

I.J. Cannings & Son Limited

PRIVACY POLICY

Introduction

Welcome to I.J. Cannings & Son Limited's (company number 1889679) ("**the Company**") privacy notice.

The Company respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on the Company collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, purchase a product or service or take part in a competition or offer.

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. This privacy notice supplements the other notices and is not intended to override them.

Controller

The Company is made up of different legal entities, details of which can be found here [LINK]. This privacy notice is issued on behalf of the Company Group so when we mention the "Company", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the Company Group responsible for processing your data. We will let you know which entity will be the controller for your data when you purchase a product or service with us. The Company is the controller and responsible for this website.

We have appointed a Data Protection Manager 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 Data Protection Manager using the details set out below.

Contact details

Our full details are:

Full name of legal entity: I.J. Cannings & Son Limited

Data Protection Manager: Julie Ali-Hassan

Email address: julie@ijcannings.co.uk

Postal address: Stratford House, Waterbridge Court, Matford Park Rd, Exeter. Devon.EX2 8EX

Telephone number: 01392 279354

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

The data protection law in the UK will change on 25 May 2018. Although this privacy notice sets out most of your rights under the new laws, we may not yet be able to respond to some of your requests (for example, a request for the transfer of your personal data) until May 2018 as we are still working towards getting our systems ready for some of these 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.

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. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. 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 data where the identity has been removed (anonymous data).

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

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from 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, 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 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. 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 notice.

We do not collect any **Special Categories of Personal Data** 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.

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 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?

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

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website;
 - subscribe to our service or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us some feedback.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. Please see our cookie policy [LINK] for further details.
- **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 the following parties:
 - (a) analytics providers such as Google based outside the EU;
 - (b) advertising networks such as (see d) based inside or outside the EU; and
 - (c) search information providers such as (see d) based inside or outside the EU.

d)

1020, Inc. dba Placecast and Ericsson Emodo
 1plusX AG
 2KDirect, Inc. (dba iPromote)
 33Across
7Hops.com Inc. (ZergNet)
 : Tappx
 A Million Ads Limited
 A.Mob
 Accelerize Inc.
 Accorp Sp. z o.o.
 Active Agent AG
 Acuityads Inc.
 Ad Unity Ltd
 ad6media
 ADARA MEDIA UNLIMITED
 AdClear GmbH
 AdColony, Inc.
 AddApptr GmbH
 AdDefend GmbH
 AdElement Media Solutions Pvt Ltd
 Adello Group AG
 Adelphic LLC
 Adform A/S
 Adhese
adhood.com
 Adikteev / Emoteev
 Adimo
 ADITION technologies AG
 Adkernel LLC
 Adledge
 Adloox SA
 Adludio Ltd
 ADMAN - Phaistos Networks, S.A.
 ADman Interactive SL
 AdMaxim Inc.
 Admedo Ltd
 admetrics GmbH
 Admixer EU GmbH
 Admotion SRL
 Adnami Aps
 Adobe Advertising Cloud
 Adobe Audience Manager
 Adprime Media Inc.
 ADRINO Sp. z o.o.

AdRoll Inc
adrule mobile GmbH
Adsolutions BV
AdSpirit GmbH
adsquare GmbH
Adssets AB
AdsWizz Inc.
Adtelligent Inc.
AdTheorent, Inc
AdTiming Technology Company Limited
ADUX
advanced store GmbH
ADventori SAS
Adverline
ADYOULIKE SA
Aerserv LLC
Affectv Ltd
affilinet
Alliance Gravity Data Media
Amobee, Inc.
AntVoice
Apester Ltd
AppLift GmbH
AppNexus Inc.
Arcspire Limited
ARMIS SAS
Arrivalist Co.
ATG Ad Tech Group GmbH
Audience Trading Platform Ltd.
AudienceProject Aps
Audiens S.r.l.
audio content & control GmbH
Automattic Inc.
Avazu Inc.
Avid Media Ltd
Avocet Systems Limited
Azerion Holding B.V.
B2B Media Group EMEA GmbH
Bandsintown Amplified LLC
Bannerflow AB
Beachfront Media LLC
Beemray Oy
BeeswaxIO Corporation
BEINTOO SPA
Better Banners A/S
Bidmanagement GmbH
bidstack Ltd
BIDSWITCH GmbH
Bidtellect, Inc
BidTheatre AB
Bigabid Media Ltd
BILENDI SA
Bit Q Holdings Limited
Blis Media Limited
Blue
Bmind a Sales Maker Company, S.L.
Bombora Inc.
Bounce Exchange, Inc
Brand Metrics Sweden AB
Browsi Mobile Ltd
Bucksense Inc

Cablato Limited
Capitaldata
Captify Technologies Limited
Celtra, Inc.
Centro, Inc.
CerebroAd.com s.r.o.
ChannelSight
Chargeads
CHEQ AI TECHNOLOGIES LTD.
Clicksco Digital Limited
Clipcentric, Inc.
Cloud Technologies S.A.
Codewise Sp. z o.o. Sp. k
Collective Europe Ltd.
Collective, Inc. dba Visto
Colpirio.com
Comcast International France SAS
Commanders Act
communicationAds GmbH & Co. KG
comScore, Inc.
Confiant Inc.
Connatix Native Exchange Inc.
ConnectAd Realtime GmbH
Consumable, Inc.
Contact Impact GmbH
Converge-Digital
Conversant Europe Ltd.
Crimtan Holdings Limited
Criteo SA
Cuebiq Inc.
Cxense ASA
Cybba, Inc.
Cydersoft
Czech Publisher Exchange z.s.p.o.
D-Edge
Dataxu, Inc.
DeepIntent, Inc.
DEFINE MEDIA GMBH
Delta Projects AB
Demandbase, Inc.
Densou Trading Desk ApS
Digilant Spain, SLU
Digital Control GmbH & Co. KG
digitalAudience
DIGITEKA Technologies
Digitize New Media Ltd
DigiTrust / IAB Tech Lab
district m inc.
DoubleVerify Inc.
Dr. Banner
Drawbridge, Inc.
DTS (Filiale de Solocal Group)
dunnhumby Germany GmbH
Duplo Media AS
DynAdmic
Dynamic 1001 GmbH
EASYmedia GmbH
Effiliation
Emerse Sverige AB
emetriq GmbH
EMX Digital LLC

Etarget SE
Eulerian Technologies
Exactag GmbH
Exponential Interactive, Inc
Eyeota Ptd Ltd
Ezoic Inc.
Fidzup
Fifty Technology Limited
Flashtalking, Inc.
FlexOffers.com, LLC
FM Labs LLC
Forensiq LLC
FORTVISION
Free Stream Media Corp. dba Samba TV
Fyber
Gammed
GDMServices, Inc. d/b/a FiksuDSP
Gemius SA
Genius Sports Media Limited
Getintent USA, inc.
GlobalWebIndex
Goldbach Group AG
Golden Bees
Goodway Group, Inc.
Greenhouse Group BV (with its trademark LemonPI)
GroupM
GumGum, Inc.
Haensel AMS GmbH
Happydemics
hbfsTech
HIRO Media Ltd
Hivestack Inc.
Hottraffic BV (DMA Institute)
Hybrid Adtech GmbH
ID5 Technology SAS
IgnitionAi Ltd
IgnitionOne
Illuma Technology Limited
Impactify
Impression Desk Technologies Limited
Improve Digital International BV
Index Exchange, Inc.
INFINIA MOBILE S.L.
InMobi Pte Ltd
INNITY
Innovid Inc.
Inskin Media LTD
Instinctive, Inc.
InsurAds Technologies SA.
Integral Ad Science, Inc.
Intent Media, Inc.
Internet BillBoard a.s.
Intowow Innovation Ltd.
INVIBES GROUP
iotec global Ltd.
IPONWEB GmbH
Jaduda GmbH
Jampp LTD
Jivox Corporation
Join
Jointag S.r.l.

Justpremium BV
Kairos Fire
Keymantics
Knorex Pte Ltd
Kochava Inc.
KUPONA GmbH
LBC France
Leadplace - Temelio
LeftsnRight, Inc. dba LIQWID
Leiki Ltd.
LEMO MEDIA GROUP LIMITED
LifeStreet Corporation
Ligatus GmbH
Linicom
LiquidM Technology GmbH
Little Big Data sp.z.o.o.
Liveintent Inc.
LiveRamp, Inc.
LKQD, a division of Nexstar Digital, LLC.
Localsensor B.V.
Location Sciences AI Ltd
LoopMe Ltd
LotaData, Inc.
Lotame Solutions, Inc.
Lucid Holdings, LLC
M32 Connect Inc
Madington
Madison Logic, Inc.
MADVERTISE MEDIA
mainADV Srl
MAIRDUMONT NETLETIX GmbH&Co. KG
Marfeel Solutions S.L
Market Resource Partners LLC
Maximus Live LLC
Maytrics GmbH
mbr targeting GmbH
McCann Discipline LTD
[Media.net](#) Advertising FZ-LLC
MediaMath, Inc.
mediarithmics SAS
Mediasmart Mobile S.L.
Meetrics GmbH
MGID Inc.
Mindlytix SAS
MiQ
Mirando GmbH & Co KG
mobalo GmbH
Mobfox US LLC
Mobile Journey B.V.
Mobile Professionals BV
Mobilewalla, Inc.
Mobusi Mobile Advertising S.L.
My6sense Inc.
Myntelligence Limited
N Technologies Inc.
Nano Interactive GmbH
Nativo, Inc.
Near Pte Ltd
Neodata Group srl
NEORY GmbH
Netsprint SA

NetSuccess, s.r.o.
netzeffekt GmbH
NEURAL.ONE
Neustar on behalf of The Procter & Gamble Company
Neustar, Inc.
News and Media Holding, a.s.
NEXD
Nielsen Marketing Cloud
Norstat Danmark A/S
[nugg.ad](#) GmbH
numberly
Oath (EMEA) Limited
Ogury Ltd.
On Device Research Limited
One Person Health, Inc. (DBA Adacado)
OneTag Ltd
Onfocus (Adagio)
Online Solution Int Limited
Onnetwork Sp. z o.o.
Ooyala Inc
OpenX
Opinary GmbH
Optomaton UG
Oracle
Oracle AddThis
Orion Semantics
ORTEC B.V.
Otto (GmbH & Co KG)
Outbrain UK Ltd
PaperG, Inc. dba Thunder Industries
Parsec Media Inc.
Perform Media Services Ltd
Permodo GmbH
Permutive Ltd.
Permutive Technologies, Inc.
Pexi B.V.
[pilotx.tv](#)
Pixalate, Inc.
PIXIMEDIA SAS
Platform161
Playbuzz Ltd.
PLAYGROUND XYZ EMEA LTD
plista GmbH
Pocketmath Pte Ltd
Polar Mobile Group Inc.
PowerLinks Media Limited
Predicio
PREX Programmatic Exchange GmbH&Co KG
Programatica de publicidad S.L.
[Proxi.cloud](#) Sp. z o.o.
PROXISTORE
PUB OCEAN LIMITED
Publicis Media GmbH
Publishers Internationale Pty Ltd
PubMatic, Inc.
PubNative GmbH
PulsePoint, Inc.
Purch Group, Inc.
PurposeLab, LLC
Qriously
Quantcast International Limited

Qwertize
R-Advertising
R-TARGET
Rakuten Marketing LLC
Readpeak Oy
Realeyes OÜ
ReigNN Platform Ltd.
Relay42 Netherlands B.V.
remerge GmbH
Research Now Group, Inc
Revcontent, LLC
Reveal Mobile, Inc
RevLifter Ltd
RevX Inc.
Rezonce Limited
RhythmOne, LLC
Rich Audience
RMSi Radio Marketing Service interactive GmbH
Rockabox Media Ltd
Rockerbox, Inc
RockYou, Inc.
[Rog.ad](#) GmbH
RTB House S.A.
RTK.IO, Inc
RUN, Inc.
S4M
salesforce.com, inc.
Samba TV UK Limited
Sanoma Media Finland
Scene Stealer Limited
Schibsted Classified Media Spain, S.L.
Schibsted Product and Tech UK
Seeding Alliance GmbH
Seedtag Advertising S.L
Seenthis AB
Sellpoints Inc.
Semasio GmbH
Seznam.cz, a.s.
ShareThis, Inc.
Sharethrough, Inc
SheMedia, LLC
Shopalyst Inc
Shopstyle
ShowHeroes GmbH
Sift Media, Inc
Signal Digital Inc.
Signals
Simplifi Holdings Inc.
SINGLESPOT SAS
Sirdata
Sizmek Technologies, Inc.
Skimbit Ltd
SlimCut Media SAS
Smaato, Inc.
Smadex SL
Smart Adserver
Smart Traffik
Smartclip Hispania SL
smartclip Holding AG
Smartology Limited
SMARTSTREAM.TV GmbH

SmartyAds Inc.
Snapsort Inc., operating as Sortable
Social Tokens Ltd.
Sojern, Inc.
Somo Audience Corp
Sonobi, Inc
Sourcepoint Technologies, Inc.
Sovrn Holdings Inc
Spolecznosci Sp. z o.o. Sp. k.
Spot.IM Ltd.
Spotad
SpotX
StackAdapt
StartApp Inc.
Steel House, Inc.
Ströer Mobile Performance GmbH
Ströer SSP GmbH
Sub2 Technologies Ltd
Sublime
SunMedia
Switch Concepts Limited
SYNC
TabMo SAS
Taboola Europe Limited
TACTIC™ Real-Time Marketing AS
Tapad, Inc.
Tapjoy, Inc.
TAPTAP Networks SL
TARGETSPOT BELGIUM SPRL
Teads
Tealium Inc
Teemo SA
Telaria, Inc
Telecoming S.A.
Teroa S.A.
The ADEX GmbH
The Kantar Group Limited
The Ozone Project Limited
The Reach Group GmbH
The Rubicon Project, Inc.
The Trade Desk
Thirdpresence Oy
TimeOne
Totaljobs Group Ltd
Tradedoubler AB
Tradelab, SAS
TradeTracker
travel audience GmbH
TreSensa, Inc.
Triapodi Ltd.
Triboo Data Analytics
TripleLift, Inc.
Triton Digital Canada Inc.
Tunni BV
Turbo
twiango GmbH
UberMedia, Inc.
ucfunnel Co., Ltd.
Underdog Media LLC
Unruly Group Ltd
uppr GmbH

Uprival LLC
usemax advertisement (Emego GmbH)
Vdopia DBA Chocolate Platform
VECTAURY
Venatus Media Limited
Vibrant Media Limited
video intelligence AG
Video Media Groep B.V.
Video Reach
Vidoomy Media SL
ViewPay
Viralize SRL
Visarity Technologies GmbH
Vuble
WebAds B.V
Webedia
WEBORAMA
Welect GmbH
Whenever Media Ltd
White Ops, Inc.
Widespace AB
Wizaly
X-Mode Social, Inc.
xAD, Inc. dba GroundTruth
YellowHammer Media Group
Yieldlab AG
Yieldlove GmbH
Yieldmo, Inc.
Yieldr UK
YOC AG
Yormedia Solutions Ltd
Zebestof
Zemanta, Inc.
zeotap GmbH
Zeta Global
Ziff Davis LLC
ZighZag

- Contact, Financial and Transaction Data from providers of technical, payment and delivery services [such as [NAME]] based inside or outside the EU.
- Identity and Contact Data from data brokers or aggregators [such as [NAME]] based inside or outside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

4. How we use your personal data

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:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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 or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal 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 for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order 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 (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about 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 (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business 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 business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)

		(b) Necessary to comply with a legal obligation
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) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

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

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile 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 for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or 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.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Company group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or 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 purchase, warranty registration, product/service experience or other transactions – we call this service emails.

Cookies

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. For more information about the cookies we use, please see [LINK TO YOUR COOKIE POLICY](#).

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 us.

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.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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.

6. Data security

We have put in place appropriate security measures 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 a business need to know. 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.

7. Data retention

How long will you use my personal data for?

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.

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 requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

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

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

YOUR LEGAL RIGHTS

You have 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 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.

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 information 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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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 information which you initially provided consent for us to use or where we used the information 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 us.

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 may 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 may 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.

9. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We

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

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 or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

Internal Third Parties

Other companies in the I J Cannings Group and who are based in the UK/EU and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers based in the UK/EU who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers based in the UK/EU who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.