

## **DATA SECURITY MEASURES AND PROTECTION RIGHTS**

### **A. Data security measures:**

We understand that the security of your personal information is important. We provide reasonable administrative, technical, and physical security controls to protect your personal information. All information you provide us is stored on secure servers. In case you would like to have more information on the specific security measures taken in order to save your data than please contact us.

Also, 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.

Finally, 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.

### **B. Your data protection rights:**

The GDPR sets out in detail your data protection rights and the available legal remedies, as well as the restrictions thereof (in particular Articles 5, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79 and 82 of the GDPR). You can request information at any time about your personal data processed, you can request the rectification and erasure of your personal data or the restriction of their processing, furthermore you can object to the data processing based on a legitimate interest, and you have the right to data portability. The most important provisions are summarised below.

#### **Right to information:**

Where the controller processes personal data concerning you, it must provide you information concerning the data relating to you – even without your special request to that effect – including the main characteristics of the data processing, such as the purpose, legal basis and duration of the processing, the name and address of the controller and its representative, the recipients of the personal data (in case of data transfer to third countries indicating also the appropriate or suitable safeguards), the legitimate interests of the controller and/or third parties in case of a data processing based on a legitimate interest, furthermore your data protection rights and your possibilities of seeking a legal remedy (including the right of lodging a complaint with the supervisory authority), where this information is not yet available to you. The controller provides you the above-mentioned information by making this privacy notice available to you.

#### **Right of access:**

You have the right to obtain from the controller confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and the following information:

- the purposes of the processing;
- the categories of personal data concerned;
- the recipients the personal data;
- the duration of the data processing;
- the data subject's data protection rights and possibilities of seeking a legal remedy;
- where the personal data are not collected from the data subject, any available information as to their source;
- the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.

Upon your request, the controller shall provide you with a copy of your personal data undergoing processing. For any further copies requested by you, the controller may charge a reasonable fee based on administrative costs. The right to obtain a copy shall not adversely affect the rights and freedoms of others.

**Right to rectification:**

You have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

**Right to erasure:**

The data subject shall have the right to obtain from the controller the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- if the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- if you withdraw consent on which the processing is based, and there is no other legal ground for the processing;
- if you object to the processing and there are no overriding legitimate grounds for the processing;
- if the personal data have been unlawfully processed;
- if the personal data have to be erased for compliance with a legal obligation in Union or Member State law (in the UK under domestic law) to which the controller is subject;
- if the personal data have been collected in relation to the offer of information society services.

**Right to restriction of processing:**

You have the right to obtain from the controller restriction of processing where one of the following applies:

- the accuracy of the personal data is contested by you, for a period enabling the controller to verify the accuracy of the personal data;
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead;
- the controller no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims;
- You have objected to processing, pending the verification whether the legitimate grounds of the controller override your legitimate grounds.

Where the processing has been restricted for any of the above-mentioned reasons, such personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

You shall be informed by the controller before the restriction of processing is lifted.

**Right to data portability:**

You have the right to receive the personal data concerning you, which you have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, where the processing is based on consent or on a contract, and the processing is carried out by automated means.

In exercising your right to data portability, you have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

**Right to object:**

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on the legitimate interests of the data controller. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

**C. How to exercise your rights:**

The controller shall provide information on action taken on a request based on your abovementioned rights without undue delay and in any event **within one month** of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The controller shall inform you of any such extension within one month of receipt of the request, together with the reasons for the delay. If you make the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by you.

If the controller does not take action on your request, the controller shall inform you without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with the competent data protection supervisory authority (in the UK: the *Information Commissioner's Office*, abbreviated as "ICO") and seeking a judicial remedy. Contact information of ICO: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (head office), Telephone: 0303 123 1113, <https://ico.org.uk>

In the event of an infringement of your rights, you may file for court action. Upon the data subject's request, the action may be brought before the court that is competent based on the domicile or the place of residence of the data subject.