



HOTTINGER



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PRIVACY STATEMENT

HOTTINGER GROUP LIMITED AND ALL ITS SUBSIDIARY COMPANIES (TOGETHER REFERRED TO AS THE "GROUP"), INCLUDING HOTTINGER & CO. LIMITED (REFERRED TO IN THIS PRIVACY POLICY AS THE "FIRM"), ARE COMMITTED TO MAINTAINING, PROTECTING AND RESPECTING YOUR PRIVACY. 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.

FOR THE PURPOSES OF THE UK GENERAL DATA PROTECTION REGULATION ("UK GDPR") AND THE DATA PROTECTION ACT 2018, HOTTINGER & CO. LIMITED IS THE CONTROLLER OF THE PERSONAL DATA DESCRIBED IN THIS PRIVACY POLICY.

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.

THIS PRIVACY POLICY APPLIES TO PERSONAL DATA PROCESSED BY HOTTINGER & CO. LIMITED IN CONNECTION WITH ITS WEBSITE, PROSPECTIVE AND EXISTING CLIENTS, BUSINESS RELATIONSHIPS, COMMUNICATIONS AND THE PROVISION OF ITS SERVICES.

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;
- 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).

RECORDED COMMUNICATIONS AND VIRTUAL MEETINGS

WE MAY RECORD TELEPHONE CONVERSATIONS AND VIRTUAL MEETINGS CONDUCTED THROUGH FIRM-APPROVED COMMUNICATION CHANNELS, INCLUDING MICROSOFT TEAMS, WHERE REQUIRED FOR LEGAL OR REGULATORY RECORD-KEEPING PURPOSES OR WHERE OTHERWISE NECESSARY FOR THE LEGITIMATE BUSINESS PURPOSES DESCRIBED IN THIS PRIVACY POLICY.

A VIRTUAL-MEETING RECORDING MAY CAPTURE YOUR NAME AND CONTACT DETAILS, AUDIO, VIDEO, SHARED CONTENT AND INFORMATION DISCUSSED OR DISPLAYED DURING THE MEETING, WHERE TRANSCRIPTION IS ENABLED, SPOKEN CONTENT MAY ALSO BE CONVERTED INTO WRITTEN TEXT.

PARTICIPANTS WILL BE NOTIFIED WHEN RECORDING OR TRANSCRIPTION BEGINS.

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, 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. WE MAY USE TELEPHONE AND VIRTUAL-MEETING RECORDINGS AND TRANSCRIPTS;
- TO COMPLY WITH OUR LEGAL AND REGULATORY OBLIGATIONS;
- TO MAINTAIN AN ACCURATE RECORD OF RELEVANT COMMUNICATIONS, INSTRUCTIONS AND TRANSACTIONS;
- TO MONITOR COMPLIANCE WITH OUR POLICIES AND PROCEDURES;
- TO RESPOND TO COMPLAINTS, DISPUTES OR REGULATORY ENQUIRIES; AND
- TO ESTABLISH, EXERCISE OR DEFEND LEGAL CLAIMS.

WHERE RECORDING IS REQUIRED BY APPLICABLE LAW OR REGULATION, WE PROCESS THE INFORMATION BECAUSE IT IS NECESSARY TO COMPLY WITH A LEGAL OBLIGATION. WHERE RECORDING FALLS OUTSIDE A SPECIFIC LEGAL OBLIGATION, WE WILL ONLY PROCESS IT WHERE ANOTHER LAWFUL BASIS APPLIES, INCLUDING OUR LEGITIMATE INTERESTS IN MAINTAINING ACCURATE BUSINESS RECORDS AND PROTECTING OUR LEGAL AND REGULATORY POSITION.

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 SUBCONTRACTORS FOR THE PERFORMANCE OF ANY CONTRACT WE ENTER INTO WITH THEM OR YOU;
- ANALYTICS AND SEARCH ENGINE PROVIDERS THAT ASSIST US IN THE IMPROVEMENT AND OPTIMISATION OF OUR SITE.

TELEPHONE AND VIRTUAL-MEETING RECORDINGS AND TRANSCRIPTS MAY BE ACCESSED BY AUTHORISED EMPLOYEES AND PROCESSED ON OUR BEHALF BY TECHNOLOGY AND COMMUNICATIONS SERVICE PROVIDERS. THEY MAY ALSO BE DISCLOSED TO PROFESSIONAL ADVISERS, AUDITORS, REGULATORS, LAW-ENFORCEMENT AUTHORITIES AND OTHER PERSONS WHERE REQUIRED BY LAW OR REASONABLY NECESSARY FOR THE PURPOSES DESCRIBED IN THIS PRIVACY POLICY.

ACCESS IS RESTRICTED TO PERSONS WITH A LEGITIMATE BUSINESS, LEGAL, COMPLIANCE OR REGULATORY NEED.

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.

5. WHERE WE STORE YOUR PERSONAL DATA

PERSONAL DATA IS STORED WITHIN THE FIRM'S SECURE SYSTEMS AND WITHIN SYSTEMS OPERATED ON ITS BEHALF BY APPROVED SERVICE PROVIDERS. WHERE YOU HAVE A PASSWORD THAT ENABLES YOU TO ACCESS CERTAIN PARTS OF OUR WEBSITE OR SERVICES, YOU ARE RESPONSIBLE FOR KEEPING THAT PASSWORD CONFIDENTIAL.

RECORDINGS AND TRANSCRIPTS CREATED THROUGH MICROSOFT TEAMS ARE PROCESSED WITHIN THE FIRM'S MICROSOFT 365 ENVIRONMENT. DEPENDING ON THE TYPE OF MEETING OR CALL, RECORDINGS AND TRANSCRIPTS MAY BE STORED IN MICROSOFT ONEDRIVE OR SHAREPOINT.

PERSONAL DATA MAY BE TRANSFERRED TO, ACCESSED FROM OR PROCESSED IN COUNTRIES OUTSIDE THE UNITED KINGDOM. WHERE THIS OCCURS, THE FIRM WILL ENSURE THAT THE TRANSFER IS MADE IN ACCORDANCE WITH APPLICABLE UK DATA PROTECTION LAW. THIS MAY INCLUDE RELIANCE ON UK ADEQUACY REGULATIONS OR THE USE OF APPROPRIATE CONTRACTUAL SAFEGUARDS, SUCH AS THE UK INTERNATIONAL DATA TRANSFER AGREEMENT OR THE UK ADDENDUM TO THE EU STANDARD CONTRACTUAL CLAUSES. FURTHER INFORMATION ABOUT THE SAFEGUARDS USED MAY BE OBTAINED BY CONTACTING US AT ADMIN@HOTTINGER.CO.UK.

ALTHOUGH THE FIRM TAKES APPROPRIATE MEASURES TO PROTECT PERSONAL DATA, TRANSMISSION OF INFORMATION OVER THE INTERNET IS NOT COMPLETELY SECURE. ONCE PERSONAL DATA HAS BEEN RECEIVED, APPROPRIATE PROCEDURES AND SECURITY MEASURES WILL BE USED TO PROTECT IT AGAINST UNAUTHORISED ACCESS, USE OR DISCLOSURE.

6. RETENTION

TELEPHONE AND VIRTUAL-MEETING RECORDINGS, INCLUDING ASSOCIATED TRANSCRIPTS AND SHARED CONTENT, WILL NORMALLY BE RETAINED FOR SEVEN YEARS FROM THE DATE OF THE COMMUNICATION IN ACCORDANCE WITH THE FIRM'S RECORDS RETENTION POLICY AND APPLICABLE LEGAL AND REGULATORY REQUIREMENTS.

RECORDINGS AND TRANSCRIPTS ARE PROTECTED AGAINST UNAUTHORISED ACCESS, ALTERATION, DELETION AND DISCLOSURE. A TRANSCRIPT IS AN ANCILLARY RECORD AND DOES NOT REPLACE AN ORIGINAL RECORDING REQUIRED FOR REGULATORY PURPOSES.

7. YOUR RIGHTS

EVEN IF YOU HAVE ACCEPTED THE PROCESSING OF YOUR PERSONAL DATA FOR MARKETING PURPOSES, 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.

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.

8. ACCESS TO AND OTHER DATA PROTECTION RIGHTS

SUBJECT TO APPLICABLE LEGAL CONDITIONS AND EXEMPTIONS, YOU MAY HAVE THE RIGHT TO REQUEST ACCESS TO YOUR PERSONAL DATA, RECTIFICATION OF INACCURATE INFORMATION, ERASURE, RESTRICTION OF PROCESSING AND DATA PORTABILITY, AND TO OBJECT TO CERTAIN PROCESSING. WHERE PROCESSING IS BASED ON CONSENT, YOU MAY WITHDRAW THAT CONSENT AT ANY TIME WITHOUT AFFECTING THE LAWFULNESS OF PROCESSING UNDERTAKEN BEFORE ITS WITHDRAWAL.

YOU WILL NOT NORMALLY BE CHARGED FOR EXERCISING YOUR RIGHTS. HOWEVER, WE MAY CHARGE A REASONABLE FEE OR REFUSE TO ACT WHERE A REQUEST IS MANIFESTLY UNFOUNDED OR EXCESSIVE, IN ACCORDANCE WITH APPLICABLE DATA PROTECTION LAW.

YOU CAN EXERCISE YOUR RIGHTS BY CONTACTING US AT ADMIN@HOTTINGER.CO.UK.

YOU ALSO HAVE THE RIGHT TO COMPLAIN TO THE INFORMATION COMMISSIONER'S OFFICE ("ICO"). FURTHER INFORMATION IS AVAILABLE AT WWW.ICO.ORG.UK.

9. 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.

10. CONTACT

ANY COMMENTS OR QUERIES YOU HAVE REGARDING THIS POLICY ARE WELCOMED AND SHOULD BE ADDRESSED TO ADMIN@HOTTINGER.CO.UK