

Privacy Policy

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy here: [LINK]. Please also use the Glossary below to understand the meaning of some of the terms/expressions used in this privacy policy.

1. [WHO WE ARE & IMPORTANT INFORMATION](#)
2. [DATA WE COLLECT ABOUT YOU](#)
3. [HOW IS YOUR PERSONAL DATA COLLECTED](#)
4. [HOW WE USE YOUR PERSONAL DATA](#)
5. [DISCLOSURES OF YOUR PERSONAL DATA](#)
6. [INTERNATIONAL TRANSFERS](#)
7. [COOKIES AND OTHER TECHNOLOGIES](#)
8. [DATA SECURITY](#)
9. [DATA RETENTION](#)
10. [YOUR LEGAL RIGHTS](#)

1. **WHO WE ARE & IMPORTANT INFORMATION**

Who We are

The privacy policy is issued separately by **SPEAKS HOLDINGS LTD** and **CDSMART LTD** for their respective independent businesses and related operations and affairs.

SPEAKS HOLDINGS LTD is a company incorporated in Barbados with registered number 51469, whose registered office is at G.L.M. Global Ltd. XS Solutions Centre, Salters, Saint George, Barbados, BB19000.

CDSMART LTD is a company incorporated in England with registered number 09639441, whose registered office is at 1 Clive House, Clive Street, Bolton, England, BL1 1ET

Any reference to “**we**”, “**us**”, “**our**” is a reference to each of the above stated companies for their own respective independent businesses and related operations and affairs.

Any reference to “**Speaks Holdings**” is to the said Speaks Holdings

Ltd. Any reference to “**CDSmart**” is to the said CDSmart Ltd.

Privacy Policy Purpose

This privacy policy aims to give you information on how we collect and process your personal data.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy 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 policy supplements other applicable notices and privacy policies and is not intended to override them.

Any particular part of this privacy policy that only applies to one of the companies will expressly state which company it applies to.

Controller & Processor Roles

We operate in dual capacities: depending on the nature of the information and the context of its processing we may be a controller, a processor or both in respect of the applicable personal data.

- **Controller Status:** When we act as a controller, we determine the purposes and means of processing personal data. This typically involves situations where we collect personal data directly from individuals for specific purposes outlined in this privacy policy. As a controller, we are committed to ensuring that your personal data is processed lawfully, transparently, and in accordance with applicable data protection laws.
- **Processor Status:** In some instances, we may also act as a processor, where we process personal data on behalf of another organisation (the data controller) in accordance with their instructions. This may involve providing services or processing personal data as directed by our clients, customers or other counterparties in a commercial or trading transaction or relationship. When acting as a processor, we adhere to contractual obligations and take appropriate measures to safeguard the personal data entrusted to us. **In some circumstances CDSmart provides services to Speaks Holdings and in that context may (as processor) from time to time process personal data for Speaks Holdings (as controller for such personal data).**
- **Your rights:** Regardless of whether we act as a controller or processor, individuals have certain rights regarding their personal data under applicable data protection laws. These rights may include the right to access, rectify, erase, restrict processing, or object to the processing of their personal data. Further information on these rights can be read in [Your Legal Rights](#).

Data Processing Officer & Contact Details

Speaks Holdings has appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy concerning Speaks Holdings. If you have any questions about this privacy policy concerning Speaks Holdings, including any requests to exercise [your legal rights](#), please contact the data privacy manager using the details set out below.

- Email: support@pharmsmart.co.uk
- Telephone: 0333 772 0679

You have the right to make a complaint against Speaks Holding at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (<https://ico.org.uk/>). You may also lodge a complaint directly with the Data Protection Commission (DPC) in Barbados (<https://www.gov.bb/Departments/data-protection-commissioner>). Speaks Holdings would, however, appreciate the chance to deal with your concerns before you approach the ICO or the DPC so please contact us in the first instance.

CDSmart has appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy concerning CDSmart. If you have any questions about this privacy policy concerning CDSmart, including any requests to exercise [your legal rights](#), please contact the data privacy manager using the details set out below.

- Email: support@pharmsmart.co.uk

- Telephone: 0333 772 0679

You have the right to make a complaint against CDSmart at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (<https://ico.org.uk/>). CDSmart 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 policy and your duty to inform us of changes

We keep our privacy policy under regular review. As such, we may change this privacy policy from time to time. However, we will not reduce your rights under this privacy policy.

This version was last updated on 13/11/2024.

Historic versions can be obtained by contacting us.

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 or interaction with us.

Third-party links

Our website or software applications 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, plug ins or applications, and are not responsible for their privacy statements or privacy standards. When you leave our website or software application, we encourage you to read the privacy policy of every third party website or third party software application that you visit, access or use.

2. 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 from time to time 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, date of birth, gender, job role and professional body registration.
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, software applications, products and services

Marketing and Communication Data	includes your preferences in receiving marketing from us and our third parties and your communication preferences.
Recorded data	audio and/or visual recordings from telephone calls, video made conferencing and/or CCTV recordings
Special Category Data	<ul style="list-style-type: none"> • Health Data: information related to physical or mental health, medical history, medication, treatment or other information that can be used to assess health status. • Other Data: race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, genetic or biometric data.

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 will **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 or application 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.

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 a client/ customer, 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 or a client/customer (for example, to provide you or our client/customer with goods or services). In this case, we may have to cancel a product or service you or our client/customer has with us but we will notify you or our client/customer 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:

<p>Direct Interactions</p>	<p>You may give us your personal data or Special Category Data as follows, when you (for yourself or on behalf of your employer or business) or your pharmacist or staff working at a pharmacy that you use:</p> <ul style="list-style-type: none"> ■ register to use or upload information to our or our client's/customer's website or software application; ■ sign up to our or our client's/customer's newsletter; ■ purchase or receive from us or our client's/customers any product or service; ■ sell or supply to us or our clients/customers any product or service; ■ respond to a questionnaire, survey, assessment or other request for information as part of a consultation or otherwise; ■ take part in a competition or prize draw; ■ enter into (and/or comply with) any contract, arrangement, understanding or commitment with us or our client/customer; ■ interact with us through any telephone call, SMS texts, instant messaging or any online call or meeting platform or application; ■ interact with us through any social media platform or application; ■ interact with us through email or by post; ■ interact with us through any "in person" offline meeting; ■ have any other interaction with us.
<p>Automated technologies or interactions</p>	<p>As you interact with our website or software application, we will automatically collect Technical Data about your equipment, browsing actions and patterns.</p> <p>We collect this personal data by using cookies, server logs and other similar technologies.</p> <p>We may also receive Technical Data about you if you visit other websites or software applications employing our cookies. Please see our cookie policy for further details.</p>
<p>Third parties or publicly available sources</p>	<p>We will receive personal data about you from various third parties and public sources as set out below:</p> <ul style="list-style-type: none"> ■ Technical Data from: analytics providers such as Google based inside or outside the UK; ■ search information providers such as Google based inside or outside the UK. <p>Contact Data, Financial Data and Transactional Data from: providers of technical, payment and delivery services such as Stripe based inside or outside the UK.</p> <ul style="list-style-type: none"> ■ Identity Data and Contact Data from Publicly available sources such as NHS, Companies House and the Electoral Register based inside the UK.

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:

<p>Where it is necessary for our legitimate interests (or the legitimate interest of our client, customer or other third party) and your interests and fundamental rights do not override those interests.</p>	<p>Which means the interest of our business in conducting and managing our business to include, but not limited to, enabling us to give you or our client/ customer the best service/product and the best and most secure experience. This includes to monitor, measure, improve and protect our content, website, applications and services and provide an enhanced, personal, user experience for you.</p> <p>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.</p> <p>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).</p> <p>You can obtain further information about how we assess our legitimate interests</p>
<p>Where it is necessary to perform a contract</p>	<p>Which means processing your personal 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.</p>
<p>Where it is needed to comply with a legal</p>	<p>Which means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.</p>

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. In this context a third party does not include a client or customer of ours who is in contract negotiations with you, has a contract with you or has sold a product or service to you and whose behalf we are interacting with you.

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	Lawful basis for processing including basis of legitimate interest
<p>To register you as a new client, customer or website/application user.</p>	<p>Performance of a contract with you</p>
<p>To process and deliver orders or perform services to you or our client/customer including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us or any of our clients or customers</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)</p>

<p>To manage our relationship with you or our client/ customer or website/application user, which will include:</p> <p>(a) Notifying you about changes to applicable terms or privacy policy (b) Asking you to leave a review or take a survey</p>	<p>(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)</p>
<p>To administer and protect our business and this website or our software applications (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(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</p>
<p>To contact you, to see if you would like to take part in our customer research (for example, feedback on your use of our applications, products and services); assisting with research and development.</p>	<p>This is necessary for our legitimate interests to improve our services, products and applications for you;</p>
<p>To deliver relevant content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>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)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>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)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
<p>To operate/administer a prize draw or competition that you respond to or participate in or to enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate business interests (to develop our services and to grow our business).</p>
<p>Business administration, continuity, survival, improvement or growth</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep the business running, to help it grow or to realise any profit or other benefit)</p>
<p>To defend or enforce our rights</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep the business running, to help it grow or to realise any profit or other benefit)</p>

Choices

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 Data, Contact Data, Technical Data, Usage Data 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 and 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 third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by:

- following the opt-out links on any marketing message sent to you; or
- [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.

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 share your personal data with the parties set out below for the purposes set out in the table under the [Purposes for which we will use your personal data section](#) above.

Internal Third Parties	Speaks Holdings may share personal data with its service provider and licensee CDSmart and, in turn, CDSmart may share personal data with its principal/customer and licensor Speaks Holdings. Speaks Holdings is based in Barbados. CDSmart is based in England.
External Third Parties	The following third parties: <ul style="list-style-type: none">■ Professional advisers or agents acting as processors or separate controllers including lawyers, bankers, auditors and insurers based in India, USA, the EU or UK.■ Suppliers of goods or services not covered above acting as processors or separate controllers providing goods and services to us and based in the India, Barbados, USA, the EU or the UK. This includes software providers like Advantage Technologies concerning single sign on, integration and more efficient service delivery facilities/services.■ HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom or Barbados who require reporting of processing activities in certain circumstances.

- **Finance credit facilities providers** (in each case whether or not holding security interests over us or our assets) based in the UK or EU.
- **Prospective or actual buyers (or their prospective or actual finance or credit providers)** of our business or assets or shares in our share capital or the share capital of any of our parent companies based in the UK or anywhere else in the world. If a change in share or business ownership happens, the new owners may use your personal data in the same way as set out in this privacy policy.

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. INTERNATIONAL TRANSFERS

International transfers of personal data may be necessary for the performance of a contract between you and us or for the implementation of pre-contractual measures taken at your request.

Additionally, international transfers may also be based on your explicit consent or other lawful grounds permitted or required under applicable data protection laws.

To ensure that your personal data receives an adequate level of protection during international transfers, we may rely on one or more of the following transfer scenarios:

Going to a country, territory, sector or entity determined by the UK and/or EU to provide an adequate level of protection for personal data

At the date of this privacy policy being issued, this covers:

- EU member states: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden
- Other EEA countries: Iceland, Liechtenstein and Norway;
- EU or EEA institutions, bodies, offices or agencies;
- Gibraltar;
- Republic of Korea;
- Countries, territories and sectors covered by the European Commission's adequacy decisions as at 31.12.2020:
 - o Andorra, Argentina, Guernsey, Isle of Man, Israel, Jersey, New Zealand, Switzerland and Uruguay;
 - o Canada - only covers data that is subject to Canada's Personal Information Protection and Electronic Documents Act (PIPEDA);
 - o Japan - only covers personal data transferred to private sector organisations subject to Japan's Act on the Protection of Personal Information. This does not include transfers of the types listed in the EU's adequacy decision for Japan; or
 - o United States of America - only covers data which is transferred under the UK Extension to the EU-US Data Privacy Framework

Standard Contractual Clauses are used

We may enter into standard contractual clauses approved by ICO in the UK, or the European Commission in the EU, as applicable, or other relevant authorities with recipients of your personal data (such as service providers in India) to ensure that they provide an adequate level of protection

7. COOKIES AND OTHER TECHNOLOGIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Please read our [cookies policy](#) for more information.

8. 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.

If you believe your account has been compromised, please [contact us](#).

9. DATA RETENTION

How long will you use my personal data for?

To the extent permitted by applicable law, we retain information about you after closure of your Pharmsmart Account if your application for a Pharmsmart Account is declined or if you decide not to proceed. This information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

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. Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by [contacting us](#).

In some circumstances you can ask us to delete your data: see [your legal rights](#) 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 which case we may use this information indefinitely without further notice to you.

10. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are as follows:

Request access	<p>You can request access to your personal data (known as “data subject access request”).</p> <p>This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.</p>
Request correction	<p>You can request correction of the personal data that we hold about you.</p> <p>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.</p>
Request erasure	<p>You can ask us to erase your personal data.</p> <p>This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it.</p> <p>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.</p> <p>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</p>

Object to processing	<p>You can object to our 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.</p> <p>You also have the right to object where we are processing your personal data for direct marketing purposes.</p> <p>In some cases, we may demonstrate that we have compelling legitimate</p>
Request a restriction of processing	<p>You can request that we restrict the processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:</p> <ul style="list-style-type: none"> ■ If you want us to establish the data's accuracy. ■ Where our use of the data is unlawful, but you do not want us to erase it. ■ Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims. ■ You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
Request a transfer	<p>You can request that we transfer of your personal data to you or to a third party.</p> <p>We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.</p> <p>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</p>
Withdraw consent	<p>You can withdraw consent to the processing of your personal data in situations where we relied on your consent to do so.</p> <p>However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.</p> <p>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.</p>

If you wish to exercise any of the rights set out above, please [contact us](#)

Manifestly unfounded or excessive

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

Redactions

Under section 15 and Schedule 2 of Data Protection Act 2018 certain personal data cannot be provided if requested from us. This includes, for example:

1. Personal data of other individuals who have not given consent to disclosure (and it would be unreasonable to make the disclosure).
2. Personal data consisting of legally privileged information, which is (in summary):
 - confidential in nature;
 - except where litigation is in contemplation, made solely between client and professional legal adviser acting in a professional capacity; and
 - made for the dominant purpose of obtaining or providing legal advice or being used by lawyers in possible or probable litigation.

3. Personal data processed for the purposes of management forecasting or management planning in relation to a business or other activity, to the extent that those provisions would be likely to prejudice the conduct of that business or other activity.
4. Personal data that consists of records of the intentions in relation to any negotiations with you as data subject, to the extent that the application of those provisions would be likely to prejudice those negotiations.
5. Personal data consisting of a reference given or to be given in confidence for the purposes of any of the following:
 - Education, training or employment, or prospective education, training or employment.
 - Placement, or prospective placement, of the data subject as a volunteer.
 - Appointment, or prospective appointment, of the data subject to any office.
 - Provision, or prospective provision, by the data subject of any service.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for **further information in relation to your request to speed up our response**.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.