



**HOTTINGER**

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# PRIVACY STATEMENT

THE HOTTINGER GROUP AND ALL ITS SUBSIDIARY COMPANIES, (TOGETHER REFERRED TO AS THE "GROUP") ARE COMMITTED TO MAINTAINING, PROTECTING, AND RESPECTING YOUR PRIVACY. YOU CAN VISIT OUR WEBSITE WITHOUT TELLING US WHO YOU ARE OR REVEALING ANY INFORMATION ABOUT YOURSELF. HOWEVER, IF YOU DO GIVE US ANY PERSONAL INFORMATION ABOUT YOURSELF OR OTHERS, WE PROMISE TO TREAT IT SECURELY, FAIRLY AND LAWFULLY.

THIS PRIVACY POLICY (TOGETHER WITH OUR TERMS OF USE AND ANY OTHER DOCUMENTS REFERRED TO IN IT) SETS OUT THE BASIS ON WHICH ANY PERSONAL DATA WE COLLECT FROM YOU, OR THAT YOU PROVIDE TO US, WILL BE PROCESSED, AND USED BY US.

PLEASE READ THE FOLLOWING CAREFULLY TO UNDERSTAND OUR VIEWS AND PRACTICES REGARDING YOUR PERSONAL DATA AND HOW WE WILL TREAT IT. IF YOU DO NOT AGREE WITH THE TERMS OF THIS POLICY, PLEASE DO NOT USE [WWW.HOTTINGER.CO.UK](http://WWW.HOTTINGER.CO.UK) ("OURSITE").

FOR THE PURPOSE OF THE DATA PROTECTION ACT 2018 (THE "ACT"), THE DATA CONTROLLER OF THE PERSONAL DATA YOU SUBMIT TO THIS SITE IS HOTTINGER & CO. LIMITED. FURTHER INFORMATION CAN BE OBTAINED FROM THE GROUP AT 4 CARLTON GARDENS, LONDON, SW1Y 5AA, UNITED KINGDOM.

THIS PRIVACY POLICY COVERS WITHOUT LIMITATION, THE HOME PAGE, SPLASH PAGE AND ALL OTHER PAGES UNDER THE DOMAIN NAME [WWW.HOTTINGER.CO.UK](http://WWW.HOTTINGER.CO.UK) AND ALL CONTENT CONTAINED ON THOSE PAGES.

#### 1. INFORMATION WE MAY COLLECT FROM YOU

INFORMATION YOU GIVE US. YOU MAY GIVE US INFORMATION ABOUT YOU BY FILLING IN FORMS ON OUR SITE OR BY CORRESPONDING WITH US VIA PHONE, EMAIL, FACSIMILE OR OTHERWISE. THIS INCLUDES INFORMATION YOU PROVIDE WHEN YOU REGISTER TO USE OUR SITE, LOG IN TO A SERVICE, SUBSCRIBE TO A SERVICE AND WHEN YOU REPORT AN ISSUE WITH OUR SITE. THE INFORMATION YOU GIVE US MAY INCLUDE YOUR NAME, EMAIL ADDRESS AND PHONE NUMBER.

INFORMATION WE COLLECT ABOUT YOU. EACH TIME YOU VISIT OUR SITE WE MAY AUTOMATICALLY COLLECT THE FOLLOWING INFORMATION: •

- TECHNICAL INFORMATION INCLUDING THE INTERNET PROTOCOL ("IP") ADDRESS USED TO CONNECT YOUR COMPUTER TO THE INTERNET, YOUR LOG-IN INFORMATION, BROWSER TYPE AND VERSION, BROWSER PLUG-IN TYPES AND VERSIONS, TIME ZONE SETTING, OPERATING SYSTEM AND PLATFORM; AND
- INFORMATION ABOUT YOUR VISIT, INCLUDING THE UNIFORM RESOURCE LOCATORS("URL") CLICKSTREAM TO, THROUGH AND FROM OUR SITE (INCLUDING DATE AND TIME); ITEMS YOU SEARCHED FOR; PAGE RESPONSE TIMES; DOWNLOAD ERRORS, LENGTH OF TIME SPENT ON PAGES, PAGE INTERACTION INFORMATION (SUCH AS SCROLLING, CLICKS AND MOUSE-OVERS) AND METHODS USED TO BROWSE AWAY FROM THE PAGE AND ANY PHONE NUMBER USED TO CALL US.

INFORMATION WE RECEIVE FROM OTHER SOURCES. WE MAY RECEIVE INFORMATION ABOUT YOU FROM THIRD PARTIES WE WORK WITH (INCLUDING FOR EXAMPLE ANALYTICS PROVIDERS, SEARCH INFORMATION PROVIDERS, SUBCONTRACTORS IN TECHNICAL SERVICES).

## 2. COOKIES

OUR SITE USES COOKIES TO DISTINGUISH YOU FROM OTHER USERS OF OUR SITE AND TO MAKE THE SITE WORK MORE EFFICIENTLY. FOR DETAILED INFORMATION ON THE COOKIES, WE USE AND THE PURPOSES FOR WHICH WE USE THEM PLEASE REFER TO OUR COOKIE POLICY ON THE TERMS & CONDITIONS PAGE ON THE WEBSITE.

## 3. USES MADE OF INFORMATION COLLECTED

WE USE INFORMATION HELD ABOUT YOU IN THE FOLLOWING WAYS:

INFORMATION YOU GIVE TO US. WE WILL USE THIS INFORMATION:

- TO CARRY OUT OUR OBLIGATIONS ARISING FROM ANY CONTRACTS ENTERED INTO BETWEEN YOU AND THE GROUP AND TO PROVIDE YOU WITH THE INFORMATION, PRODUCTS AND SERVICES THAT YOU REQUEST FROM US;
- TO PROVIDE YOU WITH INFORMATION ABOUT OTHER PRODUCTS AND SERVICES THAT WE OFFER THAT ARE SIMILAR TO THOSE THAT YOU HAVE ALREADY PURCHASED OR ENQUIRED ABOUT;
- TO PROVIDE YOU, OR PERMIT SELECTED THIRD PARTIES TO PROVIDE YOU WITH INFORMATION ABOUT PRODUCTS OR SERVICES WE FEEL MAY INTEREST YOU. IF YOU ARE AN EXISTING CUSTOMER, WE WILL ONLY CONTACT YOU BY ELECTRONIC MEANS WITH INFORMATION ABOUT PRODUCTS AND SERVICES SIMILAR TO THOSE WHICH WERE THE SUBJECT OF PRIOR DEALINGS BETWEEN US. IF YOU ARE A NEW CUSTOMER, AND WHERE WE PERMIT SELECTED THIRD PARTIES TO USE YOUR DATA, WE (OR THEY) WILL CONTACT YOU BY ELECTRONIC MEANS ONLY IF YOU HAVE CONSENTED TO DO THIS BY TICKING THE RELEVANT BOX. IF YOU DO NOT WANT US TO USE YOUR DATA IN THIS WAY, OR TO PASS YOUR DETAILS ON TO THIRD PARTIES FOR MARKETING PURPOSES, PLEASE DO NOT TICK THE RELEVANT BOX ON THE FORM ON WHICH WE COLLECT YOUR DATA;
- TO NOTIFY YOU ABOUT CHANGES TO OUR SERVICE; AND
- TO ENSURE THAT CONTENT FROM OUR SITE IS PRESENTED IN THE MOST EFFECTIVE MANNER FOR YOU AND FOR YOUR COMPUTER.

INFORMATION WE COLLECT ABOUT YOU. WE WILL USE THIS INFORMATION:

- TO ADMINISTER OUR SITE AND FOR INTERNAL OPERATIONS INCLUDING TROUBLESHOOTING, DATA ANALYSIS, TESTING, RESEARCH, STATISTICAL AND SURVEY PURPOSES;
- TO IMPROVE OUR SITE TO ENSURE THAT CONTENT IS PRESENTED IN THE MOST EFFECTIVE MANNER FOR YOU AND YOUR COMPUTER;
- TO ALLOW YOU TO PARTICIPATE IN INTERACTIVE FEATURES OF OUR SERVICE, WHEN YOU CHOOSE TO DO SO; • AS PART OF OUR EFFORTS TO KEEP OUR SITE SAFE AND SECURE;
- TO MEASURE OR UNDERSTAND THE EFFECTIVENESS OF ADVERTISING WE SERVE TO YOU AND OTHERS, AND TO DELIVER RELEVANT ADVERTISING TO YOU;

INFORMATION WE RECEIVE FROM OTHER SOURCES. WE MAY COMBINE THIS INFORMATION WITH INFORMATION YOU GIVE TO US AND INFORMATION WE COLLECT ABOUT YOU. WE MAY USE THIS INFORMATION AND COMBINED INFORMATION FOR THE PURPOSES SET OUT ABOVE (DEPENDING ON THE TYPES OF INFORMATION WE RECEIVE).

#### 4. DISCLOSURE OF YOUR INFORMATION

WE MAY SHARE YOUR PERSONAL INFORMATION WITH ANY COMPANY WHICH IS PART OF THE GROUP.

WE MAY SHARE YOUR INFORMATION WITH SELECTED THIRD PARTIES INCLUDING: • SUPPLIERS AND SUB-CONTRACTORS FOR THE PERFORMANCE OF ANY CONTRACT WE ENTER INTO WITH THEM OR YOU; AND  
• ANALYTICS AND SEARCH ENGINE PROVIDERS THAT ASSIST US IN THE IMPROVEMENT AND OPTIMISATION OF OUR SITE.

WE MAY DISCLOSE YOUR PERSONAL INFORMATION TO THIRD PARTIES: •

- IN THE EVENT THAT WE BUY OR SELL ANY BUSINESS OR ASSETS, IN WHICH CASE WE MAY DISCLOSE YOUR PERSONAL DATA TO THE PROSPECTIVE SELLER OR BUYER OF SUCH BUSINESS OR ASSETS;
- IF WE ARE UNDER A DUTY TO DISCLOSE OR SHARE YOUR PERSONAL DATA IN ORDER TO COMPLY WITH ANY LEGAL OBLIGATION, WHERE REQUESTED BY REGULATORY AGENCIES, OR IN ORDER TO ENFORCE OR APPLY OUR TERMS OF USE AND OTHER AGREEMENTS OR TO PROTECT THE RIGHTS, PROPERTY OR SAFETY OF THE GROUP (AS DEFINED ABOVE). THIS INCLUDES EXCHANGING INFORMATION WITH OTHER COMPANIES AND ORGANISATIONS FOR THE PURPOSES OF FRAUD PROTECTION AND CREDIT RISK REDUCTION;
- FINANCIAL INSTITUTIONS AND OTHER SIMILAR ORGANISATIONS THAT WE DEAL WITH IN THE COURSE OF THE SERVICES WE OFFER;

- AUDITORS OR CONTRACTORS OR OTHER ADVISERS AUDITING, ASSISTING WITH OR ADVISING ON ANY OF OUR BUSINESS PURPOSES, IN ANY JURISDICTION WHERE WE OPERATE.

WHEN WE SHARE YOUR INFORMATION WITH SELECTED THIRD PARTIES, THEY WILL PROCESS YOUR INFORMATION EITHER AS A DATA CONTROLLER OR AS OUR DATA PROCESSOR AND THIS WILL DEPEND ON THE PURPOSE OF OUR SHARING THE PERSONAL DATA. WE WILL ONLY SHARE YOUR PERSONAL DATA IN COMPLIANCE WITH THE APPLICABLE DATA PROTECTION LEGISLATION. A LIST OF OUR SELECTED THIRD PARTIES WITH WHOM WE MAY SHARE YOUR INFORMATION IS AVAILABLE BY CONTACTING US AT [ADMIN@HOTTINGER.CO.UK](mailto:ADMIN@HOTTINGER.CO.UK).

## 5. WHERE WE STORE YOUR PERSONAL DATA

ALL INFORMATION YOU PROVIDE TO US IS STORED ON OUR SECURE SERVERS. WHERE YOU HAVE A PASSWORD WHICH ENABLES YOU TO ACCESS CERTAIN PARTS OF OUR SITE, YOU ARE RESPONSIBLE FOR KEEPING THIS PASSWORD CONFIDENTIAL.

YOUR PERSONAL INFORMATION MAY BE TRANSFERRED FOR PROCESSING TO OTHER COUNTRIES WHICH MAY HAVE DIFFERENT PERSONAL DATA PROTECTION RULES THAN IN YOUR OWN COUNTRY. WHERE WE TRANSFER YOUR DATA OUTSIDE THE UNITED KINGDOM ("UK"), WE WILL DO SO UNDER THE UK TRANSFER RULES AND ENSURE ADEQUATE PROTECTION REMAINS IN PLACE, INCLUDING WHERE APPLICABLE THROUGH THE CONTINUED USE OF ANY EU STANDARD CONTRACTUAL CLAUSES ("SCCS"). BY SUBMITTING YOUR PERSONAL DATA, YOU AGREE TO THIS TRANSFER, STORAGE OR PROCESSING.

WE MUST ADVISE YOU THAT THE TRANSMISSION OF INFORMATION VIA THE INTERNET IS NOT COMPLETELY SECURE. WHILE WE WILL DO OUR UTMOST TO PROTECT YOUR PERSONAL DATA, WE CANNOT GUARANTEE THE SECURITY OF DATA TRANSMITTED TO OUR SITE, ANY TRANSMISSION IS MADE AT YOUR OWN RISK. ONCE WE HAVE RECEIVED YOUR INFORMATION, WE WILL USE STRICT PROCEDURES AND SECURITY FEATURES TO TRY TO PREVENT UNAUTHORISED ACCESS.

BY PROVIDING ANY PERSONAL INFORMATION TO OUR SITE YOU FULLY UNDERSTAND THAT YOUR PERSONAL INFORMATION MAY BE TRANSFERRED TO AND COLLECTED AND PROCESSED IN THE UK, THE REPUBLIC OF IRELAND AND SWITZERLAND.

## 6. YOUR RIGHTS

EVEN IF YOU HAVE ACCEPTED THE PROCESSING OF YOUR PERSONAL DATA FOR MARKETING PURPOSES (BY TICKING THE RELEVANT BOX), YOU HAVE THE RIGHT TO ASK US TO STOP PROCESSING YOUR PERSONAL DATA FOR SUCH PURPOSES. YOU CAN EXERCISE THIS RIGHT AT ANY TIME BY CONTACTING US AT [ADMIN@HOTTINGER.CO.UK](mailto:ADMIN@HOTTINGER.CO.UK).

OUR SITE MAY, FROM TIME TO TIME, CONTAIN LINKS TO AND FROM THE WEBSITES OF OUR PARTNER NETWORKS, ADVERTISERS AND AFFILIATES. 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.

## 7. ACCESS TO INFORMATION

UK DATA PROTECTION LEGISLATION GIVES YOU THE RIGHT TO ACCESS INFORMATION HELD ABOUT YOU. ANY ACCESS REQUEST MAY BE SUBJECT TO A REASONABLE FEE TO COVER THE COST OF PROVIDING YOU WITH DETAILS OF THE INFORMATION WE HOLD ABOUT YOU. YOUR RIGHTS TO ACCESS, RECTIFY SUCH INFORMATION, OBJECT, OR CANCEL THE INFORMATION WE HOLD ABOUT YOU CAN BE EXERCISED AT ANY TIME BY CONTACTING US AT [ADMIN@HOTTINGER.CO.UK](mailto:ADMIN@HOTTINGER.CO.UK)

## 8. CHANGES TO OUR PRIVACY POLICY

ANY CHANGES TO OUR PRIVACY POLICY IN THE FUTURE WILL BE POSTED ON THIS PAGE AND WHERE APPROPRIATE NOTIFIED TO YOU BY EMAIL. PLEASE CHECK BACK FREQUENTLY TO SEE ANY UPDATES OR CHANGES TO OUR PRIVACY POLICY.

## 9. CONTACT

ANY COMMENTS OR QUERIES YOU HAVE REGARDING THIS POLICY ARE WELCOMED AND SHOULD BE ADDRESSED TO [ADMIN@HOTTINGER.CO.UK](mailto:ADMIN@HOTTINGER.CO.UK)