

## WILLIAM GRANT & SONS PRIVACY STATEMENT

### Who we are

This is the privacy statement of William Grant & Sons (Company Number SC131772). Our registered address is at the Glenfiddich Distillery, Dufftown, Banffshire AB55 4DH.

All references to "our", "us", "we" or "Company" within this policy are deemed to refer to William Grant & Sons Limited, its subsidiaries, affiliates and associates.

We own and operate [Reyka.com](http://Reyka.com).

We are committed to protecting your personal data; your privacy matters to us. That is why we have developed this Privacy Notice to explain how we collect, use, share and store your personal information when you use this website, and to inform you about how we will look after that information. This includes any information you may provide us with when you sign up to keep in touch with us or take part in any competitions that we might run.

It is important that you take some time to read and familiarise yourself with this notice, together with our website terms and conditions and any other privacy or fair processing notices that we may provide on specific occasions when we are collecting or processing personal data about you. This will help you to be fully aware of how and why we are using your information.

If you do not agree with any term in this policy, please do not use the website or submit any personal information to or through it.

### Types of personal information we collect

We may collect, use and store different types of personal information about you, which we have grouped together as follows:

Types of personal information	Description
<i>Personal identifying</i>	<i>Your first name and last name.</i>
<i>Contact</i>	<i>Your billing and delivery addresses including postcode, your contact email and telephone numbers</i>
<i>Technical</i>	<i>Information sent to us as a result of connecting to our website, including internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.</i>
<i>Financial</i>	<i>Your bank account and payment card details</i>
<i>Transaction</i>	<i>Details about payments to and from you and other details of products and services you have purchased from us.</i>
<i>Contractual</i>	<i>Details about the services we provide to you.</i>
<i>Social-demographic</i>	<i>Details about your work or profession, nationality, education and where you fit in to various social or income groupings.</i>
<i>Usage</i>	<i>Information about how you use our website, products and services</i>
<i>Marketing and Communications</i>	<i>Information about your preferences in receiving marketing from us and your communication preferences.</i>

## How we use your personal information

In general terms, we collect and use personal information to:

- *deliver our services and meet our legal responsibilities*
- *verify your identity where this is required*
- *contact you by post, email or telephone*
- *understand your needs and how they may be met*
- *maintain our records*
- *process financial transactions*

More specifically, the table below explains how we use your personal information and the reasons that we rely on in doing so. Where these reasons include legitimate interests, we explain what these legitimate interests are.

What we use your information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> <li>• <i>To deliver our services To make and manage customer payments</i></li> <li>• <i>To manage fees, charges and interest due on customer accounts</i></li> <li>• <i>To collect and recover money that is owed to us</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Contractual performance</i></li> <li>• <i>Legitimate interests</i></li> <li>• <i>Legal obligations</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Being efficient about how we fulfil our legal and contractual duties</i></li> <li>• <i>Complying with regulations that apply to us</i></li> </ul>
<ul style="list-style-type: none"> <li>• <i>To manage our relationship with you which may include asking you to leave a review of take a survey or notifying you about changes to our terms or privacy statement.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Contractual performance</i></li> <li>• <i>Legal obligations</i></li> <li>• <i>Legitimate interests</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Keeping our records updated and to study how customers use our products/services)</i></li> </ul>
<ul style="list-style-type: none"> <li>• <i>To enable you to partake in a prize draw, competition or complete a survey</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Contractual performance</i></li> <li>• <i>Legitimate interests.</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Being able to study how customers use our products/ services, to develop them and to grow our business.</i></li> </ul>
<ul style="list-style-type: none"> <li>• <i>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising that we serve to you</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Legitimate interests</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>To study how customers use our products/services to develop them, to grow our business and to improve our marketing strategy</i></li> </ul>
<ul style="list-style-type: none"> <li>• <i>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Legitimate interests</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Defining 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</i></li> </ul>

<ul style="list-style-type: none"> <li>• <i>To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance and audit</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Legitimate interests</i></li> <li>• <i>Legal obligations</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Being efficient about how we fulfil our legal duties</i></li> <li>• <i>Complying with regulations that apply to us</i></li> </ul>
<ul style="list-style-type: none"> <li>• <i>To exercise our rights set out in contracts and agreements</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Contractual performance</i></li> </ul>	
<ul style="list-style-type: none"> <li>• <i>To make suggestions and recommendations to you about goods or services that may be of interest to you</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Legitimate interests</i></li> </ul>	<ul style="list-style-type: none"> <li>• <i>Developing our products/ services and to be able to grow our business</i></li> </ul>

### **Where we collect your personal information from**

We may collect personal information about you (or your business) from the following sources:

Data you give to us e.g. by entering into any competitions that we may run on this site or completing online questionnaires or if you contact us directly, for example, regarding career vacancies, enquiries or other feedback.

Technical Data e.g. your IP address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.

Data we collect when you use our services e.g. payment and transaction information, identity and contact information, etc.

Data from third parties that we work with.

### **Information you post on public areas of our site and social media**

Information that you post on or through any public areas of the website (such as chatrooms, bulletin boards or discussion forums) and on any social media pages that we operate is publicly available information. This means that it is generally accessible to, and may be collected by, others and may be used by them to send you unsolicited messages. We do not have control over if or how other people may use that information therefore you should use caution and ensure not to disclose personal information when using public web areas or social media. We will not be responsible for any postings that you make with personal information in them.

### **Who we share your information with**

We may share your personal information with the following third parties:

- payment processors and providers
- members of our group of companies
- agencies or third parties that we are partnering with to deliver events and services
- third parties for the purpose of marketing, where you have provided consent
- Security providers
- Health & Safety providers

### **Information Security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information 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. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to any of our affiliated websites. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures.

### **Marketing**

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

We will get your express opt-in consent before directly sending you marketing communications or before sharing your personal information with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by contacting us.

Where you opt out of receiving these marketing messages, this will not apply to personal information provided to us as a result of our providing of services to you.

### **If you choose not to give your personal information**

If you choose not to give your personal information it may prevent us from being able to provide our services to you.

### **How long we keep your personal information**

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting obligations that we may have. We will only keep personal data for longer where there is a legal requirement for us to do so.

To determine how long we should keep your information for, we will consider the amount, type, and sensitivity of the personal information involved as well as the potential risk of harm if it is lost, or used or disclosed without authorisation. We will also consider the purposes for which we process your personal data and whether we can achieve those purposes through other means without the need to keep your data.

In some circumstances you can ask us to delete your data (see section on "**Your rights**" below for more information).

In some circumstances, we may also anonymise your personal data so that it can no longer be associated with you, for example for statistical purposes. Where we do this, we may use this information indefinitely without further notice to you.

### **Where we hold your personal information internationally**

If you are based in the EU, we may transfer your personal information we collect about you to countries outside the EU in order to perform our contract with you. To ensure that your personal information receives an adequate level of protection we will put in place appropriate measures to ensure that your personal information is treated by third parties in a way that is consistent with and which respects EU and UK laws on data protection. If you require further information about these protective measures, you can request it from our Compliance Counsel.

If you are based outside the EU, we will collect your personal data in line with our global standards and your data will be processed both inside and outside the EU. To ensure that your personal information receives an adequate level of protection we will put in place appropriate measures to ensure that your personal information is treated by third parties in a way that is consistent with and which respects EU and UK laws on data protection and any local applicable laws.

### Using our website

We collect and process the following information from our website:

- details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access;
- IP addresses – we will automatically receive your IP address when you visit the site; and
- cookies – we will use cookies in accordance with our Cookies Policy (<https://reyka.com/reyka-cookie-notice.pdf>) you configure your browser not to accept them. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Where this website contains links to other sites, William Grant & Sons is not responsible for the privacy policies or practices of any third party. By clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

### Your rights

**Access to your information** – You have the right to request a copy of the personal information about you that we hold.

**Correcting your information** – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

**Deletion of your information** – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent – see *Withdrawing consent to using your information* below
- You have validly objected to our use of your personal information – see *Objecting to how we may use your information* below
- Our use of your personal information is contrary to law or our other legal obligations.

**Objecting to how we may use your information** – You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or pursuant to the legitimate interests of us or a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

**Restricting how we may use your information** – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right to validly

exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

**Portability** – if we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine readable format. Where technically feasible, you also have the right to have that personal information transmitted directly to another controller.

**Automated processing** – if we use your personal information on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you

**Withdrawing consent using your information** – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in the *Contact information and further advice* section if you wish to exercise any of these rights.

## CALIFORNIA SPECIFIC PROVISIONS

Notwithstanding the information, disclosures, and obligations set forth above, if you are a California resident, California law may provide you with additional rights regarding our use of your personal information, as follows:

### A. Sale of Data:

You have the right to know if any personal information of yours was sold (as defined by the California Consumer Protection Act) to a third party (including the identity of those third parties, the method of sale and what rights they were granted in the personal information). We will not sell your personal information to third parties if we have received and processed a request from you not to do so. To submit such a request, pursuant to the California Consumer Protection Act, please contact us by clicking [here](#). DO NOT SELL MY PERSONAL INFORMATION.

We do not sell information about individuals we know are under age 16.

### B. Do Not Track:

We do not track our customers or website users over time and across third party websites for the purpose of providing targeted advertising. We do not respond to Do Not Track (DNT) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, some browsers allow you to set the DNT signal so that third parties know you do not want to be tracked. If you would like any more information regarding our DNT policy, please contact our Compliance Counsel in writing.

### C. Data Requests:

You may also submit requests for access, correction, erasure, objection, or restriction by calling us at (insert number). You must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. You do not need to create an account with us to submit a request. We will only use personal information provided in the request to verify the requestor's identity or authority to make it

### Changes to our privacy statement

We keep this privacy statement under regular review and will place any updates on this website. We recommend that you check this page regularly to ensure that you have read the most recent version.

This privacy statement was last updated on [date].

### Contact information and further advice

Our contact details are:

UK	EU Representative
William Grant & Sons Ltd The Old Court House, 7 Parkshot, Richmond TW9 2RF	William Grant & Sons Irish Brands Ltd 4th Floor Block D, Iveagh Court, Harcourt Road, Dublin 2, 662881

### Complaints

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office:

Online: <https://ico.org.uk/global/contact-us/email/>

By phone: 0303 123 1113

By post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF