### **Privacy Policy**

1. This privacy policy applies to deWinton-Williams Consulting Ltd.'s website at www.dewinton-williams.com. We at deWinton-Williams Consulting Ltd take your privacy seriously. This policy covers the collection, processing and other use of personal data under the Data Protection Act 1998, for which purpose the data controller is deWinton-Williams Consulting Ltd. By using deWinton-Williams Consulting Ltd.'s website you consent to the policy.

#### Information we collect

2. We will collect personal data on this website only if it is directly provided to us by you the user, e.g. your e-mail address, name, home or work address and telephone number, and therefore has been provided by you with your consent. Normally you will only provide such details if you wish to sign up for our free enewsletter. We also use analytical and statistical tools that monitor details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data (but this data will not identify you personally).

# Use, storage and disclosure of your information

- 3. We may hold and process this personal data in accordance with the Data Protection Act 1998 and send you our e-newsletters from time to time, but we will not transfer, share, sell, rent or lease your personal data to third parties. We may share your personal data within our group of companies, but it will still be subject to these terms if we do.
- 4. The information that we collect and store relating to you is primarily used to enable us to provide our services to you. In addition, we may use the information for the following purposes:
  - 4.1 To provide you with information requested from us, relating to our products or services. To provide information on other products which we feel may be of interest to you, where you have consented to receive such information;
  - 4.2 To meet our contractual commitments to you;
  - 4.3 To notify you about any changes to our website, such as improvements or service/product changes, that may affect our service;
  - 4.4 If you are an existing customer, we may contact you with information about goods and services similar to those which were the subject of a previous sale to you;
  - 4.5 To assist fraud protection and minimise credit risk.
- 5. If you do not want us to use your data for our use you will have the opportunity to withhold your consent to this when you provide your details to us on the form on

- which we collect your data, or can do so by sending us an email to team@dewinton-williams.com at any time..
- 6. As part of the services offered to you, for example through our website, the information you provide to us may be transferred to and stored in countries outside of the European Economic Area (EEA) as we use remote website server hosts to provide the website and some aspects of our service, which may be based outside of the EEA, or use servers based outside of the EEA - this is generally the nature of data stored in "the Cloud". It may also be processed by staff operating outside the EEA who work with one of our suppliers, e.g. our website server host, or work for us when temporarily outside of the EEA. A transfer of your personal data may happen if any of our servers are located in a country outside of the EEA or one of our service providers is located in a country outside of the EEA. If we transfer or store your personal data outside the EEA in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected, as outlined in this privacy policy and in accordance with the Data Protection Act 1998. If you use our service while you are outside the EEA, your personal data may be transferred outside the EEA in order to provide you with these services.
- 7. We do not use or disclose sensitive personal data, such as race, religion, or political affiliations, without your explicit consent.
- 8. We may disclose your personal data outside of our group: (a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; and (b) if deWinton-Williams Consulting Ltd.'s business is bought by a third party, in which case personal data held by it about its customers will be one of the assets to transfer to the buyer. However any such transfer will only be on terms that the confidentiality of your personal data is protected and that the terms of this privacy policy will continue to be complied with by the recipient.
- 9. Otherwise, we will process, disclose or share your personal data only if required to do so by law or in the good faith belief that such action is necessary to comply with legal requirements or legal process served on us or the website.
- 10. You have the right to opt out of our processing your personal data for marketing purposes by contacting us at team@dewinton-williams.com

# **Security**

- 11. The transmission of information via the Internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data while you are transmitting it to our site; any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.
- 12. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this

password confidential. You should choose a password that is not easy for someone to guess.

## Third party links

13. You might find links to third party websites on our website. These websites should have their own privacy policies, which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

#### Use of cookies

14. On occasion, we may gather information about your computer for our services and to provide statistical information regarding the use of our website to our advertisers. Such information will not identify you personally - it is statistical data about our visitors and their use of our site. This statistical data does not identify any personal details whatsoever. Similarly to the above, we may gather information about your general Internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer, as cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and the service that we provide to you. All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website. Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.

### Access to information

15. The Data Protection Act 1998 gives you the right to access information held about you by us. This right can be exercised by you in accordance with the Act an access request will be subject to a fee of £10 towards our costs of complying with your request for the information we hold about you. Should you wish to receive details that we hold about you, please contact us using the contact details below.

# Changes to this policy

16. We may update these policies to reflect changes to the website and customer feedback. Please regularly review these policies to be informed of how we are protecting your personal data.

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact us at team@dewinton-williams.com

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