

## Privacy Policy

This policy sets out the principles governing our use of your personal data. This policy applies whether you contact us through our website or through a trade show or event, a sales person, a promotion or any other channel.

James Finlay Limited is the data controller, which means that we are responsible for, and control the processing of, your personal data.

We respect your privacy and take it very seriously. We ask that you read this policy carefully as it contains important information on:

- the personal data we collect about you;
- what we do with your information; and
- who your information might be shared with.

Our website may link to other web sites and we are not responsible for their data policies or procedures or their content. Please ensure you read their policies.

### Information we may collect

Website: We collect personal data about you when you contact us, [or when you submit a response to an online questionnaire on our website]. We may collect your name, contact details (including email address and telephone number), company, industry, product area, and other information you choose to share with us, such as queries.

Trade shows and events: If you attend our stand at a trade show or an event we are sponsoring, we may collect personal data about you at our stand or from the organiser. We may collect your name, contact details (including email address and telephone number), company, industry and product area.

Sales contacts: If you deal with any of our sales people, they may collect your name, contact details (including email address and telephone number), company, industry, product area and other information you choose to share with them.

Promotions: If you respond to or enter a promotion we are running, we may collect your name, contact details (including email address and telephone number), company, industry and product area.

Direct marketing: When you contact us through any of these channels, we will record whether you have opted into or out of receiving direct marketing from us.

### How we use your information

Website: When you use certain areas of our website, we will use your personal data for the following purposes:

- to fulfil our obligations under a contract with you or your company, or to provide you with requested information (such as a response to your enquiry);
- to improve our website and its content (i) in accordance with your particular preferences (in accordance with the Cookies and Tracking section below), and (ii) by conducting research, statistical analysis and behavioural analysis.

- to protect against fraud, prevent abuses of our websites and enable third parties to carry out technical, logistical or other website functions on our behalf.

Trade shows and events: We will use your information to make follow up sales contact and for any other specific purpose communicated at the trade show or event.

Sales contacts: We will use your information to fulfil our obligations under a contract with you or your company, to provide you with requested information, and to manage the relationship between your company and Finlays.

Promotions: If you enter a competition or promotion, we will use your personal data to administer the competition or promotion.

Direct marketing: where permissible, we will use your contact details to notify you of products, promotions, news and other matters concerning Finlays that may be of interest to you or your company. Where consent is required by local law for business to business direct marketing, we will only use your details in this way if you have opted in to receive marketing communications from us.

We may share your personal data with any company within the Finlays group of companies for the purposes listed in this policy. We will not disclose your personal information to any third party except as follows:

- For direct marketing communications, we may share your information our third party service providers who provide email distribution services or with social media companies providing digital marketing services.
- We will provide your personal data to our business partners who provide, ordering, logistics, fulfilment, and other services in order to process your orders, deliver your products, and provide customer care.

All of these disclosures would be made under contractual arrangements to ensure confidentiality, and carried out in accordance with the requirements of the relevant data protection regulations.

How long we will keep your personal data

We shall retain your information in line with legal and regulatory requirements. If you would like more information on our retention policy, please contact us at [info@finlays.net](mailto:info@finlays.net)

Our approach to information security

To protect your information, T&L has policies and procedures in place to make sure that only authorised personnel can access your personal data, that personal data is handled and stored in a secure and sensible manner and all systems that can access the personal data have the necessary security measures in place. To accomplish this, all employees, contractors and sub-contractors have defined roles and responsibilities and receive appropriate training.

We endeavour to take all reasonable steps to protect your personal data but cannot guarantee the security of any data you disclose online. You accept the inherent security implications of disclosing information online over the internet and will not hold us responsible for any breach of security unless we have been negligent or in wilful default.

Transfers of your information

We may need to transfer your personal data to other companies within the Finlays group, or to service providers, agents, subcontractors or regulatory authorities in countries where data protection laws may not provide the same level of protection as those in the European Economic Area. In these circumstances, we ensure that your data is adequately protected in accordance with EU data protection laws.

## Your rights

Right of access: You can request what information we hold about you, as well as why we have that information, who has access to the information and where we got the information.

Right to correct and update: If the data we hold about you is out of date, incomplete or incorrect, you can inform us and we will ensure that it is updated.

Right of erasure: If you feel that we should no longer be using your data, or that we are illegally using your data, you can request that we erase the data we hold. We will confirm whether the data has been deleted or tell you the reason why it cannot be deleted.

Right to object: You have the right to request that we stop processing your data. We will confirm if we are able to comply with your request or if we have legitimate grounds to continue. If data is no longer processed, we may continue to hold your data to comply with your other rights.

Right to opt out of direct marketing: You have the right to request that we stop contacting you with direct marketing.

The right to complain: You can make a complaint to us by contacting us on [info@finlays.net](mailto:info@finlays.net) or to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

## Cookies and Tracking

### Use of cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website. We use cookies on this website to:

- recognise you whenever you visit this website (this speeds up your access to the website);
- obtain information about your preferences, online movements and use of the internet;
- carry out research and statistical analysis to help improve our content, products and services and to help us better understand our customer requirements and interests;
- target our marketing and advertising campaigns more effectively by providing interest-based advertisements that are personalised to your interests; and
- make your online experience more efficient and enjoyable.

In most cases we will need your consent in order to use cookies on this website. The exception is where the cookie is essential in order for us to provide you with a product or service you have requested.

For more information on our use of cookies, please see our cookie policy.

### Contact details

If you have any queries about this policy, need further information, or wish to lodge a complaint you can contact us at [info@finlays.net](mailto:info@finlays.net).

Changes to this privacy policy

We may change this policy from time to time. You should check this policy occasionally to ensure that you are aware of the most recent version.