PRIVACY POLICY

We are committed to protecting your privacy and complying with applicable data protection and privacy laws. This Privacy Policy will inform you as to how we process your Personal Data and tell you about your privacy rights and how the law protects you (as Data Subject).

By submitting Personal Data to us, it will be seen as your consent to us to process the Personal Data. Reference to "consent", "your consent" or "your explicit consent" shall include the ticking of a tick box or clicking on a "Submit" or "I agree" button on our site(s) or "send" on email.

1) Important information and who we are

a) **Purpose of this Privacy Policy**

i) This Privacy Policy aims to give you information on how we processes Personal Data through your use of this website, including any data you may provide when you contact using the "*Contact us*"- form or Personal Data we process when you send to us or receive from us other electronic communications (i.e. emails, electronic forms or any of our social media sites).

ii) This website is not intended for children, and we do not knowingly collect data relating to children.

iii) **It is important that you read this Privacy Policy so that you are fully aware of how and why we are using your Personal Data.**

b) **Data Controller**

i) International Brand Creators (Pty) Ltd is the Data Controller and responsible for your Personal Data (collectively referred to as "Luxury Lake Como Experiences", "we", "us" or "our" in this Privacy Policy).

ii) We have appointed an information officer (IO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests, please contact the IO using the details set out below.

c) **Contact details**

i) Our Data Protection Officer's contact details:

(1) Full name of legal entity: **International Brand Creators (Pty) Ltd**
(2) Contact details: Website (*click here* to communicate via our website) or WhatsApp: **+39 327 249 3277**
(3) Email**: info@lakecomoluxuryexperiences.com**

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

d) **Changes to the Privacy Policy and your duty to inform us of changes**

i) We keep our Privacy Policy under regular review. Archived versions (if available) can be obtained by contacting us. Any changes made to our Privacy Policy in future will be posted on our website or made available during your engagement with us. The new version will apply the moment it is published on our website or incorporated by reference in any communication.

ii) **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.**

e) **Integration into other sites**: This Privacy Policy applies to our website(s) and our electronic communications only. We do not exercise control over the sites who provide services or products to us as part of their own offering. These other sites may place their own cookies or other files on your computer, collect data or solicit Personal Data from you. We cannot be held responsible for any wrongful handling of end users' information by other sites.

f) **Third-Party links**: Our website, social media pages 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. If you disclose your Personal Data to a Third-Party, such as an entity which operates a website linked to this our website or social media sites, **WE WILL NOT BE LIABLE FOR ANY LOSS OR DAMAGE, HOWSOEVER ARISING, SUFFERED BY YOU AS A RESULT OF THE DISCLOSURE OF SUCH INFORMATION TO THE THIRD-PARTY**. This is because we do not regulate or control how that Third-Party uses your Personal Data. You should always ensure that you read the privacy policy of any Third-Party. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2) The data we collect about you

a) **We collect your Personal Data (as defined in this Policy). It does not include data where the identity of the Data Subject has been removed (anonymous data).**

b) We may Process different kinds of Personal Data about you when we engage with you, which we have grouped together as follows:

Type of Data	Details
Identity Data	Full name, Username or similar identifier, Title, Date of birth, registration/identity number Gender.
Contact Data	Billing address, Delivery address, Email address, Telephone numbers.

Financial Data	Payment card details, tax information, financial (including credit) status, VAT number, banking details.
Transaction Data	Details about payments to and from us and other details of goods and/or services you have acquired from us.
Technical Data	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, Other technology on the devices you use to access this website/ portal.
Profile Data	Your username and password, Purchases or orders made by you, Your interests, Preferences, Feedback and survey responses.
Usage Data	Information about how a Person uses our website products and/or Services. This information shall include: the full Uniform Resource Locators (URL) Clickstream to, through and from our website (including the date and time) and the services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), use of a certain function on any Service and methods used to browse away from the page and any phone number used to call our client service number, service transaction instructions from and to you via our APIs.
Marketing and Communications Data	Marketing preferences in receiving marketing from us and third parties, your communication preferences (communications related to the Services).
Aggregate data and pattern data ("Pattern Data"):	Statistical, demographical or transactional information derived from Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal the identity of the Data Subject. For example, we may aggregate the Usage Data of a Data Subject to calculate the percentage of users accessing a specific website or specific Service feature or executing a specific transaction type. However, if we combine or connect Pattern Data with your Personal Data so that it can directly or indirectly identify you, we will treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.
Additional Personal Data	You may choose to provide additional Personal Data to us. When you do so, you agree to provide accurate and current information, and to not impersonate or misrepresent any person or entity or falsely state your affiliation with anyone or anything.
Special Category Data and Children Information	We do not collect any Special Category Data or Children Information directly from Data Subjects.

c) You may choose to provide additional Personal Data to us, in which event you agree to provide accurate and current information, and not to impersonate or misrepresent any person or entity or falsely state or otherwise misrepresent your affiliation with anyone or anything.

d) We do not collect any Special Personal Data about you, except during provision of our Services, which shall be collected as per your consent.

e) **Submission of Personal Data on behalf of another: If you provide information on behalf of someone else, then it is your responsibility to obtain the necessary consent from the person/ User before making the Personal Data available to us. On receipt of Personal Data, we assume that the necessary consent has been obtained and will process the Personal Data as per your instructions. By submitting such Personal Data on behalf of another person/ User, you indemnify us against any Third-Party claim, where such Third-Party claim relates to Personal Data that has been processed without the necessary consent or other available exception allowed by law.**

f) **If you fail to provide Personal Data: 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 (for example, to provide you with Services (including Services for no charge)). In this case, we may have to cancel a Service you have with us, but we will notify you if this is the case at the time.**

3) How is Personal Data collected?

We use different methods to collect data from and about you including through:

Direct Interactions	Automated technologies	Third Parties/Publicly Available Sources
• Engage through Zoom, Teams, Skype, WhatsApp, and similar platforms • Sign up/ register for our Services • Make a booking online with with us • Contact an Agent regarding Real Estate • Request our marketing material from us • When engaging with our support services • Provide us feedback • Contact us via our "*Contact Us*" form, or WhatsApp or other social media sites' messaging platforms	• As you interact with our Services or website, we will automatically collect Technical Data about your equipment, browsing actions, patterns, and device(s). This Personal Data is collected by using cookies, server logs and other similar technologies. • We may also receive Technical Data about you if you visit other websites employing our cookies	• Analytics providers such as Google • Advertising networks • Search information providers • Third Party service providers that provide a service or product to you, subject to your consent to us to collect the information • Contact, Financial and Transaction Data from providers of technical, payment and delivery services

4) Cookies

See our Cookies Policy.

5) How we use your Personal Data

a) We will not sell your Personal Data.

b) We will only use Personal Data within the framework of the law. Most commonly, we will use Personal Data in the following circumstances:

i) **Consent:** where you have given us your consent; or

ii) **Performance of Contract:** where we need to perform the contract, we are about to enter into or have entered into with you; or

iii) **Legitimate Interest:** 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; or

iv) **Compliance with Legal Obligations:** Where we need to comply with a legal obligation.

c) We will get your consent before sending third-party direct-marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us or using such automated facilities made available by us.

d) **Purposes for which we will use Personal Data**:

i) We have set out in the table below a description of all the ways we plan to use Personal Data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

ii) Note that we may process Personal Data for more than one lawful ground depending on the specific purpose for which we are using the 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.

Purpose of Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To book a tour or Experience through us and to deliver the Services (including but not limited to sharing of information with External Parties as part of the Services)	• Identity, Contact, Financial, Marketing and Communications	• Consent • Performance of a contract with you
To manage our Suppliers	• Identity, Contact, Financial	• Consent • Performance of a contract with you
Manage payments, fees and charges; Collect and recover money owed to us	• Identity, Contact, Financial, Transaction, Marketing and Communications	• Performance of a contract with you • Necessary for our legitimate interests (to recover debts due to us) **[TAKE NOTE: we do not store credit card details. We use third party service provider(s) to execute transactions where you use your card. You should read their privacy policy]**
To manage our relationship with our clients which will include: • Notifying about changes to our Terms of Services or this Privacy Policy where required • Asking the client to leave a review • General Service communications.	• Identity, Contact, Profile, Marketing and Communications	• Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how clients use our services)
To administer and protect our business, website and other electronic platforms (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	• Identity, Contact, Technical	• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) • Necessary to comply with a legal obligation
To deliver relevant website and Service content and information about similar services and/or products to you and measure or understand the effectiveness of the advertising we serve to you	• Identity, Contact, Profile, Usage, Marketing and Communications, Technical	• Necessary for our legitimate interests (to study how clients use our services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, Services, marketing, client relationships and experiences	• Technical Usage	• Necessary for our legitimate interests (to define types of clients for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about Services that may be of interest to you	• Identity, Contact, Profile, Usage, Marketing and Communications, Technical	• Necessary for our legitimate interests (to develop our services and grow our business)

e) **Marketing:** We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising.

i) **Promotional offers from us**

(1) Once you have selected and made payment in respect of our Services and from use you will be seen as a client of us;

(2) As a client 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 products, services and offers may be relevant for you (we call this marketing); and

(3) As a client you will receive marketing communications from us if you have not opted out of receiving that marketing.

ii) **Third-party marketing**

(1) We will get your express opt-in consent before we share your Personal Data with any Third-Party for marketing purposes.

(2) TAKE NOTE: We may provide (without your consent) Third-Party marketing parties/ advertisers with anonymous aggregate information (Aggregate Data (see above)) about our users (for example, we may inform them that 500 men aged under 30 have clicked on a specific product or advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a specific region). We may make use of the Personal Data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience. **IMPORTANT: We do not disclose information about identifiable individuals to our advertisers**.

iii) **Opting out**

(1) You can ask us or Third-Parties to stop sending you marketing messages at any time by logging into the website or unsubscribe on the email communication or by contacting us at any time and requesting to op-out of our marketing services.

(2) Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a Service purchase, service experience or other transactions.

f) **Change of purpose**

i) 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 reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

ii) 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.

iii) Please note that we may process your Personal Data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6) Disclosures of Personal Data

a) We may share Personal Data with the parties set out below for the purposes set out in the table above.

i) **Internal Third-Parties** as set out in the Definitions. Where we share Personal Data to our group (collaborating companies/ partners/ agents), we ensure your Personal Data is protected by requiring all our collaborating companies to follow this Policy when processing your Personal Data.

ii) **External Third-Parties** as set out in the Definitions.

iii) **Third-Parties** to whom we may choose to sell, transfer or merge all or parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this Privacy Policy.

b) We require all Third-Parties to respect the security of your Personal Data and to treat it in accordance with the law. We do 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.

7) International transfers

a) Some of our External Third-Parties may be based outside your country so their processing of your Personal Data could involve a transfer of data outside your country.

b) Whenever we transfer your Personal Data out of your country, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

i) We will only transfer your Personal Data to countries that have appropriate data protection and privacy legislation to protect your Personal Data.

ii) Where we use certain service providers, we conclude an agreement with them to confirm that your Personal Data is confidential, they can only process on our instructions and that they should establish and maintain appropriate technological and organisational measurements to protect your Personal Data.

c) By submitting your Personal Data to us you consent to the transfer of your Personal Data outside the borders of your country (when required).

8) Data security

a) We have put in place appropriate technological and organisational measures to prevent Personal Data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to Personal Data to those employees, agents, contractors, and other third-parties who have a business need to know. They will only process Personal Data on our instructions, and they are subject to a duty of confidentiality.

b) 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.

9) Data retention

How long will we use your Personal Data for?

a) We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

b) To determine the appropriate retention period for Personal Data, we consider 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 and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

c) By law we have to keep basic information about our clients (including Contact, Identity and Transaction Data) for five (5) years after they cease being clients for tax purposes.

d) In some circumstances you can ask us to delete your data: see your legal rights below for further information.

e) In some circumstances we will anonymise your Personal Data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10) Records

a) We will keep detailed, accurate and up-to-date written records regarding any Processing of Personal Data it carries out, including but not limited to, the access, control and security of the Personal Data and approved subcontractors, the processing purposes, categories of processing, any transfers of Personal Data to a third country and related safeguards, the instructions as received from you and a general description of the technical and organisational security measures and retention and destruction of Personal Data.

11) Social Media

a) Our website(s) or Services may, in certain circumstances, provide you with social plug-ins from various social media networks. If you choose to interact with a social network such as Facebook, Instagram, LinkedIn or Twitter (for example by registering an account or click on the links from our *website*), your activity on our website(s) will also be made available to that social network. This is necessary for the performance of your contract with us which allows you to interact with a social network. If you are logged in on one of these social networks during your visit to our website(s) or are interacting with one of the social plug-ins, the social network might add this information to your respective profile on this network based on your privacy settings. If you would like to prevent this type of information transfer, please log out of your social network account before you enter our website(s), or change the necessary privacy settings, where possible.

b) Communication, engagement, and actions taken through external social media networks that we participate in are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

c) You are advised to use social media networks wisely and communicate/engage with them with due care and caution in regard to their own privacy policies (if any). **PLEASE NOTE: WE WILL NEVER ASK FOR PERSONAL OR SENSITIVE INFORMATION THROUGH SOCIAL MEDIA NETWORKS AND ENCOURAGE USERS, WISHING TO DISCUSS SENSITIVE DETAILS OR TO RESOLVE ISSUES/CONCERNS, TO CONTACT US THROUGH PRIMARY COMMUNICATION CHANNELS SUCH AS BY TELEPHONE OR EMAIL.**

d) Our social media network page(s) may share web links to relevant web pages. By default, some social media platforms shorten lengthy URL's. You are advised to exercise caution and due care before clicking on any shortened URL's published on social media platforms by this website. Despite our best efforts to ensure that only genuine URL's are published, many social media platforms are prone to spam and hacking and therefore our website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

12) Data Subject's legal rights

a) Under certain circumstances, you have the following rights under data protection laws in relation to your Personal Data:

i) **Request for Access**: Request access to Personal Data (commonly known as a "Data Subject access request"). There may be a fee associated with this request – see below. This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it. See our Promotion of Access to Information Manual ("**PAI Manual**").

ii) **Request Correction or rectification** 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.

iii) **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 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. Take Note: Erasure of your Personal Data shall further not limit our rights in terms of Aggregate Data and Pattern Data.

iv) **Object to processing** of your Personal Data where we are relying on a legitimate interest (or those of a third-party) and there is something about your particular situation which makes you want to object to processing on this ground, as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

v) **Request restriction of processing** of your Personal Information. This enables you to ask us to suspend the processing of your Personal Information in the following scenarios:

(1) If you want us to establish the data's accuracy.
(2) Where our use of the data is unlawful, but you do not want us to erase it.
(3) 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.
(4) You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

vi) **Request the transfer** of your Personal Information to you or to a third-party. We will provide to you, or a third-party you have chosen, your Personal Information 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. Contact us if you need to transfer your Personal Information.

vii) **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 Services to you. We will advise you if this is the case at the time you withdraw your consent.

b) **If you wish to exercise any of the rights set out above, please contact us at the details mentioned 1)c) above.**

c) **Fee required:** Apart from any prescribed fees under any applicable data protection legislation, 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.

d) **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.

e) **Time limit to respond:** We try to respond to all legitimate requests within 30 (thirty) days. Occasionally it could take us longer than 30 (thirty) days 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.

13) Subcontractors

a) We may authorise a third party (subcontractor) to Process the Personal Data. Where we use sub-contractors, we will:
   i) enter into a written contract with the subcontractor that contains terms substantially the same as those set out in this Privacy Policy, in particular, in relation to requiring appropriate technical and organisational data security measures; and
   ii) maintain control over all Personal Data it entrusts to the subcontractor.

b) We agree to select subcontractors carefully according to their suitability and reliability.

c) A subcontractor within the meaning of this Privacy Policy shall not exist if we commissions third parties with additional services, that are not an essential part of this Privacy Policy.

d) We undertake to ensure that all subcontractors who process Personal Data of Data Subjects shall not amend, modify, merge or combine such Personal Data and Process same as per instructions from us.

14) Personal Data breach

a) We will without undue delay notify you if any Personal Data is lost or destroyed or becomes damaged, corrupted, or unusable or have been accessed by an unauthorized person.

b) Immediately following any unauthorised or unlawful Personal Data processing or Personal Data Breach, the parties will co-ordinate with each other to investigate the matter.

c) We will not inform any third party of any Personal Data Breach without first obtaining your prior written consent, except when required to do so by law. Your indemnify us against any claim from the supervisory authorities where you refuse or neglect to provide the required consent.

d) We will cover all reasonable direct expenses associated with the performance of the obligations under this clause 14), unless the matter arose from your specific instructions, negligence, willful default or breach of this Privacy Policy or any third party actions outside our reasonable control in which case you will cover all reasonable expenses.

15) Definitions

a) **Child** means a natural person under the age of 18 years who is not legally competent, without the assistance of a competent person, to take any action or decision in respect of any matter concerning him – or herself.

b) **Consent** means any voluntary, specific and informed expression of will in terms of which permission is given for the processing of Personal Data.

c) **Data Controller** means a public or private body or any other person which, alone or in conjunction with others, determines the purposes of and means for processing Personal Data.

d) **Data Subject** means the person to whom Personal Data relates and, in this document, refers to you as the party providing Personal Data that will be processed by us or a relevant third-party.

e) **Data Protection Legislation** means any and all applicable laws relating to the protection of data or of Personal Data and shall include the Protection of Personal Data as per the General Data Protection Regulations (*GDPR*).

f) **Data Processors** mean a person who processes Personal Information for a Data Controller in terms of a contract or mandate, without coming under the direct authority of the party.

g) **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best Service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your Personal Data for our legitimate interests. We do not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

h) **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

i) **Personal Data** means Personal Data as defined under the *GDPR*;

j) **Process** means processing as defined under the *GDPR*;

k) **Services** has the same meaning as per our Terms of Use.

l) **Special Categories of Personal Data** means information that may be sensitive information, such as details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and biometric information or criminal convictions and offences.

m) **THIRD-PARTIES**

   i) **Internal Third-Parties:** Partners, affiliates, employees, shareholders, directors and/ or agents of us (if applicable), acting as Data Controllers parties or operators and who may also provide IT and system administration services and undertake leadership reporting.

ii) **External Third-Parties:**

(1) Service providers acting as Data Processors who provide IT and system administration services or such services providers that assist us in detecting, preventing, or otherwise address fraud, security or technical issues.
(2) Professional advisers acting as Data Processors or joint Data Controllers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
(3) The Revenue Services, regulators and other authorities acting as Data Processors or joint Data Controllers who require reporting of processing activities in certain circumstances.
(4) Courts of law or any other authorities where we have an obligation under law to share your Personal Data.
(5) In the event that we sell or buy any business or assets, in which case we may disclose your Personal Data to the prospective seller or buyer of such business or assets.

END OF POLICY