



Department for
Digital, Culture
Media & Sport

Review of exemptions from paying charges to the Information Commissioner's Office

Public Consultation

June 2018
Department for Digital, Culture, Media and Sport

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1. How to respond

We welcome your views. To help us analyse the responses please use the online system wherever possible. Visit the Department's online tool https://dcms.eu.qualtrics.com/jfe/form/SV_baucMyDLEWCIUPX to submit your response. Hard copy responses can be sent to:

ICO Sponsorship Team
Department for Digital, Culture, Media & Sport
4th Floor
100 Parliament Street
London
SW1A 2BQ

The closing date for receiving responses is 1st August 2018.

This consultation is intended to be an entirely written exercise but we reserve the right to follow up any responses to seek further information.

Please contact the data protection team (kavita.perry@culture.gov.uk) if you require any other format e.g. Braille, Large Font or Audio.

For enquiries about the handling of this consultation please contact the Department for Digital, Culture, Media & Sport Correspondence Team at the above address or email enquiries@culture.gov.uk heading your communication 'ICO fee exemption consultation'.

Copies of responses may be published after the consultation closing date on the Department's website: www.gov.uk/dcms.

Information provided in response to this consultation may be published or disclosed in accordance with access to information regimes (these are primarily the Freedom of Information Act 2000 ('FOIA'), the Data Protection Act 2018 and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances.

An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the Data Protection Act 2018 (and the General Data Protection Regulations).

This consultation follows the UK government's consultation principles which can be found here:

<https://www.gov.uk/government/publications/consultation-principles-guidance>.

2. Introduction

The Information Commissioner's Office (ICO) is the UK's independent body set up to uphold information rights. The Information Commissioner's data protection activities are funded by charges paid by data controllers (individuals and organisations that process personal data). There are a number of exemptions for data controllers from paying the charges. This consultation is seeking to obtain views as to whether the current exemptions from paying charges are still appropriate and whether there should be any new exemptions. This consultation will help inform the Government's decision as to whether any exemptions should be removed and whether any new exemptions should be introduced. Under the General Data Protection Regulation (GDPR) the Government is required to ensure an adequate level of funding to the ICO. Therefore the impact of any changes to fee exemptions on the ICO's resources will be given due consideration.

3. Background on charges paid to the ICO

Until this year, and under Regulations made under Part III of the Data Protection Act 1998 (the '1998 Act'), data controllers were required to 'notify' (register with) the ICO and pay an annual 'notification' charge which was used to fund the ICO's data protection activities. There were two tiers of charge payable. The vast majority of data controllers paid a charge of £35 (payable by data controllers with a turnover of less than £25.9M per annum or fewer than 250 staff). A charge of £500 was payable by data controllers with an annual turnover of £25.9 million or more, and 250 or more staff (or public authorities with 250 or more staff). The duty to notify and pay fees was imposed on all data controllers unless an exemption could be claimed.

A new charge structure, which does not require the current process of formal notification, was brought into force on 25th May 2018 with the Data Protection (Charges and Information) Regulations, which can be found on www.legislation.gov.uk and in Annex 1.

Tier	Categorisation summary	Charge (if pay by direct debit)
Micro Organisations	Satisfies the following requirements: <ul style="list-style-type: none"> • Members of staff not more than 10, or • Turnover not more than £632,000. 	£40 (£35)
Small & Medium Organisations	Satisfies the following requirements: <ul style="list-style-type: none"> • Members of staff not more than 250, or • Turnover not more than £36,000,000. 	£60 (£55)
Large Organisations	An organisation that does not fall within either of the two categories above.	£2900 (£2,895)

The new structure is made up of three categories of charge: 'Micro Organisations' (including individuals), who will pay a charge of £40; 'Small & Medium Organisations' who will pay £60, and; 'Large Organisations' who will pay £2,900. There are currently in excess of 500,000 data controllers paying fees to the ICO.

It is estimated that almost 99% of data controllers will fall within the first two charge categories. The remaining 1% of data controllers are liable for the highest charge of £2,900.

The structure is designed to be closely aligned with the standard Government categorisation of businesses. A £5 discount applies to all organisations where they pay by direct debit. This in effect means that micro organisations who pay by direct debit will pay the same charge that they have since 2001. Similar to the current approach under the Data Protection Act 1998, public authorities will be categorised on the basis of number of members of staff only. In addition, charities and small occupational pension schemes will continue to automatically pay the lowest charge (£40 or £35 if paid by direct debit).

The new funding model for the Information Commissioner has three main policy objectives. It will ensure an adequate and stable level of funding for the ICO; build regulatory risk into the charge level; and raise awareness of data protection obligations in organisations, thereby increasing their compliance.

4. Background on exemptions from paying charges

The new Regulations substantially replicate the former exemptions from paying notification fees with some minor exceptions: the Regulations effectively remove the current exemption from payment of a fee for data controllers who only undertake processing for the purposes of safeguarding national security (this exemption is therefore not considered in this consultation). In addition we introduced a clarification to the wording of the existing exemption relating to processing for personal and household purposes so as to make clear that homeowners using CCTV for these purposes are no longer required to pay a charge under the new scheme.

It is important to note that organisations that are exempt from paying the charges still need to comply with the relevant data protection legislation, such as complying with the principles set out in Article 5 of the GDPR, including ensuring data is processed lawfully and fairly, ensuring personal data is adequate, relevant and up to date, and ensuring personal data is kept secure.

The exemptions can be found in the Schedule to the new Regulations (see Annex 1). The Regulations provide exemptions from paying charges for people and organisations that process personal data only for one or more of the following 'core business purposes':

- Staff administration (including payroll)
- Advertising, marketing and public relations (in connection with their own business activity)
- Accounts and records (except in relation to processing of personal data by or obtained from a credit reference agency)

Other exemptions include processing for the purposes of:

- Judicial functions; and
- Personal, family or household affairs (including recreational purposes)

Also exempt are:

- Some not for profit organisations
- Data controllers processing personal data only for maintaining a public register (such as the Electoral Roll)
- Data controllers that do not process personal data by automated means, or with the intention that it be processed by automated means

The following are not full exemptions but rather all data controllers eligible are automatically classified as being required to pay the tier 1 fee (£40).

- Small occupational pension schemes

- Charities

Reasoning behind the existing exemptions

Some of the exemptions arise from the Data Protection Act 1998 ('the 1998 Act') itself whilst others are set out in The Data Protection (Notification and Notification Fees) Regulations 2000 ('the 2000 Regulations'): section 17(3) of the 1998 Act allows notification regulations to provide for exemptions from notification where processing is 'unlikely to prejudice the rights and freedoms of data subjects'. Some of the exemptions found in both the 1998 Act and the 2000 Regulations have their basis in the Data Protection Act 1984.

The 'core business purposes' exemptions for processing for staff administration and accounts and records purposes derive from the 1984 Act and the 2000 Regulations. These exemptions are intended to apply to routine, closely defined processing which is well understood by data subjects who would expect their personal data to be processed as a matter of course for these matters. These exemptions were introduced in the 1984 Act with the intention of reducing burdens on business, given that many smaller companies only held personal data for these purposes. The advertising, marketing and public relations exemption, which can also be described as a 'core business' exemption was introduced in the 2000 Regulations. This exemption covers activity which was considered to be low risk when it was introduced, as it was intended to cover circumstances such as local, non electronic advertising activity by small businesses (leafleting etc).

The exemption for not for profit organisations is narrow and only applies to processing which is for the purposes of: establishing or maintaining membership; supporting a not for profit body or association or providing or administering activities for either the members or for those who have regular contact with the organisation. All charities not covered by this exemption, regardless of size or turnover, are liable to pay the lowest charge.

The exemption from processing personal data for the purposes of maintaining a public register derives from the 1984 Act and the 2000 regulations. It was intended to cover those responsible for maintaining a public register, in particular registers required by statute, and who do not process any additional personal data. The exemption was intended to cover Electoral Registration Officers when the electoral roll in its entirety was public.

The exemptions for domestic purposes and for non-automated processing of personal data derive from the 1984 Act and the 2000 Regulations. At the time of their introduction, this processing activity was considered to represent a low risk to data subjects.

The Data Protection (Notification and Notifications Fees) (Amendment) Regulations 2009, inserted a new exemption for judicial processing which came into effect on 31 July 2009. Prior to this, judges never had to personally notify the Information Commissioner in any case, since their data processing was covered by the Ministry of Justice's notification. However, following implementation of the Constitutional Reform Act 2005, the Tribunals, Courts and Enforcement Act 2007 and the Judiciary and Courts (Scotland) Act 2008 it was no longer considered appropriate to regard judicial office holders as being covered by government notification arrangements. This was because these Acts gave a statutory basis to the constitutional separation of the judiciary. The Government of the time considered that the judicial exemption met the test of section 17(3) ('processing unlikely to prejudice the rights and freedoms of data subjects'), in particular because of the strict obligations on judges only to proceed on evidence that is capable of being tested or corrected in the course of proceedings, and the public, and transparent nature of their decisions. The Government also concluded that data subjects would reasonably expect judges to be engaging in data processing of the type they undertake and that notification would be an unsuitable administrative formality. In respect of the non-adjudicative functions of judges, these corresponded in large part to the staff administration and record keeping exemptions that were already in force.

Given that most of the exemptions date back many years, and to a time when digital processing of personal data was not undertaken on anything near the scale it is today, the Government considers that there is merit in reviewing the exemptions to ensure that they are still appropriate to the current time, and fit for the digital age. We are aware too that there is appetite from stakeholders to review the exemptions. In the consultation, we are asking stakeholders to look at each exemption and state whether they think it should be retained or not, and their reason(s) for their response. In response to feedback from stakeholders, we have also asked for respondents to state whether they consider exemptions should be provided for elected representatives and members of the House of Lords. Additionally, we have invited respondents to detail any other data controllers or processing that they consider appropriate for an exemption.

5. Consultation questions

The consultation questions are below. Please visit the Department's online tool https://dcms.eu.qualtrics.com/jfe/form/SV_baucMyDLEWCIUPX to submit your response.

Introduction

The Data Protection (Charges and Information) Regulations 2018 require data controllers who are processing personal information to pay a charge to the Information Commissioner's Office (ICO), unless they are exempt. More than 500,000 organisations are currently registered. The Schedule to the Data Protection (Charges and Information) Regulations 2018 provides a number of exemptions for individuals and organisations from paying charges to the Information Commissioner. Each current exemption is described in the questions to follow.

Completing the form

We encourage everyone to consider all sections of this form, but we understand that there will be sections which may be more relevant to you, or your organisation. You can choose to respond to as many questions as you like.

You can also return to the form at a later date to continue with your response, as long as you use the same internet browser and the same computer when returning to the form. Partially completed responses will be automatically submitted one week after last activity or on the closing date.

When you are ready to submit your response click on 'Submit' and follow the instructions.

To improve your experience, we recommend that you complete this form on a larger screen type rather than a mobile phone.

You can download the full set of questions on the GOV.UK consultation page. Please only use this as a reference document.

About you

Are you responding as an individual or on behalf of an organisation?

Individual

Organisation

If organisation

What is the name of the organisation?

If organisation

Which of the following statements best describes your organisation?

Public Sector

Private Sector

Charitable Sector

Other (please specify)

Are you a data controller? (yes, no, don't know)

If Data controller

Do you currently pay a notification fee to the ICO? (yes, no, don't know)

We may wish to contact you in order to discuss your response in more detail.

If you are happy to be contacted, please provide your details below. If not, please move on to the next question.

Name:

Email Address:

Phone Number:

Survey

Please indicate which exemptions you consider are still appropriate, and should therefore be retained, and which exemptions you consider are no longer appropriate and should either be changed or removed. The review will also consider if any new exemptions are appropriate. Although optional, it would be very helpful if you are able to provide reason(s) for your response for each exemption.

1. 'Core business purposes' exemptions

Individuals and organisations do not have to pay charges if they are only processing personal data for one or more of the 'core business purposes'. These are listed below and are: (a) staff administration, (b) advertising, marketing and public relations, and (c) accounts and records. These exemptions could, for example, cover many small businesses or sole traders that do not conduct extensive electronic marketing. Although these exemptions are effectively interlinked, please consider them separately.

a) Staff administration (including payroll)

- This exemption covers organisations that only process personal data for administration in relation to their staff, including past, existing and prospective staff (as well as contractors and volunteers). It includes processing of staff members' personal data for the purposes of appointments or dismissals, pay, discipline, superannuation, work management and other personnel matters.

Do you consider this exemption:

- Still appropriate
- No longer appropriate
- Don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

- b) Advertising, marketing and public relations (in connection with an individual or organisation's own business activity);
 - This exemption allows an individual or organisation to market or advertise its business activity, goods and services to past, existing or prospective customers and suppliers. The exemption does not apply where an organisation sells lists of customers' details to other organisations.

Do you consider this exemption:

- Still appropriate
- No longer appropriate
- Don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

- c) Accounts and records, accepting customers and suppliers, and financial forecasts;
 - This exemption covers processing for the purposes of keeping accounts or records of transactions, deciding whether to accept a customer or supplier, or making financial forecasts. However, the exemption specifically does not apply in respect of information processed by or obtained from credit reference agencies. In addition, controllers who are providing accounting services for their customers are not exempt.

Do you consider this exemption:

- Still appropriate
- No longer appropriate
- Don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

2. Other exemptions

d) Judicial functions;

- This exemption is for the processing of personal data carried out by a judge, or person acting on behalf of a judge, in relation to exercising “judicial functions”. This can include case work, and also covers the processing of personal data in relation to the appointment, discipline, administration or leadership of judges. ‘Judge’ includes a justice of the peace (or, in Northern Ireland, a lay magistrate); a member of a tribunal; and a clerk or other officer entitled to exercise the jurisdiction of a court or tribunal.

Do you consider this exemption:

- Still appropriate
- No longer appropriate
- Don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

e) Personal, family or household affairs (including recreational purposes);

- People are exempt from paying charges if the only information they process is for their own personal, family or household affairs that have no connection to any commercial or professional activity. The exemption includes recreational activities and the capturing of images (photographs or video footage) that contain personal data, even if such images are captured in a public space, provided they are for their own personal, family or household affairs. Examples could include a personal address book, or an individual's personal social media account. The exemption includes a householder's personal CCTV, even if the CCTV is capable of collecting images of public spaces.

Do you consider this exemption:

- Still appropriate
- No longer appropriate
- Don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

- f) Some not for profit organisations;
- This exemption is for not-for-profit organisations carrying out processing of personal data for membership purposes, or in the context of activities for members or other individuals who have regular contact with the organisation concerned. Examples could include a food bank or a park's volunteer group.

Do you consider this exemption:

- Still appropriate
- No longer appropriate
- Don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

- g) Maintaining a public register;
- 'Public Register' in this exemption refers to those registers that are required by statute to be open for public inspection, or open to inspection by any person having a legitimate interest. For example, it covers the collection of personal data for the Electoral Roll, and the publication of the Open Register.

Do you consider this exemption:

- Still appropriate
- No longer appropriate
- Don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

- h) Data Controllers that do not process personal data by automated means;

- This exemption covers manual processing of personal data (but not where data is recorded manually, with the intention that it should be processed by automated means). For example, it would cover an organisation that only held customer records in a manual or hard copy filing system. Personal data that is processed using any kind of computer (including cloud computing, desktops, laptops and tablets) would not be covered by this exemption.

Do you consider this exemption:

- Still appropriate
- No longer appropriate
- Don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

3. Automatic Fee Tier 1 (£40, or £35 if paid by direct debit).

N.b The following are not full exemptions but rather all data controllers eligible are automatically classified as being required to pay the tier 1 fee (£40, or £35 if paid by direct debit).

i) Small occupational pension scheme;

- A small occupational pension scheme is defined as a scheme with fewer than twelve members where all members are trustees of the scheme, and either all decisions made have unanimous agreement from the members; or the scheme has a trustee who is independent in relation to the scheme (for the purposes of section 23 of the Pensions Act 1995) and is registered with the Pensions Regulator.

Do you consider this automatic classification in fee tier 1:

- Still appropriate
- No longer appropriate
- Don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

j) Charities;

- A data controller that is a charity automatically pays the lowest level of charge. For these purposes, "charity"

- in England and Wales, has the meaning given in section 1 of the Charities Act 2011,
- In Scotland, means a body entered in the Scottish Charity Register maintained under section 3 of the Charity and Trustee Investment (Scotland) Act 2005, and
- in Northern Ireland, has the meaning in section 1 of the Charities Act (Northern Ireland) 2008;

Do you consider this automatic classification in fee tier 1:

- Still appropriate
- No longer appropriate
- Don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

3. Proposed new exemptions

Elected representatives (separate to their elected assembly or political party) can be data controllers in their own right particularly where they engage with and undertake casework on behalf of their constituents. Government has previously committed to considering the appropriateness of elected representatives being required to pay a charge in respect of their processing of personal data. The Government is minded that this activity deriving from their public office and public function should not be liable to a charge. The Government also wishes to avoid barriers to democratic engagement, mirroring the approach that the Government has taken during the passage of the Data Protection Act through Parliament.

The Government is minded that all elected representatives should be exempt, as well as members of the House of Lords and (prospective) candidates for those elected offices.

N.b. Elected representatives as defined in Schedule 1 of the Data Protection Act 2018.

Do you agree? yes/no/don't know

If possible, please provide a reason for your response.

Reason(s) for your response (optional) *1,000 characters limit*

(Non required field) Do you think that any other groups of data controllers or data processing that should be exempt from paying the charges? Please provide reasons for your response.

yes/no/don't know

New exemption(s) and reason(s) for your response (optional) *1,000 characters limit*

4. The Equality Act 2010 defines discrimination as someone being treated unfairly because of who they are. There are nine protected characteristics in the Equality Act. Discrimination which happens because of one or more of these characteristics is unlawful under the Act.

The nine protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Do you consider any of the current or proposed exemptions to impact on any of the nine characteristics protected under the Equality Act 2010.

Yes/No/Don't know

If yes, please select from the below:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Reason(s) for your response (optional) *1,000 characters limit*

5. Do you have any additional comments?

(optional) *1,000 characters limit*

Annex 1: Schedule to the Data Protection (Charges and Information) Regulations 2018

Exempt processing

2.—(1) For the purposes of regulation 2(1), processing of personal data is exempt processing if it—

(a) falls within one or more of the descriptions of processing set out in sub-paragraph (2), or

(b) does not fall within one or more of those descriptions solely by virtue of the fact that disclosure of the personal data is made for one of the reasons set out in sub-paragraph (3).

(2) The processing is—

(a) of personal data which is not being processed wholly or partly by automated means or recorded with the intention that it should be processed wholly or partly by automated means;

(b) undertaken by a data controller for the purposes of their personal, family or household affairs, including—

(i) the processing of personal data for recreational purposes, and

(ii) the capturing of images, in a public space, containing personal data;

(c) for the purpose of the maintenance of a public register;

(d) for the purposes of matters of administration in relation to the members of staff and volunteers of, or persons working under any contract for services provided to, the data controller;

(e) for the purposes of advertising, marketing and public relations in respect of the data controller's business, activity, goods or services;

(f) subject to sub-paragraph (4), for the purposes of—

(i) keeping accounts, or records of purchases, sales or other transactions,

(ii) deciding whether to accept any person as a customer or supplier, or

(iii) making financial or financial management forecasts,

in relation to any activity carried on by the data controller;

(g) carried out by a body or association which is not established or conducted for profit and which carries out the processing for the purposes of establishing or maintaining membership or support for the body or association, or providing or

administering activities for individuals who are either a member of the body or association or who have regular contact with it; or

(h) carried out by—

(i) a judge, or

(ii) a person acting on the instructions, or on behalf, of a judge,

for the purposes of exercising judicial functions including the functions of appointment, discipline, administration or leadership of judges.

(3) The disclosure is—

(a) required by or under any enactment, by any rule of law or by the order of a court;

(b) made for the purposes of—

(i) the prevention or detection of crime,

(ii) the apprehension or prosecution of offenders, or

(iii) the assessment or collection of any tax or duty or of any imposition of a similar nature,

and not otherwise being able to make the disclosure would be likely to prejudice any of the matters in (i) to (iii) above;

(c) necessary—

(i) for the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings), or

(ii) for the purposes of obtaining legal advice,

or is otherwise necessary for the purposes of establishing, exercising or defending legal rights; or

(d) required for the purpose of avoiding an infringement of the privileges of either House of Parliament.

(4) The processing of personal data by or obtained from a credit reference agency (within the meaning of section 145(8) of the Consumer Credit Act 1974⁽¹⁾) does not fall within the description of processing set out in sub-paragraph (2)(f).

(1) 1974 c. 39. Section 145(8) was substituted by S.I 2013/1881, art. 20(1) and (41)(g).

Annex 2: Privacy Notice

Privacy Notice

The following is to explain your rights and give you the information you are entitled to under the Data Protection Act 2018 and the General Data Protection Regulation (“the Data Protection Legislation”).

Note that this section only refers to your personal data (your name, address and anything that could be used to identify you personally) not the content of your response to the consultation.

1. The identity of the data controller and contact details of our Data Protection Officer

The Department for Digital, Culture, Media and Sport (“the department”) is the data controller. The Data Protection Officer can be contacted at dcmsdataprotection@culture.gov.uk. You can find out more here: <https://www.gov.uk/government/organisations/department-for-digital-culture-media-sport/about/personal-information-charter>

2. Why we are collecting your personal data

Your personal data is being collected as an essential part of the consultation process, so that we can contact you regarding your response and for statistical purposes. We may also use it to contact you about related matters.

3. Our legal basis for processing your personal data

The Data Protection Legislation states that, as a government department, the department may process personal data as necessary for the effective performance of a task carried out in the public interest. i.e. a consultation.

4. With whom we will be sharing your personal data

We will not share the personal data obtained through this consultation outside of the department. Copies of responses may be published after the consultation closing date on the Department’s website: www.gov.uk/dcms.

Qualtrics is the online survey platform used to conduct this survey. They will store the data in accordance with DCMS instructions and their privacy policy can be found here: <https://www.qualtrics.com/privacy-statement/>

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have

provided as confidential. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

5. For how long we will keep your personal data, or criteria used to determine the retention period.

Your personal data will be held for two years after the consultation is closed. This is so that the department is able to contact you regarding the result of the consultation following analysis of the responses.

6. Your rights, e.g. access, rectification, erasure

The data we are collecting is your personal data, and you have considerable say over what happens to it. You have the right:

- to see what data we have about you
- to ask us to stop using your data, but keep it on record
- to have all or some of your data deleted or corrected
- to lodge a complaint with the independent Information Commissioner (ICO) if you think we are not handling your data fairly or in accordance with the law.

You can contact the ICO at <https://ico.org.uk/>, or telephone 0303 123 1113. ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

7. Your personal data will not be sent overseas.

8. Your personal data will not be used for any automated decision making.

9. Your personal data will be stored in a secure government IT system.