

Byfield Potential AT1 Bonds Group Action Privacy Notice

Byfield Consultancy Limited (“**Byfield**” or “**we**”) is the data controller responsible for your personal data for the Potential AT1 Bonds Group Action Expression of Interest Form (“**Form**”) during our collection process, at which point we will transfer your personal data to global law firm Clyde & Co LLP, who will receive the personal data and who have their own legal basis and purpose for processing your personal data. Once Clyde & Co LLP receive your personal data, it will be processed in accordance with their data handling policy which can be seen [here](#).

We collect and process your personal data when you provide the information requested in this form. This website is not intended for children, and we do not knowingly collect data relating to children. This privacy notice provides information on how we collect and process your personal data when you submit it to the [Form](#). Byfield only collects the personal data about you requested on this Form and that you otherwise provide to us.

The data we collect about you on this Form

Byfield may collect, use, store and transfer different kinds of personal data which you submit to us via the Form as follows:

- Identity data
- Contact data
- Financial data

How we use your personal data

The law requires us to have a legal basis for collecting and using your personal data. We rely on your legitimate interests and contract as the legal basis for our use of your personal data. We rely on legitimate interest where it is necessary to conduct our business and pursue our legitimate interests, and to perform the contract.

Byfield will only use your personal data for the purpose for which we collected it, which includes the following:

- [to register potential interest in being included in a larger legal proceedings
- to process your personal data post collection

- to collate your personal data for transfer
- transfer your personal data to Clyde & Co
- to enable you to be contacted in relation to the information provided in the Form
- to record or assist with any legal rights you may invoke, including complaints]

We (Byfield) will retain this data for a maximum of six (6) calendar months.

How we share your personal data

When Byfield is a controller, we may share your personal data within our organisation on a limited basis to carry out the purposes for which we have collected it.

As controller, Byfield may share your personal data where necessary with the parties set out below for the purposes set out above.

- Internal third parties which assist us in hosting our IT systems and operating our website.

These companies are:

- o Microsoft 365
- o SWBROADBAND Ltd trading as Cloudabove which is our website hosting third party
- o Bespoke Solutions Limited, our IT support supplier.

Byfield require all third parties to respect the security of your personal data and to treat it in accordance with the law. Byfield does not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Clyde & Co, upon receipt of your personal data will process your personal data on their own lawful basis and purposes. Clyde & Co's privacy policy is available here: [Privacy notice](#).

International transfers

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside the UK to countries which have laws that do not provide the same level of data protection as the UK law.

Whenever we transfer your personal data out of the UK to service providers, we ensure a similar degree of protection is afforded to it by ensuring that the following safeguards are in place.

Byfield will be using Microsoft 365 and Sharepoint, Microsoft Corporation products, to transfer and store data, which will be protected by the EU data protection laws. The data held through Microsoft will be held within the EU/EEA/UK area.

The Byfield website is hosted by the UK Company, via SWBROADBAND Ltd trading as Cloudabove, under which your data may be transferred outside of the EEA/EU/UK area. To understand more please see the link for Cloudabove's data privacy policy <https://cloudabove.com/privacy>.

Data security

Byfield have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, Byfield limits access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data

to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - o If you want us to establish the data's accuracy;
 - o Where our use of the data is unlawful but you do not want us to erase it;
 - o Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - o You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, or if you have any questions about this privacy notice or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: info@byfieldconsultancy.com
- Postal address: 3rd Floor, 1 Lady Hale Gate, London WC1X 8BS

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Complaints

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.