

Wonderful Payments Privacy Policy – v2.3 – Published 02/10/2023

INTRODUCTION

Wonderful Payments Limited (“we” or “our”) respects your privacy and is committed to protecting your personal data. This privacy notice lets you know how we look after your personal data when you visit our Websites at wonderful.co.uk, wonderful.one, wonderful.support and wonderful.org (our “Websites”), our smartphone Apps and/or use our services, and tells you about your privacy rights and how the law protects you. All references in this policy to “our App” refer to the apps owned by Wonderful Payments and made available to you in the Apple App store and Google Play Store.

This policy applies where we are acting as a data controller with respect to the personal data of our Website visitors and service users; in other words, where we determine the purposes and means of the processing of that personal data.

This privacy notice will apply to any person who visits our Website, or uses our App or payment service (“Service”) and will include:

Merchants

- Businesses – A commercial organisation of any type (which is not a Charity) and operates in the United Kingdom.
- Charity – A charity operating in the United Kingdom and registered with a Charity Regulator.

Consumers

- Donors – A person who uses our Service to donate to a Charity.
- End Users – A person who uses our Service to make payments to our Customers.
- Fundraisers- A person (other than the Charity) who solicits or procures Donations for you (when acting as a Charity) in connection with a fundraising event on our Platform.

References to “you” will include any Customer, End User, Merchant, Consumer, or other user as described above, as the context so requires.

This Website uses cookies in accordance with our Cookie Policy available on our Website at wonderful.co.uk.

This privacy notice is provided in a layered format so you can navigate through to the specific areas set out below. Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how we collect and process your personal data through your use of this Website and all associated subdomains; your use of our donate button and any data you may provide to us or otherwise make available through this Website or App, when you sign up or otherwise use our Service.

This Website and App are not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

Wonderful Payments Limited is the data controller and responsible for your personal data (referred to as “Wonderful Payments”, “we”, “us” or “our” in this privacy notice).

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.

OUR DPO AND CONTACT DETAILS

Our DPO’s contact details are:

Data Protection Officer
41 Luke Street
London
England

EC2A 4DP

Email address: dataprotectionofficer@wonderful.co.uk

Telephone number: +44 (0) 33 3443 3333

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.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES TO YOUR PERSONAL INFORMATION

This version was last updated on 28th April 2023 and versions can be obtained by contacting us.

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.

THIRD-PARTY LINKS

Our App and 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.

OUR CUSTOMERS

MERCHANTS (CHARITIES & BUSINESSES)

A Merchant must sign up and register with our Website or App in order to receive our Service from us. When you register with us, we will collect various personal information including relevant contact names and email addresses, and other information identified in paragraph 4 below.

CONSUMERS

END USERS

If you are an End User who uses our Service in order to make payments to our Customer, then we will collect certain personal data relating to payments that you make using our Service as identified in paragraph 4 below.

DONORS

If you are a Donor, you may elect to make Donations to your chosen Charity using our Service, in which case we will collect certain personal data relating to payments that you make to your chosen Charity as identified in paragraph 4 below.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means 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 as follows:

1. **Identity Data** includes first name, title, last name, username, photo ID (in the case of Charities and Customers only) or similar identifier.
2. **Contact Data** includes billing address, delivery address, email address and telephone numbers.
3. **Technical Data** includes internet protocol (IP) address, browser type and version, time zone settings and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website or App.
4. **Profile Data** includes your interests, preferences, feedback; and if you carry out charitable activities, fundraising habits and supported causes.
5. **Usage Data** includes information about how you use our Website, products and services.
6. **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties, and your communication preferences.
7. **Financial Data** includes information such as bank account numbers and sort codes, that you submit to us.
8. **Transaction Data** includes information relating to payments or Donations made by Consumers using our Service.

We also collect, use, and share **Aggregated 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 under the 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 or App feature. 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 process **Special Categories of Personal Data** about you (this includes 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) as part of our client inception procedures. We process Special Categories of Personal Data including biometric data in order to carry out client inception processes when engaging with our Customers and Charities and to discharge regulatory duties including anti-money laundering obligations which may include IDV checking of named individuals (PSCs), enhanced and sanctions screening checks for politically exposed persons. We have a Policy

for Processing Special Categories of Data in place. This is available on request to dataprotectionofficer@wonderful.co.uk

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 with you (for example, to process a Donation). In this case, we may have to cancel a service we provide you, but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

1. **Direct interactions.** You may give us your Identity, Contact 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 our products or services;
 - subscribe to or use our service or publications;
 - request marketing to be sent to you; or
 - give us some feedback.
2. **Automated technologies or interactions.** As you interact with our Website or App, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data 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.
3. **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
4. **Technical Data from the following parties:**
 - (a) analytics providers such as Google based outside the UK/EU;

4. 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:

1. Where we need to perform the contract we are about to enter or have entered into with you.
2. 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.
3. Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to 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.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may process your personal data on 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:

IF YOU ARE A MERCHANT

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
If you are (or work for) a Merchant, to register you as a new user	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (allow provision of a service)
To install the App and register you as a new App user	(a) Identity (b) Contact (c) Technical	(a) Performance of a contract with you
If you are (or work for) a Merchant to process and deliver an order or request from you (or your employer) for example (a) Manage payments, fees and charges (b) deliver services to you (or your employer) (c) Collect and money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to allow provision of service and to recover debts due to us)
	Communications recover	

<p>(a) Identity To manage our relationship with you</p> <p>(b) Contact act including notifying you of changes to</p> <p>(c) Profile our Website, App or Service</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p>	<p>To deliver relevant Website and App content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>
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<p>(a) Performance of a contract with you</p>	<p>(a) Performance of a contract with you</p>	<p>To use data analytics to improve our</p>
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<p>(b) Necessary for our legitimate Purpose/Activity</p>	<p>(d) Marketing and interests (to study how customers Communications use our products/services, to Website, App, products/services,</p>	<p>To use data analytics to improve our</p>
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Lawful basis for processing
Type of data including basis of legitimate interest
 develop them and grow our business)

<p>To enable Merchants to complete a survey</p>	<p>(c) Necessary to comply with a legal obligation</p>
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<p>To administer and protect our business, Website and App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Performance of a contract with</p>
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<p>To administer and protect our business, Website and App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity you</p> <p>(b) Contact</p> <p>(b) Necessary for our legitimate</p> <p>(c) Profile interests (to study how customers</p> <p>(d) Usage</p>
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use our products/services, to

(e) Marketing and develop them and grow our Communications business)

- (a) Identity (a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our Communications marketing strategy)
- (b) Contact
- (c) Profile
- (d) Usage
- (e) Marketing and business and to inform our Communications marketing strategy)
- (f) Technical

- (a) Identity (a) 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)
- (b) Contact
- (c) Technical (b) Necessary to comply with a legal obligation

- (a) Necessary for our legitimate interests (to define types of customers for our products and
- (b) Usage

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
marketing, customer relationships and experiences		services, to keep our Website and App updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations about goods or services that may be of interest.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)

If you are a Consumer

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To process and deliver a request	(a) Identity	

or order from you or the relevant Merchant including: (a) Manage payments, fees and charges (b) Contact (c) Financial (d) Transaction (e) Marketing and keep our records updated and to relevant Merchant Communications study how customers use our products/services)

If you are a Donor, to process and deliver a request or order from obligation (a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to deliver services and fees and charges (b) deliver (c) Profile keep our records updated and to services to you and/or the (d) Marketing and study how customers use our relevant Charity Communications products/services)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To enable Consumers to complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
To administer and protect our business, Website and App (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity services, network security, to (b) Contact prevent fraud and in the context of a (c) Technical business reorganisation or group restructuring exercise)	(a) 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) (b) Necessary to comply with a legal obligation

To deliver relevant Website and App content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact interests (to study how customers use our products/services, to develop them, to grow our business) (c) Profile use our products/services, to develop them, to grow our business (d) Usage develop them, to grow our business (e) Marketing and Communications strategy) (f) Technical	(a) Necessary for our legitimate interests (to define types of customers for our products and services) (b) App updated and relevant, to develop our business and to inform our marketing strategy)
To use data analytics to improve our Website, App, products/services, marketing, customer relationships and experiences	(a) Technical services, to keep our Website and App updated and relevant, to develop our business and to inform our marketing strategy) (b) Usage	(a) Necessary for our legitimate interests (to define types of customers for our products and services) (b) App updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to Customers and Merchants about goods or services that may be of interest.	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	(a) Necessary for our legitimate interests (to develop our products/services and grow our business)

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. Our established personal data control mechanism allows you to make a subject access request to our appointed Data Protection Officer, at which point you will be provided with all personal data held about you. You may then request addition, modification, redaction, or removal of the data in accordance with this privacy notice.

PROMOTIONAL OFFERS FROM US

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).

You will receive marketing communications from us if you have requested information from us or, you are a Merchant or a Consumer, or purchased services from us and, in each case, you have not opted out of receiving that marketing. The legal basis for such processing of your personal data will be our legitimate interest to promote our services.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party 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 hello@wonderful.co.uk 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, product/service experience or other transactions.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when Websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Website may become inaccessible or not function properly. We use cookies and/or other tracking technologies to distinguish you from other users of the App, the distribution platform (App store) and to remember your preferences. This helps us to provide you with a good experience when you use or browse Our Sites and allows us to improve Our Sites. For more information about the cookies we use, please see our cookie policy available on our Website at wonderful.co.uk.

CHANGE OF PURPOSE

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](#).

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 this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

1. External Third Parties as set out in the Glossary.
2. Third parties to whom we may choose to sell, transfer, or merge 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 notice.

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.

6. INTERNATIONAL TRANSFERS

Some of our external third parties are based in locations outside of the UK and the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data to locations outside of the UK and the EEA.

Whenever we transfer your personal data to locations outside of the UK and the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

1. 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 UK Information Commissioner or, where appropriate, the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).
2. Appropriate and adequate safeguards have been provided in relation to such transfers, including for example, adoption of Standard Contractual Clauses approved by the European Commission in our contract with the party importing the personal data. For further details, see [European Commission: Standard Contractual Clauses](#).

Please *Contact us* if you want further information on the specific mechanism used by us when transferring your personal data out of the UK and EEA.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and

other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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.

8. DATA RETENTION

FOR HOW LONG WILL YOU USE MY PERSONAL DATA?

By law we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for regulatory and financial purposes. If you do not use the App for a period of six years, then we will treat the account as expired and your personal data will be deleted according to our data retention policy.

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

In some circumstances we may 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.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You will find more information about these rights at the end of this policy:

1. You can request access to your data by contacting our Data Protection Officer using the contact details provided at the beginning of this policy.
2. You can request correction to your data by contacting our Data Protection Officer using the contact details provided at the beginning of this policy.
3. You can request erasure of your data by contacting our Data Protection Officer using the contact details provided at the beginning of this policy.
4. You can object to our processing of your personal data by contacting our Data Protection Officer using the contact details provided at the beginning of this policy.
5. You can request restriction of processing of your personal data by contacting our Data Protection Officer using the contact details provided at the beginning of this policy.
6. You can request transfer of your personal data by contacting our Data Protection Officer using the contact details provided at the beginning of this policy.
7. You can register your right to withdraw consent by contacting our Data Protection Officer using the contact details provided at the beginning of this policy.

NO FEE USUALLY REQUIRED (with exception)

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.

WHAT WE MAY NEED FROM YOU

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

TIME LIMIT TO RESPOND

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

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product 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.

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 such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

EXTERNAL THIRD PARTIES

1. Service providers acting as processors based in the UK and EEA and the United States of America who provide IT and system administration services.
2. Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors, and insurers based in the UK and EEA who provide consultancy, banking, legal, insurance and accounting services.
3. HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
4. We have published a comprehensive list and notice of our third-party application providers and related sub-processors on our Website at wonderful.co.uk which is kept up to date regularly. This notice includes further privacy information about how we process personal data through such providers.

YOUR LEGAL RIGHTS (FURTHER INFORMATION)

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 we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your 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.

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 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 you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

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 if this is the case at the time you withdraw your consent.

Further information about your rights can be found at the ICO Website:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-dataprotection-regulation-gdpr/individual-rights/>