

Intelligent compliance | Unique combination of smart people and smart tech



Momenta

Privacy and Cookie Policy

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1 Introduction

Momenta is strongly committed to protecting personal data. This privacy statement describes why or how we collect and use personal data and provides information about individuals' rights. It applies to personal data provided by us, both by individuals themselves or by others.

Personal data is any information relating to an identified or identifiable living person. Momenta processes personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure and retention periods for each purpose may differ.

This Privacy Notice tells you how we look after your personal data when you visit our website and at other points at which we collect your personal data. It tells you about your privacy rights and how the law protects you. A further Privacy Notice may be presented separately in order to describe how we will use personal data in specific scenarios.

We may use personal data provided to us for any of the purposes described in this privacy notice or as otherwise stated at the point of collection. This document may also be described as a Fair Processing Notice.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

1.1 Important information about us

Momenta operates as an employment business, supplying personnel to companies and organisations to help them complete tasks or projects. This can include complaints handling services, regulatory claims resolution services and training services. Momenta has a strong presence in the financial services sector, but also acts for a wide range of industries, to include the banking and financial services industries, complaints handling industry and legal projects industries.

The Momenta Group of companies are comprised of the following.

- Momenta Customer Services Limited
- Momenta Interim Management Limited
- Momenta Operations Limited
- Momenta Solutions Limited
- Momenta Holdings (PPI) Limited
- Momenta Performance Academy Limited
- Momenta Group Limited
- Momenta People Limited

Momenta Operations Limited acts as a data controller of personal data for each of Momenta's Group entities and is responsible for your personal data in connection with its activities (collectively referred to as "Momenta", "we", "us" or "our" in this privacy notice). Momenta is the data controller which is responsible for this particular website.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details	
Name or title of DPO:	Chris Matthews
Email address:	dpo@momentagroup.com
Postal address:	18 King William Street London EC4N 7BP
Telephone number:	0207 374 6600

1.2 Changes to this privacy statement

We recognise that transparency is an ongoing responsibility so we will keep this privacy notice under regular review. This privacy notice was last updated on 29th May 2018.

1.3 Making a complaint

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

1.4 A request we would like to make of you

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. We will notify you if this is the case at the time.

1.5 Traditional marketing

Momenta does not generally engage in traditional marketing to end-user clients. Where it does, it strives to provide you with choices regarding certain personal data uses around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data (see definitions below) to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered a competition and, in each case, you have not opted out of receiving that marketing.

1.6 Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Momenta group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of [a product/service purchase, warranty registration, product/service experience or other transactions].

1.7 Cookies

What about cookies?

We use cookies. A cookie is a small file of letters and numbers that we put on your computer. Our site's functionality will be limited if you do not accept cookies.

Cookies are widely used to make websites work, or work more efficiently, as well as to provide information to the site owner or others. Session cookies are temporary cookies that remain in the cookie file of your browser only until you leave the site. They allow websites to link your actions during a browser session. Persistent cookies stay in the cookie file of your browser for longer (though how long will depend on the lifetime of the specific cookie). For further information on cookies, including how to use your browser to block them, visit: www.allaboutcookies.org.

Cookies are used on this site for the following purposes:

- A. Associate Portal: This cookie, which is used on our associated portal, allows you to proceed through many pages of the site quickly and easily without having to authenticate or reprocess each new area you visit. If you disallow or delete this cookie, then you will not be able to access any features that require authentication. Whether this cookie is persistent or not depends whether or not you tick "remember me" checkbox. If you do, the cookie will persist for 90 days.
- B. Google analytics cookies: Google may set persistent cookies (up to two years) to recognize and count the number of site visitors as well as providing other information about the visit such as duration, route through the site and what sites the visitor came from. This information helps us to improve the way our site works, for example by making sure users find what they need easily. Google requires us to tell you the following: "This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above." Click [here](#) for more information about Google Analytics cookies. Click [here](#) to opt out of Google Analytics.
- C. civicAllowCookies: This cookie takes note of whether you are happy to accept cookies on this website based on your response to the message which appeared when you first visited the site. This persistent cookie will remember your preference for up to 60 days.

By continuing to use our site, having seen our cookie notice, we assume that you consent to use of the cookies outlined above.

Momenta may invite employees, contractors and clients and/or those who have expressed an interest in Momenta, to events. You may receive such invitations if you have requested information from us where you have not opted out of receiving such invitations. If we seek to share your personal data with any company other than Momenta, for the purpose of assisting us with offering invitations and organising events, we will request your express 'opt-in' consent. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which events may be relevant for you.

Opting out

You can ask us or third parties to stop sending you such invitations at any time by logging into the website and checking or unchecking relevant boxes to adjust your contact preferences or by following the opt-out links on any invitations sent to you or by [contacting us](#) at any time.

2 Updates regarding job vacancies

Opting out

You can ask us or to stop sending you such notifications at any time by logging into the website and checking or unchecking relevant boxes to adjust your contact preferences or by following the opt-out links on any email sent to you or by [contacting us](#) at any time.

2.1 The Momena newsletter

Momena invites its contractor and seconded-employee population to sign up to receive (or continue to receive) its popular newsletter.

Opting out

You can ask us or to stop sending you such newsletters at any time by logging into the website and checking or unchecking relevant boxes to adjust your contact preferences or by following the opt-out links on any cover email sent to you or by [contacting us](#) at any time.

3 The type of personal data that we collect and use

When we refer to collecting or using personal data, or personal information, we are referring to any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together in this table.

Types of personal data that we collect, store, use and transfer	
Identity Data	This includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, title and: · Company Director Data; or · status as an end-user client and title within your organisation; · status as a supplier and title within your organisation.
Contact Data	This includes billing address, delivery address, email address and telephone numbers.
Onboarding Data	This includes data given by any referees, the outcome of any Vetting Data, CV data which may contain Special Data, details of any company or umbrella company through which your services are provided.
Project Data	This includes details of any overproduction payments paid or owed, performance data whilst working on any project (to include times logging in and out of the systems used on a project and arrival and departure times), timesheets.
Offboarding Data	This includes off-boarding requests and associated details, correspondence, emails or documents, reasons for voluntarily leaving, reference requests.

Historic Project Data	This includes the nature and duration of any role performed in the past through Momenta, any end-user client feedback if you were placed on a project through Momenta in the past.
Contractor Data	This includes Identify Data, Onboarding Data, Project Data, Offboarding Data and Historic Project Data, Financial Data, Vetting Data, Financial Data.
Company Director Data	This includes Identity Data and details of your status in any company providing personnel for a project (if applicable), title or office held when placed on contract (if applicable), affiliation with any company supplying your services (if applicable).
Vetting Data	This includes: · criminal record check (DBS) status and outcome of any check; · outcome of an assessment to test competency for particular tasks; · credit check using Equifax or equivalent; · sanctions status; · equal opportunities monitoring data; · Cifas fraud check; · passport data, to include your photograph; · proofs of address; · outcome of any administrative assessment; · outcome of any PPI assessment; · outcome of any Business Review assessment; · outcome of any end-user client assessment.
Financial Data	This includes bank account details and details of payments made to you (including over production payments and expenses) or by you.
Transaction Data	This includes details about payments to and from you, and in some cases details of products you have purchased from us.
Technical Data	This includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and details of you opening any emails or attachments sent by Momenta.
Profile Data	This includes your username and password, contracting history with Momenta or requests made by you which are associated with any project, your interests, preferences, feedback and survey responses.
Usage Data	This includes information about how you use our website and details of you opening any emails or attachments sent by Momenta.

Events Data	This includes your preferences in receiving information about (or invites to) events and your communication preferences.
Travel Data	This includes Identity Data, Contact Data, Transaction Data and the data available on a copy of your passport.
Special Category Data	This includes data relating to race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data.
Special Project Data (complaints handling activities)	This includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, title and other details necessary to manage the complaint itself, which may include: · details of your decision(s) to seek PPI protection and details of the administration of that protection; · details of your complaint(s) regarding your acquisition of PPI protection.
Special Project Data (claims resolution activities)	This includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, title and other details necessary to manage the complaint itself, which may include · details of your property or mortgage payments and past debt obligations; · your bank account details;
Special Project Data (review of desire to remain on client databases)	This includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender, title and other details necessary to manage the complaint itself, which may include:
Human Resources Data ('HR Data')	This includes Identity Data, Contact Data and Special Category Data for internal staff and employees placed on secondment. This may also include Financial Data and Transaction Data.

We may also collect, use and share Aggregated Data (i.e. Anonymous Data) such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature or opening an email communication. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may collect Special Categories of Personal Data about you (this may include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) in the course of our dealings with you. This is most likely to occur if you have been placed on a project through us. We may also collect information about criminal convictions and offences as part of our vetting process. Details of the data we collect, why we collect it and what we use it for are listed below.

4 Where do we get your personal data from?

We use different methods to collect data from and about you. We have set this out in the table below.

How we collect personal data	
Direct Interactions	You may give us your Identity, Contact, Contractor Data, H.R. Data and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you: · apply for a role through us; · become a contractor or employee on secondment; · subscribe to our publications, including The Mix; · request that details of events be sent to you; · give us feedback; · become a client; · become a supplier.
Automated technologies or interactions.	As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy above for further details. We also engage an automated process for the administration of onboarding and offboarding relating to projects which also assists with the administration of timesheet payments and which also stores Contractor Data and similar data relating to employees placed on secondments on end-user client projects.
Third parties or publicly available sources.	We may receive personal data about you from various third parties and public sources as set out below Technical Data from the following parties: · analytics providers such as Google based outside the EU; · Contact, Financial and Transaction Data from providers of technical, payment and delivery services; Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we have your consent to do so.
- Where we need to perform a contract which we are about to enter into, or have entered into, with you.

- Where we need to comply with a legal or regulatory obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

5 Purposes for which we use your personal data

We use your personal data when undertaking the following activities.

Type of activities which we engage in, and corresponding purposes	
Type of Activity	Purpose Description
Sourcing and engaging potential contractors or employees wishing to go on client projects	
Contractor enquiry administration	Preparing to onboard potential contractors to facilitate the process of individuals being placed on projects run by end-user clients.
Seconded employee enquiry administration	Preparing to onboard potential contractors to facilitate the process of individuals being placed on projects run by end-user clients.
Vetting	Onboarding potential personnel to facilitate the process of individuals being placed on projects run by end-user clients.
Assessment of persons wishing to work on projects	So we can determine whether they are suited to the work and likely to be accepted by an end user client
Project placement	
Managing end user client demand or direction during projects	So we can assist end user clients and personnel to work efficiently and to standards dictated by our end user client.
Administering the supply of personnel during projects	To facilitate the engagement.
Processing timesheets	To facilitate payments to personnel.
End user client initial engagement	To set up the administration of a project by an end-user client
End user client engagement for the purposes of project management	To set up the management of a project by an end-user client
Managing specific complaints handling projects	

Setting up special projects	To set up special projects and associated administration.
Administering special projects	To process a complaint, enquiry or task in compliance with end user client requirements, acting as data processor only.
Client and supplier activities	
Circulating notifications regarding available roles	To facilitate the engagement of personnel on projects, should they so wish.
Scoping new projects	To explore and set up new projects with end-user clients
Managing projects	To manage projects with end-user clients
Managing supplier relationships	To manage the engagement of and relationship with and payment of suppliers.
Circulating notification about potential roles	To keep potential contractors or secondees informed of new opportunities.
Billing of end-user clients	To ensure we are paid for our services.
Marketing	
Marketing	To market our services, to include sending SMS communications and emailing.
Circulating the Momena Newsletter	To update potential and existing personnel (contractors/employees on secondment) on developments in the marketplace via email
Administering website	To make sure our website functions optimally (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)
Website content servicing	To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you; and to use data analytics to improve our website, products/services, marketing, customer relationships and experiences.
Managing website enquiries	To facilitate interaction with you

6 Legal basis for using your personal data

We have set out below, in a table format, a description of particular activities in which we engage, and according to which we process personal data. Further, we have set out the legal bases which we rely on in order to do so. We have also identified our legitimate interests for processing personal data, where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Legal basis for using your personal data

Specific purpose or activity	Type of data used	Lawful basis for processing (Article 6 GDPR)	Lawful basis for processing (Article 9 GDPR)
Sourcing and engaging potential contractors or employees wishing to go on client projects			
Contractor enquiry administration	Identity Data, Contact Data, Onboarding Data, Project Data, Historic Project Data, Contractor Data, Contractor Director Data.	(1) Legitimate interest, where both parties wish to explore the basis of any role (2) Contract (3) Express consent.	-N/A
Seconded employee enquiry administration	Identity Data, Contact Data, Onboarding Data, Project Data, Historic Project Data, Contractor Data, Human Resources Data.	(1) Legitimate interest, where both parties wish to explore the basis of any role (2) Contract (3) Express consent.	
Vetting	Vetting Data, Contact Data, Identity Data	Express consent.	Express consent
Assessment of persons wishing to work on projects	Vetting Data, Contact Data, Identity Data and the outcome of written or oral assessments.	Legitimate interest, where this is a necessary part of being approved to go on a project due to client demand.	N/A
Project placement			
Managing end user client demand or direction during projects	Project Data, Contact Data, Identity Data	(1) Legitimate interest, where this is a necessary part of managing your placement on a project or administering legal obligations. (2) Contract	Express Consent (contractors) Express Consent or administration of employment obligations (employees on secondment).
Administering the supply of personnel during projects	Project Data, Contact Data, Identity Data	(1) Legitimate interest, where this is a necessary part of managing your placement on a project or administering legal obligations. (2) Contract	Express Consent (contractors) Express Consent or administration of employment obligations (employees on secondment).

Processing timesheets	Financial Data, Transactional Data, Contact Data	Contract	N/A
End user client initial engagement	Identity Data, Contact Data	Legitimate interest, for the purposes of offering services or responding to a request	N/A
End user client engagement for the purposes of project management	Identity Data, Contact Data	Legitimate interest, for the purposes of offering services or responding to a request	N/A
Managing specific complaints handling projects			
Setting up special projects	Identity Data, Special Project Data, Contact Data	Legitimate interest, for the purposes of setting up a special project	N/A
Administering special projects (end user client interaction)	Identity Data, Special Project Data, Contact Data	Legitimate interest, for the purposes of setting up a special project	N/A
Administering special projects (personnel supplied interaction)	Identity Data, Special Project Data, Contact Data	Legitimate interest, for the purposes of administering their involvement on the project	N/A
Administering special projects (data subject/person affected/ complainant interaction)	Identity Data, Special Project Data, Contact Data	Express consent	Express consent
Client and supplier activities			
Circulating notifications regarding available roles	Identity Data, Contact Data	Legitimate interest, for the purposes of offering services	N/A
Scoping new projects	Identity Data, Contact Data	Legitimate interest, for the purposes of offering services	N/A
Managing projects	Project Data, Contact Data, Identity Data	Legitimate interest, for the purposes of managing relationship with end-user client	N/A
Managing supplier relationships	Project Data, Contact Data, Identity Data	Contract	N/A
Circulating notifications regarding available roles	Project Data, Contact Data, Identity Data	Legitimate interest, for the purposes of offering services	N/A
Billing of end-user clients	Identity Data, Contact Data		

Marketing			
Marketing	Usage Data, Events Data, Technical Data, Identity Data, Contact Data	Legitimate interest, for the purposes of offering services	N/A
Circulating The Momenta Newsletter	Usage Data, Technical Data, Identity Data, Contact Data	Legitimate interest, for the purposes of engaging and updating interested (or likely interested) parties in its content.	N/A
Administering website	Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data Technical Data	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)	N/A
Website content servicing	Technical Data, Identity Data, Usage Data	Necessary for each party's legitimate interests in answering queries	N/A
Managing website enquiries			

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another purpose. This new purpose must be compatible with the original purpose for which we collected your data. If you have any questions concerning this matter, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where we are required, or permitted to do so by law.

7 Disclosing your personal data to others

Momenta may need to share your personal data with the parties set out below. Our purposes for doing so are set out in the table above marked "Types of personal data that we collect, store, use and transfer" (see pg. 6).

External third parties		
Type of professional advisers acting as processors or joint controllers	Country in which company is based	Service provided / need for disclosure
Lawyers	United Kingdom	Legal services

Bankers	United Kingdom	Banking services
Accountants	United Kingdom	Accounting services
Accountancy software provider	United Kingdom	Accountancy software provider services
Auditors	United Kingdom	Accountancy services
Insurers	United Kingdom	Insurance services
Insurance broker	United Kingdom	Insurance brokering services
HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers	United Kingdom	Require reporting of processing activities in certain circumstances
Clients		
End-User Clients, acting as joint-controller	United Kingdom	Service advertised by that End-User Client
Other members of the Momena group		
Momena Customer Services Limited	United Kingdom	Customer services. Interaction needed so that the business operation can be supported by Momena Operations Limited.
Momena Interim Management Limited	United Kingdom	Interim management services. Interaction needed so that the business operation can be supported by Momena Operations Limited.
Momena Operations Limited	United Kingdom	Supply of operational expertise throughout Momena group of companies.
Momena Solutions Limited	Australia	Supply of personnel services in Australia. Interaction needed so that the business operation can be supported by Momena Operations Limited.
Momena Holdings (PPI) Limited	United Kingdom	Supply of personnel to resolve PPI complaints on behalf of end-user clients. Interaction needed so that the business operation can be supported by Momena Operations Limited.
Momena Performance Academy Limited	United Kingdom	Supply of personnel to resolve PPI complaints on behalf of end-user clients. Interaction needed so that the business operation can be supported by Momena Operations Limited.
Momena Group Limited	United Kingdom	Supply of operational expertise throughout Momena group of companies.

Momenta People Limited	United Kingdom	Supply of personnel for projects
Third party companies acting as processors or joint controllers		
HR Administration software provider	United Kingdom	HR administration / data base services
Sales Administration software provider	United Kingdom	Associated services, for the purpose of generating sales of our services.
Fraud prevention check service provider	United Kingdom	Associated services, for the purposes of facilitating the onboarding of potential personnel
Sanctions-checking service provider	United Kingdom	Associated services, for the purposes of facilitating the onboarding of potential personnel
Temporary e-storage provider	United Kingdom	Associated services, for the purposes of facilitating business operations
Umbrella companies	United Kingdom	Associated services, for the purposes of facilitating the onboarding of potential personnel
Companies used by contractors to provide services	United Kingdom	Associated services, for the purposes of facilitating the onboarding of potential personnel
Web server provider	United Kingdom	Associated services, for the purposes of managing our website and our technology which facilitates the management of personnel on projects.
Back up provider	United Kingdom	Associated services, for the purposes of backing up our data.
Telephone provider	United Kingdom	Associated services, for the purposes of supplying telephone services including voicemail.
CRM email provider	U.S.A.	Associated services, for the purposes of administering e-shots with marketing information, service or operational updates relevant to individuals, administering Momenta newsletters and passing on details of new roles.
Health insurance provider	United Kingdom	Associated services, for the purposes of administering medial insurance cover.
Google Analytics	U.S.A.	Analytic services, so we can understand whether roles or the content of Momenta newsletters is well received.
Debt recovery services provider	United Kingdom	Associated services.

Further details of all transfers and transactions are available upon [contacting us](#).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and our own specific and stringent security requirements. We do not allow the above 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. In the event that Momenta sells, transfers, or merges parts of our operation or assets with a third-party organisation, then the new owners or operators may use your personal data in the same way as set out in this privacy notice.

8 International data transfers

Some of our external third parties are based outside the European Economic Area (EEA). Therefore, their processing of your personal data will involve a transfer of data outside of the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded by ensuring at least one of the following safeguards is implemented.

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: ‘Adequacy of the protection of personal data in non-EU countries’.
- Where we use service providers in countries that have not been deemed to provide an adequate level of protection, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: ‘Model contracts for the transfer of personal data to third countries’.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.
- In the case of transfers to Momenta Solutions Limited we have agreed Binding Corporate Rules in order to ensure that your data rights are respected when your personal data is transmitted between Momenta and Momenta Solutions Limited.
- In the case of transfers to the USA, specific contracts have been entered into when signing up to those organisations’ terms and conditions.

Please [contact us](#) if you wish to receive further information on the specific mechanism which we use when transferring your personal data out of the EEA.

9 Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed and/or processed in an unauthorised manner. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have an operational ‘need to know’. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

10 Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the following criterion: the amount, nature, and sensitivity of the personal data; the potential risk of harm from unauthorised use or disclosure of your personal data; the purposes for which we process your personal data; whether we can achieve those purposes through other means; and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy, which you can request by [contacting us](#).

In some circumstances, you can ask us to delete your data: see [Request Erasure] below for further information.

In some circumstances, we may anonymise your personal data (so that you can no longer be identified through the data) for research or statistical purposes. According to the law, anonymous data is not classed as personal data, as the data cannot be used to identify any given individual. As such, we are permitted by law to use anonymous data indefinitely without further notice to any data subject.

11 Exercising your legal rights

Under certain circumstances, you have rights under data protection law in relation to your personal data. [[Please click on the links below to find out more about these rights.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

11.1 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 may refuse to comply with your request in these circumstances.

11.2 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.

11.3 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may 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.

12 Description of your legal rights

You have the right to:

- **Request access to your personal data** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that your data is being lawfully processed.
- **Request correction of the personal data that we hold about you.** This enables you to request that any incomplete or inaccurate data which we hold about you is corrected, though we may need to verify the accuracy of the new data which you provide to us.
- **Request erasure of your personal data.** 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 in the following circumstances: 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 legally required to erase your personal data. Please note, however, that we may not always be able to comply with your request of erasure due to specific legal reasons. If such circumstances arise, you will be notified 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) if our legitimate interest is overridden by your own interests and/or fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where you consider our use of the data is unlawful but you do not want us to erase it; (c) 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 (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to yourself 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. Please note, 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.
- **Withdraw consent at any time where we are relying on consent to process your personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you at the time if this is the case.

13 Contact us

As mentioned above, we have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please [contact](#) our DPO using the contact details provided above.

Head Office

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