Morgana Court and Lodge
Morgana Court and Lodge, Porthcawl Road, South Cornelly, Mid Glamorgan, Bridgend, CF33 4RE, South Wales

Review Sheet

Last Reviewed	Last Amended	Next Planned Review
28 Jun '23	28 Jun '23	in 12 months, or sooner as required.

Business impact	**MEDIUM IMPACT** Changes are important, but urgent implementation is not required, incorporate into your existing workflow.
Reason for this review	Scheduled review
Were changes made?	Yes
Summary:	Each organisation should ensure that data privacy policies are suitable and tailored for their service. This policy has been reviewed and updated. Template data privacy policies have been added in the form section. The policy title has been changed from Fair Processing Notice Policy and Procedure to Data Privacy Policy and Procedure. References have been checked and updated.
Relevant legislation:	• Data Protection Act 2018 • UK GDPR
Underpinning knowledge - What have we used to ensure that the policy is current:	• Author: ICO, (2021), *Guide to the UK General Data Protection Regulation (UK GDPR)*. [Online] Available from: https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/ [Accessed: 28/6/2023] • Author: ICO, (2021), *Right to be informed*. [Online] Available from: https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/ [Accessed: 28/6/2023]
Suggested action:	• Encourage sharing the policy through the use of the QCS App
Equality Impact Assessment:	QCS have undertaken an equality analysis during the review of this policy. This statement is a written record that demonstrates that we have shown due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations with respect to the characteristics protected by equality law.

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Morgana Court and Lodge
Morgana Court and Lodge, Porthcawl Road, South Cornelly, Mid Glamorgan, Bridgend, CF33 4RE, South Wales

1. Purpose

1.1 To provide Morgana Court and Lodge with two template data privacy policies - one for use with employees and one for use with external data subjects, including Individuals.
1.2 By using the template data privacy policies provided within the 'Forms' sections of the UK GDPR suite, Morgana Court and Lodge will meet one of the key requirements of UK GDPR in terms of the provision of information to a data subject.
1.3 To support Morgana Court and Lodge in meeting the following Lines of Enquiry:

Theme	Lines of Enquiry
Leadership-and-Management	LM09: Overall governance
Leadership-and-Management	LM11: Quality assurance

1.4 To meet the legal requirements of the regulated activities that {Morgana Court and Lodge} is registered to provide:

- Data Protection Act 2018
- UK GDPR

2. Scope

2.1 The following roles may be affected by this policy:

- All staff

2.2 The following Individuals may be affected by this policy:

- Individuals

2.3 The following stakeholders may be affected by this policy:

- Family
- Advocates
- Representatives
- Commissioners
- External health professionals
- Local Authority
- NHS

3. Objectives

3.1 To enable Morgana Court and Lodge to circulate privacy policies to its data subjects to ensure compliance with one of the key elements of UK GDPR.
3.2 To ensure that all data subjects understand the ways in which their personal data is processed by Morgana Court and Lodge.

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4. Policy

4.1 Morgana Court and Lodge understands that UK GDPR requires organisations to provide certain information to all Data Subjects about how Morgana Court and Lodge processes personal data.
4.2 Morgana Court and Lodge has determined that the simplest and most effective way to provide the required information is by issuing privacy policies.
4.3 Morgana Court and Lodge understands that the processing of personal data it carries out in respect of its staff and employees will differ from the processing of personal data it carries out in respect of external clients, contacts and Individuals. Morgana Court and Lodge will, therefore, produce and circulate at least two privacy policies, one to employees and another to external contacts and Individuals.

5. Procedure

5.1 Morgana Court and Lodge will review the following Template Data Privacy Policies located in the 'Forms' sections of the UK GDPR suite within the QCS management system and adapt them before circulating them to the relevant data subjects:

- Template Data Privacy Policy - Employees
- Template Data Privacy Policy - External

Morgana Court and Lodge will ensure that all aspects of the privacy policies are relevant and reflect the ways in which Morgana Court and Lodge processes personal data. If Morgana Court and Lodge has any concerns or queries in relation to the privacy policies, it will seek legal advice.
5.2 Morgana Court and Lodge will consider whether it would benefit from producing more than two types of privacy policies. For example, Morgana Court and Lodge may deem it necessary to modify the privacy policies provided to Individuals so that they can be used with other external contacts and suppliers.
5.3 Morgana Court and Lodge may decide that the types of personal data it processes differs in relation to various types of data subjects, so an additional privacy policy may be required.
Morgana Court and Lodge acknowledges that it may be able to use the privacy policy templates provided within the 'Forms' sections of the UK GDPR suite in the QCS management system for a further privacy policy, but will seek legal advice if necessary.
5.4 Morgana Court and Lodge understands that the privacy policies cover the processing of personal data that has been obtained other than through its website.
Collection of personal data via the website will be governed by the Website Privacy and Cookies Policy and Procedure at Morgana Court and Lodge and the National Data Opt-Out Policy and Procedure.

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6. Definitions

6.1 Special Categories of Data

- A term for personal data that is sensitive and personal in nature
- Special categories of data include, but are not limited to, medical and health records (including information collected as a result of providing health care services), genetic and biometric data, and information about a person's religious beliefs, ethnic origin and race, sexual orientation, trade union membership and political views

6.2 Data Subject

- The identified or identifiable individual about whom Morgana Court and Lodge has collected personal data

6.3 Data Protection Act 2018

- The Data Protection Act 2018 is a United Kingdom Act of Parliament that updates data protection laws in the UK. It sits alongside the General Data Protection Regulation and implements the EU's Law Enforcement Directive

6.4 UK GDPR

- The UK GDPR is the retained EU law version of GDPR that forms part of English law

6.5 Personal Data

- Any information about a living person from which that person can be identified directly or indirectly, including but not limited to names, email addresses, postal addresses, job roles, photographs, CCTV, online identifiers and special categories of data, as defined below

6.6 Process or Processing

- Doing anything with personal data, including but not limited to collecting, storing, holding, using, amending or transferring it. Morgana Court and Lodge does not need to be doing anything actively with personal data - at the point Morgana Court and Lodge collects it, it is processing it

6.7 Privacy Notice and Fair Processing Notice

- The UK General Data Protection Regulation (GDPR) requires that data controllers provide certain information to people whose information (personal data) they hold and use. A privacy notice is one way of providing this information. This is sometimes referred to as a fair processing notice

Key Facts - Professionals

Professionals providing this service should be aware of the following:

- The privacy policy sets out the way Morgana Court and Lodge processes personal data

Key Facts - People affected by the service

People affected by this service should be aware of the following:

- The privacy policy sets out the way in which Morgana Court and Lodge processes personal data provided to them

Further Reading

As well as the information in the 'underpinning knowledge' section of the review sheet we recommend that you add to your understanding in this policy area by considering the following materials:

Morgana Court and Lodge Website Privacy and Cookies Policy and Procedure
Morgana Court and Lodge National Data Opt-Out Policy and Procedure
Consent Authorisation Policy and Procedure - UK GDPR Consent Authorisation Forms

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Outstanding Practice

To be ' outstanding ' in this policy area you could provide evidence that:

- The wide understanding of the policy is enabled by proactive use of the QCS App
- There is evidence of a high level of awareness regarding fair processing and Morgana Court and Lodge shares understanding and knowledge with others
- Morgana Court and Lodge confirms satisfaction with all parties regarding fair processing
- Morgana Court and Lodge has modified the template privacy policies to ensure that they include all information relevant to the processing of personal data by Morgana Court and Lodge

Forms

The following forms are included as part of this policy:

Title of form	When would the form be used?	Created by
Template Data Privacy Policy - Employees - GDPR09	To help employees understand what information is collected, why it is collected it and how they can update, manage, export and delete their information.	QCS
Template Data Privacy Policy - External - GDPR09	To help third parties understand what information is collected, why it is collected it and how they can update, manage, export and delete their information.	QCS

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Morgana Court and Lodge

Data Privacy Policy – Employees

[This Notice should be circulated to employees once it has been reviewed by Morgana Court and Lodge and updated if necessary]

This notice applies to current and former employees, workers and contractors. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using that information and what your rights are under the data protection legislation.

You are required to sign and date this data privacy notice and return it to [HR **OR** NAME OF MANAGER]. Morgana Court and Lodge may update the data privacy notice at any time and will notify you in writing of any changes. Following any update to the data privacy notice, you are required to review, sign and return any new version issued.

When Morgana Court and Lodge processes your personal data, it is required to comply with the Data Protection Act 2018 ("DPA") and the UK GDPR (the DPA and UK GDPR are together referred to as the "Data Protection Legislation").

Your personal data includes all the information we hold that identifies you or is about you, for example, your name, email address, postal address, date of birth, location data, and in some cases opinions that we document about you, as well as special categories of data including, but not limited to, medical and health records and information about your religious beliefs, ethnic origin and race, sexual orientation and political views *[Update as necessary to reflect the personal data that is being processed about employees]*.

Everything we do with your personal data counts as processing it - including collecting, storing, amending, transferring and deleting it. We are therefore required to comply with the Data Protection Legislation to make sure that your information is properly protected and used appropriately.

This data privacy policy provides information about the personal data we process, why we process it and how we process it.

Our responsibilities

Morgana Court and Lodge is the data controller of the personal data you provide. We have appointed Sofia Maoub as Data Protection Officer and they will have day to day responsibility for ensuring that we comply with the Data Protection Legislation and for dealing with any requests we receive from individuals exercising their rights under the Data Protection Legislation.

Why do we process your personal data?

We process your personal data for HR, employment and administrative purposes. We need your personal data to make sure you have all you need to be able to work at Morgana Court and Lodge, to make sure you are safe and secure at work and to make sure you receive all the benefits and rights to which you are entitled.

We process your personal data on a number of grounds including, but not limited to, our legitimate interests, our contract with you, our legal obligations and our rights and responsibilities as your employer. More information about the types of data we process and the grounds for processing are set out in the table below *[Update the table below as necessary to ensure that it correctly reflects the different types of personal data being processed about employees. Some types of data may need to be deleted and others may need to be added. The grounds for processing are likely to be correct for most organisations but each should be considered and amended ifnecessary]*:

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Type of Data	Grounds for Processing
Identity data such as your first name, middle names, last name, date of birth and gender	Legal obligation
Marital status and title	Legitimate interests
Contact data such as your postal address, email address and telephone numbers	Legitimate interests
Immigration checks	Legal obligation
Financial data including your bank account details, payroll records and tax status information	Legal obligation
National Insurance number	Legal obligation
Next of kin and emergency contact information	Legitimate interests
Information about your dependants	Contractual requirement
Background data such as your education, career background and work experience	Legitimate interests
Personal information such as your skills and qualities	Legitimate interests
Salary, annual leave and pension information	Legal obligation
Benefits information including life assurance and ill health cover	Contractual requirement
Start date and, if different, the date of your continuous employment	Legal obligation
Leaving date	Legal obligation
Your reason for leaving	Legitimate interests
Location of employment or workplace	Legal obligation
Copy of passport	Legal obligation
Employment records including job titles and work history	Legitimate interests
Training records	Legal obligation or legitimate interests, depending on the type of training
Information about working hours and holidays	Legal obligation
Maternity and paternity leave information	Legal obligation
Performance information	Legitimate interests
Disciplinary and grievance information	Legal obligation
Accident records	Legal obligation
CCTV images (more information is set out below)	Legitimate interests
Information about your ethnicity/racial background	Provision of this information is voluntary and therefore collected on the grounds of your consent *[If this information is not collected on the grounds of consent (including if the employee is required to provide the information), this will need to be updated to reflect one of the grounds for processing special categories of data. If the processing is collected anonymously it is not personal data and can therefore be deleted from this table]*
Special categories of data to the extent we need such information to make sure you are comfortable and safe at work including information relating to your health and medical conditions	Required for us to meet our obligations and exercise our rights as your employer
Any other information included on any CV, application or covering letter you provided to us	Consent on the basis that the information was provided voluntarily

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If none of the grounds set out above applies, we will obtain separate consent from you to the processing of your personal data. You can withdraw your consent at any time. This will not affect the lawfulness of any processing we carried out prior to you withdrawing your consent.

Who will receive your personal data?

Please note - although the UK is no longer part of the EU, we still comply with the following:

We only transfer your personal data to the extent we need to. Recipients of your personal data include:

- *[insert any potential recipients or categories of recipients such as payroll providers, insurers, healthcare providers, hosted data centres, third parties that provide benefits/perks, etc.]*

We do not transfer your personal data outside of the EEA. *[If Morgana Court and Lodge transfers personal data outside of the EEA, delete this sentence and include the paragraph below instead]*.

We may transfer your personal data outside of the EEA to *[name of recipient of data outside EEA]*. [A finding of adequacy has been made in respect of [relevant country], which means the EU Commission is satisfied that any data transferred to [relevant country] will be adequately protected]. [We will transfer your personal data on the basis of a data transfer agreement that incorporates EU model clauses. The EU model clauses mean that appropriate safeguards will govern the transfer of the data]. [We will transfer your personal data on the basis of an intragroup agreement, which includes appropriate safeguards to protect your personal data]. *[This paragraph should be included if Morgana Court and Lodge transfers personal data outside the EEA. There are a number of optional clauses within this paragraph. Morgana Court and Lodge will need to consider the location of the recipient and the grounds on which personal data is transferred and update this paragraph accordingly]*.

How long will we keep your personal data?

We will retain your personal data for [confirm retention period]. [There must be valid reasons to retain the personal data for the chosen period of time. Personal data must not be retained “just in case” it is needed in the future. Further guidance about appropriate retention periods for employee and HR personal data is included in the Data Security and Data Retention Policy and Procedure]. Your information will be kept securely at all times. Following the end of the relevant retention period, your files and the personal data covered by the retention period will be permanently deleted or destroyed.

What are your rights?

You benefit from a number of rights in respect of the personal data we hold about you. We have summarised the rights which may be available to you below, depending on the grounds on which we process your data. More information is available from the Information Commissioner’s Office website (https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/). These rights apply for the period in which we process your data.

1. Access to your data

You have the right to ask us to confirm that we process your personal data, as well as having the right to request access to/copies of your personal data. You can also ask us to provide a range of information, although most of that information corresponds to the information set out in this data privacy policy.

We will provide the information free of charge unless your request is manifestly unfounded, excessive or repetitive, in which case we are entitled to charge a reasonable fee. We may also charge you if you request more than one copy of the same information.

We will provide the information you request as soon as possible and in any event within one month of receiving your request. If we need more information to comply with your request, we will let you know.

2. Rectification of your data

If you believe personal data we hold about you is inaccurate or incomplete, you can ask us to rectify that information. We will comply with your request within one month of receiving it unless we do not feel it is appropriate, in which case we will let you know why. We will also let you know if we need more time to comply with your request.

3. Right to be forgotten

In some circumstances, you have the right to ask us to delete personal data we hold about you. This right is available to you:

- Where we no longer need your personal data for the purpose for which we collected it
- Where we have collected your personal data on the grounds of consent and you withdraw that consent
- Where you object to the processing and we do not have any overriding legitimate interests to continue processing the data
- Where we have unlawfully processed your personal data (i.e. we have failed to comply with UK GDPR); and
- Where the personal data has to be deleted to comply with a legal obligation

There are certain scenarios in which we are entitled to refuse to comply with a request. If any of those apply, we will let you know.

4. Right to restrict processing

In some circumstances, you are entitled to ask us to suppress processing of your personal data. This means we will stop actively processing your personal data but we do not have to delete it. This right is available to you:

- If you believe the personal data we hold is not accurate – we will cease processing it until we can verify its accuracy
- If you have objected to us processing the data – we will cease processing it until we have determined whether our legitimate interests override your objection
- If the processing is unlawful; or
- If we no longer need the data but you would like us to keep it because you need it to establish, exercise or defend a legal claim

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5. Data portability

You have the right to ask us to provide your personal data in a structured, commonly used and machine-readable format so that you are able to transmit the personal data to another data controller. This right only applies to personal data you provide to us:

- Where processing is based on your consent or for performance of a contract (i.e. the right does not apply if we process your personal data on the grounds of legitimate interests); and
- Where we carry out the processing by automated means

We will respond to your request as soon as possible and in any event within one month from the date we receive it. If we need more time, we will let you know.

6. Right to object

You are entitled to object to us processing your personal data:

- If the processing is based on legitimate interests or performance of a task in the public interest or exercise of official authority
- For direct marketing purposes (including profiling); and/or
- For the purposes of scientific or historical research and statistics

In order to object, you must have grounds for doing so based on your particular situation. We will stop processing your data unless we can demonstrate that there are compelling, legitimate grounds which override your interests, rights and freedoms or the processing is for the establishment, exercise or defence of legal claims.

Automated decision making

Automated decision making means making a decision solely by automated means without any human involvement. This would include, for example, an online credit reference check that makes a decision based on information you input without any human involvement. It would also include the use of an automated clocking-in system that automatically issues a warning if a person is late a certain number of times (without any input from HR, for example).

We do not carry out any automated decision making using your personal data. [*If Morgana Court and Lodge carries out automated decision making, delete this sentence and complete the section below].*

We carry out the following types of automated decision making using your personal data: *[If Morgana Court and Lodge does not carry out automated decision making, delete this sentence and include the sentence above. If it does carry out automated decision making, provide further information here].*

Your right to complain about our processing

If you think we have processed your personal data unlawfully or that we have not complied with UK GDPR, you can report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ("**ICO**"). You can call the ICO on 0303 123 1113 or get in touch via other means, as set out on the ICO website: https://ico.org.uk/concerns/.

Any questions?

If you have any questions or would like more information about the ways in which we process your data, please contact *[insert name/job role/email address]*.

Signed:_____ Signed: _____

On behalf of Morgana Court and Lodge **Employee**

Date:_____ Date: _____

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Morgana Court and Lodge

Data Privacy Policy – External

[This Notice should be circulated to non-employees, including Individuals, although Morgana Court and Lodge should consider the extent to which the provisions are applicable to Individuals and other contacts. If necessary, Morgana Court and Lodge should use more than one data privacy policy for non-employees.]

When Morgana Court and Lodge processes your personal data, it is required to comply with the Data Protection Act 2018 ("DPA") and the UK GDPR (the DPA and UK GDPR are together referred to as the "Data Protection Legislation").
Your personal data includes all the information we hold that identifies you or is about you, for example, your name, email address, postal address, date of birth, location data and in some cases opinions that we document about you; as well as special categories of data, including but not limited to, medical and health records, Personal Plans and information about your religious beliefs, ethnic origin and race, sexual orientation and political views *[Update as necessary to reflect the personal data that is being processed about the Data Subjects to whom this data privacy policy will be provided]*.
Everything we do with your personal data counts as processing it - including collecting, storing, amending, transferring and deleting it. We are, therefore, required to comply with the Data Protection Legislation to make sure that your information is properly protected and used appropriately.
This data privacy policy provides information about the personal data we process, why we process it and how we process it.

Our responsibilities

Morgana Court and Lodge is the data controller of the personal data you provide. We have appointed Sofia Maoub as Data Protection Officer and they will have day to day responsibility for ensuring that we comply with the Data Protection Legislation and for dealing with any requests we receive from individuals exercising their rights under the Data Protection Legislation.

What personal data do we process about you?

[Note:* Morgana Court and Lodge *should include as much information as possible about the types of data it processes. Some examples are included below but these will need to be reviewed and updated on a case by case basis]

We process your personal data in order to provide you with the services you have requested, to fulfil the contract we have entered into with you and/or to receive services or goods from you. We may also process your personal data to respond to any queries or comments you submit to us and to correspond with you on a day-to-day basis. *[Note, this paragraph tries to cover all bases including provision and receipt of services.* Morgana Court and Lodge *may feel it is more appropriate to use more than one data privacy policy fornon-employees].*
We may need personal data from you to be able to provide services to you, to meet our legal obligations, to enter into a contract with you and/or to provide you with all the information you need. If we do not receive the personal data from you, we may be unable to fulfil our obligations toyou.
More information about the personal data we process is set out below:

- [Individuals]

[Personal data that we may process about you (depending on the extent of the information you have provided to us) includes:

- Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender
- Contact data such as your address, email address and telephone numbers
- Financial data including your bank account and payment card details
- Special categories of data including information about your medical background and health and diversity/equality information such as your race and ethnicity]

We process most of your information on the grounds of consent from you, legitimate interests (such as *[please insert a description of the legitimate interests you are pursuing when you process personal data]*, performance of a contract we have entered into with you, protection of the vital interests of a Data Subject or, in the case of special categories of data, processing for the provision of health or social care or treatment or the management of health or social care systems or services. *[Please delete any that are not appropriate, particularly if* Morgana Court and Lodge *chooses to use more than one data privacy policy depending on the type of Data Subject].*

- [Suppliers]

[Personal data that we may process about you includes:

- Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender
- Contact data such as your billing address and delivery address (whether residential or your company address), email address and telephone numbers
- Financial data including your bank account and payment card details (except to the extent the financial information is company rather than personal information); and
- Transaction data including details about payments made to you (where you are an individual)]

We process most of your information on the grounds of our legitimate interests (including a business relationship with you or the company for which you work) and fulfilment of our contract with you (where you are an individual). Any information we process about the company for which you work rather than you as an individual is not covered by this data privacy policy.

- [Candidates]

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[Personal data that we are likely to process about you includes:

- Identity data such as your first name, middle names, last name, marital status, title, date of birth and gender
- Contact data such as your postal address, email address and telephone numbers
- Background data such as your education, career background and work experience
- Personal information such as your skills and qualities
- Any other information that you include on any CV, application or covering letter you send to us. If this information includes special categories of data we will process that information on the grounds of consent, because you have chosen to provide it to us.]

We process most of your information on the grounds of our legitimate interests to determine whether or not we have a suitable vacancy for you.

If we obtain consent from you to the processing of your personal data, you can withdraw your consent at any time. This will not affect the lawfulness of any processing we carried out prior to you withdrawing your consent.

Who will receive your personal data?

Please note - although the UK is no longer part of the EU, we still comply with the following:

We only transfer your personal data to the extent we need to. Recipients of your personal data include:

- *[insert any potential recipients or categories of recipients]*

We do not transfer your personal data outside of the EEA. [*If Morgana Court and Lodge transfers personal data outside of the EEA, delete this sentence and include the paragraph below instead*].

We may transfer your personal data outside of the EEA to [name of recipient of data outside EEA]. [A finding of adequacy has been made in respect of [relevant country], which means the EU Commission is satisfied that any data transferred to [relevant country] will be adequately protected]. [We will transfer your personal data on the basis of a data transfer agreement that incorporates EU model clauses. The EU model clauses mean that appropriate safeguards will govern the transfer of the data]. [We will transfer your personal data on the basis of an intragroup agreement, which includes appropriate safeguards to protect your personal data]. *[This paragraph should be included if Morgana Court and Lodge transfers personal data outside the EEA. There are a number of optional clauses within this paragraph. Morgana Court and Lodge will need to consider the location of the recipient and the grounds on which personal data is transferred and update this paragraph accordingly].*

How long will we keep your personal data?

We will retain your personal data for [confirm retention period – there must be valid reasons to retain the personal data for the chosen period of time. Personal data must not be retained "just in case" it is needed in the future. Valid reasons may be, for example, 6 years in case a contract claim arises. Morgana Court and Lodge *may need to refer to numerous retention periods particularly if this policy covers a number of different types of individuals*]. Your information will be kept securely at all times.

Following the end of the relevant retention period, your files and the personal data covered by the retention period will be permanently deleted or destroyed.

What are your rights?

You benefit from a number of rights in respect of the personal data we hold about you. We have summarised the rights which may be available to you below, depending on the grounds on which we process your data. More information is available from the Information Commissioner's Office website (https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/). These rights apply for the period in which we process your data.

1. Access to your data

You have the right to ask us to confirm that we process your personal data, as well as having the right to request access to/copies of your personal data. You can also ask us to provide a range of information, although most of that information corresponds to the information set out in this data privacy policy.

We will provide the information free of charge unless your request is manifestly unfounded, excessive or repetitive, in which case we are entitled to charge a reasonable fee. We may also charge you if you request more than one copy of the same information.

We will provide the information you request as soon as possible and in any event within one month of receiving your request. If we need more information to comply with your request, we will let you know.

2. Rectification of your data

If you believe personal data we hold about you is inaccurate or incomplete, you can ask us to rectify that information. We will comply with your request within one month of receiving it unless we do not feel it is appropriate, in which case we will let you know why. We will also let you know if we need more time to comply with your request.

3. Right to be forgotten

In some circumstances, you have the right to ask us to delete personal data we hold about you. This right is available to you:

- Where we no longer need your personal data for the purpose for which we collected it
- Where we have collected your personal data on the grounds of consent and you withdraw that consent
- Where you object to the processing and we do not have any overriding legitimate interests to continue processing the data
- Where we have unlawfully processed your personal data (i.e. we have failed to comply with UK GDPR); and
- Where the personal data has to be deleted to comply with a legal obligation

There are certain scenarios in which we are entitled to refuse to comply with a request. If any of those apply, we will let you know.

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4. Right to restrict processing

In some circumstances, you are entitled to ask us to suppress processing of your personal data. This means we will stop actively processing your personal data but we do not have to delete it. This right is available to you:

- If you believe the personal data we hold is not accurate – we will cease processing it until we can verify its accuracy
- If you have objected to us processing the data – we will cease processing it until we have determined whether our legitimate interests override your objection
- If the processing is unlawful; or
- If we no longer need the data but you would like us to keep it because you need it to establish, exercise or defend a legal claim

5. Data portability

You have the right to ask us to provide your personal data in a structured, commonly used and machine-readable format so that you are able to transmit the personal data to another data controller. This right only applies to personal data you provide to us:

- Where processing is based on your consent or for performance of a contract (i.e. the right does not apply if we process your personal data on the grounds of legitimate interests); and
- Where we carry out the processing by automated means

We will respond to your request as soon as possible and in any event within one month from the date we receive it. If we need more time, we will let you know.

6. Right to object

You are entitled to object to us processing your personal data:

- If the processing is based on legitimate interests or performance of a task in the public interest or exercise of official authority
- For direct marketing purposes (including profiling); and/or
- For the purposes of scientific or historical research and statistics

In order to object, you must have grounds for doing so based on your particular situation. We will stop processing your data unless we can demonstrate that there are compelling, legitimate grounds which override your interests, rights and freedoms or the processing is for the establishment, exercise or defence of legal claims.

Automated decision making

Automated decision making means making a decision solely by automated means without any human involvement. This would include, for example, an online credit reference check that makes a decision based on information you input without any human involvement. It would also include the use of an automated clocking-in system that automatically issues a warning if a person is late a certain number of times (without any input from HR, for example).

We do not carry out any automated decision making using your personal data. [*If Morgana Court and Lodge carries out automated decision making, delete this sentence and complete the section below].*

We carry out the following types of automated decision making using your personal data: *[If Morgana Court and Lodge does not carry out automated decision making, delete this sentence and include the sentence above. If it does carry out automated decision making, provide further information here].*

Your right to complain about our processing

If you think we have processed your personal data unlawfully or that we have not complied with UK GDPR, you can report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ("**ICO**"). You can call the ICO on 0303 123 1113 or get in touch via other means, as set out on the ICO website: https://ico.org.uk/concerns/.

Any questions?

If you have any questions or would like more information about the ways in which we process your data, please contact *[insert name/job role/email address]*.

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