

## PRIVACY POLICY

THE JONES FAMILY CHARITABLE TRUST are committed to protecting and respecting your privacy.

This document (the “**Privacy Policy**”) explains our policy regarding any information you might supply to us when you visit our website at [https://www.jonesfamilycharitabletrust.co.uk] (the “**Website**”) or that you provide to THE JONES FAMILY CHARITABLE TRUST via another route such a by post or phone. Our goal is to protect your information.

This Website may contain links to other websites, from time to time, which are provided for your convenience. We are only responsible for the privacy practices and security of this Website. We recommend that you check the privacy and security policies and procedures of each and every other website that you may visit.

The ‘**Data Controller**’ (for the purposes of Data Protection Law (currently the Data Protection Act 1998 but from 25 May 2018, the EU General Data Protection Regulation 2016 and the Data Protection Act 2018) of any personal information that you provide to us through the Website or via another route will be THE JONES FAMILY CHARITABLE TRUST.

Where you provide personal information via another route to THE JONES FAMILY CHARITABLE TRUST, the Data Controller of such information will be the company to whom you provide it.

This Privacy Policy uses some words with special meanings. These words are identified in bold. If you want to know what any words with special meanings mean, simply scroll back till you find the word in bold, where you will also find the relevant explanation.

### 2. What Information Do We Collect?

The information we collect falls into the following categories (together, the “**Information**”):

- a) Personal information that you provide to us such as your name, address, telephone number, date of birth, credit card number, billing address, email address and details of purchasing preferences (“**Personal Information**”), which we use in accordance with this Privacy Policy.
- b) Website Use Information - the Website utilises a standard technology called “**cookies**” and web server logs to collect information about how the Website is used. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at the Website, and the websites visited just before and just after the Website (“**Website Use Information**”). For more information on the cookies that we use and their purpose, please see our Cookie Policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Personal Information by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
  - create an account on our website;

- submit an application form to us;
- request marketing to be sent to you;
- give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. Please see our cookie policy [LINK] for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below :
  - technical data from the following parties: HM Revenue and Customs
  - analytics providers such as Google based outside the EU;
  - identity and contact data from publicly available sources such as The Office of the Scottish Charity Regulator, The Charity Commission, Companies House and the Electoral Register based inside the EU.

#### 4. How Will We Use Your Information?

We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- Where we have your consent

Generally we do not rely on consent as a legal basis for processing your personal data, but where we do, you have the right to withdraw consent at any time.

In some cases we may need to collect your personal data by law, or in order to perform our side of a contract we have entered into with you or with a view to entering into such a contract. If you fail to provide the requested data, we may not be able to perform under the contract we have with you, or to enter into the contract with you. In such circumstances, we may have to cancel the contract, or be unable to conclude the contract, which means we would not be able to provide the product or service to you. If that is the case, we will notify you of that at the time.

#### 5. Purposes For Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we intend to use your personal data, and the legal basis we will rely upon to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful purpose, depending on the specific purpose for which we are using your data.

| Purpose/Activity   | Type of data  | Lawful basis for processing including basis of legitimate interest  | Retention period |
|--|---|---|------------------|
| To register you as a new applicant   | Identity<br>Contact   | Performance of a contract with you  | 6 years          |
| To process your application including:<br><br>(a) Manage payments, fees and charges<br><br>(b) Collect and recover money owed to us  | Identity<br>Contact<br>Financial<br>Transaction<br>Marketing and Communications | (a) Performance of a contract with you<br><br>(b) Necessary for our legitimate interests (to recover debts due to us)   | 6 years          |
| To manage our relationship with you which will include:<br><br>(a) Notifying you about changes to our terms or privacy notice<br><br>(b) Asking you to leave a review or take a survey | Identity<br>Contact<br>Application details<br>Marketing and Communications      | (a) Performance of a contract with you<br><br>(b) Necessary to comply with a legal obligation<br><br>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)  | 6 years          |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)                | Identity<br>Contact<br>Website use Information                                  | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br><br>(b) Necessary to comply with a legal obligation | 6 years          |
| To deliver relevant website content and advertisements to you and measure or understand  | Identity<br>Contact   | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to   | 6 years          |

|  |  |   |         |
|--|--|---|---------|
| the effectiveness of the advertising we serve to you   | Application details<br>Marketing and Communications<br>Website use Information | grow our business and to inform our marketing strategy)   |         |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences                             | Website use Information  | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy) |         |
| To make suggestions and recommendations to you about goods or services that may be of interest to you  | Identity<br>Contact<br>Website use Information                                 | Necessary for our legitimate interests (to develop our products/services and grow our business)   | 6 years |
| To share your details with our associated companies and partners so they can keep you informed of services, products events or special offers. | Contact  | Necessary for your legitimate interests and 3 <sup>rd</sup> party legitimate interests (to develop products/services and grow business)   |         |

### Promotional Offers From Us

We may use your Personal Information to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing). We may also create an individual profile for you so that we can inform you of services, products, events or special offers that may be of interest to you.

You will receive marketing communications from us if you have requested information from us or purchased services from us and, in each case, you have not opted out of receiving that marketing.

### Third-Party Marketing

Each of our associated companies and these partners may keep you informed of services, products, events and special offers made available by that organisation. If you express an interest in an offer from one of our associated companies or partners, said associated company or partner may let us know. In all cases, we will take care to ensure that these organisations only process your Information in accordance with this Privacy Policy, your preferences and the law.

## Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time at [victoria.simpson@andersonstrathern.co.uk](mailto:victoria.simpson@andersonstrathern.co.uk).

## Disclosure of your information

We may share and pass your Personal Information (including details of your purchasing preferences) with or to our holding companies, subsidiaries or associated companies in which we have an interest including, without limitation, any of our joint venture organisations (together, our “**associated companies**”).

We may also pass your Information to other carefully selected partner organisations (“**partners**”) with whom we have a business relationship, such as:

- our sponsors;
- financial services partners; and
- other organisations whose services we need to use to process and deliver your orders, for credit control and debt collection, to maintain our systems or to comply with legal obligations or a court order.

In the event of the integration of THE JONES FAMILY CHARITABLE TRUST with another party, we may disclose your details to advisers or prospective purchasers’ advisers.

We may also disclose your Personal Information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, to enforce or apply our terms and conditions and other agreements, or to protect our rights or property or those of our customers or others. This includes exchanging information with other companies and organisations for fraud protection and credit risk reduction.

Your Information is password-protected to prevent unauthorised access to it. We recommend that you do not divulge your password to anyone.

## 5. Security

We take the security of your Information seriously.

We have a committed security policy. We implement a number of security measures to ensure the safety of any Information in our possession or control. The Information is contained on a secure server, which is accessible only by a limited number of employees who have limited access rights to such information.

We have security procedures in place to protect our customer database from loss and misuse, and only allow access to it when absolutely necessary, and then under strict guidelines as to what use may be made of the Information contained within it.

## **6. Use of your Information outside the European Union**

Some of the organisations (including, without limitation, our associated companies and partners) to which we may disclose your Information are situated outside of the European Union. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please Contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

## **7. Policy for Children**

We realise and understand that children may visit the Website, or interact with THE JONES FAMILY CHARITABLE TRUST via another route, but encourage all persons under 13 to consult with their parents or legal guardian before submitting any content or information to THE JONES FAMILY CHARITABLE TRUST. Parents or legal guardians should, in particular, supervise children when online and recommend that parental control tools be put in place.

## **8. Changes to this Privacy Policy**

We aim to meet high standards and our policies and procedures are, therefore, constantly under review. From time to time we may change our security and privacy policies. Accordingly, we recommend that you check this page periodically, or request a copy of the current Privacy Policy from our Data Protection Officer, in order to keep up to date.

## **9. Updating and Correcting Information**

You may correct the Information we hold about you by changing your profile preferences online or by contacting the Data Protection Officer (see contact details below). Please include your name, address, and/or email address when you contact us. We would encourage you to update your Personal Information promptly if it changes.

## **10. Your Rights to Access Your Information**

As an individual, you have the following rights as a data subject under Data Protection Law in relation to the processing of your personal data:

- Request access to your personal data (a data subject access request), which enables you to receive a copy of the personal information we hold about you and the check that we are lawfully processing it.
- Request correction of the personal data that we hold about you, to have any incomplete or inaccurate information corrected.

- Request erasure of your personal data, so that we delete or remove personal data where there is no good and lawful reason for us to continue to process it (although in some cases we can refuse this request where we can claim exemptions as a data controller).
- Object to processing of your personal data where we are processing your personal data for direct marketing or where we are relying on a legitimate interest (of a third party) and there is something specific to your particular situation which gives rise to your objection.
- Request the restriction of processing of your personal data, through the suspension of our processing, e.g. where you want us to establish its accuracy or the reasons for the processing.

Request the transfer of your personal data to another party in an easily portable format.

## **11. How to Contact Us**

If you would like any further information or have any comments about our use of your Information, our Privacy Policy or any aspect of the Website or our service, please contact our Data Protection Officer by any of the methods shown below:

[Contact us](#)

Email: [Audrey.Souness@andersonstrathern.co.uk](mailto:Audrey.Souness@andersonstrathern.co.uk)

Telephone: 0131 625 8168

Post: The Secretary, The Jones Family Charitable Trust, Anderson Strathern LLP, 1 Rutland Court,  
Edinburgh EH3 8EY