

COOKIE AND PRIVACY POLICY

Last updated: March 2018

**WE ARE COMMITTED TO RESPECTING AND PROTECTING YOUR PRIVACY.
THIS POLICY SETS OUT WHAT WE DO WITH THE PERSONAL DATA WE OBTAIN FROM YOU
AND HOW WE DEAL WITH COOKIES**

We Us Our	HAMILTON MACKENZIE LIMITED a company registered in England and Wales under company number 06756062 and whose registered office is at TEN Lovat Lane, 10-13 Lovat Lane, London, EC3R 8DN
Site	http://www.hamiltonmackenzie.com/
You, Your	A visitor to the Site

1. Definitions and Interpretation

In this Policy the following terms shall have the following meanings:

Data	means collectively all information that you submit to us via the Site and this definition shall, where applicable, incorporate the definitions provided in the General Data Protection Regulation the General Data Protection Regulation (Regulation 2016/679) ("GDPR")
Computer	Includes all types of electronic device used to access the Site
Cookie	means a small text file placed on your computer by this Site when you visit certain parts of the Site and/or when you use certain features of the Site. Details of the cookies used by this Site are set out in Clause 12;
User	means any third party that accesses the Site and is not employed by Us and acting in the course of their employment;

2. Scope

2.1 This Privacy Policy is an integral part of the agreement between you and us concerning the use of the Site(s). The other integral parts of such agreement are the Terms of Service and any other legal notices that may be provided by Hamilton Mackenzie Limited. This policy explains who we are, why and how we process personal data and, if you are the subject of any of the personal data concerned, what rights you have and how to get in touch with us if you need to.

2.2 We reserve the right to amend this Privacy Policy at any time, for any reason. The date of the last revision to the Privacy Policy will be indicated by the "Last updated" date at the beginning of this page.

3. The Data We Collect

3.1 We may process personal data relating to you if:

- You are a customer or a supplier of ours (or are interested in becoming so).

- You use our products or services.
- You work for a customer or a supplier of ours, or for someone who uses our products or services.
- You are someone (or you work for someone) to whom we want to advertise or market our goods or services.
- You have expressed an interest in working for us.
- You visit the Site.

3.2 We collect some or all of the following information from time to time:

- name
- date of birth
- gender
- job title
- profession
- contact information such as email addresses and telephone numbers
- demographic information such as post code, preferences and interests
- IP address (automatically collected)
- web browser type and version (automatically collected)
- operating system (automatically collected)
- a list of URLs starting with a referring site, your activity on this Site, and the site you exit to (automatically collected)

4. What We Do With the Data We Collect

4.1 We may keep your personal data for up to 12 months or (if you have an account with us) for the life of that account (or as long as we are legally required to do so).

4.2 Unless the law tells us otherwise we will not disclose your personal data to any third party (except members of our group of companies and our affiliates). See Clause 5.

4.3 All your personal data is stored securely in accordance with the principles of the. For more details on security see Clause 12 below.

4.4 We use your personal data as follows:

- To enter into, and to perform, contracts with you or the person that you work for.
- To:
 - provide services to customers or other users of those services;
 - obtain goods and services from suppliers;
 - manage and administer our relationships with customers, suppliers or other users of our services;

where you or the person that you work for may be the relevant customer, user or supplier of goods or services for these purposes.

- To advertise and market, and provide information about, our services;
- To administer our website under our terms and for internal operations, including troubleshooting, and 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 for your computer.
- To keep our website and other systems safe and secure.
- To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising.
- To make suggestions and recommendations about services that may interest you or the person that you work for and subject to your stated preferences, where relevant.

5. Third Party Sites and Services

5.1 In order to operate the Site and deliver you any services we agree to provide to you we may share your data with appropriate third parties including business partners, customers, suppliers and sub-contractors for the performance of any contract we enter into or other dealings we have in the normal course of business with you or the person that you work for, as well as our auditors, legal advisors and other professional advisors or service providers such as analytics and search engine providers that assist us in the improvement and optimisation of our site and subject to the cookie section of this policy

5.2 Any third party getting data from us uses it only to the extent they need by them to do what we have asked them to do. Any use for other purposes is strictly prohibited. Any personal data that is processed by any third party will be processed strictly within the terms of this Policy and in accordance with the requirements of the GDPR and national law implementing and supplementing it.

6. Links to Other Sites

6.1 If we provide links to other Sites please note that we have no control over those sites and cannot be responsible for their content. Our Policy does not apply when you use a link we provide. You should always to read the privacy policy of any other sites prior before you use it.

7. Changes of Business Ownership and Control

7.1 From time to time our business will change and this may involve us selling some or part of our Company. The personal data you give us will, if it is appropriate, be transferred to any new owner but always under the terms of this Policy and they will only be allowed to use that data for the same purposes for which you supplied it to us.

7.2 Because of the number of users of our site we won't contact you in advance of any transfer.

8. Legal Basis for Data Processing

8.1 The legal basis on which we process your personal data is as follows:

- Where it is necessary to obtain your prior consent to the processing concerned in order for us to be allowed to do it (for example, direct marketing activities), we will obtain and rely on your consent in relation to the processing concerned (see Your Rights below).
- Otherwise, we will process your personal data only where the processing is necessary:
 - for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into such a contract;
 - for compliance with a legal obligation to which we are a subject; or
 - for the purposes of the legitimate interests pursued by us or another person, provided that this will only be in circumstances in which those legitimate interests are not overridden by your interests or fundamental rights and freedoms which require protection of personal data (most circumstances in which we process your personal data in relation to a relationship that we have with the person that you work for will fall into this category).

9. Location of Processing

9.1 The data that we process in relation to you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") that may not be subject to equivalent data protection law. It may also be processed by staff situated outside the EEA who work for us or for one of our suppliers. This includes staff engaged in, among other things, the fulfilment of orders, the processing of payment details and the provision of support services.

9.2 Where personal data is transferred in relation to providing our services we will take all steps reasonably necessary to ensure that it is subject to appropriate safeguards, such as relying on a recognised legal adequacy mechanism which may include by entering into EC approved standard contractual clauses relevant to transfers of personal information (see http://ec.europa.eu/justice/dataprotection/internationaltransfers/transfer/index_en.html) and that it is treated securely and in accordance with this privacy policy.

9.3 We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. All personal data processed by is stored on secure servers. Any payment transactions will be encrypted using appropriate technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website or systems, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

9.4 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 or warrant the security of your data transmitted to our website and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

10. Your Rights

10.1 You have the following rights in relation to personal data relating to you that we process:

- You may request access to the personal data concerned (see below).
- You may request that any incorrect personal data about you that we are processing be rectified.
- In certain circumstances (normally where the personal data has been provided by you and it is no longer necessary for us to continue to process it), you may be entitled to request that we erase the personal data concerned.
- Where we are processing personal data relating to you on the basis of your prior consent to that processing, you may withdraw your consent to processing, after which we shall stop the processing concerned.
- If you have a complaint about any processing of your personal data being conducted by us, you can contact us or, if you are based in the EU you can contact your local regulator.

10.2 You can withdraw your consent to any relevant processing of personal data or request access to your personal data:

- By emailing us at gdpr@hamiltonmackenzie.com OR
- By writing to us at the address below:

Data Protection Officer
Hamilton Mackenzie
TEN Lovat Lane
10-13 Lovat Lane
London
EC3R 8DN

10.3 Please note that we may be required to ask you for further information in order to confirm Your identity before we provide the information requested.

11. Security

11.1 Data security is very important to us and to protect your personal data we have put in place appropriate physical, electronic and managerial procedures to make sure that that data is secure.

12. Cookies

12.1 Our Cookies Policy is set out below:

How do we use 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 site.

We also use cookies in our marketing emails (which you may receive if you have provided us with your consent to contact you in that way) to enable us to review how users interact with our marketing. This helps us to tailor it more appropriately and make it more user-friendly.

Details of the specific cookies we use are set out below.

What are cookies and how do they work?

Cookies are pieces of information that a website transfers to your hard drive to store and sometimes track information about you. Most web browsers automatically accept cookies, but if you prefer, you can change your browser to prevent that and your help screen or manual will tell you how to do this. However, you will not be able to take full advantage of our website if you do so. Cookies are specific to the server that created them and cannot be accessed by other servers, which means they cannot be used to track your movements around the web. Although they do identify a user's computer, cookies do not personally identify users and passwords and credit card information are not stored in cookies.

You can read more about cookies at www.AboutCookies.org

What sort of cookies do we use?

We use the following types of cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website and under our terms with you. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us for our legitimate purposes to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us, subject to your choices and preferences, to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information subject to your choices and preferences to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

When do our cookies expire?

Except for strictly necessary cookies, all cookies used on our site will expire after 31 days.

How do you disable cookies?

The effect of disabling cookies depends on which cookies you disable, but in general the website may not operate properly if cookies are switched off. If you only disable third party cookies, you will not be prevented from making purchases on our sites. If you disable all cookies, you will be unable to complete a purchase on our sites. See below for details of how to use common types of browser to disable cookies.

Disabling cookies in Internet Explorer

Internet Explorer:

1. Choose the menu "tools" then "Internet Options"
2. Click on the "privacy" tab
3. Select the setting the appropriate setting

Disabling cookies in Google Chrome

Google Chrome:

1. Choose Settings> Advanced
2. Under "Privacy and security," click "Content settings".
3. Click "Cookies"

Disabling cookies in Safari

Safari:

1. Choose Preferences > Privacy
2. Click on "Remove all Website Data"

Disabling cookies in Firefox

Firefox:

1. Choose the menu “tools” then “Options”
2. Click on the icon “privacy”
3. Find the menu “cookie” and select the relevant options

Disabling cookies in Opera

Opera 6.0 and subsequent:

1. Choose the menu Files”> “Preferences”
2. Privacy

Other help we may provide

Where you have not set your permissions, we may also separately prompt you regarding our use of cookies on the Site.

How to get help

if you would like further information about our use of cookies, please contact us:

gdpr@hamiltonmackenzie.com

13. Changes to this Policy

13.1 We may change this Policy as we decide from time to time or as may be required by law. If we make any changes they will be posted on the site.