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1. BACKGROUND

James Finlay Limited 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 in isolation 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. This policy applies whether you contact us through our website or through a trade show or event, a salesperson, a promotion, or any other channel.

2. POLICY

James Finlay Limited and its affiliated entities 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 web sites, and we are not responsible for their data policies or procedures or their content. Please ensure you read their policies.

2.1 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.

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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.

2.2 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 website or on the website from one of our third party providers. 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.

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- 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 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: 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, 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.

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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.

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.

2.3 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

2.4 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 2.7 [Your Rights] below to learn more about your rights, including your right to withdraw consent.

2.5 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 if a security incident, we will notify regulators and/or you as required by applicable laws and regulations. Such notice may come in the form of an email.

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2.6 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.

2.7 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 legalcounsel@finlays.net or to the data protection supervisory authority. In the UK, this is the Information Commissioner's Office, at <https://ico.org.uk/>.

2.8 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 website. We use cookies on this website to:

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- 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.

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

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cookieinwinform-checkbox-necessary	The cookie helps to manage cookie consent
cookieinwinform-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. It helps us understand 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

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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.

2.9 CONTACT DETAILS

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

3. REVISION HISTORY

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.

Editor	Version	Update date
Juliana Guerra	Added the section 'legal purpose' Material changes to the policy across all sections.	February 2024

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