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Introduction

Welcome to the Bentley Motors Limited ("**Bentley**") Bentley Network App ("App") privacy policy.

Bentley respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below.

1. *Important information and who we are*

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1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Bentley collects and processes your personal data through your interaction with the App.

To ensure that you are fully informed of how and why we are using your data, it is important that you read this privacy policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing personal data about you. This privacy policy supplements our other privacy policies and is not intended to override them.

Data Controller

Bentley Motors Limited ("Bentley", "we", "us") is a company registered in England and Wales (company registration number 0992897).

Contact details

Bentley's Data Protection Officer (**DPO**) is responsible for overseeing questions in relation to this privacy policy and our privacy practices. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details below:

Full name of legal entity: Bentley Motors Limited

Email address: DPO@bentley.co.uk

Postal address: Data Protection Officer, Bentley Motors Limited, Pyms Lane, Crewe, Cheshire, CW1 3PL, United Kingdom

The Information Commissioner's Office (ICO) regulates the processing of personal data in the United Kingdom and is the supervisory authority for data protection issues. You have the right to make a complaint at any time to the ICO (www.ico.org.uk). We would, however, welcome the opportunity to deal with your concerns in the first instance, and will work towards addressing issues or complaints that you may have.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 2nd January 2019. We recommend that you check this privacy policy regularly to see if any updates or changes have been made.

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 may contain 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 the content of, security or privacy policy of such sites. We recommend that you check the privacy and security policies of each website or social media service that you visit and / or sign up to.

2. The data we collect about you

Personal data, or personal information, means any information about a living 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:

- Identity data (such as name, username or similar identifier, title, marital status, date of birth, gender)
- Contact information (such as delivery address, telephone number/s, e-mail address)
- Vehicle information (such as VIN, make, model, year, retailer interaction, date of purchase / lease)

- Interests / preferences (such as purchases or orders made by you, your interests, preferences, feedback and survey responses)
- Image / profile information (such as photographs or other user generated content such as materials you may submit for surveys, or personal interests that you may add to the App)
- Transaction data (such as details of products and services you have purchased from us)
- Usage data (such as information about how you use our App, products and services)
- Marketing and communications data (such as your preferences in receiving marketing from us and our third parties, your communication preferences)

If you use a digital device to activate or access Bentley services, we may collect information about your specific device. This could include:

- Technical data (such as the IP address used to connect your computer to the internet, login information, browser type and version, time zone setting and location, browser plug in types and versions, operating system and platform)
- Location information (through for example, IP address, GPS)
- Information about your visit (such as URL clickstream to / through / from our App, products viewed or searched for, page response times, download errors, length of visit to certain pages, page interaction information, method used to browse away from the page, phone number used to call our customer services number)
- Information relating to e-mail communications (such as time / date stamp that the e-mail is opened, links accessed from the e-mail, unsubscribe preferences)

We also collect, use and share aggregated data such as statistical or demographic data. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

We do not collect any 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). Nor do we collect any information about criminal convictions and offences.

Our Apps and other digital platforms are not intended for children and we do not knowingly collect data relating to children. In the event that we learn we have collected information from a child without verification of parental consent, we will delete that information.

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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

You can choose whether to allow the App to collect and use real-time information about your Device's location through the Device's settings. However, please be aware that blocking tracking technology and location information may result in portions of the App being inaccessible or not functioning properly.

3. How is your personal data collected?

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

- **Direct interactions.** You may give us your personal information by filling in forms, completing the App registration process, or by corresponding with us by post, phone, email, SMS / MMS, direct messaging or otherwise. This includes data you provide when you:
 - enquire about / purchase our products and services
 - attend Bentley events, product shows or test drives
 - create an account on or visit our website
 - create a Bentley Network App account
 - subscribe to our services or publications
 - request marketing to be sent to you
 - enter a competition, promotion or survey
 - give us feedback or contact us
- **Indirect interactions.** Personal information may be collected during the course of your use of the App. This includes information posted by you on your profile or in response to other BNA users posts
- **Automated technologies or interactions.** As you interact with our App and digital services including website and social media platforms, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Vehicle records and other information provided to us directly by your independent, Bentley authorised dealership (hereafter, "Bentley Retailer")
 - Technical data from parties such as analytics providers and search information providers
 - Advertising networks
 - Events agencies
 - Identity and contact data from publicly available sources and data brokers
- **Information which is freely available through public internet searches**

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:

- Where processing your data is necessary for the performance of a contract or service we are about to enter into or have entered into with you
- 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. 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 overall experience. We make sure that we consider and balance any potential impact on you and your rights before we process your personal data for our legitimate interests
- Where we need to comply with a legal obligation

Generally we do not rely on consent as a lawful basis for processing your personal data. However we will get your consent where it is required before sending direct marketing communications to you. You have the right to withdraw consent to marketing at any time.

Purposes for which we will use your personal data

We have set out below a description of all the ways we may use your personal data. We may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Purpose/Activity	Type of data	Lawful basis for processing, including basis of legitimate interest
To manage our relationship with you which will include:		
To respond to any questions or complaints you may have regarding our products and services	(a) Identity (b) Contact (c) Concerns and complaints (d) Purchase history (e) Activity and interaction	(a) Necessary for our legitimate interests (to support customers with sales and other enquiries, to operate our business) (b) Performance of a contract with you
To fulfil requests you make to us (for example: test drives, service requests, call back requests for events or vehicles, brochure requests or information about specific vehicles)	(a) Identity (b) Contact (c) Vehicle data (d) Purchase history (e) Activity and interaction (f) Proof of identity	(a) Performance of a contract with you
To notify you about changes to our terms or privacy policy	(a) Identity (b) Contact	(a) Necessary to comply with a legal obligation

	(c) Marketing and communications	
To register you as a new customer	(a) Identity (b) Contact (c) Driver's licence (d) Purchase history (e) Marketing and communications (f) Activity and interaction (g) Profiling Retailer interaction history (h) Profiling, demographics and lifestyle	(a) Necessary for our legitimate interests (to support customers with sales and other enquiries, to operate our business)
To contact you when your local authorised Retailer opens, closes or moves premises	(a) Identity (b) Contact (c) Purchase history (d) Marketing and communications (e) Activity and interaction (f) Profiling Retailer interaction history	(a) Necessary for our legitimate interests (to support customers with sales and other enquiries, to operate our business)
To verify the accuracy of information that we hold about you and create a better understanding of you as a customer	(a) Identity (b) Contact (c) Concerns and complaints (d) Vehicle data (e) Purchase history (f) Marketing and communications (g) Activity and interaction (h) Profiling Retailer interaction history (i) Profiling, demographics and lifestyle (j) Driver's licence (k) Proof of identity	(a) Necessary for our legitimate interests (to support customers with sales and other enquiries, to operate our business)
To personalise your experience of our services (for example: tailor offerings within the Bentley Network	(a) Identity (b) Contact (c) Vehicle data	(a) Necessary for our legitimate interests (to support customers

App or digital platforms based on your usage, profile and interactions)	<ul style="list-style-type: none"> (d) Purchase history (e) Marketing and communications (f) Activity and interaction (g) Profiling, demographics and lifestyle 	with sales and other enquiries, to operate our business)
To make suggestions, recommendations and market to you about goods or services that may be of interest to you, which will include:		
To send you details of products, services, exclusive events, special offers and rewards that we think will be of interest to you, unless you object	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Marketing and Communications (d) Activity and interaction (e) Purchase history (f) Usage and web activity tracking (g) Social media (h) Profiling, demographics and lifestyle 	<ul style="list-style-type: none"> (a) Where you have provided your consent (b) Necessary for our legitimate interests (to tailor and provide relevant services and communications in the event that consent is not required)
To measure or understand the effectiveness of the communications we serve to you to make them more relevant	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Marketing and Communications (d) Activity and interaction (e) Purchase history (f) Usage and App activity tracking (g) Social media (h) Profiling, demographics and lifestyle 	(a) Necessary for our legitimate interests (to understanding customers' and drivers' needs and measure the reach and effectiveness of our campaigns)
To contact you with targeted communications delivered online through social media and other platforms operated by other companies	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Marketing and Communications (d) Activity and interaction (e) Purchase history (f) Usage and App activity tracking 	<ul style="list-style-type: none"> (a) Where you have provided your consent (b) Necessary for our legitimate interests (to tailor and provide relevant services and communications in the event that consent is not required)

	<ul style="list-style-type: none"> (g) Social media (h) Profiling, demographics and lifestyle 	
To identify and record when you have received, opened or engaged with our App or electronic communications	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Marketing and Communications (d) Activity and interaction (e) Usage and App activity tracking (f) Social media 	(a) Necessary for our legitimate interests (to understanding customers' and drivers' needs and measure the reach and effectiveness of our campaigns)
To help us provide you with improved products and services, which will include:		
To undertake market analysis and research so that we can better understand you as a customer	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Concerns and complaints (d) Vehicle data (e) Purchase history (f) Activity and interaction (g) Retailer Interaction History (h) Profiling, demographics and lifestyle 	(a) Where you have provided your consent
For product/ service development purposes (including contacting you with customer surveys), for example to improve vehicle quality, performance and safety	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Concerns and complaints (d) Vehicle data (e) Purchase history (f) Marketing and Communications (g) Activity and interaction (h) Profiling, demographics and lifestyle 	(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 marketing strategy)
To carry out data analytics to improve our App, products/services, marketing, experiences, customer service centre and authorised repairer network	<ul style="list-style-type: none"> (a) Identity (b) Purchase history (c) Marketing and Communications (d) Activity and interaction 	(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 marketing strategy)

	<ul style="list-style-type: none"> (e) Profiling, demographics and lifestyle (f) Usage and App activity tracking 	
Images and/ or videos may be captured and used to gain insight in order to make recommendations to the business for future product development and strategy	<ul style="list-style-type: none"> (a) Identity (b) Photographs, videos, voice recordings (c) Profiling, demographics and lifestyle 	(a) Necessary for our legitimate interests (to operate our business)
To process and deliver your requests, which will include:		
Fulfilment of requests placed by you or on your behalf	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Activity and interaction (d) Vehicle data (e) Retailer interaction history (f) Business Relationship/ Association (g) Purchase history (h) Profiling, demographics and lifestyle (i) Usage and App activity tracking 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to operate our business)
To perform a contract with you and to fulfil and complete your orders, purchases and other transactions entered into with us (or one of our selected partners)	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Activity and interaction (d) Vehicle data (e) Business Relationship/ Association (f) Purchase history (g) Usage and App activity tracking 	(a) Performance of a contract with you
To provide you with service information, warranty information, reminders and updates in relation to the products and services you've ordered from us	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Activity and interaction (d) Vehicle data (e) Marketing and Communications (f) Purchase history 	<ul style="list-style-type: none"> (a) Performance of a contract with you (b) Necessary for our legitimate interests (to operate our business)

<p>To determine your eligibility for our products and services / whether they're available in your area</p>	<ul style="list-style-type: none"> (a) Identity (b) Business Relationship/ Association (c) Profiling, demographics and lifestyle (d) Purchase history 	<p>(a) Necessary for our legitimate interests (to operate our business)</p>
<p>Complying with laws and regulations that apply to us, which will include:</p>		
<p>To meet our contractual requirements with third parties (for example to provide ownership information to vehicle warranty underwriters)</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Vehicle data (d) Purchase history (e) Proof of identification (f) Marketing and Communications (g) Retailer Interaction History (h) Activity and interaction 	<p>(a) Performance of a contract with other organisations</p>
<p>To contact you if there is an urgent safety or product recall notice and we need to tell you about it</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Vehicle data (d) Purchase history (e) Retailer Interaction History 	<p>(a) Necessary to comply with a legal obligation</p>
<p>To demonstrate compliance with anti-money laundering rules</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Purchase history (d) Proof of identification (e) Retailer Interaction History 	<p>(a) Necessary to comply with a legal obligation</p>
<p>To monitor any other regulatory requirements linked with treating customers fairly and processing records properly</p>	<ul style="list-style-type: none"> (a) Identity (b) Purchase history (c) Proof of identification (d) Marketing and Communications (e) Retailer Interaction History (f) Activity and interaction 	<p>(a) Necessary to comply with a legal obligation</p>
<p>To help authorities with any security, crime or anti-terrorism enquiries</p>	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Vehicle data 	<p>(a) Necessary to comply with a legal obligation</p>

	<ul style="list-style-type: none"> (d) Purchase history (e) Proof of identification (f) Retailer Interaction History (g) Activity and interaction 	
To inform you of updates to our terms and conditions and policies	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Marketing and Communications 	(a) Necessary to comply with a legal obligation
To comply with local authority requirements (for example to register your car with the DVLA)	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Vehicle data 	(a) Necessary to comply with a legal obligation
Responding to courts and enforcement authorities	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Vehicle data (d) Purchase history (e) Proof of identification (f) Marketing and Communications (g) Retailer Interaction History (h) Activity and interaction 	(a) Necessary to comply with a legal obligation
To comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request)	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Vehicle data (d) Purchase history (e) Proof of identification (f) Marketing and Communications (g) Retailer Interaction History (h) Activity and interaction 	(a) Necessary to comply with a legal obligation
To administer and protect our business and this App, which will include:		
Troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	<ul style="list-style-type: none"> (a) Identity (b) Contact (c) Proof of identity (d) Vehicle data (e) Business Relationship/ Association 	(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 (c) Performance of a contract with you
To enable you to partake in a prize draw, competition or complete a survey:		
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) 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 generate product exposure and develop marketing material:		
Profiling and analysis, conducted for strategic brand development	(a) Identity (b) Contact (c) Profiling, demographics and lifestyle (d) Social media (e) Purchase history (f) Retailer Interaction History (g) Business Relationship/ Association (h) Activity and interaction (i) Usage and App activity tracking	(a) Necessary for our legitimate interests (to operate our business and create products/service marketing material to grow our business)
Profiling and identifying influencers, Royals and VIPs	(a) Identity (b) Contact (c) Profiling, demographics and lifestyle (d) Social media (e) Purchase history	(a) Necessary for our legitimate interests (to operate our business and create products/service marketing material to grow our business)
Cultivating relationships with influencers	(a) Identity (b) Contact (c) Profiling, demographics and lifestyle (d) Social media (e) Usage and App activity tracking (f) Purchase history	(a) Necessary for our legitimate interests (to operate our business and create products/service marketing material to grow our business)

	(g) Retailer Interaction History (h) Business Relationship/ Association (i) Activity and interaction	
To retain a record of the company and vehicle history	(a) Identity (b) Contact (c) Vehicle data (d) Purchase history	(a) Necessary for our legitimate interests (to operate our business and create products/service marketing material to grow our business)
To capture images and/ or videos for marketing and promotion in all and any media, including Bentley's printed publications, presentations, promotional materials, in the advertising of Bentley's goods or services or on the Bentley website or within video montages, training materials, newsletters and on Retailer Marketing News Online, unless you object	(a) Identity (b) Contact (c) Social media	(a) Necessary for our legitimate interests (to create products/service marketing material and grow our business)

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 that is compatible with the original purpose. 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.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your 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. You will receive marketing communications from us if you have requested information from us or purchased from us and you have consented to receiving that marketing, where consent is required.

Third party marketing

We will get your express opt-in consent before we share your personal data with any third party who may then contact you for their own marketing purposes.

Opting out and Account Deletion

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing communication sent to you. Alternatively you can contact us directly by calling +44(0)1270 444 450.

You may update, correct, or delete your Bentley Network subscription information and preferences at any time by e-mailing:

Community-manager@bentley-network.com

Please be aware that requesting the deletion of your user account will also remove your access to the Bentley Network and associated services. Where Bentley has a legal requirement to retain data, measures have been established to anonymise data, or ensure processing limitations. A request to delete your user account will not affect the processing of your data by Bentley outside of the Bentley Network, unless a wider request for the erasure of your personal data has been made.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in Section 4, 'How we use your personal data':

- Internal third parties (such as other companies within the Volkswagen Group)
- External third parties (such as Retailers, service providers acting on our behalf, professional advisers and other authorities/ regulatory bodies)
- 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 policy

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.

Members of the Bentley Network are required to set up a User Profile, which will be visible to all other members of the Bentley Network but not visible outside of the App. Your profile will display your username (which consists of your first name and the first initial of your last name), your App membership start date, and information about your interests and business profile. Your User Profile will also include other information that you choose to include as part of your profile, including photos, preferred Retailer/s, your location and My Places. If you have opted in to location based services, your public profile will include your location information. All of your User Contributions will also appear on the App, and will be visible to other members of the Bentley Network.

We cannot control how other members of the Bentley Network will use or share any information that you choose to include in your App profile, or that you submit as a User. The disclosure of information is not mandatory and is entirely within your control. You should only share this information if you are comfortable that it will be seen, and potentially used, by other members of the Bentley Network.

6. International transfers

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”) (subject also to any relevant data localisation legislation). It may also be processed by staff operating outside of the EEA who works for us or for one of our suppliers, such as your local Bentley Retailer. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and provision of support services. We will take all reasonable steps necessary to ensure that your data is treated securely and in accordance with this privacy policy and current EU and UK Data Protection Law unless otherwise stated.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by implementing at least one of the following safeguards:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission
- Where we use certain service providers, we may use specific model contracts approved by the European Commission which give personal data the same protection it has in Europe

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.

Please note that you are responsible for maintaining the secrecy of your unique password and account information at all times.

8. Data retention

How long will you use my personal data for?

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 to our relationship with you.

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.

In some circumstances we will anonymise your personal data (so that you are not identifiable and the data can no longer be associated with you) for research or statistical purposes. In this case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- 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
- 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. In many instances you can amend the personal data directly
- 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 to continue 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which overrides your rights and freedoms in this instance
- 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:
 - If you want us to establish the data's accuracy
 - Where our use of the data is unlawful but you do not want us to erase it
 - 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
 - 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
- Withdraw consent at any time where we are relying on consent to process your personal data. 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.

If you wish to exercise any of the rights set out above, please contact our DPO:

DPO@bentley.co.uk

Fees

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.

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 could 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.