

# **GLOBAL FUND FOR CHILDREN**

## **Website Privacy Policy**

### **1. Introduction**

Welcome to the Global Fund for Children's ("GFC") privacy policy.

GFC respects your privacy and is committed to protecting your Personal Data (as defined below in Section 3). This privacy policy will inform you as to how we look after your Personal Data when you visit our website and tell you about your privacy rights and how the law protects you.

### **2. Important information and who we are**

#### **Purpose of this privacy policy**

This privacy policy aims to give you information on how GFC collects and processes your Personal Data through your use of this website, including any data you may voluntarily provide through this website when you, for example, make a financial donation, make a purchase, use the "forward to a friend" function or request further information regarding GFC.

It is important that you read this privacy policy together with our data protection policy that 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.

#### **Controllers**

GFC is made up of different legal entities, including The Global Fund for Children and The Global Fund for Children UK Trust, (together, the "**GFC Group**"). This privacy policy is issued on behalf of the GFC Group so when we mention "**GFC**", "**we**", "**us**" or "**our**" in this privacy policy, we are referring to the relevant member of the GFC Group responsible for processing your data. Each member of the GFC Group may act as a controller of your Personal Data from time to time.

We have appointed a data protection officer (the "**DPO**") collectively for the members of the GFC Group, who is responsible for overseeing questions in relation to this privacy policy. If

you have any questions about this privacy policy, please contact the DPO using the details set out below.

Postal address: Palmer Shepherd  
Global Fund for Children  
1411 K St., NW, Suite 1200  
Washington, DC 20005 USA

Email address: [info@globalfundforchildren.org](mailto:info@globalfundforchildren.org)

Telephone number: (202) 331-9003

Fax number: (202) 331-9004

You have the right to make a complaint at any time to the applicable regulatory body in the European Union: (a list of which is available on the European Commission's website: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)) or the UK is the Information Commissioner's Office (the "ICO"), the UK's statutory data protection regulatory authority ([www.ico.org.uk](http://www.ico.org.uk)). Usually, the regulatory body will not investigate complaints until we have had a chance to resolve your concerns.

We would, however, appreciate the chance to deal with your concerns before you approach the applicable regulatory body, so please contact us in the first instance at [info@globalfundforchildren.org](mailto:info@globalfundforchildren.org).

### **Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 22 July 2024. Historic versions can be obtained by contacting the DPO.

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.

### **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or any information you provide to those third party websites. We encourage you to read the privacy policy of every website you visit.

### **3. The data we collect about you**

**Personal Data**, or personal information, means any information about an individual from which that person can be identified. It does not include statistical or anonymised data, i.e.

information which cannot, either on its own or in conjunction with other information we hold, be used to identify that individual.

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, social media name, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account, payment card details, and taxpayer status. [To be distinguished from “financial information”, defined in New Jersey privacy law as including consumer account numbers, account login, financial account, or credit or debit card numbers *in combination with* any required security codes, access code, or password that would permit access to the financial account.]
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from, or donations you have made to, us.
- **Technical Data** includes internet protocol (“IP”) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, donations, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data **cannot** directly or indirectly reveal your identity, either on its own or in conjunction with other information we may hold. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy policy.

We do not collect any **Sensitive Personal Information** as defined by Colorado privacy law, **Sensitive Data** as defined by Delaware, New Jersey or Oregon privacy laws or **Special Category Personal Data** as defined by the EU and/or UK General Data Protection Regulation (“GDPR”) about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any

information about criminal convictions and offences other than as part of standard background checks on field staff and board members conducted during the employment/hiring process, and standard checks carried out on grantee partners who have been selected to receive grants from GFC.

#### **If you fail to provide Personal Data**

Where we need to collect Personal Data by law, or under the terms of a contract we have with you or in order to provide you with the services, products or information you have requested, and you fail to provide that data when requested, we may not be able to provide you with goods, services or information you requested or to accept your donation. In this case, we may have to cancel the contract we have with you or your donation or the product or service you have with us, as applicable, but we will notify you if this is the case.

#### **4. How we collect your Personal Data**

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Personal Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:
  - make a financial donation;
  - purchase one of our services;
  - use the “forward to a friend” function;
  - request further information from GFC;
  - create an account on our website;
  - subscribe to our service or publications;
  - press request for marketing to be sent to you;
  - attend or register for an event;
  - apply for a job;
  - submit an organizational profile;
  - enter a competition, promotion or survey; or
  - give us feedback or contact us at [info@globalfundforchildren.org](mailto:info@globalfundforchildren.org).
- **Automated technologies or interactions.** As you interact with our website, and we get your consent, we will collect Technical Data about your equipment, browsing actions and patterns where you have consented to allow us to use non-essential cookies or other similar technologies. We may collect this Technical Data by using cookies, server logs and

other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

- **Third parties or publicly available sources.** We may receive Personal Data about you from various third parties and public sources as set out below:
  - Technical Data from parties inside and outside of the EU such as analytics providers (e.g. Google), advertising networks and search information providers.
  - Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as Blackbaud Merchant Services based outside the EU, and Charities Aid Foundation and JustGiving based inside the EU.
  - Identity and Contact Data from data brokers or aggregators such as iWave based outside the EU.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU/UK.

## 5. **How we use your Personal Data**

Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to in order to provide you with the services, products or information you have requested or to comply with your instructions.
- 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.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your Personal Data although we will get your consent for non-essential cookies and before sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us at [info@globalfundforchildren.org](mailto:info@globalfundforchildren.org).

### **Purposes for which we will use your Personal Data**

We have set out below, in a table format, a description of the ways we may use your Personal Data, and, for processing under the GDPR, 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 for more than one lawful basis depending on the specific purpose for which we are using your data. Please contact us at [info@globalfundforchildren.org](mailto:info@globalfundforchildren.org) if you need details about the specific legal basis we are relying on to process your Personal Data where more than one basis has been set out in the table below.

	<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including</b>
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			<b>basis of legitimate interest</b>
1.	To register you as a new donor or customer	(a) Identity (b) Contact	(a) Performance of a contract with you or to provide you with the services, products or information you have requested (customer) (b) Consent (donor) (c) Legitimate interests (donor) in doing this.
2.	To process your donation including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you or to provide you with the services, products or information you have requested (b) Necessary to comply with a legal obligation imposed on us (c) Necessary for our legitimate interests (to recover any debts due to us)
3.	To manage our relationship with you which will include: (a) Notifying you about any substantive changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you or to provide you with the services, products or information you have requested (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to allow us to understand how our donors and customers interact with us)
4.	To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you or to provide you with the services, products or

		(d) Usage (e) Marketing and Communications	information you have requested  (b) Necessary for our legitimate interests (to study how donors and customers use our products/services, to develop them and grow our operations and/or to promote members of the GFC group and their purposes)
5.	To administer and protect our operations and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our operations, provision of administration and IT services, network security, to prevent fraud and in the context of a reorganisation or group restructuring exercise)  (b) Necessary to comply with a legal obligation
6.	To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Fundraising, Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how donors and customers use our products/services, to develop them, to grow our operations and to inform our fundraising)
7.	To use data analytics to improve our website, fundraising, services, marketing, donor and customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of donors and customers for our services, to keep our website updated and relevant, to develop our

			operations and to inform our fundraising and marketing strategies)
8.	To make suggestions and recommendations to you about fundraising services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Consent  (b) Necessary for our legitimate interests (to develop our fundraising activities and products/services and grow our operations)
9.	To manage our operations, including evidencing our compliance with our legal and regulatory obligations.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	(a) Necessary to comply with a legal obligation  (b) Necessary for our legitimate interests (to develop our fundraising activities and products/services and grow our operations)

For the purposes of the third column in the table immediately above, the following terms shall be defined as follows:

**Consent** means where you have consented to our use of your data (you will have been presented with a consent form or facility in relation to any such use and may withdraw your consent through any unsubscribe link or similar facility at any time or by contacting our DPO).

**Legitimate Interest** means the interest of our charity in conducting and managing our charity to enable us to fulfil our charitable aims. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our legitimate interests are overridden by your rights and freedoms (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about



how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at [info@globalfundforchildren.org](mailto:info@globalfundforchildren.org).

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal obligation** means processing your Personal Data where it is necessary for compliance with a legal obligation that we are subject to.

## 6. **Fundraising and marketing**

We strive to provide you with choices regarding certain Personal Data uses, particularly around fundraising and marketing and advertising.

Where we have your consent, we may provide you with electronic direct marketing (email) communications about GFC products, services, prize draw or competitions or future fundraising initiatives which might be of interest to you.

### **Opting out**

If you receive marketing material from us, you may unsubscribe at any time and or/ opt-out of receiving any other marketing or promotional materials, by following the opt-out links on any e-mail, letter, message or other form of correspondence sent to you or by contacting the DPO at any time.

If you wish to opt- out from receiving marketing materials from any third parties, please contact the relevant organisation directly.

### **Cookies**

When you visit GFC's website, GFC install cookie(s) or use other similar technologies to your device. Some of these cookies require your prior consent.

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

A "cookie" is a small piece of data that can be sent by a Web server to your computer, which then may be stored by your browser on your computer's hard drive. Cookies and other similar technologies are useful in allowing more efficient login for users, tracking transaction histories, preserving information between sessions, and improve the functionality of the website. Some Web browsers such as Microsoft Edge, Apple Safari and Google Chrome may have features that can notify you when you receive a cookie or prevent cookies from being sent. If you disable cookies, however, you may not be able to use certain personalized functions of this website. For more information about online behavioral advertising and your choice to opt-out of receiving targeted online advertisements from members of the Digital Advertising Alliance, please visit their website at <http://www.aboutads.info/choices/>. To learn how you can opt-out of Google's use of cookies, please visit Google's Ad Settings at <https://www.google.com/settings/u/0/ads/authenticated>.

In addition to the use of cookies, we may use certain third-party services, such as Google Analytics, to help us analyze how people use the website. We use this information to evaluate your and other users' use of the website, compiling reports on website activity, and providing other services relating to website activity and Internet usage.

### **Change of purpose**

We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the DPO.

If we need to use your Personal Data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **7. Disclosures of your Personal Data**

We may share your Personal Data with the parties set out below for the purposes set out in the table in section 5 above.

- **Internal Third Parties** for example other members of the GFC Group acting as joint controllers or processors and who are based in the USA, the UK, India and/or Hong Kong.
- **External Third Parties** for example:
  - Service providers acting as processors based in the UK, the USA, India and/or Hong Kong who provide IT and system administration services.
  - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the USA, the UK, India and/or Hong Kong who provide consultancy, banking, legal, insurance and accounting services.
  - Tax authorities, regulators and other authorities acting as processors or joint controllers based in the USA, the UK, India and/or Hong Kong who require reporting of processing activities in certain circumstances.

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

## **8. International transfers**

We share your Personal Data within the GFC Group. This will involve transferring your data outside the UK or the European Economic Area (“EEA”).

Many of our external third parties are based outside the UK or the EEA so their processing of your Personal Data will involve a transfer of data outside the UK or the EEA.

Whenever we transfer your Personal Data out of the UK or the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Using service providers located in jurisdictions deemed by the relevant Data Protection Regulator or jurisdiction to have adequate applicable data protection legislation;
- Where we use service providers located in other jurisdictions, we may use specific contracts approved by the relevant Data Protection Regulator which give Personal Data the same protection it has in that jurisdiction;
- where you have given us your prior consent to do so; or
- where we are otherwise legally entitled to do so under applicable data protection legislation.
- Where we use providers based in the US, we may transfer data to them if they are part of the EU-US Data Protection Framework and UK-US Data Bridge as applicable which requires them to provide similar protection to Personal Data shared between Europe and the US.

Please contact us at [info@globalfundforchildren.org](mailto:info@globalfundforchildren.org) if you want further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

## **9. Data security**

We have put in place appropriate security measures designed to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Data to those employees, agents, contractors and other third parties who have an operational need to access such information. They will only process your Personal Data on our instructions and they 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.

Acknowledgment may include mailings of GFC’s own materials, such as annual reports, which list donors who do not desire anonymity and those in whose honour donations were made.

## **Children’s Privacy**

When information is provided by a parent or guardian, GFC will use the information only for those limited purposes.

GDPR and the US Children’s Online Privacy Protection Act (“**COPPA**”) protect the personally identifying information of children. GDPR and/or COPPA extends protection to personally identifying information collected online, including name, residential and email addresses, and telephone number, as well as to information about hobbies and interests when linked to personally identifying information. Under US state privacy laws, protection from processing Personal Data for targeted advertising, the sale of a consumer’s Personal Data, or types of profiling is also extended to consumers ages 13 to 17 years old in New Jersey and ages 13 to 16 in Oregon. In accordance with GDPR and COPPA, GFC is deeply committed to ensuring the safety of all children, and to the protection of their personally identifying information.

## **10. 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.

By law we have to keep basic information about our donors (including Contact, Identity, Financial and Transaction Data) for a certain period, for example in the EU for six years after they cease being donors.

In some circumstances you can ask us to delete your data: see section 11 below for further information.

In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in our legitimate interest, in which case we may use and retain this information indefinitely without further notice to you.

## **11. Your legal rights**

Under certain circumstances, and depending on your jurisdiction, you may have the following rights under data protection laws in relation to your Personal Data:

- **Right to request access** to your Personal Data (commonly known as a "data subject access request" or the "right to know"). This enables you to receive a copy of your Personal Data we hold about you and to check that we are lawfully processing it and its accuracy, including the categories of Personal Data, the categories of sources from which we collected the information, the business or commercial purposes of collecting the information, the categories of third parties with whom we have shared the

information, and the categories of Personal Data that we have shared with third parties for a business purpose. In some instances, you may have the right to receive the information about you we have collected in a portable and readily usable format. Before providing any of this information, we must be able to verify your identity.

- **Right to 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.
- **Right to request erasure** of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. For example, we cannot delete information about you if your PersonalData is on the contract between us for our services or products.
- **Right to object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third party). You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Right to 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.
- **Right to request the transfer (data portability)** of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Right to Object** to our processing of your personal data for direct marketing purposes; and/or object to reliance on our legitimate interests as the basis for processing of your personal data
- **Right to 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.
- **Right to limit use and disclosure of sensitive personal information** – You have the right to not have your Sensitive Data, including Sensitive Data Inferences, processed until we obtain consent, subject to certain exceptions.

You may also be entitled to request in writing a list of the types of personal information that we have disclosed to a third party for their direct marketing purposes during the preceding year and to whom that information was disclosed.

We do not discriminate against you if you choose to exercise any of these rights.

Data solely retained for data backup or archive purposes is principally excluded from these rights until it is restored to an active system, accessed, used or disclosed to another member of the GFC Group in accordance with this Privacy Policy.

No Personal Data will be sold or disclosed to any third party for any commercial purposes.

Under Colorado law, these rights do not apply to pseudonymous data if the information necessary to identify the consumer is kept separately and is subject to controls that prevent access to the information. Pseudonymous data is Personal Data that can no longer be attributed to a specific individual without the use of additional information, if the additional information is kept separately and is subject measures to ensure that Personal Data is not attributed to the specific individual.

Whilst we will endeavour to fully comply with your personal information requests, in certain situations we may not be able to comply with your request, either fully or in part. If this is the case, we will set out the reasons when responding to your request.

We will maintain records of all of your requests made under Consumer Data Rights (in the US) or Data Protection Rights (in the EU or UK ) for at least six years. This information will not be used for any other purpose except to review compliance processes, evidence our compliance with our legal obligations and/or allow us to exercise, establish or defend legal rights; it will not be shared except as necessary to comply with a legal obligation. Sensitive data which we

no longer have consent to process will be deleted or rendered permanently anonymized or inaccessible within a reasonable period of time after withdrawal of consent.

Under Colorado, Delaware, New Jersey and Oregon privacy laws, to the extent they apply, if after you submit a request to exercise your right over your Personal Data, we do not take action or deny your subsequent appeal, you have a right to submit a complaint to the applicable regulatory body.

Under the GDPR, you have the right to submit a complaint to the relevant Statutory Data Protection Regulatory Authority if we fail to comply with any requests made by you under the GDPR, or if you consider that we have failed to comply with the GDPR or other applicable data protection laws. However, they will not normally investigate until we have been given a chance to respond.

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

### **No fee usually required**

You will not have to pay a fee to access your Personal Data (or to exercise any of your other rights set out above). 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 valid requests within one month from receipt of your request, or where required, satisfactory proof of identity . 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 within the first month and keep you updated.

The deadline for responding may be extended whilst we are waiting for any additional information reasonably necessary to allow us to comply with your request.

If we fail to receive this additional information within one month of our request, we will close your request.