

# **PRIVACY POLICY**

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Thank you for visiting <u>www.onlinecrbcheck.co.uk</u>, <u>www.onlinedbscheck.co.uk</u> (Website).

This Website is operated by Access Personal Checking Services Ltd (registered number 07399692) which has its registered office address at Access Personal Checking Services Ltd Unit 5, The Courtyard, Old Court House Road, Bromborough, Wirral CH62 4UE.



References in this Privacy Policy to "we", "us", "our" and "ourselves" are references to Access Personal Checking Services Ltd. We are a 'data controller' for the purposes of the Data Protection Act 2018 (DPA 2018) and a 'controller' for the purposes of the EU General Data Protection Regulation (GDPR 2016) (i.e. we are responsible for and control the processing of, your personal information). We also act as a 'data processor' for the purposes of DPA 2018 and a 'processor' for the purposes of the GDPR (once it is in force) in the course of our business operations. Our authorised representative for the purposes of the DPA 2018 and the GDPR is Mark Gardner.

We take your privacy very seriously and we ask that you read this privacy policy carefully as it contains important information on:

- the personal information we collect about you
- · what we do with your information, and
- who your information might be shared with.

## What information we collect?

### Personal information provided by you

Information that you provide by filling in forms on our website. This includes information provided at the time of registering to use our site, ordering any products or services described on our website, posting any information or material or requesting further services.

Access Personal Checking Services Ltd does not capture or store data about visitors to its website. However, you may choose to give us data such as your name, address, or email for enquiries. If this is the case, the data received will be kept for 6 months. The data is kept for this period to allow for any follow up enquiries and/or information.

If we ask you for personal information, we will:

- make sure you know why we need it;
- only ask for what we need;
- make sure nobody has access to it who shouldn't;
- · keep it securely;
- let you know if we share it with other organisations;
- ask you to agree to us sharing your information where you have a choice;
- only keep it for as long as we need to
- not make it available for commercial use (such as marketing) without your permission;
- provide you with a copy of data we hold on you, on request. Please note that if you would like
  to view the data the DBS hold on you. For further information please click <a href="here">here</a>
- have procedures in place for dealing promptly with any disputes / complaints

In return, we ask you to give us accurate information.

## Personal information provided by third parties

We may receive information about you from other sources (such as credit reference agencies, the Disclosure & Barring Service, Disclosure Scotland, Access NI, NCTL and the Department of



Education), which we will add to the information we already hold about you in order to help us provide services to you. In certain circumstances we will share information with third parties where we a legally permitted to do so i.e.:

- · prevention and detection of crime;
- apprehension and prosecution of offenders

#### Basic Disclosure - DBS

If you are submitting your application for the purpose of a Basic Disclosure within your application you will be asked to provide the following information:- What is the purpose of this disclosure? (employment or personal interest). Is the place of employment in England or Wales? If the answer is Yes then see below. If the answer is no, please see section Basic Disclosure – Disclosure Scotland.

Information you enter through the online system for a Basic DBS Disclosure:- Date of birth, Title, forename, any middle names, surname, any previous names/surnames, gender, place of birth (town), birth county, Birth Nationality email address, home landline number, mobile number, mothers' maiden name, national insurance number, passport details, driving licence details, do you have a DBS profile number? (please note you will have been given one of these if you have already undertaken a DBS Basic Disclosure check). 5 year address history. You must provide all other addresses where you have lived in the last 5 years. There must be no gaps in dates and no overlapping dates with the exception that the month that you left one property must be the same as the month that you started living in a new property. You will be asked the question 'Can APCS view your certificate when issued'? which means 'Do you wish to provide consent to lead contact of the Registered organisation (APCS) to view your online DBS certificate when it has been issued?' If you select the 'Yes' option, the Accountable Officer of the RO (APCS) will be able to view an electronic image of your certificate and if applicable could make a recruitment decision based on that information. You can remove or amend consent once your Basic check has been completed from your DBS account which you will need to create. You will receive information from the Disclosure & Barring Service on how to do this once you have submitted your application. Do you want a paper copy of your certificate?

Also within your application you will be asked the question 'Consented 3rd Party Email Address' which means 'Enter the third party email address to provide consent to view your DBS certificate once it is issued. This should match the email address registered for the recipients DBS online account'. Therefore if you enter an email address in response to this question the person that address belongs to will be able to view an electronic image of your certificate and if applicable could make a recruitment decision based on that information. You can remove or amend consent once your Basic check has been completed from your DBS account which you will need to create.

If you give consent on your application to an Accountable Officer and/or a 3rd Party and your DBS certificate contains conviction information, the consent to view an electronic image of your certificate will automatically be removed. You can reinstate this consent using your DBS online account.

Within your application for a Basic Disclosure you can choose to receive a paper certificate. This can be sent to your current address or you can send it to another address. This does not have to be your own address, you can send it to another recipient, for example your employer. If you choose to have



your paper certificate sent to another person this person will be able to view your certificate before you have had an opportunity to check that your details on the certificate are correct.

Within your application we ask you for your email address in order to provide an update on the progress of your application and a way in which we can contact you should we need to contact you about your application.

Access Personal Checking Services Ltd will obtain an electronic result once your application is completed containing the following wording 'Certificate contains no information' or 'Please wait to view applicant certificate.' If you do not wish to consent to this result being received you should not submit your application through Access Personal Checking Services Ltd.

We may also share information with organisations or individuals you have provided consent for. This will only occur where you choose to allow the sharing to take place.

### Basic Disclosure - Disclosure Scotland

If you are submitting your application for the purpose of a Basic Disclosure and you live in Scotland or overseas address then your application will be processed by Disclosure Scotland (DS).

Information you enter through the online system for a Basic DS Disclosure:- Date of birth, Title, forename, any middle names, surname, any previous names/surnames, gender, place of birth (town), birth county, Birth Nationality email address, home landline number, mobile number, mothers' maiden name, national insurance number, passport details, driving licence details, 5 year address history. You must provide all other addresses where you have lived in the last 5 years. There must be no gaps in dates and no overlapping dates with the exception that the month that you left one property must be the same as the month that you started living in a new property. You will be asked whether you have any unspent criminal convictions. Please note most convictions become spent after a period of time and, after that time, no longer have to be disclosed. Please note that whether Yes or No has been entered the results of the check will remain the same. Please note that if you are completing this form for employment purposes by not disclosing whether you have conviction history may be further explored by your employing organisation and could lead to disciplinary proceedings. Access Personal checking service Ltd will then ask for you consent for the following:-

Access Personal Checking Service Ltd (APCS) is intending to submit an application to Disclosure Scotland for a basic disclosure on behalf of Access Personal Checking Services Ltd. The Basic Disclosure certificate will contain information about any unspent convictions held in your name, or confirm that no such convictions exist.

By ticking the box in the consent and writing your full name in the space provided you confirm you are giving my freely provided consent to:

a). APCS submitting a single application to Disclosure Scotland on behalf of Access Personal Checking Services Ltd for a basic disclosure certificate.



- b). Disclosure Scotland advising APCS by e-mail whether or not my basic disclosure contains information about unspent convictions, and posting the Disclosure Certificate to APCS.
- c). APCS sending the e-mail and certificate on to the organisation that requested for the application. The e-mail and certificate to be sent to a named individual at the organisation that asked you to complete the online form who has signed an agreement to abide by Disclosure Scotland's Code of Practice regarding security and confidentiality of disclosure information. This individual will receive and view my basic disclosure certificate prior to me seeing it.

Declaration by the applicant. You will be required to put a tick in the box, by doing so you confirm that the information that you provided in support of your application is complete and true and understand that knowingly to make a false statement for this purpose may be a criminal offence.

Within your application for a Basic Disclosure – Disclosure Scotland you will receive a paper certificate. This can be sent to your current address or you can send it to another address. This does not have to be your own address, you can send it to another recipient, for example your employer.

#### Standard & Enhanced Disclosure - DBS

If you are submitting your application for the purpose of a Standard or Enhanced DBS within your application you will be asked to provide the following information:-

Date of birth, Title, forename, any middle names, surname, any previous names/surnames, gender, place of birth (town), birth county, Birth Nationality email address, home landline number, mobile number, mothers' maiden name, national insurance number, passport details, driving licence details, 5 year address history. You must provide all other addresses where you have lived in the last 5 years. There must be no gaps in dates and no overlapping dates with the exception that the month that you left one property must be the same as the month that you started living in a new property. You will be asked whether you have any convictions, cautions, reprimands or final warnings, which would not be filtered in line with current guidance.

#### What is Filtering on DBS Disclosures?

Certain old and minor cautions and convictions may no longer appear on a disclosure. They are filtered out and an employer is no longer entitled to know about them.

#### What Conviction Information will not be filtered?

The following conviction information will continue to appear on a disclosure. If you have one of these you must answer YES to this question if you have one of these

- All cautions and convictions for serious violent and sexual offences; and other specified offences of relevance for posts concerned with safeguarding children and vulnerable adults, will continue to appear on a disclosure. (A full list of such offences is available on the DBS website)
- Cautions given less than 2 years ago (where the individual was under 18 at the time of caution)
- Cautions given less than 6 years ago (where the individual was over 18 at the time of caution)
- Where the individual has more than one conviction offence, all convictions will appear. No offences will be filtered.



- Convictions that resulted in a custodial sentence (regardless of whether served)
- Convictions given less than 11 years ago (where individual was over 18 at the time of conviction)
- Convictions given less than 5.5 years ago (where individual was under 18 at the time of conviction)

These changes relate to what appears on a disclosure, and to what convictions an employer is legally allowed to ask about.

Please note that if you are completing this form for employment purposes by not disclosing whether you have conviction history may be further explored by your employing organisation and could lead to disciplinary proceedings. DBS Statement of Fair Processing - The Disclosure and Barring Service will refer the details provided on this application form to government and law enforcement bodies in accordance with any relevant legislation. The details provided to these bodies will be used for identifying possible matches to records held by them. Where such a match is established, data may be released to the DBS for inclusion on any certificate issued. The details provided on this form may be used to update the records held by the bodies specified above. The details provided on the application form may be used to verify your identity for authentication purposes. The DBS may use any information provided by the DBS on a certificate or otherwise held by the DBS to inform any of its barring decisions made under its powers within the Safeguarding Vulnerable Groups Act 2006.

Where is states "Declaration by the applicant" you will be required to place a tick in the box to confirm that the information that you have provided in support of your application is complete and true and understand that knowingly to make a false statement for this purpose may be a criminal offence. You will be required to enter your full name to confirm and confirm the date of declaration which is the date in which you entered the details.

### Standard & Enhanced Disclosure - Access NI

If you are submitting your application for the purpose of a Standard or Enhanced Access NI within your application you will be asked to provide the following information:-

Date of birth, title, forename, any middle names, surname, any previous names/surnames, gender, place of birth (town), birth county, Birth nationality, email address, home landline number, mobile number, Mothers' maiden name, national insurance number, passport details, driving licence details, 5 year address history. You must provide all other addresses where you have lived in the last 5 years. There must be no gaps in dates and no overlapping dates with the exception that the month that you left one property must be the same as the month that you started living in a new property. In the online application you will also be asked to give your consent to the following:-

- The information I have provided in support of this application is complete and true. I will supply AccessNI with any additional information required to verify the information provided in this application. I understand that knowingly to make a false statement in this application is a criminal offence
- AccessNI may use the information I have supplied on this form to verify my identity
- AccessNI may use the information I have supplied on this form for the purposes of the prevention or detection of crime.



AccessNI may pass the information I have supplied on this form, and any other information I
have supplied in support of this application to other Government organisations and law
enforcement agencies.

There will be a check box for you to confirm that you have read and understood the information above Information on this form will be treated in confidence.

AccessNI is registered with the Information Commissioner. Data supplied by you on this form will be processed in accordance with the provisions of the General Data Protection Regulations.

Please note you must be at least 16 years old to make a Standard/Enhanced application.

#### Filtering criminal records - Access NI

Sometimes details of your criminal record won't appear on your Access NI disclosure certificate. This is called 'filtering'. AccessNI filters convictions and cautions for minor or certain old offences from standard and enhanced checks.

Filtering does not remove convictions for serious offences or convictions that resulted in a prison sentence.

#### Offences exempt from filtering

AccessNI does not filter:

- a conviction or caution, diversionary youth conference or informed warning for a specified offence
- a conviction resulting in a custodial sentence (including a suspended sentence), regardless of offence
- a conviction for trying to commit a specified offence
- a conviction for encouraging or helping someone else to commit a specified offence

#### **Specified offences**

Specified offences are serious crimes that will always appear on an AccessNI check no matter when the crime occurred or the offender's age when they were convicted. Specified offences include:

- murder, manslaughter, kidnap, hijack, money laundering
- violent or sexual crimes
- matters relevant to safeguarding or child protection

If you're convicted of an offence abroad and the foreign authorities share this information with UK police, this offence could appear on your criminal record in Northern Ireland. AccessNI will not filter an offence if it is equivalent to any on the specified list.

See the full list of AccessNI specified offences.

#### Offences which are filtered



#### AccessNI will filter information as follows:

		Under 18 at time of conviction/disposal
Conviction for single non- specified offence	filtered after 11 years	filtered after five and a half years
Cautions for non-specified offences	filtered after six years	filtered after two years
Diversionary Youth Conferences	n/a	filtered after two years
Informed warning for non- specified offence	filtered after one year	filtered after one year

## Once you have submitted your application

Once you have completed your application, the next stage will be to get your application details checked against your ID documents. Your employer or organisation that requested you to get the check done will have arranged this, or may get in touch with you to do so. Once your application details have been verified, your application can be submitted for processing to the DBS or Disclosure Scotland or Access NI.

You can check the progress of your application at any time by logging back in to your account (found on the website <a href="www.onlinecrbcheck.co.uk">www.onlinecrbcheck.co.uk</a> or <a href="www.onlinedbscheck.co.uk">www.onlinedbscheck.co.uk</a>) and this will take you to a summary page with the current status of your application.

If you have any queries regarding your application, please contact APCS on 0845 643 1145 or alternatively via email <a href="mailto:enquiries@accesspcs.co.uk">enquiries@accesspcs.co.uk</a>.

If your application has been submitted to Disclosure Scotland their privacy policy can be found here:www.mygov.scot/privacy/

If your application has been submitted to Disclosure & Barring Service for Standard/Enhanced DBS check their privacy policy can be found here:- <a href="https://www.gov.uk/government/publications/dbs-privacy-policy/dbs-pri

If your application has been submitted to Disclosure & Barring Service for Basic DBS Disclosure their privacy policy can be found here:- <a href="www.gov.uk/government/publications/dbs-privacy-policies-for-basic-checks">www.gov.uk/government/publications/dbs-privacy-policies-for-basic-checks</a>

If your application has been submitted to Access NI for a Standard or Enhanced Access NI their privacy policy can be found here:- <a href="https://www.nidirect.gov.uk/articles/your-privacy">www.nidirect.gov.uk/articles/your-privacy</a>

#### Management reporting system

We give the client organisation secure access to a management reporting system which shows the following data regarding the application: Customer/organisation Name, Branch Name, ID Checker Name, User ID, Applicant Surname, Applicant Forename, PositionAppliedFor, DBS Ref No, Level of



Disclosure, Disclosure Number, Issue Date, Work Force, whether the application was for a Volunteer position, whether the position involves working with children, whether the position involves working with Vulnerable Adults and whether the position will be working in the person's own home.

#### Personal information about other individuals

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can:

- give consent on his/her behalf to the processing of his/her personal data;
- receive on his/her behalf any data protection notices;
- give consent to the transfer of his/her personal data abroad; and
- give consent to the processing of his/her personal data.

### Monitoring and recording communications

We may monitor and record communications with you (such as telephone conversations and emails) for the purpose of quality assurance, training, fraud prevention and compliance.

## Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you use our Website. We use cookies on our Website.

For example, we may monitor how many times you visit the website, which pages you go to, traffic data, location data and the originating domain name of a user's internet service provider. This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

You can set your browser not to accept cookies and the websites below tell you how to remove cookies from your browser. However, some of our website features may not function as a result.

For further information on our use of cookies please see our Website cookie policy.

For further information on cookies generally visit www.aboutcookies.org or www.allaboutcookies.org.

# How will we use the information about you?

We collect information about you so that we can:

- identify you and manage any accounts you hold with us;
- process your order;
- conduct research, statistical analysis and behavioural analysis;
- carry out customer profiling and analyse your purchasing preferences;
- if you agree, let you know about other products or services that may be of interest to you —
   see 'Marketing' section below;
- detect and prevent fraud;
- · do due diligence checks;
- customise our website and its content to your particular preferences;



- notify you of any changes to our website or to our services that may affect you;
- · carry out security vetting; and
- improve our services.

## Who your information might be shared with

Our data (in accordance with our legitimate interests and in accordance with the DPA 2018 and the GDPR) disclose your personal data to: will only be seen by those whose jobs require them to do so. In practice, this means APCS, Disclosure Scotland (if submitting Basic Disclosure Scotland Checks) and DBS (if submitting Basic, Standard or Enhanced DBS checks) and Access NI (if submitting Standard or Enhanced Access NI checks) staff conducting the various checks that are necessary for the issue of disclosure certificates and decision making.

Data may also be passed to organisations and 'data sources' involved. For the DBS these are:

- Tata Consultancy Services a partner in the DBS service
- police forces in England, Wales and Northern Ireland, the Isle of Man and the Channel Islands – searches will be made on the PNC and data may be passed to local police forces in the area where you live, or have previously lived. The data will be used to update any personal data the police currently hold about you
- ACRO Criminal Records Office manages criminal record information and improves the exchange of criminal records and biometric information
- other data sources such as British Transport Police, the Royal Military Police and the Ministry
  of Defence Police. Searches are made of an internal database which lists the nominal details
  of those upon whom these departments hold data. Where a match occurs the information will
  be shared to clarify whether that data is information held about you
- Disclosure Scotland if you have spent any time living in Scotland, your details may be referred to Disclosure Scotland
- customer satisfaction surveys the DBS may conduct customer satisfaction surveys and may
  employ a specialised organisation to conduct the survey on their behalf. The data used
  includes: name, address, age, gender, telephone number and email address. Customer
  satisfaction packs are issued directly from DBS to persons referred for barring consideration,
  no information is passed to any third party
- United Kingdom Central Authority for information exchange with other EU countries in accordance with the decision made by the council of The European Union
- the Child Exploitation Online Protection Centre (CEOP) who are an affiliate of the Serious Organised Crime Agency (SOCA)
- data may be shared with Keepers of Registers and Registered Bodies etc as defined in the Safeguarding Vulnerable Groups Act and Protection of Freedoms Act or secondary legislation

Data may also be passed to organisations and 'data sources' involved. For the Disclosure Scotland:-

Disclosure Scotland is fully committed to compliance with the Data Protection Act 2018 and all operations and processes are in accordance with the Act. Information from applicants, police forces and police records is required to prevent crime and to protect the vulnerable.



Information will only be disclosed to legitimate organisations who have a legal right to have access to this under Part V of the Police Act 1997, the Protecting Vulnerable Groups Act 2007, or can display a legal right to do so. However, Disclosure Scotland reserves the right to share information with the police where it believes a crime may have been committed.

Data may also be passed to organisations and 'data sources' involved. For APCS these are:

- Disclosure Scotland (if submitting Basic Disclosure Scotland Checks)
- DBS (if submitting Basic, Standard or Enhanced DBS checks) staff conducting the various checks that are necessary for the issue of disclosure certificates and decision making.
- Access NI (if submitting Access NI Standard or Enhanced disclosures) staff conducting various checks that are necessary for the issue of disclosure certificates and decision making.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by us about you will be one of the transferred assets;
- in the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;

We will (in accordance with the DPA 2018 and the GDPR and in order to provide our services to you or (as relevant) to our business customers at your request) disclose your personal data to:

- · our agents and service providers;
- law enforcement agencies in connection with any investigation to help prevent unlawful activity;

We may (in accordance with the DPA 2018 and the GDPR and if you consent to it) disclose your personal data to our business partners in accordance with the 'Marketing' section below.

## Keeping your data secure

We will use technical and organisational measures to safeguard your personal data, for example:

- access to your account is controlled by a password and user name that are unique to you;
- we store your personal data on secure servers; and
- payment details are encrypted using SSL technology (typically you will see a lock icon or green address bar (or both) in your browser when we use this technology).

We are certified to ISO 27001. This family of standards helps us manage your information and keep it safe and secure. We are also certified to Cyber essentials plus which is a government-backed, industry-supported scheme to help organisations protect themselves against common online security threats.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see 'How to contact us?' below).



## What can I do to keep my information safe?

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

## What rights do you have?

## Right to request a copy of your information

- 1. You can request a copy of your information which we hold (this is known as a subject access request). If you would like a copy of some or it, please:
- 2. email, call or write to us (see 'How to contact us?' below);
- 3. let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and,
- 4. let us know the information you want a copy of, including any account or reference numbers, if you have them.

Please note that if you would like to request information held by the Disclosure and Barring Service click here <a href="https://www.gov.uk/government/publications/dbs-subject-access-request">https://www.gov.uk/government/publications/dbs-subject-access-request</a>

Please note that if you would like to request information held by Disclosure Scotland click here <a href="https://www.mygov.scot/disclosure-types/">https://www.mygov.scot/disclosure-types/</a>

### How long we hold your data for

We will hold your data no longer than we need to. For the purposes of criminal record checking we keep the details entered by the applicant and employer (for id checking) for 6 months after the issue date of the certificate. We are required to keep the applicant's consent to proceed with the e-application for 12 months.

After 6 months from the issue date of the certificate, we only keep hold of the data that is recorded in the management section above. (Customer/organisation Name, Branch Name, ID Checker Name, User ID, Applicant Surname, Applicant Forename, PositionAppliedFor, DBS Ref No, Level of Disclosure, Disclosure Number, Issue Date, Work Force, whether the application was for a Volunteer position, whether the position involves working with children, whether the position involves working with Vulnerable Adults and whether the position will be working in the person's own home)

## Right to correct any mistakes in your information

The DBS/Disclosure Scotland/Access NI will not uphold Data Entry disputes (Data entry disputes are those where the applicant or APCS challenge that the data that which appears on the disclosure certificate was not the data they submitted for the application) where the application was made via



ebulk, unless the information has been subsequently amended incorrectly by DBS. Where complaints occur due to information being incorrect, APCS must be able to demonstrate that the information submitted using the e-Bulk system differs from what appears in the e-Result or the applicant's disclosure certificate. Where disputes are upheld by DBS/DS/Access NI another e-result will be issued. APCS will not uphold Data Entry disputes where the application was made via ebulk unless data has been amended incorrectly by APCS. Where disputes are upheld by APCS, APCS will resubmit the data to DBS/Disclosure Scotland/Access NI or, in certain cases, may require a new application to be completed which will then be processed free-of-charge.

If you would like to do this, please: email, call or write to us (see 'How to contact us?' below); let us have enough information to identify you (eg account number, user name, registration details); and, let us know the information that is incorrect and what it should be replaced with.

#### Your right of subject access – Access Personal Checking Services Ltd

You are entitled to be told if the Access Personal Checking Services (APCS) holds any information about you and if so to be provided with a copy of that information. This is called the 'Right of Subject Access'. These rights are governed by the Data Protection Act 2018. When you make an application for subject access to APCS, we must:

- tell you whether we hold any data on you; and
- give you a copy of this data in a clear form.

For further information see Subject Access Policy

#### How to contact us

Please contact us if you have any questions about this privacy policy or the information we hold about you. If you wish to contact us, please send an email to enquiries@accesspcs.co.uk or write to us at Access Personal Checking Services Ltd, 46 Seaview Road, Wallasey, CH45 4LA or call us on 0845 6431145.

If you wish to complain about any aspect of our processing of your personal data then please contact us in the first instance. If we cannot resolve your complaint you have the right to complain to the Information Commissioner at <a href="https://www.ico.org.uk">www.ico.org.uk</a>.

## Changes to the privacy policy

We may change this privacy policy from time to time. You should check this policy occasionally to ensure you are aware of the most recent version that will apply each time you access this Website.