

## PRIVACY POLICY

### 1. General

- 1.1 We, Spirit of Speyside Whisky Festival Limited (“we” or “us”) are committed to protecting and respecting your privacy.
- 1.2 This policy (together with our Terms of Website Use and any other documents referred to in it) sets out the basis on which any personal data collected from you via our website, or that you provide via our website, will be processed.
- 1.3 Except as stated in Clause 1.4 below, for the purpose of the Data Protection Act 1998 (the “Act”) the data controller is us, Spirit of Speyside Whisky Festival Limited, a company registered in Scotland under company number SC298534 and having our registered office at 103 High Street, Elgin, Moray, IV30 1ED and our trading address at PO Box 6764, Elgin, IV30 9AW.
- 1.4 In the event of you using our website to book tickets for an event at the Spirit of Speyside Whisky Festival, unless we are the event provider named in the event details, the data controller of any personal data provided by you as part of the booking process will be the third party provider of the event concerned. You will find the name and contact details of the provider of each event within the event details on our website or on your ticket for each event, but if you are in any doubt about the identity of the provider of any event please do not hesitate to contact us on [companysecretary@spiritofspeyside.com](mailto:companysecretary@spiritofspeyside.com).
- 1.5 If you tick the appropriate box as part of the process of booking tickets for an event at the Spirit of Speyside Whisky Festival to request updates about the Spirit of Speyside Whisky Festival, then we will be the data controller of your personal data held by us for the purpose of sending you such updates. This will be the case even if you tick the appropriate box whilst booking tickets for an event provided by a third party.
- 1.6 In the following clauses of this Privacy Policy the term “Data Controller” will mean the relevant person or body who is data controller for your personal data, as explained in Clauses 1.3 to 1.5 above.

### 2. Information that may be collected from you

- 2.1 We may collect and process the following data about you:
- 2.1.1 information that you provide by filling in forms on our website. This includes (but is not limited to) information provided at the time of registering to use our website or posting material to our website, information provided at the time of requesting services via the website or when you enter a competition or promotion via the website, and when you report a problem with our website;

- 2.1.2 if you contact us, we may keep a record of that correspondence;
  - 2.1.3 you may also be asked to complete surveys that we use for research purposes, although you do not have to respond to them;
  - 2.1.4 details of transactions you carry out through our website; and
  - 2.1.5 details of your visits to our website and the resources that you access (this information is collected in an anonymous manner and it cannot be used to identify you personally).
- 2.2 Any third party provider of an event which you book tickets for using our website may collect and process the following data about you:
- 2.2.1 any information you provide at the time of booking tickets for the event provider's event;
  - 2.2.2 details of any bookings you make for events provided by the event provider; and
  - 2.2.3 if you contact the event provider, the event provider may keep a record of that correspondence.

### **3. Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. For detailed information on the cookies we use and the purposes for which we use them see our Cookies Policy

### **4. Where your personal data is stored**

- 4.1 The personal data that is collected from or provided by you using our website may be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**"). It may also be processed by staff operating outside the EEA who work for the Data Controller or for one of the Data Controller's suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing.
- 4.2 Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once your information has been received, the Data Controller will use procedures and security features to try to prevent unauthorised access.

### **5. Uses made of your information**

- 5.1 The Data Controller uses information held about you in the following ways:
- 5.1.1 to ensure that content from our website is presented in the most effective manner for you and for your computer;
  - 5.1.2 to provide you with information or services that you request or which the Data Controller feels may interest you, where you have consented to be contacted for such purposes;
  - 5.1.3 to carry out the Data Controller's obligations arising from any contracts entered into through our website;
  - 5.1.4 to allow you to participate in interactive features of our website, when you choose to do so; and
  - 5.1.5 to notify you about changes to our website.
- 5.2 If requested by you by ticking the appropriate box on the website, we may also use your personal data to provide you with updates about the Spirit of Speyside Whisky Festival. We may contact you with updates by email, post or telephone.
- 5.3 We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a certain post code). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

## **6. Disclosure of your information**

- 6.1 The Data Controller may disclose your personal data to any member of the Data Controller's group, which means the Data Controller's subsidiaries, the Data Controller's ultimate holding company and the Data Controller's subsidiaries, as defined in section 1159 of the UK Companies Act 2006.
- 6.2 The Data Controller may disclose your personal data to third parties:
- 6.2.1 in the event of you purchasing tickets for an event via our website, the Data Controller may disclose your personal details to payment processing organisations;
  - 6.2.2 in the event that the Data Controller sells any business or assets, in which case the Data Controller may disclose your personal data to the prospective buyer of such business or assets;

6.2.3 if the Data Controller or substantially all of its assets are acquired by a third party, in which case personal data held by the Data Controller about the Data Controller's customers will be one of the transferred assets; or

6.2.4 if the Data Controller is under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply or comply with our Terms of Website Use or Booking Terms and Conditions or other agreements; or to protect the rights, property, or safety of the Data Controller, the Data Controller's customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## **7. Your rights**

7.1 You have the right to ask the Data Controller not to process your personal data for marketing purposes. You can exercise the right at any time by contacting us at [companysecretary@spiritofspeyside.com](mailto:companysecretary@spiritofspeyside.com). Alternatively, if you have provided personal data via our website in order to book tickets for an event provided by a third party (as specified in Clause 1.4 above) then you may contact the third party event provider direct using the contact details of the event provider provided within the event details on our website or on your tickets for the relevant event.

7.2 Our website contains links to the websites of third parties including event providers and visitor attractions. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **8. Access to information**

The Act gives you the right to access information the Data Controller holds about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee of £10 to meet our costs in providing you with details of the information we hold about you.

## **9. Changes to our Privacy Policy**

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

## **10. Contact**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [companysecretary@spiritofspeyside.com](mailto:companysecretary@spiritofspeyside.com).