

DATA PORTABILITY POLICY

In respect of our obligations under the General Data Protection Regulation, our firm will adhere to the requirements in regard to the right to data portability.

We will undertake when requested by a data subject 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 the basis for processing is consent, or that the data is being processed to fulfil a contract or steps preparatory to a contract.