

## PRIVACY POLICY

### **Introduction**

Edrington-Beam Suntory UK ('We') have created this data protection policy to demonstrate a firm commitment to your privacy, to explain how we use the information we collect about you and to describe the procedures we have in place to protect your privacy.

### **Who we are**

Edrington-Beam Suntory UK Distribution Limited ('Edrington-Beam Suntory UK') is a company registered in Scotland (number SC203623). Our registered office is at 191 West George Street, Glasgow, G2 2LD.

### **Overview**

Edrington-Beam Suntory UK is committed to protecting and respecting the privacy of the personal information of its consumers, employees, applicants, and individual customer contacts. Looking after the personal data that we collect is a priority for us and we want you to be confident that your information is in safe hands. We've developed this Privacy Policy to let you know:

- What types of personal data we collect;
- How we collect personal data;
- When and why we share it with other organisations, including the types of organisations involved;
- How long we keep personal data for; and
- The rights and choices you have with regards to your personal data.

If you are a consumer of one of our brands (Jim Beam, Maker's Mark, Laphroaig, Highland Park, The Famous Grouse, Courvoisier, Naked Grouse, Auchentoshan, Roku, Brugal, Sourz and Bols liqueurs), a separate privacy policy related to each of these brands is available on their individual brand websites.

### **What types of personal data do we collect?**

- Your name, age/date of birth (for age verification purposes) and location;
- Your contact details: postal addresses including billing and delivery addresses, contact telephone numbers;
- Details of purchases and orders made by you;
- When you make a purchase or place an order with us, your payment card details;
- Your correspondence and communications with Edrington-Beam Suntory UK;
- Personal data which you have maybe shared via a public platform (such as on Edrington-Beam Suntory UK's Facebook page);

- Your communication and marketing preferences;
- Your interests, preferences, feedback and survey responses;
- Online browsing activities on Edrington-Beam Suntory UK's website, IP address, mobile device ID, any login data, browser type and other technology you use to access this website.

#### **How do we collect your personal data?**

We collect your personal data when:

- You subscribe to receive news from Edrington-Beam Suntory UK or its brands;
- You enter a ballot or competition related to Edrington-Beam Suntory UK or to one of our brands;
- When you attend one of our events or visit one of our sites;
- When you contact us, for whatever reason.

#### **How do we use your personal data?**

Edrington-Beam Suntory UK (and trusted partners acting on our behalf) use your personal data:

- With your agreement, to provide you with information, products or services that you request from us, or which we feel may interest you (but only when you've given your consent to be contacted by us);
- We may send you personalised communications based on your preferences and use of our brands;
- To verify your identity and your age;
- For crime and fraud prevention, detection and related purposes;
- To enable Edrington-Beam Suntory UK to manage any customer service interactions with you;
- To carry out our obligations arising from any contracts entered into between you and us.
- To ensure that our web content is presented in the most efficient way for you and your computer;
- To allow you to participate in interactive features on our website, when you choose to do so; and
- Where we have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

#### **What is our legal reason for holding personal data?**

Data protection laws require us to state our legal reason for processing your personal data.

Edrington-Beam Suntory UK's brands rely on your consent to send you marketing communications. You can withdraw your consent to receive these communications at any time by using the unsubscribe button included in the communications sent to you.

Edrington-Beam Suntory UK also collects and uses your personal data because it is necessary for:

- the pursuit of our legitimate interests (as set out below);
- the purposes of complying with our duties and exercising our rights under a contract for the sale of goods to a consumer; or
- complying with our legal and regulatory obligations.

### **Our legitimate interests**

The normal legal basis for processing personal data, is that it is necessary for the legitimate interests of Edrington-Beam Suntory UK, or its subsidiary brand owning companies, including:

- selling and supplying goods to our customers and consumers;
- protecting consumers, employees and other individuals and maintaining their safety, health and welfare;
- promoting, marketing and advertising our products;
- understanding our consumers' behaviour, activities, preferences, and needs;
- improving existing products and developing new products;
- handling consumer and customer contacts, queries, complaints, or disputes; and
- preventing, investigating and detecting crime, fraud, or anti-social behaviour and prosecuting offenders.

### **What are your rights?**

You have a number of rights under the data protection laws in relation to the way we process your personal data, namely:

- to access your data;
- to have your data rectified if it is inaccurate or incomplete;
- in certain circumstances, to have your data deleted or removed;
- in certain circumstances, to restrict the processing of your data;
- a right of data portability, namely to obtain and reuse your data for your own purposes across different services;
- to object to direct marketing;
- not to be subject to automated decision making (including profiling), where it produces a legal effect or a similarly significant effect on you; and
- to claim compensation for damages caused by a breach of the data protection laws.

If you wish to exercise any of these rights, please contact [dataprotection@edrington-beamsuntory.com](mailto:dataprotection@edrington-beamsuntory.com).

### **Who do we share your Personal Data with?**

To effectively fulfil our obligations to you, and to provide you with certain benefits, we use a number of trusted and reliable third parties to carry out functions which involve the processing of your personal data. These include IT, delivery and marketing service providers.

- We use marketing service providers to administer services on our behalf, such as sending communications to our consumers, administering any promotions or ballots which we run.
- Other agencies and fulfilment partners to administer events, competitions and brand programmes that you have opted into.

Some of the third party service providers we use may be based outside of the European Economic Area, but we will only transfer personal data to these service providers where we are satisfied that adequate levels of protection and security controls are in place to protect your personal data. We impose contractual obligations on service providers relating to data protection and security which means that they can only use your personal data to provide services to Edrington-Beam Suntory UK or to you, and no other purpose.

We may provide information to others (such as governmental or law enforcement agencies) in the good faith belief that such action is necessary to: (i) enforce or apply terms and conditions; (ii) comply with any legal claims raised against Edrington-Beam Suntory UK; (iii) protect the rights, property or safety of Edrington-Beam Suntory UK; or (iv) protect the rights, property or safety of the public.

If Edrington-Beam Suntory UK becomes involved in a merger, acquisition, bankruptcy, or other transaction involving the sale of some or all of our assets, user information, including personal information collected from you through your use of our website, could be included in the transferred assets. Should such an event occur, we will use reasonable means to notify you, either through email and/or a prominent notice on the website.

### **How long do we keep your personal data?**

We will not retain your personal data for longer than necessary for the purposes set out in this Policy. Different retention periods will apply to different types of data. If you wish to have your data deleted or removed please contact [dataprotection@edrington-beamsuntoryuk.com](mailto:dataprotection@edrington-beamsuntoryuk.com).

### **How do we protect your personal data?**

Edrington-Beam Suntory UK is committed to keeping your personal data safe and secure. To prevent unauthorised access, maintain data accuracy and ensure the correct usage of personal data, we monitor and adjust our physical, electronic and managerial procedures to safeguard and secure the personal data we collect online.

### **Cookies**

Cookies are small files downloaded to your computer or mobile device when you browse certain websites. Cookies contain information that is transferred to your computer's hard drive.

Please visit [www.allaboutcookies.org](http://www.allaboutcookies.org) for more information about cookies and the way they work.

We use cookies on your device when you use our website to:

- (i) verify you are old enough to view our site content;
- (ii) track which parts of a site you visit and which websites you came from to get to our website. All information collected by this cookie is aggregated and is therefore anonymous
- (iii) with your consent we may place a cookie to remember your preferences so that you do not need to re-enter your details (country/age and language).
- (iv) provide you with a quick link to social networking sites such as Facebook; we embed external cookies from third parties within our website. You can view the cookie usage policy of these third parties on their own websites.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can alter your browser settings to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

If you would like to opt out of being tracked by Google Analytics across all websites which you view, please visit <http://tools.google.com/dlpage/gaoptout>.

Some areas of our site use AddThis, a widely used social bookmarking service that makes it easy to share articles to social media websites like Twitter or Facebook. If you would like to opt out please visit <http://www.addthis.com/privacy>.

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### **Disclaimer**

Please note that telephone and other connection charges may apply to your use of this website. For details of such charges you should contact your telephone company and internet service provider.

The information contained in this website may include opinions or views which, unless expressly stated otherwise, are not those of Edrington-Beam Suntory UK.

This website is not guaranteed to be free from any so-called computer viruses and it is strongly recommended that you check for such viruses before down-loading it to your computer equipment.

The information and other contents of this website are designed to comply with Scots law. This website shall be governed by and construed in accordance with Scots law and all parties irrevocably submit to the jurisdiction of the Scottish courts. If anything on this website is construed as being contrary to the laws applicable in any other country, then this website is not intended to be accessed by persons from that country and any persons who are subject to such laws shall not be entitled to purchase our products unless they can satisfy us that such purchase would be lawful.

### **Liability**

Whilst every effort has been taken to ensure that the information provided on this website is correct at the time of writing it is not possible to provide any guarantee of accuracy. Edrington-Beam Suntory UK does not accept responsibility or liability to any person for loss or damage suffered as a consequence of their placing reliance upon the information. You should make appropriate queries and satisfy yourself before placing any reliance upon or taking any action on such information. By so placing reliance or taking action you accept that you do so at your own risk.

### **Questions**

If you have any questions or concerns about the way in which your personal data is processed, please contact: [dataprotection@edrington-beamsuntoryuk.com](mailto:dataprotection@edrington-beamsuntoryuk.com).

### **Complaints**

You have the right to complain about data protection matters to the Information Commissioner's Office (ICO).

The ICO is the UK's independent body set up to uphold information rights. You can find out more about the ICO on its website (<https://ico.org.uk/>). The ICO can be contacted by calling 0303 123 1113.

### **Changes**

This policy may change from time to time. If we change anything important we will notify or contact you.

Version	Date	Additions/Modifications	Prepared/Revised by	Approved by
1	25 May 2018	All sections of the policy have been updated in order to reflect the requirements	Prepared by Gemma Robson, Edrington Legal Counsel; revised by Elaine Bannerman,	

		of GDPR.	communications manager; approved by Gail Cockburn, HR Director	
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## **Changes to our Privacy Policy**

Any changes we may make to our Privacy Policy, we will post such changes to our website so that you are always aware of what information we are collecting from you, how we will be using it and if we will be disclosing it to a third party.

## **Contact us**

If you have any questions about this Privacy Policy or your dealings with this website, you may contact the HR Department at Edrington-Beam Suntory UK on +44 (0)1786 430 500.

May 2018