

# Privacy and cookies policy

## 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will treat your personal information.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

## 2. Collecting personal information

- 2.1 We may collect, store and use the following kinds of personal information:
  - (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
  - (b) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address);
  - (c) information that you supply to us through our enquiry form and information relating to the use of the form (including your name, your email address, your telephone number, your postal address and the date and time of your enquiry);
  - (d) information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication); and
  - (e) any other personal information that you choose to send to us.
- 2.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

## 3. Using personal information

- 3.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- 3.2 We may use your personal information to:
  - (a) administer our website and business;
  - (b) send you non-marketing commercial communications;
  - (c) send you email notifications that you have specifically requested;
  - (d) send you our email newsletter, if you have requested it (you can inform us at any time if you no longer require the newsletter);
  - (e) send you marketing communications relating to our business which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);

- (f) provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
- (g) deal with enquiries and complaints made by or about you relating to our website;
- (h) keep our website secure and prevent fraud; and
- (i) verify compliance with the terms and conditions governing the use of our website.

#### **4. Disclosing personal information**

4.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this policy.

4.2 We may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings; and
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

4.3 Except as provided in this policy, we will not provide your personal information to third parties.

#### **5. Retaining personal information**

5.1 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.2 Notwithstanding the other provisions of this Section 5, we will retain documents (including electronic documents) containing personal data:

- (a) to the extent that we are required to do so by law;
- (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

#### **6. Security of personal information**

6.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

6.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.

6.3 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

- 6.4 Where we transfer to another business the information that you supply to us through our enquiry forms, we will do so securely. We keep such transfers secure by encrypting transferred data.

## **7. Amendments**

- 7.1 We may update this policy from time to time by publishing a new version on our website.

## **8. Your rights**

- 8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- (a) the payment of a fee (currently fixed at GBP 10); and
  - (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a notarized photocopy of your passport or drivers license plus an original copy of a utility bill showing your current address).
- 8.2 We may withhold personal information that you request to the extent permitted by law.
- 8.3 You may instruct us at any time not to process your personal information for marketing purposes.
- 8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.

## **9. Third party websites**

- 9.1 Our website includes hyperlinks to, and details of, third party websites.
- 9.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **10. Updating information**

- 10.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

## **11. About cookies**

- 11.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 11.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 11.3 Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

## **12. Our cookies**

- 12.1 We use both session and persistent cookies on our website.
- 12.2 The names of the cookies that we use on our website, and the purposes for which they are used, are set out below:
- (a) we use session cookies to track users as they navigate the website;
  - (b) we use persistent cookies to target advertisements which may be of particular interest to specific users.

## **13. Analytics cookies**

- 13.1 We use Google Analytics to analyse the use of our website.
- 13.2 Our analytics service provider generates statistical and other information about website use by means of cookies.
- 13.3 The analytics cookies used by our website have the following names: `_ga`, `_gat`, `__utma`, `__utmt`, `__utmb`, `__utmc`, `__utmz` and `__utmv`.
- 13.4 The information generated relating to our website is used to create reports about the use of our website.
- 13.5 Our analytics service provider's privacy policy is available at:  
<http://www.google.com/policies/privacy/> id="subunit-1454326350383128516"><http://www.google.com/policies/privacy/>.

## **14. Blocking cookies**

- 14.1 Most browsers allow you to refuse to accept cookies; for example:
- (a) in Internet Explorer (version 11) you can block cookies using the cookie handling override settings available by clicking "Tools", "Internet Options", "Privacy" and then "Advanced";
  - (b) in Firefox (version 47) you can block all cookies by clicking "Tools", "Options", "Privacy", selecting "Use custom settings for history" from the drop-down menu, and unticking "Accept cookies from sites"; and
  - (c) in Chrome (version 52), you can block all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Content settings", and then selecting "Block sites from setting any data" under the "Cookies" heading.
- 14.2 Blocking all cookies will have a negative impact upon the usability of many websites.

## **15. Deleting cookies**

- 15.1 You can delete cookies already stored on your computer; for example:
- (a) in Internet Explorer (version 11), you must manually delete cookie files (you can find instructions for doing so at <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>);
  - (b) in Firefox (version 47), you can delete cookies by clicking "Tools", "Options" and "Privacy", then selecting "Use custom settings for

history" from the drop-down menu, clicking "Show Cookies", and then clicking "Remove All Cookies"; and

- (c) in Chrome (version 52), you can delete all cookies by accessing the "Customise and control" menu, and clicking "Settings", "Show advanced settings" and "Clear browsing data", and then selecting "Cookies and other site and plug-in data" before clicking "Clear browsing data".

15.2 Deleting cookies will have a negative impact on the usability of many websites.