

## DATA PROTECTION NOTICE

This Data Protection Notice contains the information You need in order to understand how Your personal data is used by us. For further information please contact us with the contact details provided below in section 11 or view our website at [www. https://leave.eu/privacy-policy/](https://leave.eu/privacy-policy/)

In this Data Protection Notice:

**Leave EU** means Leave.EU the Leave.EU (also known as Leave EU) the political advocacy campaign (**the Campaign**) promoting the United Kingdom's sovereign withdrawal from the European Union . It is the trading name of Leave EU Group Limited a company registered in England. Registration number: 9763501

**Better for the Country Limited (BFtCL)** means Better for the Country Limited the management services company acting for the Leave EU campaign for their outsourced management service needs, and which is a company registered in England with registration number 09609018 and also registered with the ICO ZA132343.

**You/Your** refers to the person seeking to be involved in the Campaign, whether that is via completing any forms, registering your details on our website, donating to the Campaign, volunteering or becoming involved in some way with the Campaign.

In order to manage the Campaign, Leave EU and/or BFtCL (collectively **We, Our or Us**) collect a certain amount of personal data. "Personal data" means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information.

This Data Protection Notice sets the basis on which we gather, use, disclose and process any personal data we collect from You, or that You provide to us. We will use Your personal data only for the purposes and in the manner set forth below which describes the steps we take to ensure our processing of Your personal data is in compliance with the General Data Protection Regulation ((EU) 2016/679) (the **GDPR**) and any implementing legislation.

**Please read the following carefully to understand our use of Your personal data.**

**Your Right to Object – Please note that You have a right to object to the processing of Your personal data where that processing is carried out for our legitimate interests.**

### 1. What Personal Data We May Collect about You?

In order for you to assist the Campaign effectively, we need to collect and process personal data about you. The types of personal data that are processed may include:

Category	Types of Data Collected
Individual details	Name, address (including proof of address), other contact details such as email address and phone number, gender, marital status, date and place of birth, nationality, marketing preferences, political preference

	information, IP address, bank account details or payment card details, transactional information from our website, job title.
Identification details	Identification numbers issued by government bodies or agencies, including Your driving license number and photographs identifying You.

**2. The Purposes of, and Legal Basis for, the Processing of Your Personal Data**

We hold, disclose and process Your personal data in order to provide information on the withdrawal process and share our insights, and those of our partners, into how the UK government should go about executing its Brexit strategy, along with other information and analysis on issues related to the Brexit cause. The Campaign will also invite you to attend events, occasionally volunteer and contribute to fundraising campaigns. Providing you with this information involves using the following personal data:

- Information that you provide by filling in forms on our site [www.leave.eu](http://www.leave.eu) (our site). This includes information provided at the time of registering to use our site, subscribing to our service, posting material or requesting further services. If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access on our site.

We may also use Your personal data where:

- a) it is necessary to comply with our legal and regulatory obligations (for example, complying with reporting obligations to the Information Commissioners Office);
- b) it is necessary to support our legitimate interests in (i) managing and or administering the Campaign (ii) improving our services (iii) prevention and detection of crime, (iv) analytics, provided in each such instance they are not overridden by Your interests and rights; and/or
- c) You have consented to processing Your information in such a way.

**3. Criminal Convictions**

We may hold, use, disclose and process personal data relating to relevant criminal convictions and offences for the purposes identified above, where necessary to comply with our legal and regulatory obligations, or where necessary to support our legitimate interests. We will only carry out such processing where it is authorised by European Union (EU) or Member State law.

**4. Special Categories of Personal Data**

We hold, use, disclose and process special categories of personal data (e.g., Your health or criminal convictions data) where:

- You have given us Your explicit consent;
- the processing is necessary to protect Your, or another's vital interest;
- You have manifestly made Your personal data publicly available;
- the processing is necessary for the establishment, exercise or defence of legal claims; or

- necessary for reasons of substantial public interest on the basis of law.

## 5. Who We Share Your Information with

In order to provide our services and to comply with legal obligations imposed on us, it may be necessary from time to time for us to disclose Your personal data to third parties, including without limitation to the following:

- With our agents and third parties who provide services to us to help us administer our products and services;
- with regulatory bodies and law enforcement bodies (where we are required to do so to comply with a relevant legal and regulatory obligation);
- legal, financial, political and other professional advisors;

## 6. Transfer of Personal Data outside the EEA

The personal data we collect from You may be transferred to, and stored at a destination outside of the European Economic Area (**EEA**) for purposes described above. These countries may not provide an adequate level of protection in relation to the processing of Your personal data. Due to the global nature of the company who own the servers that we utilise for our business, Your personal data may be disclosed to members of our group outside of the EEA, including in particular Switzerland, Bermuda and the U.S.

However, to ensure that Your personal data receives an adequate level of protection we have ensured that the following appropriate safeguards are in place to protect the privacy and integrity of such personal data:

- **Model Clauses:** standard clauses in contracts with our above listed third parties to ensure that any personal data leaving the EEA will be transferred in compliance with EU data-protection law. Copies of these clauses are available if you require them, please contact us using the details in section 10; and
- **EU/Swiss-U.S. Privacy Shield:** an agreement between the EU and the Governments of Switzerland and the US concerning the treatment of data concerning EU citizens. Some of the relevant third parties are certified under the EU/Swiss-U.S. Privacy Shield.

## 7. How Long we Keep Your Personal Data

We are required to ensure that Your personal data is accurate and maintained in a secure environment for a period of time no longer than necessary for the purposes for which we are processing Your personal data.

Information submitted for an initial discussion where you did not proceed with a claim or utilise our legal services may be retained by us for a period of up to 6 years from the date of the initial discussion. Where You proceed with your claim, information will be held for the duration of Your claim remaining active and a period of 6 years after the end of our relationship. We keep information after our relationship ends in order to comply with applicable laws and regulations and for use in connection with any subsequent legal claims.

## 8. Your Data Rights

You have several rights in relation to Your personal data. You have a right to:

- access a copy of Your personal data held by us;
- request rectification of Your personal data if it is inaccurate or incomplete;
- request erasure of Your personal data in certain circumstances;
- restrict our use of Your personal data in certain circumstances;
- move (or port) personal data which You have given us to process on the basis of Your consent or for automated processing;
- object to the processing of Your data where our legal basis for processing Your data is for our legitimate interests; and
- not to be subject to a decision based on automated processing, including profiling which has legal or similar significant effects.

However, these rights may not be exercised in certain circumstances, such as when the processing of Your data is necessary to comply with a legal obligation or for the exercise or defence of legal claims. If You wish to exercise any of Your rights in this regard please contact us using the details in Section 11. We will respond to Your request in writing, or orally if requested, as soon as practicable and in any event not more than one month after receipt of Your request. In exceptional cases, we may extend this period by two months, and if we do this we will tell you why. We may request proof of identification to verify Your request.

#### **9. Automated Decision Making**

You have a right not to be subjected to decisions based solely on automated processing, including profiling, which produce legal effects concerning You or similarly significantly affects You. However in certain circumstances we are entitled to make decisions based on solely automated decision-making and profiling. These cases are restricted to situations where the decision is necessary for the management of the Campaign, where it is authorised by law or where You have provided Your explicit consent. Where we base a decision on solely automated decision-making You will always be entitled to have a person review the decision so that You can contest it and put Your point of view and circumstances forward.

#### **10. Consequences of Failure to Provide Information**

If we or any of the parties detailed above cannot collect information requested from You, it may make it difficult, impossible, or unlawful for us to manage your involvement in the Campaign or to provide the product or services that you requested on our Website.

If we or any of the parties listed above ask for information and You do not wish to give it to us, or if You wish to withdraw consent to the use of Your personal data, we will explain the consequences based on the specific information concerned including whether it is a legal or contractual requirement that we use such data. If You have any queries in respect of the consequences of not providing information or withdrawing Your consent, please contact us using the details in Section 11.

#### **11. Further Information**

If You require any further information about how we use Your data or if You want to exercise any of Your rights under this Data Protection Notice, please contact us on the details below:

<b>Leave EU Limited</b>	<b>Better for the Country Limited</b>
Data Protection Officer Leave EU Limited Lysander House Catbrain Lane Cribbs Causeway Bristol BS10 7TQ Tel: 0800 999 4210 Email: <a href="mailto:info@leave.eu">info@leave.eu</a> Website: <a href="https://leave.eu/contact/">https://leave.eu/contact/</a>	Data Protection Officer Better for the Country Limited Lysander House Catbrain Lane Cribbs Causeway Bristol BS10 7TQ

## 12. Your Right to Complain to the ICO

If You are not satisfied with our use of Your personal data or our response to any request by You to exercise any of Your rights in Section 8, You have the right to lodge a complaint with the Information Commissioner's Office. Please see below contact details:

<b>England</b>	Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Phone: 0303 123 1113 (local rate) or 01625 545 745 (national rate) Email: <a href="mailto:casework@ico.org.uk">casework@ico.org.uk</a>
<b>Scotland</b>	Information Commissioner's Office 45 Melville Street Edinburgh EH3 7HL Phone: 0303 123 1115 Email: <a href="mailto:scotland@ico.org.uk">scotland@ico.org.uk</a>
<b>Wales</b>	Information Commissioner's Office 2 <sup>nd</sup> Floor Churchill House Churchill way Cardiff CF10 2HH Phone: 029 2067 8400 Email: <a href="mailto:wales@ico.org.uk">wales@ico.org.uk</a>
<b>Northern Ireland</b>	Information Commissioner's Office 3 <sup>rd</sup> Floor 14 Cromac Place Belfast BT7 2JB Phone: 0303 123 1114 (local rate) or 028 9027 8757 (national rate) Email: <a href="mailto:ni@ico.org.uk">ni@ico.org.uk</a>

