
PRIVACY POLICY

William Johnston & Company Limited having a place of business at 9 Spiersbridge Terrace, Thornliebank Industrial Estate, Glasgow G46 8JH understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, (“Our Site”) and will only collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

“ Account ”	means an account required to access and/or use certain areas and features of Our Site;
“ Cookie ”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site;
“ Cookie Law ”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“ personal data ”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the the General Data Protection Regulation (“GDPR”); and
“ We/Us/Our ”	means William Johnston & Company Limited having a place of business at 9 Spiersbridge Terrace, Thornliebank Industrial Estate, Glasgow G46 8JH.

2. Information About Us

2.1 Our Site is owned and operated by us.

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. We have no control over how your data is collected, stored, or used by other websites.

4. Your Rights

4.1 As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

- 4.1.1 The right to be informed about Our collection and use of personal data;
- 4.1.2 The right of access to the personal data We hold about you;
- 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete;
- 4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We only hold your personal data for a limited time, but if you would like Us to delete it sooner, please contact Us);
- 4.1.5 The right to restrict the processing of your personal data;
- 4.1.6 The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- 4.1.7 The right to object to Us using your personal data for particular purposes; and
- 4.1.8 Rights with respect to automated decision making and profiling.
- 4.2 If you have any cause for complaint about Our use of your personal data, please contact Us and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the Information Commissioner's Office.
- 4.3 For further information about your rights, please contact the Information Commissioner's Office

5. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following data:

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 business/company name
- 5.5 job title;
- 5.6 contact information such as email addresses and telephone numbers;
- 5.7 demographic information such as post code, preferences, and interests;
- 5.8 IP address;
- 5.9 web browser type and version;
- 5.10 operating system;

6. **How Do We Use Your Data?**

- 6.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times.
- 6.2 Our use of your personal data will always have a lawful basis.

Specifically, We may use your data for the following purposes:

- 6.2.1 Providing and managing your access to Our Site;
- 6.2.2 Personalising and tailoring your experience on Our Site;
- 6.2.3 Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
- 6.2.4 Replying to emails from you;
- 6.2.5 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time
- 6.2.6 Market research;
- 6.2.7 Analysing your use of Our Site to enable Us to continually improve Our Site and your user experience;
- 6.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you with information, news and offers on Our services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR.
- 6.4 Third parties whose content appears on Our Site may use third party Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.5 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.6 We do not keep your personal data for any longer than is necessary in light of the reason for which it was first collected.

7. How and Where Do We Store Your Data?

- 7.1 We only keep your personal data for as long as We need to in order to use it as described above in section 6, and/or for as long as We have your permission to keep it.
- 7.2 Your data will only be stored in the UK.

Data security is very important to Us, and to protect your data We have taken suitable measures to safeguard and secure data collected through Our Site.

8. Do We Share Your Data?

- 8.1 Subject to section 8.2, We will not share any of your data with any third parties for any purposes.
- 8.2 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority.
- 8.3 We may compile statistics about the use of Our Site including data on

traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law]

9. What Happens If Our Business Changes Hands?

- 9.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.
- 9.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes. When contacted you will, however, be given the choice to have your data deleted or withheld from the new owner or controller.

10. How Can You Control Your Data?

- 10.1 When you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details.

11. Your Right to Withhold Information

- 11.1 You may access certain areas of Our Site without providing any data at all.
- 11.2 You may restrict Our use of Cookies.

12. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Under the GDPR, no fee is payable. Please contact Us for more details

13. Our Use of Cookies

- 13.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

- 13.2 By using Our Site you may also receive certain third party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.
- 13.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 13.4 Our Site uses analytics services. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.
- 13.5 The analytics service used by Our Site uses Cookies to gather the required information.
- 13.6 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser.
- 13.7 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

14. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email, by telephone, or by post. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you

15. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations.