

## DATA PORTABILITY POLICY

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In respect of our obligations under the General Data Protection Regulation, our firm will adhere to the guidance on data portability and ensure that any information provided in response to a SAR, is structured in a ‘...commonly used and machine-readable form’. We are aware that, if requested by a data subject, we may be required to transmit such data directly to another data controller.

This will only apply to:

- Personal data which is processed by automated means (no paper records)
- Personal data which the data subject has provided to the controller, which formed part of the information collated throughout the data subject and the controller’s engagement; and
- Where additional data has been obtained under the belief that it was necessary at the time;
- Only where the basis for processing is consent, or that the data are being processed to fulfil a contract or steps preparatory to a contract.