

BACKGROUND:

Farn Williams Ltd. 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, www.farnwilliams.com (“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.

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. Details of the Cookies used by Our Site are set out in section 13, below;
“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 [Data Protection Act 1998] OR [EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”)]; and
“We/Us/Our”	means Farn Williams Ltd.

2. Information About Us

Our Site is owned and operated by Farn Williams Ltd.

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. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

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 (see section 12);
- 4.1.3 The right to rectification if any personal data We hold about you is inaccurate or incomplete (please contact Us using the details in section 14);
- 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, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 14);
- 4.1.5 The right to restrict (i.e. prevent) 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.

5. What Data Do We Collect?

Depending upon your use of Our Site, we may collect some or all of the following personal and non-personal data.

- 5.1 name;
- 5.2 date of birth;
- 5.3 gender;
- 5.4 business/company name
- 5.5 job title;
- 5.6 profession;

- 5.7 contact information such as email addresses and telephone numbers;
- 5.8 demographic information such as post code, preferences and interests;
- 5.9 financial information such as credit / debit card numbers;
- 5.10 IP address;
- 5.11 web browser type and version;
- 5.12 operating system;
- 5.13 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to;

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(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 - 6.2.1 Providing and managing your Account;
 - 6.2.2 Providing and managing your access to Our Site;
 - 6.2.3 Personalising and tailoring your experience on Our Site;
 - 6.2.4 Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
 - 6.2.5 Personalising and tailoring Our services for you;
 - 6.2.6 Replying to emails from you;
 - 6.2.7 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time.
 - 6.2.8 Market research;
 - 6.2.9 Analysing your use of Our Site to enable Us to continually improve Our Site and your user experience;
 - 6.2.10 With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, post or telephone with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

- 6.3 You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.
- 6.4 We will not keep your personal data for any longer than is necessary to fulfil the purpose 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 is stored on our secure servers here in the UK.

8. Do We Share Your Data?

We only share personal data with others when we are legally permitted to do so. When we do share data, we have in place contractual arrangements and have put in place security measures to protect your data in compliance with the GDPR and our own high standards of confidentiality and security.

When processing your personal data, we may need to share it with others as follows;

- Other members of our group.
- Third party organisations that provide us with services such as application, functionality, IT Services and data processing.
- Law enforcement or other government and regulatory agencies – or to third parties as the law may require.
- Third parties who assist us in providing services or information.
- Third parties that assist us with our marketing activities.
- Auditors, Lawyers and other professional advisors.

9. How Can You Control Your Data?

- 9.1 In addition to your rights under the GDPR, set out in section 4, 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).
- 9.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you receiving unsolicited marketing from other sources. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

10. Your Right to Withhold Information

10.1 You may restrict Our use of Cookies. For more information, see section 13.

11. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). [Under the Data Protection Act 1998. Under the GDPR, no fee is payable, and We will provide any and all information in response to your request free of charge. Please contact Us for more details by emailing governance@farnwilliams.com.

12. Our Use of Cookies

12.1 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 service.

12.2 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.

12.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.

12.4 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

12.5 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in section 13.5. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 13.9, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

12.6 The following first party Cookies may be placed on your computer or device:

Cookie Name	Purpose	Strictly Necessary
No cookies in this section		

12.7 Our Site uses analytics services provided by Google. 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 products and 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.

12.8 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.

12.9 The analytics service(s) used by Our Site use(s) the following Cookies:

Cookie Name	First/third party	Provider	Purpose
<i>_ga</i>	First	Google	Analytics identifier – used to distinguish unique visitors to the website and how they use it.
<i>_gid</i>	First	Google	Analytics identifier – used to distinguish unique visitors to the website and how they use the website.
<i>_gat</i>	First	Google	Used for “throttling” the use of Google analytics
<i>Collect</i>	Third	Google	Used to send data to Google about the visitors device and behaviour.

- 12.10 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 12.11 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.
- 12.12 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

13. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at governance@westltondrake.com. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under section 12, above).

14. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). 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. We recommend that you check this page regularly to keep up-to-date.