

## Wylie & Bisset Privacy Notice

### Introduction

Wylie & Bisset, a registered limited liability partnership (Ref: SO301911), with its registered office at 168 Bath Street, Glasgow, G2 4TP, is a data controller and is registered with the Information Commissioner (Ref: Z2617403).

In order to meet the principles of GDPR (2018), we commit to the following:

- Data is processed lawfully, fairly and transparently
- Data is processed for specific, explicit and legitimate purposes
- Processing is adequate, relevant and limited to the purposes set out
- Data is accurate and current
- Data is kept for no longer than necessary
- Data is held securely.

The rest of this document details our approach.

### Purpose of this Privacy Notice

This Privacy Notice tells you how we collect, process and look after your personal data that we collect when you visit our website (regardless of where you visit it from) and tells you about your privacy rights and how the law protects you. This website is not intended for children and we do not knowingly collect data relating to children from our website. It is important that you read this Privacy Notice, together with any other privacy notice we provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Notice supplements other notices and is not intended to override them.

### Changes to Privacy Notice

This version of our Privacy Notice was last updated on 25 May 2018. It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

### Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### Who we collect personal data about

Clients, where appropriate

Contacts, where appropriate

### What personal data we need to process

Wylie & Bisset is the 'Data Controller' and "Data Processor". This means we accept accountability and responsibility for personal information provided to us by you. We only collect basic personal

data about you which does not include any special sensitive types of information or location based information. We collect the following categories of personal data:

- **Identity and contact data** e.g. name, username or similar identifier, email address, other contact data.
- **Financial data/bank details**
- **Technical Data** e.g. internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** e.g. your interests, preferences and feedback.
- **Usage Data** e.g. information about how you use our website.
- **Marketing and Communications Data** e.g. your preferences in receiving marketing from us and your communication preferences; enquiries data.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

We do not collect any special categories of personal data about you, such as detail 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.

### **What we do with your personal data**

We will only use your personal data in accordance with the law. We will use your personal data in the following circumstances:

- to carry out our obligations arising from any contract entered into between you and us;
- to provide you with information and services that you request from us;
- to otherwise meet our legal obligations;
- to process financial transactions;
- to verify identity where required;
- to communicate with you by post, email or telephone;
- to provide you with email updates regarding news from Wylie & Bisset;
- to notify you about changes to our email update service;
- to analyse feedback or survey responses, with the aim of improving the services we provide;
- to understand your needs and how they may best be met;
- to help us develop or personalise the website to make it more useful for you and
- to maintain internal records.

### **Use of personal data for marketing**

We may use your contact information for marketing purposes. This includes contacting you with relevant newsletters, briefings, bulletins and other information about our services. We may invite

you to events and measure our communications to ensure that the content that we create is relevant and useful. Our lawful basis for this is your consent. You have the right to withdraw this consent or amend your marketing preferences at any time by contacting our marketing department ([info@wyliebisset.com](mailto:info@wyliebisset.com)) or clicking on the unsubscribe or preferences option on the bottom of all marketing emails.

Wylie & Bisset utilise MailChimp for sending out marketing material and your email and name are stored within MailChimp.

### **How we collect personal data**

We collect and process personal data about you when you:

- request information from us;
- correspond with us by phone, email or otherwise;
- fill in an online form;
- request email news alerts, or annual report notifications;
- visit our website or
- provide feedback on our website or respond to a survey.

### **Legal basis for processing personal data and retention periods**

The table below lists the personal data we are processing, linked to the purpose of that processing. It also identifies the legal basis (one or more) that we rely on for that processing and the period for which we retain that personal data, or the criteria we use to determine that retention period. Where we are relying on legitimate interests as a legal basis for processing, we have identified in the table what those legitimate interests are. Generally, we do not rely on consent as a legal basis for processing. However, if we do seek consent to process your personal data, e.g. for marketing purposes, that consent will be sought from you specifically, through an opt-in mechanism.

<b>Purpose</b>	<b>Type of data</b>	<b>Lawful basis for processing including basis of legitimate interest</b>	<b>Retention period/criteria to determine retention period for personal data</b>
To register you as a subscriber to our updates	(a) Identity (b) Contact	Performance of a contract with you	As appropriate and per our Retention Policy
To process and deliver your updates	(a) Identity (b) Contact	Performance of a contract with you	As appropriate and per our Retention Policy
To manage our relationship with you, including notifying you about changes to our terms or Privacy Notice and asking you to provide feedback or responses to surveys.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how subscribers to our update service use that service)	As appropriate and per our Retention Policy
To administer and protect our organisation and website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (provision of administration and IT services and network security) (b) Necessary to comply with a legal obligation	As appropriate and per our Retention Policy
To use data analytics to improve our website, services and for marketing.	(a) Technical (b) Usage	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)	As appropriate and per our Retention Policy
Personal Tax		Performance of a contract with you	6 Years from 31 January following the end of the tax year
Corporate Tax		Performance of a contract with you	6 years from the end of the company financial year to which it relates
Audit		Performance of a contract with you	6 years from the date of signing of the audit report for

			the financial year to which it relates
Accounts		Performance of a contract with you	7 years
Payroll		Performance of a contract with you	7 years
Bankruptcy Details		Performance of a contract with you	10 years

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with email update services). In such cases, we may have to cancel the service you have with us. In such cases, we will notify you of this at the time.

### **Who we share personal data with**

We may need to share some of your personal data with third parties in order to fulfil our purposes and for those third parties to provide services to us to support our operations and activities. When we share personal data with a third party, either another data controller or a data processor, we will always make sure that we have the necessary contracts in place to ensure the security of your personal data, that those third parties act on our instructions and do not use the personal data for their own purposes. We will only share your personal data in accordance with the law. All the third parties with whom we share personal data are required to take appropriate security measures to protect your personal data in line with our own policies and to comply with Data Protection law and with their own policies too. We may also need to share your personal information with a regulator to comply with the law.

Examples of third parties we may share personal data with include:

- administrative database providers
- contract management
- document storage companies
- email marketing providers
- postal direct mail providers
- IT services including cloud storage providers
- consultancy organisations who may analyse our data
- professional advisers
- regulatory bodies

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. Cookies are small text files sent to your computer and stored by your browser. They are used to remember browsing information. Because of cookies, your web browser can remember you are logged in, whether you have visited our site before and what your preferences are. Cookies help us to provide you with a good experience when you browse our website and also allows us to improve our site. Although cookies contain identifying information, the cookies we use do not contain any information that identifies you personally and they allow us to recognise your computer or mobile device when you return to our website. For detailed information on the cookies we use and the purposes for which we use them see our cookie policy.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which we consider allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Details of these measures are available in our IT Security Policy. We also limit access to your personal data to those employees, agents, contractors, professional advisers and other third parties who have a 'need to know'. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. [Details of these measures may be obtained from our DPO – [dpo@wyliebisset.com](mailto:dpo@wyliebisset.com)]. We have put in place procedures to deal with any suspected information security incidents that could result in a personal data breach and will notify you and any applicable regulator of a suspected breach, where we are legally required to do so.

## International transfers

All personal data is processed in the UK by our staff or by people acting on our behalf and with our authority. However, for the purposes of IT hosting and maintenance, we use data processors located within the European Union. No Third Parties have access to your personal data unless the law allows them to do so. We do not transfer your data outside the EEA.

We have a Data Protection regime in place to oversee the effective and secure processing of your personal data. More information on this framework can be found on our website.

## Your rights in connection with your personal data

Under certain circumstances, you have the right by law to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of your data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal data for direct marketing purposes.
- **Request the restricting of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

- **Request the transfer** of your personal data to another party.
- **Request that a decision made using automated processing** of your personal data which significantly affect you, be reviewed by an individual to whom you may make representations and contest the decision. This right only applies where we use your information with your consent or as part of a contractual relationship with you.
- **Withdraw your consent to our use of your personal data for a specific purpose**, at any time, where our use of your personal data for the purpose relies on consent as a legal condition for that use.

If you want to exercise any of these rights please contact our Data Protection Officer at [dpo@wyliebisset.com](mailto:dpo@wyliebisset.com)

### **No fee usually required**

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

### **Contact details for Data Protection Officer**

We have appointed a Data Protection Officer (DPO) who is responsible for overseeing any questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any request to exercise your legal rights under Data Protection Law, please contact the DPO using the details set out below:

Allan O'Hagan, IT Director  
Email: [dpo@wyliebisset.com](mailto:dpo@wyliebisset.com)  
Tel : 0141 566 7000

168 Bath Street  
Glasgow  
G2 4TP

### **Complaints**

If you have a complaint or concern about the way in which we handle your personal data, you have a right to raise a complaint with the Information Commissioner's Office. The ICO website contains details of how to make a complaint: <https://ico.org.uk/> or you can contact the ICO by phone: 0303 123 1113.

### **Further information**

For further information about any aspect of this notice please contact our Data Protection Officer at [dpo@wyliebisset.com](mailto:dpo@wyliebisset.com)