

## Website privacy policy

Your privacy is very important to us at Highland Whisky Festival (“We” or “Us”). We have prepared this Privacy Policy to explain how we collect, protect, and share information when you use the website <https://www.highlandwhiskyfestival.co.uk/> (the "Site"). This Privacy Policy also explains your choices for managing your information preferences.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. The data controller is Highland Whisky Festivals c/o Multiply Agency, 26 Palmerston Place, Edinburgh, EH12 5AL.

This Privacy Policy applies to all persons that visit the Site. By using or contacting us through this website (the "Site") you consent to the collection, storage, use and transfer of your information under the terms of this policy.

### Information We may collect from the Site

We may collect and process the following data about you:

- Information that you provide by filling in forms on our Site. We may also ask you for information when you enter a competition or promotion sponsored by Us, and when you report a problem with our Site.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to our Site including, but not limited to, traffic data, location data, weblogs and other communication data.

### Information we collect through the Site

**Cookies:** We use cookies, a small text file placed on your computer, to identify your computer and browser on the Site. Most web browsers are initially set up to accept cookies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

**Personally Identifiable Information:** We do not collect information that can uniquely identify, contact, or locate a single person or can be used with other sources to uniquely identify a single individual (“**Personally Identifiable Information**”) through cookies.

**Non-Personally Identifiable Information:** We automatically collect anonymous usage data that does not identify, or precisely locate you (“**Non-Personally Identifiable Information**”) when you use the Site. We use this information to help us understand how people use our Site. For example, each time you use the Site we automatically collect the type of the web browser you use, your operating system, which pages you view, and the time and duration of your visit to the Site.

**Third Party Cookies:** This website uses Google Analytics, a web analytics service provided by Google Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of this website will be transmitted to and stored by Google on servers in the United States. If IP anonymization is activated on this website, your IP address will however be truncated by Google beforehand within the area of member states of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases, the full IP address is sent to a Google server in the USA and truncated. Google will use this information on behalf of the operator of this website for the purpose of evaluating how you use the website, compiling reports on website activities and providing further services related to website and internet usage to the website operator. The IP address transferred by your browser within the scope of Google Analytics will not be associated with any other data held by Google. You can prevent the storage of cookies by selecting the appropriate settings of your browser software. However, we would like to point out that if you do so, it may

not be possible for you to make use of the full scope of all this website's functions. You can also prevent the data generated by the cookie and related to your usage of this website (including your IP address) from being conveyed to and processed by Google by downloading and installing a browser plug-in available through the following link: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

**How We Use and Share Information Collected through the Site**

**General:** We use Personally Identifiable Information and Non-Personally Identifiable Information for internal purposes only, such as to notify you of new products or services after you expressly opted in to receive such information and to send service notifications. Furthermore, we use Non-Personally Identifiable Information to customize the content you see, to fulfil your requests for products and services, to improve the Site, to conduct research, to solicit your feedback and input about the Site, and to provide more relevant and effective products and services on the Site. Non-Personally Identifiable Information may be combined with data collected from other sources so that we may further improve the relevance and effectiveness of products and services on or through the Site.

**Personally Identifiable Information:** 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 we need to perform the contract 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.

<b>Purpose/Activity</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) 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 administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(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
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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 use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

- Where we need to comply with a legal or regulatory obligation.

**Purposes for which we will use your Personal Data** We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

#### **Where we store Data**

We do not currently intend to transfer your personal data outside the European Economic Area (**EEA**). Some of our external third parties may however be based outside the European Economic Area (**EEA**) so their processing of your personal data may involve a transfer of data outside the EEA.

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

- 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 contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

#### **Data Retention**

We keep data collected via our Site including user behaviour data, that we control for no longer than two years.

#### **Disclosures of your personal data**

**Internal Third Parties:** We may share your information with businesses controlling, controlled by, or under common control with Us.

**External Third Parties:** We may share your information with service providers who provide IT, account and system administration services.

**Compliance with Laws and Law Enforcement:** To the extent obliged to do so by statutory law requirements, We cooperate with government and law enforcement officials to enforce and comply with the law. We may disclose your information to government or law enforcement if it is necessary in order to comply and/or to respond to legal requests (including court orders and subpoenas).

**Change of Control:** In the event that We sell or buy any business or assets, we may disclose your information to the prospective seller or buyer of such business or assets. If We, or substantially all of our assets, are acquired by a third party, the information held by it about its customers will be one of the transferred assets.

**Required Disclosure:** To the extent We may be required to protect the rights, property, or our safety or the safety of our customers, or others, We may disclose personal data. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **Third Party Websites**

The Site may contain links to websites or content operated and maintained by third parties, over which we have no control. You access such third-party websites or content at your own risk. You should always read the privacy policy of a third-party website before disclosing any information to the website.

#### **Public Forums**

Please be advised that, whenever you voluntarily post information to any of our community pages or any other public forums, such information can and may be accessed by the public. This means that any person or entity with access to such information can potentially use it for any purpose, including sending unsolicited communications.

## Security

We recognise the importance of safeguarding the confidentiality of your information. Accordingly, we employ appropriate security measures (such as firewalls and encryption of cookies) designed to protect your information from unauthorized access. 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.

## Marketing

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

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal data with any company outside the C&C group of companies for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at [info@candcgroup.ie](mailto:info@candcgroup.ie) at any time.

## Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. If you wish to exercise any of the rights set out above, please contact us at [info@candcgroup.ie](mailto:info@candcgroup.ie).

You have the right to:

**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 and to check that we are lawfully processing it. 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 may refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it may 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.

**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.

**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 continuing 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 where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**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: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. 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.

#### **Privacy Policy Changes**

From time to time, we may change this Privacy Policy. If we decide to change this Privacy Policy, we will inform you by posting the revised Privacy Policy on the Site. Those changes will go into effect on the Revision Date shown at the top of the revised Privacy Policy. Your continued use of the Site constitutes your consent to the revised Privacy Policy.

#### **Contact**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to [Highlandwhiskyfestival@multiplyagency.com](mailto:Highlandwhiskyfestival@multiplyagency.com)