
WORTHAM JAQUES LTD WEBSITE PRIVACY POLICY

BACKGROUND:

This Policy applies as between you, the User of this Website and Wortham Jaques Limited the owner and provider of this Website. This Policy applies to our use of any and all Data collected by us in relation to your use of the Website. Please refer to our Privacy Notice for details of our general privacy policy.

1. Definitions and Interpretation

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

“Data”	means collectively all information that you submit to Wortham Jaques Limited via the Website. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998;
“Cookie”	means a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in Clause 12;
“WJ”	means Wortham Jaques Limited of 130a High Street Crediton Devon EX17 3LQ;
“UK and EU Cookie Law”	means the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
“User”	means any third party that accesses the Website and is not employed by WJ and acting in the course of their employment; and
“Website”	means the website that you are currently using (www.worthamjaques.com) and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. Scope of this Policy

This Policy applies only to the actions of WJ and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

3. Data Collected

Without limitation, any of the following Data may be collected by this Website from time to time:

3.1 name;

- 3.2 gender;
- 3.3 job title;
- 3.4 profession;
- 3.5 contact information such as email addresses and telephone numbers;
- 3.6 demographic information such as post code, preferences and interests;

4. **Our Use of Data**

- 4.1 Any personal Data you submit will be retained by WJ for six months or, if longer, the minimum period required by law.
- 4.2 Unless we are obliged or permitted by law to do so, and subject to Clause 5, your Data will not be disclosed to third parties.
- 4.3 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see Clause 11 below.
- 4.4 Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
 - 4.4.1 internal record keeping;
 - 4.4.2 improvement of our products / services;
 - 4.4.3 transmission by email of promotional materials that may be of interest to you;

5. **Third Party Websites and Services**

- 5.1 WJ may, from time to time, employ the services of other parties for dealing with matters that may include, but are not limited to, payment processing, delivery of purchased items, search engine facilities, advertising and marketing. The providers of such services do not have access to personal Data provided by Users of this Website.

6. **Links to Other Websites**

This Website may, from time to time, provide links to other websites. WJ has no control over such websites and is in no way responsible for the content thereof. This Policy does not extend to your use of such websites. Users are advised to read the privacy policy or statement of other websites prior to using them.

7. **Changes of Business Ownership and Control**

- 7.1 WJ may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of WJ. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Policy, be permitted to use the

Data for the purposes for which it was originally supplied to us.

- 7.2 In the event that any Data submitted by Users is to be transferred in such a manner, you will be contacted in advance and informed of the changes. When contacted you will be given the choice to have your Data deleted or withheld from the new owner or controller.
8. **Controlling Use of Your Data**
- 8.1 Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:
- 8.1.1 use of Data for direct marketing purposes; and
 - 8.1.2 sharing Data with third parties.
9. **Your Right to Withhold Information**
- 9.1 You may access certain areas of the Website without providing any Data at all. However, to use all features and functions available on the Website you may be required to submit certain Data.
- 9.2 You may restrict your internet browser's use of Cookies. For more information see Clause 12.
10. **Accessing your own Data**
- You have the right to ask for a copy of any of your personal Data held by WJ (where such data is held) on payment of a small fee which will not exceed £10.
11. **Security**
- 11.1 Data security is of great importance to WJ and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.
- 11.2 Specifically we use the following systems:
- 11.2.1 ESET Endpoint software
 - 11.2.2 SecurityMetrics website security assessments
12. **Cookies**
- 12.1 This Website does not place or access Cookies on your computer.
13. **Changes to this Policy**
- WJ reserves the right to change this Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the Policy on your first use of the Website following the alterations.