

GDPR THIRD PARTY DATA PRIVACY NOTICE

Where we rely on your consent to use your personal data, you have the right to withdraw that consent at any time.

OBLIGATIONS TO PROVIDE PERSONAL DATA

When **20** receives a request, we will endeavour to respond without delay and at the latest within one month of receipt. We may extend the period of compliance by a further two months where requests are complex or numerous. In such instances **2** **20** will inform you within one month of the receipt of the request and explain why the extension is necessary.

When Cory Brothers receives a subject access request we will provide a copy of the information held free of charge. Cory Brothers may charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that we will charge for all subsequent access requests rather that the Cory Brothers reserves the right to charge a fee based on the administrative cost of providing the information.

If the after reviewing a request the Data Protection Contact believes a request is manifestly unfounded or excessive, particularly if it is repetitive, then Cory Brothers may charge a 'reasonable fee' which will be decided on a case by case basis. In certain circumstances, Cory Brothers may even refuse to respond to such requests.

When you contact us to exercise any of the rights above, we may ask you to provide some additional information in order to verify your identity, such as your name, your address and proof of identity.

CONTACT US & LODGING A COMPLAINT

To contact us:

Sean.obrien@corybrothers.com

Sean O'Brien

Compliance Director

Cory Brothers Ltd

8th Floor St Vincent's House

1 Cutler Street

Ipswich

United Kingdom

IP1 1UQ

If you are unsatisfied with our actions or wish to make an internal complaint, you can contact our Chief Executive Officer in writing at the address below.

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Peter Wilson
Chief Executive Officer
Cory Brothers Ltd
8th Floor St Vincent's House
1 Cutler Street
Ipswich
United Kingdom
IP1 1UQ

SUPERVISORY AUTHORITY

If you believe that Cory Brothers has not complied with your data protection rights and/or you remain dissatisfied with our actions you have the right to lodge a complaint with your Data Protection Supervisory Authority, which is The Information Commissioner's Office (ICO) in the United Kingdom.

The ICO can be reached at the address below, via their enquiries email address, or via their website:

Address:

INFORMATION COMMISSIONER'S OFFICE

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113 (*local rate*) or 01625 545 745 (*national rate*)

Fax: 01625 524 510

Email:

enquiries@ico.org.uk

ICO Website link to:

[Make a Complaint](#)

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APPENDIX 1 – TRANSFERRING PERSONAL INFORMATION OUTSIDE THE EEA

As stated above in this GDPR Privacy Notice:

“We may share your personal information with our service providers, and this may involve transferring it to countries outside the European Economic Area (EEA) whose data protection laws may not be as extensive as those which apply to us. Where we do so, we will ensure that we do this in accordance with the Acts and take appropriate measures to ensure that the level of protection which applies to your personal information processed in these countries is similar to that which applies within the EEA. Such measures may include only transferring your data to jurisdictions in respect of which there is a European Commission adequacy decision or, where this is not the case, by using model clauses which have been approved by the European Commission.”

As of January 2021, the time of approval and publication of this version of Cory Brothers' GDPR Privacy Notice, the European Commission has made decisions confirming adequacy or equivalence of individual country data protection laws currently in place for the following countries:

- Andorra,
- Argentina,
- Guernsey,
- Isle of Man,
- Israel,
- Japan,
- New Zealand,
- Switzerland, and
- Uruguay.

The European Commission has made partial findings of adequacy regarding Canada and the USA as indicated below.

CANADA

- The adequacy finding for Canada only covers data that is subject to Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).
- Not all data is subject to PIPEDA.

UNITED STATES OF AMERICA (USA)

- The adequacy finding for the USA is only for personal data transfers covered by the EU-US Privacy Shield framework.

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For further details please see the link to the European Commission's website below:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

If personal information is being shared with Cory Brothers divisions or offices in countries outside the EEA, it may be best to first consult with Cory Brothers' DPO and/or Company Secretary.

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DOCUMENT HISTORY AND VERSION CONTROL

Policy Owner: Group Head of Internal Audit & Group Risk and Compliance Manager

Date of next review: January 2022

Amendment History:

Version	Date	Amendment History
V1.00	27/01/2021	Approved and issued.

Approvals:

This document requires the following approvals.

Name	Signature	Title	Date of Approval	Version Approved
Audit Committee	Electronic Signature	Audit Committee / Board of Directors	27/01/2021	V1.00