

Website Privacy

How We Use and Manage Your Data

Key Information

Julian Worricker (“JW”) respects your right to privacy. We put in place security measures for your personal data and manage your personal data in accordance with applicable data privacy regulations.

Please note that JW is the Data Controller of your personal data. The principles set out in this Privacy Notice apply to all instances in which JW receives your personal data as a Data Controller for the purposes described in this notice. Those purposes are processing of data in order to participate in the various activities available on this website or as mentioned below.

We asked ourselves a number of key questions that we believe you would like answered about the personal data that you submit to JW. These answers will, to the extent required by applicable law, inform you of your rights relating to your personal data, the security measures that JW puts in place with regard to your personal data and the uses to which such personal data is put. We trust you find this information helpful.

If you have any requests concerning your personal data or any queries with regard to these practices please contact JW using the contact details given below.

1. Personal data JW collects through this website and how JW collects it?

You can provide your personal data if you wish. We only collect personal data that YOU want to provide to us or that is needed to provide (and improve) our service to you. We collect personal data directly such as name, age, gender, address and email address as well as connection and system information. The legal basis for the processing of your personal data is your consent and/or any other applicable legal basis, such as our legitimate interest in engaging in commerce and offering products and services of value to you. Any consent you provide may be withdrawn at any time by contacting us via one of the methods listed below.

You may want to give us your email address, name, telephone number etc. so that we can provide you with information on our products; enter you into our competitions or surveys; respond to your questions or comments; or just keep you updated about any exciting developments at JW that you are interested in. Some website functionality may be unavailable to users who do not provide their data, or who do not consent to the use of Cookies and similar technologies on this site. Additionally, if you choose not to provide your personal data, we will not be able to provide you with our products or services or with other support or responses.

Alternatively, you may want to develop your career with JW and apply for job vacancies by sending us your CV.

2. JW Security Measures

JW takes security measures in line with data protection regulations. JW has security measures in place designed to prevent data loss, to preserve data integrity, and to regulate access to the data. Only authorised JW employees, and authorised employees of our Third-Party service providers' processing data on our behalf, have access to your personal data. All JW employees who have access to your personal data are required to adhere to the JW Privacy Notice and all third-party service providers are requested by JW to ensure that any of their employees who have access to your personal data have signed non-disclosure agreements. In addition, contracts are in place with such third-party service providers acting as data processors for JW that have access to your personal data, to ensure that the level of security required in your jurisdiction is in place, and that your personal data is processed only as instructed by JW.

Please see Question 4 – Who does JW disclose your personal data to and why?

3. How JW uses your personal data

Your personal data will only be used for the purposes for which you provided it to JW, as indicated to you at the time you provided your personal data. It will also be used to administer, support and obtain feedback on the level of our services, to help prevent breaches of security, the law or our contract terms, and for direct marketing purposes. It may also be disclosed, including a disclosure to entities based outside the European Economic Area ("EEA"), to third parties (as part of the information generally contained in business) in the event of a sale of the business, or a reorganisation of the business, or as otherwise required or permitted by law or applicable regulator.

4. Who JW discloses your personal data to and why

JW will never share your personal data with any Third-Party (i.e., a party other than an entity within the JW Group) business organisation that intends to use it for their own purposes, other than as required by law. JW, as part of a worldwide group, may transfer or disclose your personal data to another data controller in the JW Group to be used for similar purposes, at its discretion, and you hereby consent to such transfer or disclosure. If your personal data is transferred or disclosed to another data controller within the JW Group, that other data controller shall have the same rights and obligations with regard to your personal data as JW.

With your consent, JW may share your personal data with Third-Parties (i.e. parties other than entities within the JW Group) such as those who assist us in providing the products and services and who perform technical operations, but only in the strictly limited circumstances set out below:

- Our “Third-Party Data Processors” (service providers such as our fulfilment and activation partners, and digital agencies, hosting providers, data storage providers and other technical partners) who help us administer this website, or process the data submitted to it, may have access to your data. Some of these business partners may be located outside the country where you accessed this website.

5. Your rights

You have the right to ask JW to provide you with all the information it stores on you. You have the right to ask JW to rectify, block, complete and delete your personal data, to restrict its use, and to port your data to another organisation. You have the right to request additional information about the handling of your personal data. You also have the right to object to the processing of your data by JW in some circumstances and, where we have asked for consent to process your data, to withdraw this consent. Additionally, you may contact us via the methods laid out below if you would like assistance with any of the aforementioned rights.

There are exceptions to these rights, however. For example, access to personal data may be denied in some circumstances if making the information available would reveal personal information about another person or if JW is legally prevented from disclosing such information. In addition, JW may be able to retain data even if you withdraw your

consent, where JW can demonstrate that it has a legal requirement to process your data.

6. Countries your personal data will be sent to and why

Your personal data may be transferred across international borders. It may be transferred to countries that have different levels of data protection laws to the country from where you submitted your personal data. JW (as Data Controller and Data Exporter) has, where local data protection regulations so require, put in place security measures for the export of personal data from its jurisdiction. Where local data protection regulations so require, JW has made arrangements with entities receiving your personal data such as Third-Party Data Processors, that they shall ensure that security measures are in place, and that your personal data is processed only in accordance with EU Data Protection laws.

If data is transferred from within the EEA to a jurisdiction outside the EEA, it is done so under a Data Transfer Agreement, which contain standard data protection contract clauses. The European Commission has adopted standard data protection contract clauses (known as the Model Clauses) which provide safeguards for personal information that is transferred outside of Europe. We use Model Clauses when transferring personal data outside of Europe. If you wish to know more about international transfers of your personal data, you may contact us via the methods laid out below.

The server that makes this website available may be located outside the country from which you have accessed this website. The provider of this website is bound by a contract that ensures your data is managed in accordance with EU Data Protection laws and that it acts only on JW instructions and implements all technical measures necessary on an ongoing basis to keep your personal data secure.

7. How and why JW uses ‘Cookies’ and other similar technologies

JW does make use of Cookies, which are small text files that are placed on your computer by websites that you visit, or certain emails you open and other similar technologies such as web beacons. Such technologies are widely used in order to make websites work, or work more efficiently, as well as to provide business and marketing information to the owners of the site, to gather such personal data as browser type and operating system, referring page, path through site, domain of ISP, etc. for the purpose

of understanding how visitors use this website. Cookie and similar technologies help us tailor this website to your personal needs.

This type of information obtained through cookies will not be disclosed outside JW Group or our authorised Third-Party Data Processors. It will not be used for unsolicited communications.

Cookies located on your computer do not contain your name but an IP address. In many case, after the user's session is cancelled the information contained in the cookies is no longer available to JW.

Please ensure that your computer setting reflects whether you are happy to accept cookies or not. You can set your browser to warn you before accepting cookies, or you can simply set it to refuse them, although you may not have access to all the features of the website if you do so. See your browser "Help" button for how you can do this. Some cookies may not be affected by such settings. You do not need to have cookies on to use or navigate through many parts of this website. Remember that if you use different computers in different locations you will need to ensure that each browser is adjusted to suit your cookie preferences.

For further information about Cookies including how to refuse them, please visit www.allaboutcookies.org

8. Website customisation

With your consent, and as set out below, we may use the data you give us about yourself when you register online to build up a picture of your interests – so we may then try to ensure that when you visit the site, you don't miss the offers and information relevant to you.

JW and its reputable third party advertising companies acting on its behalf will collect website usage information about visitors to our website for the purposes of statistical analysis, sales and marketing research, tracking page usage and paths used by visitors through our site, targeting the site content, targeting our marketing campaigns and direct marketing emails, targeting our Internet banner advertisements on our website and on other websites and tracking use of our Internet banner advertisements and other links from our marketing partners' websites to our website.

We may also combine this web usage data with other information we have collected about you, for example, whether you have arrived at our site through a marketing email sent to an individual account, data about your user registration (if you have logged in), and web usage data stored against a previous cookie set on your machine. We store this information so that we have a better and more specific understanding of the way customers are using our site and their preferences and interests. We may use it to undertake sales and marketing research and to tailor our site, our marketing campaigns and email communications specifically to you.

9. JW's policy on collecting data from children

We do not collect personal data from children under the age of 16.

10. Changes to the terms of this Privacy Policy

JW will occasionally make changes and corrections to this Privacy Policy. If we believe that the changes are material, we'll let you know by doing one (or more) of the following: (1) posting the changes on this site, or (2) sending you an email or message about the changes. We will also give you the opportunity to consent to these material changes. Changes will be effective upon the posting of the changes and your acceptance of the changes, which may be through your continued use of the site after the changes take effect.

11. Retention of your personal data

JW will retain your information only for as long as is necessary for the purposes set out in this policy. JW will retain and use your information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your information to comply with applicable tax/revenue laws), resolve disputes, and enforce our agreements. We also retain log files for internal analysis purposes. These log files are generally retained for a short period of time, except where they are used for website security, to improve website functionality, or we are legally obligated to retain them for longer time periods.

12. How to contact JW

The data controller responsible for your personal information for the purposes of the applicable European Union data protection law is Julian Worricker.

If you have any questions about this Privacy Notice or our data collection practices, please contact us via the contact form on the website, and specify your country of residence and the nature of your question.