

PRIVACY STATEMENT

1 INTRODUCTION

EFL Trust

our relationship with the supplier and the relevant individuals and to provide such services to our service users.

Administering, managing and developing our businesses and services. We process personal data in order to run our business, including:

- managing our relationship with sponsors, suppliers, vendors or other business partners;
- developing our businesses and services;
- maintaining and using IT systems; and
- administering and managing our websites, databases, CRMs and other systems.

Security, quality and risk management activities. We have security measures in place

investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.

Complying with any requirement of law, regulation or a professional body of which we are a member. We are subject to legal, regulatory and professional obligations. We need to keep certain records to show we comply with those obligations and those records may contain personal data.

3.3.2 What data do we hold?

and contact details of suppliers, sponsors, affiliated organisations, vendors or business partners as well as banking and other financial information. We also keep invoices, financial information and contracts, and quality assurance activity.

We will only process personal information when the law allows us to. Depending on the processing activity, we rely on the following lawful bases:

1. Article 6(1)(b), Where we need to perform the contract we have entered into with you
2. Article 6(1)(c), Where we need to comply with a legal obligation
3. Article 6(1)(d), Where we need to protect your vital interests, or those of somebody else, and you are incapable of providing consent.
4. Article 6(1)(f) Where it is necessary for our legitimate interests, your legitimate interests, or those of a third party, and your interests and fundamental rights do not override those interests

3.3.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights. In general we hold this information for a maximum of 10 years.

- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email info@efltrust.com

7 COMPLAINTS

data, please send an email with the details of your complaint to info@efltrust.com for the attention of **the Data Protection Officer**. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the UK data protection regulator, the [ICO](https://ico.org.uk/concerns), please refer to the ICO website <https://ico.org.uk/concerns> your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

8 CHANGES TO OUR PRIVACY STATEMENT

Our up to date privacy policy is available on our website.

Version: December 2019