



DATA PRIVACY POLICY

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BACKGROUND

James Finlay Limited ('Finlays') respects your privacy and is committed to maintaining your trust by protecting your personal data. This Privacy Policy ('Policy') describes how Finlays collects, uses, shares, or otherwise processes data that, either on its own or in combination with other information, enables you to be directly or indirectly identified ('Personal Data') and explains the rights you may have in relation to your Personal Data.

SCOPE

This Policy applies to all Finlays employees, Finlays third parties (customers, suppliers and/or partners), and whether you contact us through our website or through a trade show or event, a salesperson, a promotion, or any other channel.

DEFINITIONS

- Direct identifier: a name, address, or other unique identifier clearly points to a specific person.
- Indirect Identifier does not reveal a person's identity on its own, however, when combined with other information, it can be used to identify an individual. For example, a vehicle registration number may be combined with information from the DVLA to identify the vehicle's owner.
- Data Controller: the entity that determines the purposes and means of processing Personal Data.
- Data Processor: the entity that handles Personal Data on behalf of the Data Controller, following the Controller's instructions. It is responsible for collecting, organising, storing and securing such data but does not decide why the data is processed.
- Personal Data: any information that relates to a living person (a data subject) who can be identified directly or indirectly through identifiers like name, addresses, IP addresses, or other data points.
- Data Subject: any living individual to whom Personal Data relates and who can be identified, directly or indirectly. Examples of data subjects include customers, employees, service users. They have rights to be informed about how their data is used and to control its processing.

POLICY

James Finlay Limited and its majority owned business units are the Data Controllers, which means that we are responsible for, and control the processing of, your Personal Data. That means that Finlays determines 'why' and 'how' your Personal Data is collected and used.

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

1. the Personal Data we collect about you;
2. what we do with your information; and
3. who your information might be shared with.

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

INFORMATION WE MAY COLLECT

The different types of Personal Data we may collect are categorized in the table below. Please note, however, that not all categories may be applicable to you.

CATEGORY	DESCRIPTION
Contact Information	Data such as your name, email address, physical address, phone number, company, industry, product area, etc.
Payment information	Data about your billing address and method of payment such as bank details, credit, debit or other payment card information
Security Information	Data such as your image and video footage captured by closed circuit television (CCTV), your access data logs, data collected about you in connection with security incidents that involve you and other information relating to the safety and security of our locations.
Event Information	Data collected for purposes of registration and participation in events and webinars, such as attendee badge information (eg, name, title and company name and image) email address, photographs and videos captured during events.

HOW WE COLLECT YOUR PERSONAL DATA

We collect most of your Personal Data directly from you. The categories of Personal Data that we collect depends on how you interact with us. You may provide us Personal Data when you participate in surveys, interact with our website, fill out questionnaires or provide services to us. You may not always be required to provide Personal Data that we request. If you do not wish to provide Personal Data to us, you may choose not to do so or opt-out of processing of your Personal Data when this option is offered to you.

Website: We collect Personal Data about you when you contact us, or when you submit a response to an online questionnaire on our websites or on one of our third party provider websites. 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. 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: 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. We may use your information to make follow up sales contact and for any other specific purpose communicated at the trade show or event.

Sales contacts: If you deal with any of our salespeople, 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. We will use your information to fulfil our obligations under a contract with you or your company (if applicable), to provide you with requested information, and to manage the relationship between your company and Finlays.

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. If you enter a competition or promotion, we will use your Personal Data to administer the competition or promotion.

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.

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:

1. For direct marketing communications, we may share your information with our third party service providers who provide email distribution services or with social media companies providing digital marketing services.
2. 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.

Any and all such disclosures would be made under contractual arrangements to ensure confidentiality and be carried out in accordance with the requirements of the applicable 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 [Data Retention Policy](#), please contact us at legalcounsel@finlays.net

LEGAL PURPOSE

We are committed to the lawful processing of your Personal Data in accordance with data protection laws, which in certain jurisdiction require us to have a valid legal basis to do so. In most circumstances, we rely on our legitimate interests or those of third parties for the performance of a contract with you or to comply with our legal obligations. Where we rely on your consent as a legal basis, you may withdraw your consent at any time for any processing activities that we conduct based solely on your consent. Please see section .7 [Your Rights] below to learn more about your rights, including your right to withdraw consent.

OUR APPROACH TO INFORMATION SECURITY

To protect your information, Finlays 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.

In the event of a security incident, we will notify regulators and/or you as required by applicable laws and regulations. Such notice may be communicated via email.

TRANSFER 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 UK and 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 obtained 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 other rights [e.g open investigation].

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 lodge a complaint by contacting us on legalcounsel@finlays.net or by reference 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 another electronic device) when you access our websites. We use cookies on our websites to:

- recognise you whenever you visit our websites (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.

The below list details the cookies used in our website.

Necessary:

Necessary cookies are absolutely essential for the website to function properly. This category only includes cookies that ensures basic functionalities and security features of the website. These cookies do not store any personal information.

Cookie	Description
PHPSESSID	This cookie is native to PHP applications. The cookie is used to store and identify a users' unique session ID for the purpose of managing user session on the website. The cookie is a session cookie and is deleted when all the browser windows are closed.
viewed_cookie_policy	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any Personal Data.
__cf_bm	The cookie from CloudFlare helps to read and filter requests from bots
cookieLawinfo-checkbox-necessary	The cookie helps to manage cookie consent

cookieinfo-checkbox-analytics	The cookie helps to manage cookie consent
elementor	The cookie stores performed actions on the website

Analytics:

Analytics cookies help us understand how our visitors interact with the website - the number of visitors, where the visitors are coming from, and the pages they navigate. The cookies collect this data and are reported anonymously.

Cookie	Description
_gat_gtag	Identification code of website for tracking visits.
_ga	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assigns a randomly generated number to identify unique visitors.
_gid	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form.
ga*	Google Analytics sets this cookie to store and count page views.
_gcl_au	Google Tag Manager sets the cookie to experiment advertisement efficiency of websites using their services.
AnalyticsSyncHistory	Linkedin set this cookie to store information about the time a sync took place with the lms_analytics cookie.
pardot	The pardot cookie is set while the visitor is logged in as a Pardot user. The cookie indicates an active session and is not used for tracking.

Other

geot_rocket_country	Used to detect your location to show you country specific information
geot_rocket_state	Used to detect your location to show you country specific information

geot_rocket_city	Used to detect your location to show you country specific information
STYXKEY_geot_country	Used to detect your location to show you country specific information

Advertisement

test_cookie	doubleclick.net sets this cookie to determine if the user's browser supports cookies.
li_sugr	LinkedIn sets this cookie to collect user behaviour data to optimise the website and make advertisements on the website more relevant.
bcookie	LinkedIn sets this cookie from LinkedIn share buttons and ad tags to recognize browser IDs.
bscookie	LinkedIn sets this cookie to store performed actions on the website.

Functional

_dc_gtm_UA-*	Google Analytics sets this cookie to load the Google Analytics script tag.
li_gc	LinkedIn set this cookie for storing visitor's consent regarding using cookies for non-essential purposes.
lidc	LinkedIn sets the lidc cookie to facilitate data center selection.
UserMatchHistory	LinkedIn sets this cookie for LinkedIn Ads ID syncing.

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

CONTACT DETAILS

If you have any queries about this policy or need further information, you can contact us at legalcounsel@finlays.net

EMPLOYEE DATA

Finlays is aware of its obligations under the General Data Protection Regulation (GDPR) and domestic data protection legislation and is committed to processing all Personal Data securely and transparently. Please see appendix A1 to see the type of data that Finlays hold on its employees.

HOW WE COLLECT EMPLOYEE'S DATA

We collect data about you in a variety of ways and this will usually start when we undertake a recruitment exercise where we will collect the data from you directly. This includes the information you would normally include in a CV or a recruitment cover letter, or notes made by our recruitment officers during the recruitment interview. Further information will be collected directly from you when you complete forms at the start of your employment/engagement, for example, your bank and next of kin details. Other details may be collected directly from you in the form of official documentation such as your driving license, passport or other right to work evidence.

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references or credit reference agencies.

Personal Data is kept in a personnel file or within Finlays HR systems.

For further information on Employee Personal Data, please see Appendix A2

REVISION HISTORY

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

Editor	Version	Update date
Juliana Guerra and Tamie Hutchins	3.0 Added Employee's data section and appendix; and embedded the new values and purpose	November 2025
Juliana Guerra	2.0 Added the section 'legal purpose' Material changes to the policy across all sections.	February 2024

APPENDIX

APPENDIX A1

The following types of Employee data will be held and processed by Finlays:

- name
- address
- date of birth
- sex
- education and qualifications
- work experience
- National Insurance number
- tax code
- emergency contact details
- employment history with the organisation
- employment terms and conditions (for example, pay, hours of work, holidays, benefits, absence)
- any accidents connected with work
- any training taken
- any disciplinary action
- Documentation relating to your right to work in the applicable jurisdiction, such as, driving license, passport
- CCTV footage

APPENDIX A2

The law on data protection allows us to process your data for certain reasons only:

- in order to perform the employment contract that we are party to
- in order to carry out legally required duties
- in order for us to carry out our legitimate interests
- to protect your interests
- where something is done in the public interest and
- where we have obtained your consent.

All of the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data. For example, we need to collect your Personal Data in order to:

- perform the contract that we have entered into with you and
- ensure you are paid.

We also need to collect your data to ensure we are complying with legal requirements such as:

- ensuring tax and National Insurance is paid

- carrying out checks in relation to your right to work in the applicable jurisdiction or;

We also collect data so that we can carry out activities which are in the legitimate interests of Finlays. We have set these out below:

- making decisions about who to offer initial employment/engagement to, and subsequent internal appointments, promotions etc
- making decisions about salary and other benefits
- providing contractual benefits to you
- maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained
- if you are an employee, effectively monitoring both your conduct and your performance in order to undertake procedures with regard to both of these if the need arises
- if you are an employee, offering a method of recourse for you against decisions made about you via a grievance procedure
- assessing training needs
- implementing an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken including the making of reasonable adjustments
- making reasonable adjustments for disabled individuals.
- gaining expert medical opinion when making decisions about your fitness for work
- managing statutory leave and pay systems such as maternity leave and pay etc
- business planning and restructuring exercises
- dealing with legal claims made against us
- preventing fraud
- ensuring our administrative and IT systems are secure and robust against unauthorised access

Special categories of data

Special categories of data are data relating to your:

- health
- sexual orientation
- race
- ethnic background
- political opinion
- religion
- trade union membership
- genetic and biometric data.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

We will use your special category data:

- for the purposes of equal opportunities monitoring
- in our sickness absence management procedures
- to determine reasonable adjustments

We do not need your consent if we use special categories of Personal Data in order to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent. Consent, once given, may be withdrawn at any time.

If you do not provide your data to us

One of the reasons for processing your data is to allow us to carry out our duties in line with your contract with us. If you do not provide us with the data needed to do this, we will be unable to perform those duties e.g. ensuring you are paid correctly. We may also be prevented from confirming, or continuing with, your employment/engagement with us in relation to our legal obligations if you do not provide us with this information e.g. confirming your right to work in the UK or, where appropriate, confirming your legal status for carrying out your work via a criminal records check.

Sharing your data

Your data will be shared with colleagues within Finlays where it is necessary for them to undertake their duties. This includes, for example, your line manager for their management of you, the HR department for maintaining personnel records and for administering payment under your contract.

Your data will be shared with regulators as needed and with third parties processing the payroll, e.g ADP.

Protecting your data

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such. *Please refer to the Intercompany Data Processing and Transfer Agreement.*

Where we share your data with third parties, we provide written instructions to them to ensure that your data are held securely and in line with current data protection requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it, which will be at least for the duration of your employment with us though in some cases we will keep your data for a period after your employment has ended. Retention periods can vary depending on why we need your data. Please refer to the Data Retention Policy for further information.

Automated decision making

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request.
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it
- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- the right to portability. You may transfer the data that we hold on you for your own purposes
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- the right to regulate any automated decision-making and profiling of Personal Data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the

data that you had previously given us consent to use. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Finlays Head of Risk and Compliance.