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.