

# GDPR PRIVACY NOTICE

Last revised: 10/05/2018

*NOTICE:* The Privacy Policy below will become effective May 25, 2018

## Introduction

This document refers to personal data, this is defined as information concerning any living person (a natural person who hereafter will be called the Data Subject) that is not already in the public domain.

The Data Protection Act (DPA), Privacy and Electronic Communications Regulations (PECR) and The General Data Protection Regulations (GDPR) which is EU wide and far more extensive, seek to protect and enhance the rights of data subjects. These rights cover the safeguarding of personal data, protection against the unlawful processing of personal data and the unrestricted movement of personal data within the EU. It should be noted that GDPR does not apply to information already in the public domain such as Companies House data.

ISLA is pleased to provide the following GDPR information:

## Personal Data

ISLA uses the information collected from you to provide to email you information including marketing which ISLA believes may be of interest to you and your business. In you making initial contact you consent to ISLA maintaining a marketing dialogue with you until you either optout (which you can do at any stage) or we decide to desist in promoting our services.

Some personal data may be collected about you from the forms and surveys you complete, from records of our correspondence and phone calls and details of your visits to our website, including but not limited to personally-identifying information like Internet Protocol (IP) addresses. ISLA may from time to time use such information to

identify its visitors. ISLA may also collect statistics about the behaviour of visitors to its website.

ISLA website uses cookies, which is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. WordPress.org uses cookies to help ISLA identify and track visitors and their website access preferences. ISLA website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using ISLA website.

Any information ISLA holds about you and your business encompasses all the details we hold about you and any sales transactions including any third-party information we have obtain about you from public sources and our own suppliers such as credit referencing agencies.

ISLA will only collect the information needed so that it can provide you with our services.

## **Consent**

Through agreeing to this privacy notice you are consenting to ISLA processing your personal data for the purposes outlined. You can withdraw consent at any time by emailing the [support@isla.co.uk](mailto:support@isla.co.uk) or by phoning +44 (0)203 786 2368 or writing to us, see last section for full contact details.

## **Disclosure**

ISLA may on occasions pass your Personal Information to third parties (for example; in order to process a card payment) exclusively to process work on its behalf. ISLA requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice and GDPR. ISLA do not broker or pass on information gained from your engagement without your consent.

However, ISLA may disclose your Personal Information to meet legal obligations, regulations or valid governmental request. ISLA may also enforce its Terms and Conditions, including investigating potential violations of its Terms and Conditions to

detect, prevent or mitigate fraud or security or technical issues; or to protect against imminent harm to the rights, property or safety of ISLA, its members and/or the wider community.

## **Retention Policy**

ISLA will process personal data during the duration of any contract and will continue to store only the personal data needed for six years to meet any legal obligations. After six years any personal data not needed will be deleted.

## **Data storage**

Data is held in the United Kingdom using different (multiple) servers.

## **Compliance with legal, regulatory and law enforcement requests.**

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (such as subpoena requests), to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical.

To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process. We will also share your information to the extent necessary to comply with ICANN or any ccTLD rules, regulations and policies when you register a domain name with us.

## **Your rights as a data subject**

At any point whilst ISLA is in possession of or processing your personal data, all data subjects, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- In the event that ISLA refuses your request under rights of access, we will provide you with a reason as to why, which you have the right to legally challenge.
- ISLA at your request can confirm what information it hold about you and how it is processed

**You can request the following information:**

- Identity and the contact details of the person or organisation (ISLA) that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of ISLA or a third party such as one of its clients, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.

## **How long the data will be stored.**

Details of your rights to correct, erase, restrict or object to such processing.

Information about your right to withdraw consent at any time.

## **How to lodge a complaint with the supervisory authority (ICO).**

Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.

## **The source of personal data if it wasn't collected directly from you.**

Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

## **To access what Personal data is held, we require the below:**

ISLA will accept the following forms of ID when information on your personal data is requested:

An email from yourself, showing clearly the firm you are representing. If ISLA is dissatisfied with the quality, further information may be sought before personal data can be released.

All requests should be made to the support@isla.co.uk or by phoning +44 (0) 203 786 2368 or writing to us at the address further below.

## **Changes in our Privacy Policy.**

We reserve the right to modify this Privacy Policy at any time. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy and any other places we deem appropriate, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If we make material changes to this Privacy Policy, we will notify you here, by email, or by means of a notice on our home page, at least thirty (30) days prior to the implementation of the changes.

## **Data Protection Authority.**

If you are a resident of the European Economic Area (EEA) and believe we maintain your personal data subject to the General Data Protection Regulation (GDPR), you may direct questions or complaints to our lead supervisory authority, the UK's Information Commissioner's Office, as noted below:

[www.ico.org.uk](http://www.ico.org.uk)

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, United Kingdom

Phone: 0303 123 1113

## **Contact us:**

The International Securities Lending Association (ISLA)

75 King William Street, London, EC4N 7BE

T: +44 203 3786 2368

[support@isla.co.uk](mailto:support@isla.co.uk)