subsidiaries) insofar as is reasonably necessary for the purposes set out in this Privacy Notice;
- any prospective buyer of our business or assets or any prospective seller of another business or business assets that we are interested in buying. We will ensure that the prospective seller or buyer treats your data as confidential;
- our insurers, lawyers, accountants, auditors and professional advisers insofar as is reasonably necessary for the purposes of obtaining and maintaining insurance cover, obtaining legal and other advice, managing legal disputes, managing risks and meeting reporting, regulatory and compliance obligations;
- our business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you;
- analytics and search engine providers that assist us in the improvement and optimisation of our Site;
- third parties we use to process your data on our behalf, for example, third parties used to host the Site, maintain our IT systems or approved third party brokers. Where we use third parties to process your data on our behalf we will ensure that they have provided appropriate safeguards required in relation to such processing;
- We and fraud prevention agencies may also enable law enforcement agencies to access and use your personal data to detect, investigate and prevent crime. 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 we may stop providing existing services to you;
- Credit reference agencies for the purpose of verifying your identity and suitability for an account and assessing your credit score where this is a condition of us entering into a contract with you. Credit reference agencies keep a record of our enquiries and may record, use and provide such information to other financial institutions, insurers and other organisations. Information held about you by the credit reference agencies may already be linked to records relating to your partner or members of your household where a financial "association" has been created. Any enquiry we make at a credit reference agency may be assessed with reference to any associated records. Another person's record will be associated with yours when (i) you make a joint application, (ii) you advise us of a financial association with another person, or (iii) if the credit reference agencies have existing linked or "associate" records. This "association" will be taken into account in all future applications by either or both of you and shall continue until one of you applies to the credit reference agencies and is successful in filing a "disassociation". For more information on how credit reference agents process data, visit the Credit Reference Agency Information Notice (CRAIN) which can be found here: <https://www.experian.co.uk/legal/crain/> . For more information on how our credit reference agent processes your personal data, please visit: <https://www.experian.co.uk/consumer/privacy.html>;
- identity and address verification agencies who may record and use your data, especially if fraud and/or dishonesty is suspected, and disclose it to other organisations and law enforcement agencies (including internationally) for purposes of debt tracing and recovery, fraud and money laundering prevention and prosecution. Further details can be found at <https://www.sbiuk.com/personal-banking/personal/credit-reference>;
- HM Revenue & Customs;
- UK and overseas financial regulators to meet our regulatory, compliance and reporting obligations;
- other financial service organisations (including lenders and operators of card schemes) both within the UK and abroad;
- other third parties if we are under a duty to disclose or share your data in order to comply with any legal or regulatory obligation, or as part of legal proceedings, or in order to enforce any of our rights against you under your contract with us or to protect the property, safety or vital interests of SBIUK, or of another natural person;
- to other parties connected to your account (e.g. a joint account holder);
- your advisers (including but not limited to accountants, lawyers or other professional advisers) where authorised by you;



- to carefully selected third parties for marketing purposes when you have consented to be contacted for such purposes; and
- providers of Approved Third Party Service as set out in our General Terms and Conditions.

## 7. DATA RETENTION

- We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.
- 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 our DPO.
- Details of retention periods for different aspects of your personal data are available in our Retention Policy which you can request by contacting us.

## 8. STORAGE AND INTERNATIONAL TRANSFERS

In this section we provide information about where your data may be stored and the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).

- SBIUK has outsourced the storage of a large part of its customer data to State Bank of India in India. SBIUK's databases are held in India. As we share your data with the SBI Group, this will involve transferring your data outside the EEA. We ensure your data is protected by requiring SBI Group companies provide adequate safeguards.
- In connection with providing you our services or to comply with our regulatory and legal obligations, we may be required to send personal data to countries outside the EEA which have not been deemed to have adequate standards of data protection.
- When we do so we aim to perform a risk assessment prior to the transfer and use EU recognised and enforceable specific contracts approved by the European Commission so that your data is protected in line with data protection laws, as applicable in the UK.
- Instances where we will transfer your data outside of the EEA include:
  - processing international payments by international electronic transfer;
  - disclosures to foreign authorities, regulators and law enforcement agencies to reduce financial crime and terrorism;
  - picture based, human verified, identification checks for online account opening;
  - the data generated by cookies about your use of our web application (including your IP address but no other personal data).
- You acknowledge that personal data that you submit for publication through our Site or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.
- Where we process international payments outside the UK at your request, we do so through the SWIFT (the international payments) System. When we do this your data will be

processed and stored abroad by other banks or financial institutions involved in completing the payment. Those banks and financial institutions may have to release the information to foreign authorities and other third parties, including those outside the EEA (in which case your personal data may not be protected in line with data protection laws).

- Whenever we transfer your data out of the EEA and the contractual relationship is within our control, we aim to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
  - we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
  - where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe; and
  - where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data processed in Europe.

## **9. AUTOMATED PROCESSING**

- 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 (see below).

## **10. DATA SECURITY**

- We have put in place appropriate security measures to prevent your data from being accidentally lost, used or accessed, altered or disclosed in an unauthorised manner. In addition, we limit access to your personal data to those employees, agents, contractors and third parties who have a business “need to know”. They will only process your data on our instructions and are subject to a duty of confidentiality.
- 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.
- All information you provide to us is stored on our secure servers. Any payment transactions will be similarly secure. Where we have given you (or where you have chosen) a user name, passcode and memorable word which enables you to access certain parts of our Site, you are responsible for keeping this user-name, passcode and memorable word confidential. You must not share these with anyone.
- Unfortunately, the transmission of data via the internet is not completely secure. Although we will do our best to protect your data, we cannot guarantee the security thereof when using our Site and any transmission thereof is at your own risk. Once we have received your data, we will use strict procedures and security features to try to prevent unauthorised access.
- If you want detailed information from Get Safe Online on how to protect your data and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## **11. YOUR LEGAL RIGHTS**

You have rights under data protection laws in relation to your personal data which may include the right to:

- **Request access to your personal data (commonly known as a "data subject access request")**. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you**. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data**. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your data unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms**. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your data which override your rights and freedoms.
- **Request restriction of processing of your personal data**. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - If you want us to establish the data's accuracy.
  - Where our use of the data is unlawful but you do not want us to erase it.
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party**. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated data which you initially provided consent for us to use or where we used the data to perform a contract with you.
- **Withdraw consent at any time where we are relying on consent to process your personal data**. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact our DPO.

- **No fee usually required** - 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 is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- **What we may need from you** - 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.
- **Time limit to respond** - we try to respond to all legitimate requests within one month. 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.

EXTERNAL PRIVACY NOTICE DATED 10122020