PRIVACY POLICY

1. Introduction

Marten Walsh Chere Ltd ("the Company", "we", "us", or "our") is one of the leading providers of verbatim transcription and court reporting services in the United Kingdom. The Company has unrivalled experience in all areas of court reporting, tape transcription, note taking, videography, deposition, and examination reporting. Since its establishment, the Company has been entrusted with reporting and transcriptions in civil and criminal courts throughout the UK.

Core to that trust is our commitment to protecting the privacy of individuals and maintaining the security of information provided to us. This Privacy Policy ("privacy policy", "policy") explains how and why we collect, store, use, and/or share (collectively "process" or "processes") personal data and provides information about individuals' data protection rights.

You should read this policy so that you know what we are doing with your personal data. Please also read any other privacy policies, statements, or notices that we may provide to you (eg, in terms and conditions) in the future that might apply to our use of your personal data in specific circumstances.

Our website includes links to other third-party sites for your convenience and information. The privacy practices of those third-party sites may differ from those of the Company. If you submit personal information to those third-party sites, your information is administered by their privacy policy. We encourage you to take care in reading the privacy policy of any website you may visit.

1.1 Scope

This Privacy Policy describes how, the Company, in its capacity as a Controller (see *'Controller and Responsible Entity'*) under applicable data protection laws, handles and processes personal data and is directed at individuals who:

- request and/or purchase goods or services from us ("Clients and Prospective Clients");
- supply goods or services to us ("Suppliers");
- visit any of our websites at domain: martenwalshcherer.com or our parents, uk.escribers.net and escribers.net (eg, https://martenwalshcherer.com/, https://uk.escribers.net and https://escribers.net) (the "website") ("Website Visitors");
- apply for a role at the Company ("Job Applicants"); or
- otherwise communicate or engage with us in any way ("General Public").

Please note that this Privacy Policy does not apply to Company personnel or freelancers. For information about how and why we process personal data of personnel and freelancers, please refer to the:

- Employee Privacy Policy; or
- Freelancer Privacy Policy.

1.2 Controller and Responsible Entity

The Company may be a so-called **"controller"** or "**processor**" of your personal data, depending on our relationship with you and the services we provide to our clients. When the Company is a "controller", we make decisions about how and why we process your personal data and, because of this, we are primarily responsible for making sure it is used in accordance with data protection laws.

In common with other providers of audio and transcription services, we provide our services to various clients directly. This means that the 'Controller' of your personal data may be the Company or our client.

For information about how and why your personal data is processed when we act as a Processor, operating under the instructions of our Clients, please refer to our Clients' privacy policy. This can typically be found by referring to their website.

For the purpose of this Policy, the Controller is the Company entity that determines how and why your personal

data is collected and used. This may be:

- **Marten Walsh Cherer Ltd**, a private limited company registered in England and Wales under registration number 02669638 with its registered address at 27 Old Gloucester Street, London, United Kingdom, WC1N 3AX; or,
- any other **Marten Walsh Cherer Ltd** firm, affiliate, subsidiary, or other entity over which the Company exercises control.

Marten Walsh Cherer Ltd is registered with the UK data protection regulator, the Information Commission, under registration number ZA038140.

1.3 Contact Us

Should you wish to contact us to find out more about how we process your personal data, exercise your data protection rights, or make a complaint, please use the following details:

- EMAIL: dataprotection@martenwalshcherer.com
- PHONE: +44 (0) 2070672900
- POST: FAO: Data Protection team, 27 Old Gloucester Street, London, United Kingdom, WC1N 3AX

The Company has appointed Bridewell Consulting Limited as their Data Protection Officer ("DPO"), who can be contacted using the details provided above.

1.4 Changes to our Privacy Policy

We recognise that transparency is an ongoing responsibility, so we keep this Policy under regular review. When we update our Privacy Policy, we will take appropriate measures to inform you, which will be consistent with the significance of the changes we make. You should refer to this Privacy Policy from time to time in order to keep yourself up to date with regard to the way we process your personal data.

Last updated: **See Footer**

2. What types of personal data do we collect and where do we get it from?

We collect different types of personal data about you when you visit our website, purchase something from us, or otherwise communicate or engage with us. We also obtain some personal data from other sources and create some personal data ourselves.

If any of the personal data you have given to us changes, such as your contact details, please inform your usual Company contact without delay.

We collect your personal data from various sources. The table below sets out the different types of personal data that we may collect from time to time.

Categories	Types of Personal Data
Business Card Information	This may include information typically found on a business card such as your name, email address, telephone number, prefix (otherwise termed 'courtesy title', 'honorific'), job title, office address, and the name of the organisation that you work for or represent.
Personal Details	This may include your home address, age, gender, marital status, signature, date of birth, place of birth, language ability, and dietary requirements.
Financial Information	This may include information such as bank account details, tax information (including certain personal identifiers, eg, National Insurance Numbers), credit card information, transaction history (including any delineation of the products and/or services purchased from us), fraud checks or flags raised about transactions, payment card refusals, and information concerning income, solvency, and credit status.
Account Security Information	This may include any additional information that you provide to us voluntarily for account security, including (for example) date of birth or mother's maiden name.
Marketing Preferences	This relates to the choices that individuals make regarding how, what, and if they receive promotional communications from a company.

Pre-employment Information	This may include information such as employment status, previous employment details, CV / resume information, references, security clearances held, information about your professional development, including any qualifications and certifications held, and any other information provided on an application form.
Nationality Information	This may include nationality, citizenship status, and length and/or right of residency.
Family and Minors' Data	This extends to your family and dependents' names, dates of birth, addresses, and emergency contact information.
Sensitive Information	This may include: • information relating to actual or suspected criminal convictions and offences; • other sensitive information such as race, ethnic origin, religious beliefs, trade union membership, physical or mental health condition, sex life and sexual orientation; and, • any other information needed for equal opportunities monitoring.
Health and Safety Information	This may include information relating to accident reporting (eg, injuries) and matters concerning health and safety in our premises.
Information derived from Monitoring Activities	This may include information inferred from monitoring IT acceptable use standards on our computers, communication systems, telephones and mobile telephones, and the internet; and photographic and/or CCTV imagery.
Technical Data	This may include login information, browser type and version, time-zone setting, language preferences, browser plug-in types and versions, operating system and platform.
Traffic Data	This may include location data, weblogs, information contained in correspondence with or about you and other data required for our own billing and administration purposes.
Usage Data	This may include the source address that the page request is coming from; referring URLs; internet protocol (IP) address; domain name; date and time of the page request; other parameters in the URL (eg, search criteria); information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time); pages you viewed or searched for; page response times; download errors; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); and, methods used to browse away from the page.
Other Personal Information	This may include your alias; photocopies of your ID documents (eg, driving license, passport); vehicle registration plate; photographs, video, and other audio; and any information provided in surveys.

2.1 Sources of Personal Data

Much of the Personal Data we hold will have been provided by you, or that we assign to you, but some may come from other sources. We receive information about you from the following sources:

- Directly from you;
- Employment agencies;
- Your employer, if you are a secondee;
- Referees, either external or internal;
- Credit reference and other background screening agencies;
- Devices used to access company information;
- IT, third party, or SaaS providers, such as internet and/or phone providers;
- Visas and Immigration Authorities;
- Consultants, lawyers, and other professionals who advise us;
- Occupational health and other health providers;
- Pension administrators and other government departments;
- Providers of employee benefits;
- CCTV imagery from our landlords or taken using our own CCTV systems; and,
- Publicly available sources, eg, search engines, LinkedIn and other social media.

The Company relies on individuals to provide accurate information and to notify the Company of any changes or inaccuracies in a timely manner.

2.1 Consequences of Failing to Obtain Personal Data

If we are unable to obtain certain personal data when requested, we may be unable in some circumstances to:

- Validate your identity;

- Fulfil our contract obligations towards your employer or you, where you operate as a sole trader; or
- Meet our legal obligations, such as safeguarding your health and safety while on our premises and perform Right to Work checks.

3. What do we do with your personal data and why?

We process your personal data for particular purposes in connection with your use of the website, the provision of services or goods from us to you (or vice versa) and to our applicable clients, your communication or other engagement with us and the management and administration of our business.

We are required by law to always have a so-called "lawful basis" (ie, a reason or justification) for processing your personal data. The table below sets out the purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

3.1 Website Visitors

Purpose for processing your personal data	Category(ies) of personal data processed	Lawful basis(es)
Administering our website, including troubleshooting, data analysis, and testing.	• Technical Data • Traffic Data • Usage Data	This processing is necessary for our legitimate interests in ensuring our website is operational and fit for purpose.
To enable you to create accounts and log-in to them via the website.	• Business Card Information • Technical Data • Traffic Data • Usage Data	This processing is necessary for our legitimate interests in granting you access to a private log-in where you can access information relevant to you
To perform analytics on our website, so as to better understand website usage trends, Visitors' preferences, and tailor promotional information to you.	• Technical Data • Traffic Data • Usage Data	This processing is conducted with your consent.
To conduct regular audits of our website and cookies.	• Technical Data • Traffic Data • Usage Data	This processing is necessary for our legitimate interests in ensuring our website is operational and fit for purpose and complies with applicable data protection laws.
To improve our website and ensure that content is presented in the most effective manner for you and for your computer.	• Technical Data • Traffic Data • Usage Data	This processing is necessary for our legitimate interests in ensuring our website is operational and fit for purpose.
Keeping our website safe and secure.	• Technical Data • Traffic Data • Usage Data	This processing is necessary for our legitimate interests in establishing and maintaining a secure website.

3.2 Job Applicants

Purpose for processing your personal data	Category(ies) of personal data processed	Lawful basis(es)
For the purposes of reviewing a job application submitted by you and making a decision on whether to progress your application to the next stage.	• Business Card Information • Personal Details • Pre-employment Information • Nationality Information	This processing is necessary for: • taking steps to enter a contract for employment with you; and • our legitimate interests in sourcing and attracting talent for roles.
Management of applications submitted by agencies and making a decision on whether to progress your application to the next stage.	• Business Card Information • Personal Details • Pre-employment Information • Nationality Information	This processing is necessary for: • taking steps to enter a contract for employment with you; and • our legitimate interests in sourcing and attracting talent for roles.
If your application makes it through the initial stage of our recruitment process, your personal data will be used in order to conduct an interview(s).	• Business Card Information • Pre-employment Information	This processing is necessary for: • taking steps to enter a contract for employment with you; and • our legitimate interests in sourcing and attracting talent for roles.
To confirm your identity.	• Business Card Information • Account Security Information • Other Personal Information	This processing is necessary for our legitimate interests in safeguarding your confidentiality.
To notify you of open roles. On occasion, we may contact you regarding open roles that we believe may be of interest to you.	• Business Card Information • Pre-employment Information	This processing is necessary for our legitimate interests in sourcing and attracting talent for roles.
To protect and defend our legal rights, and those of third parties.	• Business Card Information • Personal Details • Financial Information • Marketing Preferences • Nationality Information • Family and Minors' Data • Sensitive Information • Health and Safety Information • Information derived from Monitoring Activities • Technical Data • Traffic Data • Usage Data • Other Personal Information	This processing is necessary for our legitimate interests in establishing, exercising, or defending against legal claims.
Complying with instructions from law enforcement agencies, any court or otherwise as required by law.	• Business Card Information • Personal Details • Financial Information • Marketing Preferences • Nationality Information • Family and Minors' Data • Sensitive Information • Health and Safety Information • Information derived from	This processing is necessary for our legitimate interests, or those of another, particularly where such interests relate to the prevention, detection and investigation of a crime; or the apprehension or prosecution of offenders.

	Monitoring Activities • Technical Data • Traffic Data • Usage Data • Other Personal Information	

3.3 All other individuals, except for Company personnel

Purpose for processing your personal data	Category(ies) of personal data processed	Lawful basis(es)
To correspond with you, including without limitation, on matters concerning: • Commercial contracts; • Pre-sale negotiations; and • Feedback.	• Business Card Information • Financial Information • Personal Details • Other Personal Information	This processing is necessary for our legitimate interests in running our business and conducting internal business operations, such as reviewing and actioning any feedback.
To fulfil our obligations arising from any contracts entered into between you and us, and to provide you with the products and services, and any associated information, that you request from us; and billing you for the products and services provided.	• Business Card Information • Financial Information • Personal Details • Other Personal Information	This processing is necessary for our legitimate interests in delivering our products and services.
To keep records required by law or to evidence our compliance with laws, including tax laws, consumer protection laws, and data protection laws.	• Business Card Information • Financial Information • Personal Details • Other Personal Information	This processing is necessary for: • our legitimate interests in running our business and maintaining appropriate records for financial management and compliance purposes; and • compliance with a legal obligation, where we are under a legal obligation to retain certain records, for example records pertaining to Do Not Contact (otherwise termed 'Marketing Suppression') lists.
To provide you with promotional information about our products and services, where we consider that the information is relevant to you.	• Business Card Information • Marketing Preferences • Other Personal Information	This processing is necessary for our legitimate interests in providing you with information about our services, and where you are classified as a Corporate Subscriber by applicable data protection laws. We do not provide promotional information about our products or services to Individual Subscribers. For information about who constitutes an individual or corporate subscriber, please refer to *Appendix – Definitions.*
To notify you about any events or	• Business Card Information	This processing is necessary for our

changes to our service.	• Personal Details	legitimate interests in communicating important service-related messages to you, which may include potential disruptions to our services.
To conduct analysis that helps us to improve our services, including developing new service lines.	• Business Card Information • Financial Information • Other Personal Information	This processing is necessary for our legitimate interests in improving our business, including the services that we offer to our Clients.
To perform identity verification checks in relation to certain engagements.	• Business Card Information • Personal Details • Account Security Information • Other Personal Information	This processing is necessary for our legitimate interests in ensuring that the identity of our customers / suppliers is verified prior to release of a transcript or any other information related to their account or them.
To respond to complaints or concerns received from you or another individual - or requests relating to an individuals' data protection rights - or to otherwise protect and defend our legal rights, and those of third parties.	• Business Card Information • Personal Details • Financial Information • Marketing Preferences • Nationality Information • Family and Minors' Data • Sensitive Information • Health and Safety Information • Information derived from Monitoring Activities • Technical Data • Traffic Data • Usage Data • Other Personal Information	This processing is: • necessary for our legitimate interests in running our business and responding to concerns; • necessary for our legitimate interests in establishing, exercising, or defending against legal claims; or • necessary for complying with applicable data protection laws.
To detect and prevent fraud, misuse and unauthorised access to our company products and information.	• Business Card Information • Information derived from Monitoring Activities • Other Personal Information	This processing is necessary for our legitimate interests in protecting our interests, and those of our clients, business partners, and staff.
Complying with instructions from law enforcement agencies, any court or otherwise as required by law.	• Business Card Information • Personal Details • Financial Information • Marketing Preferences • Nationality Information • Family and Minors' Data • Sensitive Information • Health and Safety Information • Information derived from Monitoring Activities • Technical Data • Traffic Data • Usage Data • Other Personal Information	This processing is necessary for our legitimate interests, or those of another, particularly where such interests relate to the prevention, detection and investigation of a crime; or the apprehension or prosecution of offenders.

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use anonymised data to conduct research and analysis, including to produce statistical research and reports.

3.1 Automated Decision-Making and Profiling

Automated decisions are where a computer makes decisions about you without a person being involved. Profiling is the recording and analysis of a person's psychological and behavioural characteristics, to assess or predict their capabilities or to assist in identifying categories of people.

The Company does not make automated decisions about individuals – whether clients or prospective clients, suppliers, website visitors, or job applicants.

4. Who do we share your personal data with and why?

Sometimes we need to disclose your personal data to other people. The Company does not share your personal data with third parties for the third parties' own marketing purposes.

Inside the Company Group:

We are part of the eScribers Group, which includes companies and operations globally. Therefore, we will need to share your personal data with other companies in the Group for our general business management purposes and, in some cases, to meet our customer needs where providing services across branches/locations and/or for authorisations/approvals with relevant decision makers, reporting and where systems and services are provided on a shared basis.

Access rights between members of the Group are limited and granted only on a need to know basis, depending on job functions and roles.

Where any Group companies process your personal data on our behalf , we will make sure that they have appropriate technical and organisational measures in place to make sure your personal data is protected.

Outside the Company Group:

From time to time, we may ask third parties to carry out certain business functions for us, such as the administration and development of our website. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate technical and organisational measures in place to protect your personal data. Examples of these third-party service providers include our outsourced IT systems software. We send information to third parties and/or subcontractors so that we can provide our services to you, improve the goods and services that we provide, and to develop new goods and services.

We have set out below a list of some of the categories of recipients with whom we are likely to share your personal data:

- Our Clients, where you are involved in the delivery of a project or service to one of our Clients;
- Companies providing services to you or us, for example those providing: information security services; accounting, payroll, pension, and other human resources services; payment gateway products; applications, functionality, and other IT services; professional and/or legal services; and payment fraud/credit checking services.
- During the purchase or sale of our business (or part of it) in connection with a share or asset sale, for which we may disclose or transfer your personal data to the prospective seller or buyer and their advisors;
- Our insurers;
- Our receivers and liquidators;
- Our business partners and joint ventures;
- The courts, court-appointed persons/entities;
- Governmental departments, statutory and regulatory bodies; and
- Other third parties, such as emergency / blue light services, where it is necessary to protect your vital interests, or those of another person, and you or that person are incapable of providing consent to share your information.

4.1 Where in the world is your personal data transferred to?

As part of an international organisation, we may transfer your personal data to recipients (either internally or externally, as set out above) that are established in jurisdictions other than your own. Please be aware that the data protection laws in some jurisdictions may not provide the same level of protection to your personal data as is provided to it under the laws in your jurisdiction, but we demand that such protection is applied to any data shared.

If any disclosures of personal data referred to above requires your personal data to be transferred from within to outside the United Kingdom or European Economic Area, we will only make that transfer if:

a) the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;

b) we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient and appropriate technical and organisational measures

c) the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or

d) you explicitly consent to the transfer.

We engage the services of various third-party vendors and suppliers, and work closely with our related corporate bodies, who assist us in providing our services and managing our business internally. As a result of our relationship with these third parties and depending on the purpose for which we have collected your personal data, your personal data may be transferred to entities in the following regions:

Activity	Regions
IT service providers for administrative applications and functions	United States of America European Union United Kingdom Canada
IT service providers for sales processes (including credit processing)	United States of America European Union United Kingdom Canada
IT service providers for data hosting	United States of America European Union United Kingdom Canada
Locations of related bodies corporate of the Company Group	United Kingdom, Israel, United States of America

For more information about the appropriate safeguards that are in place for the transfer of your personal data, please contact us. Our contact details can be located in the *Contact Us* section of this Privacy Policy.

5. How long do we keep your personal data for?

The Company stores personal data as needed to accomplish the purposes identified in this Privacy Policy and to meet its legal obligations. Where we act as a Processor, our Clients determine how long your personal data is retained for. Where we act as a Controller, we may retain different categories of personal data for different periods of time for the purposes stated above. However, it is our policy that we will only retain your personal data for a limited period of time and for no longer than is necessary for the purposes for which we are processing it for.

Retention periods for records maintained by the Company, including those containing personal data, are established based upon business need, statutory and regulatory record keeping requirements, legal obligations, and whether we are in a legal or other type of dispute with each other or any third party.

6. How do we keep your personal data secure?

We will take specific steps (as required by applicable data protection laws) to ensure we take appropriate technical and organisational measures to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

7. What are your rights in relation to your personal data and how can you exercise them?

Subject to applicable data protection laws, you may have several rights that are focused on placing you in control of how your personal data is processed. When you exercise these rights, we may ask for information to confirm the scope of your request and to confirm your identity – and, where relevant, the identity and authority of anyone acting on your behalf. We do this to ensure your request is properly understood and to ensure our teams can provide you with appropriate support.

We will aim to respond to data protection rights requests within the timeframes required by applicable data protection laws. In certain circumstances, we may need to limit or deny a request where a legal exemption applies - for example, if fulfilling it would infringe the rights and freedoms of others, conflict with our legal obligations or ability to benefit from legal advice, or interfere with legitimate business requirements.

You may have the following data protection rights in relation to the processing of your personal data:

Data Protection Right	Description
Right to be informed	A right to be informed about the personal data we hold about you.
Right of access	A right to obtain: • confirmation of whether we process your personal data; • access to the personal data held by us; • a copy of the personal data held by us; and, • information about how and why we process your personal data (similar to the information provided in this Privacy Policy).
Right to rectification	A right to request that your personal data be amended or rectified where it is inaccurate, and to have any incomplete data completed.
Right to erasure	A right to request the deletion of your personal data in certain circumstances: • We no longer need to use the personal data to achieve the purpose we collected it for. • Where you withdraw your consent if we are using your personal data based on your consent. • Where our legal basis for processing is legitimate interests and you object to the way we process your data (see the right to object described below) and we do not have any overriding legitimate grounds. • Where your personal data has been unlawfully processed; or • Where your data must be deleted to comply with a legal obligation to which we are subject.

	If you request us to delete your data, we will retain minimal personal data to document these requests and thereby avoid using your personal data for any other purpose.
Right to restrict processing	In certain circumstances, a right to restrict our processing of the personal data we hold about you: • For a period enabling us to verify the accuracy of the personal data held by us where you have contested it. • Where you would have the right to ask us to delete the personal data but would prefer that our processing is restricted instead. • Where we no longer need to use the personal data to achieve the purpose we collected it for, but you need the data for the purposes of establishing, exercising, or defending legal claims. • Where you have objected to our processing and for a period enabling us to undertake an assessment of whether we have legitimate grounds to continue processing your personal data that would override your interests.
Right to data portability	In certain circumstances, a right to receive the personal data you have given us, in a structured, commonly used, and machine-readable format. You also have the right to require us to transfer this personal data to another organisation, at your request.
Right to object	A right to object to our processing of your personal data in certain circumstances: • Where our lawful basis is for the purpose of our legitimate interests or those of a third party; or • We are processing your personal data for direct marketing purposes. You can exercise your right to object to marketing communications being sent to you by using the details in section 1.3 Contact Us.
Right related to automated decision-making and profiling	A right for you to request that we review any decisions made about you that produce legal or similarly significant effects concerning you, which are made solely through automated means, and to receive certain additional explanatory information about the logic involved in the decision-making.
Right to withdraw your consent	A right to withdraw your consent, where we are relying on it to use your personal data.
Right to complain to the Company.	If you're unhappy with how we're using your personal data, you have the right to raise a complaint with us at any time. Where you submit a complaint with us, we will process your complaint, conduct an internal investigation of your complaint and respond to you promptly with our findings and proposed outcomes.
Right to complain to the Data Protection Authority	If you're unhappy with how we're using your personal data, you have the right to complain to a Data Protection Authority. We would encourage you to contact us first, so we can handle any queries or concerns you may have. In the UK, the Data Protection Authority is the Information Commissioner's Office who can be contacted by: • Visiting their website: www.ico.org.uk • Telephone: 030 3123 1113 • Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Appendix - Definitions

Term	Definition
Data Subject	The individual about which Personal Data is collected.
'Controller' and 'Processor'	In this Privacy Policy, we use the terms 'Controller' and 'Processor' to differentiate between the types of organisations or individuals who process your personal data. Such terms are defined by the UK General Data Protection Regulation and are generally considered to mean: • "Controller" refers to those organisations that determine the means and purposes (ie, the 'how' and 'why') of processing your personal data – and, together with bearing responsibility for responding to requests made by you concerning your personal data, are also primarily responsible for determining how the processing of your personal data will comply with applicable data protection laws; and • "Processor" refers to those organisations that operate under the direction, control, and instruction of the Controller. If you make a request concerning your personal data to the Company, and it is determined that we are a Processor for your personal data, we will refer your request to the relevant Controller.
'Corporate Subscriber' and 'Individual Subscriber'	We also use the terms 'Corporate Subscriber' and 'Individual Subscriber' to differentiate between the different types of contact to whom we may send promotional information about our products and services. The definitions of these terms are contained in the Privacy and Electronic Communications (EC Directive) Regulations 2003, and associated regulatory guidance, but are generally considered to mean: • "Corporate Subscriber" covers individuals that are employees of a company, limited liability partnership, Scottish partnership, corporation sole, any other body corporate, any entity which is a legal person distinct from its members, or some government bodies. • "Individual Subscribers" refers to those who have subscribed to marketing communications in a personal capacity or are considered sole traders.
Personal Data	Any information that can identify you, either directly – such as your name – or indirectly, through combination with other data (eg, employee ID number, car license plates, IP addresses). Personal Data is also commonly referred to as "personal information" or "personally identifiable information" ("PII") and does not include data where all identifiers have been completely removed (ie, "anonymous data"). Your name, address and contact details are all examples of your personal data, if they identify you.
Processing of Personal Data ("processing")	Any operation which is performed on personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Sensitive Personal Data	Personal Data that, if lost, compromised, or disclosed, could result in harm, embarrassment or inconvenience to a Data Subject. This includes information such as your financial details; data relating to criminal convictions, offences, or allegations, or security measures; or, your race or ethnicity, your political opinions, your religious or philosophical beliefs, your trade union membership, your genetic (eg, DNA) or biometric data (eg, fingerprints), your health information or information pertaining to your sex life or sexual orientation. Because this type of information is more private in nature, it needs extra protection. Specific examples of sensitive personal data collected by the Company are provided in section 2. *What types of personal data do we collect and where do we get it from?.*
Third Party	Any individual or organisation that is not a member of the Company group.