# Gillespie Inverarity & Co Limited

Privacy Policy

### Introduction

This policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore, the way this website processes, stores and protects user data and information will also be detailed within this policy.

## The website

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies with all UK national laws and requirements for user privacy.

## Use of cookies

#### What are cookies?

Cookies are small files saved to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

#### What do we use cookies for?

We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly afterwards.

We use anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of the features. If you log into the website, application or a course as a registered user, your session cookie will also contain your user ID so that we can check which services you are allowed to access.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

Should users wish to deny the use and saving of cookies from this website onto their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors.

# **Personal information**

Whilst using our website, software applications or services, you may be required to provide personal information (name, address, email, account details, etc.). We will use this information to administer our website, applications, client databases and marketing material. We will ensure that all personal information supplied is held securely in accordance with the General Data Protection Regulation (EU) 2016/679, as adopted into law of the United Kingdom in the Data Protection Act 2018. Further, by providing telephone, fax and email details, you consent to Gillespie Inverarity & Co Limited contacting you using that method. You have the right at any time to request a copy of the personal information we hold on you. Should you wish to receive a copy of this, or would like to be removed from our database, please contact us at info@gillespiesca.co.uk

## **Information collection and use**

## How do we collect information?

Gillespie Inverarity & Co Limited collects information in two possible ways:

#### a. When you directly give it to us ("Directly Provided Data")

When you sign up for our site, purchase our products or communicate with us, you may choose to voluntarily give us certain information – for example, by filling in text boxes or completing registration forms. All this information requires a direct action by you at that time in order for us to receive it.

#### b. When you give us permission to obtain from other accounts ("User Authorised Data")

Depending on your settings or the privacy policies for other online services, you may give us permission to obtain information from your account with those other services. For example, this can be via social media or by choosing to send us your location data when accessing our website from your smartphone.

### How long do we keep your data for?

Gillespie Inverarity & Co Limited will not retain your personal information longer than necessary. We will hold onto the information you provide either while your account is in existence, or as needed to be able to provide the Services to you, or (in the case of any contact you may have with our Customer Care team) for as long as is necessary to provide support-related reporting and trend analysis only.

If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also retain some of your information for a limited period of time as required, even after you have closed your account or it is no longer needed to provide the Services to you.

## **Registration forms**

Gillespie Inverarity & Co Limited will not sell or rent your personally identifiable information, gathered as a result of filling out the site registration form, to anyone.

#### Choosing how we use your data

We understand that you trust us with your personal information and we are committed to ensuring you can manage the privacy and security of your personal information yourself.

With respect to the information relating to you that ends up in our possession, and recognising that it is your choice to provide us with your personally identifiable information, we commit to giving you the ability to do all of the following:

- You can verify the details you have submitted to Gillespie Inverarity & Co Limited by contacting our customer services team by letter or by e-mail to info@gillespiesca.co.uk. Our security procedures mean that we may request proof of identity before we reveal information, including your e-mail address and possibly your address.
- You can also contact us by the same method to change, correct, or delete your personal information controlled by Gillespie Inverarity & Co Limited regarding your profile at any time. Please note though that, if you have shared any information with others through social media channels, that information may remain visible, even if your account is deleted.

- You are also free to close your account by notifying us. If you do so, your account will be closed. However, we may retain archived copies of your information as required by law or for legitimate business purposes (including to help address fraud and spam).
- You can always feel free to update us on your details at any point by letter or by email.
- You can unsubscribe from receiving marketing emails from us by requesting us by e-mail, telephone or letter. Once you do this, you will no longer receive any marketing emails from us.
- You can request a readable copy of the personal data we hold on you at any time. To do this, please contact us by letter or by e-mail to <u>info@gillespiesca.co.uk</u>.

#### Third Party Service Providers working on our behalf

We may pass your personal data to third parties who are service providers, debt recovery agents, Field Tracing Agents and subcontractors to us, for the purposes of recovering monies owed to our firm and all within our legitimate interests.

Please note, we are constantly reviewing how we process and protect data. Therefore, changes to our policy may occur at any time. We will endeavour to publicise any changes.