

DATA PORTABILITY POLICY

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.