

**Customers and Members Data Protection Policy**  
**GW/GOV/010**

Date first approved by Management Committee.	
Review date	biannually unless otherwise required
Date last approved by Management Committee and version.	Version 3 10 June 2025
Responsibility for monitoring and review of policy.	Craig MacRitchie, Distillery Manager

**GlenWyvis Distillery Customers and Members Data Protection Policy**

**1. GENERAL**

- a. This Privacy Policy ("**Privacy Policy**") is provided by GlenWyvis Distillery Limited. based at GlenWyvis Distillery, 1 Upper Dochcarty, Dingwall, IV15 9UF.
- b. This Privacy Policy describes how and when we collect your personal information, what that information may be used for, who uses it, when it may be disclosed to other parties, how you can access your details and seek correction of your details, the control your own personal information and how you can contact us.
- c. By visiting the GlenWyvis website ([www.glenwyvis.com](http://www.glenwyvis.com)) ("**Website**"), you are deemed to have read, and agree to be bound by, this Privacy Policy.

**2. NOTICE**

This Privacy Policy serves as a notice pursuant to The General Data Protection Regulation 2016 which replaces the EU Data Protection Directive of 1995 and supersedes the laws of individual Member States that were developed in compliance with the Data Protection Directive 95/46/EC. Its purpose is to protect the "rights and freedoms" of natural persons (i.e. living individuals) and to ensure that personal data is not processed without their knowledge, and, wherever possible, that it is processed with their consent.

- a. We may vary or update this Privacy Policy from time to time. We will notify you of these changes to our Privacy Policy on our Website. Please check our Website regularly for updates to our Privacy Policy.

**3. INFORMATION COLLECTION AND USE**

- a. We may collect and hold personal information/data ("**Personal Information**") about you as a consequence of processing your order for goods or managing your

## Customers and Members Data Protection Policy

### GW/GOV/010

membership of our community benefit society, that is, information that can identify you including without limitation full name, postal and email address, other contact details, identification details, payment details, investment information, and other information relevant to providing you with the services or goods that you are seeking, which we receive from you through our Website, Emails or social media sites.

- b. You are responsible for ensuring that the Personal Information you provide us is accurate, complete and not misleading and that such Personal Information is kept up to date.
- c. We may collect Personal Information in one or more of the following circumstances or for one or more of the following purposes:
  - 1. to process your order for goods and for other operational and administrative purposes, including without limitation, processing bills and payments, manage your account;
  - 2. to provide you with customer support and services;
  - 3. to undertake various activities that are required by law;
  - 4. for administrative, operational, marketing, planning, product or service development, troubleshooting and research requirements;
  - 5. to send you information on products and services, and special or promotional offers, newsletters or customer survey forms and questionnaires;
  - 6. to manage your membership of the community benefit society including calling you to our annual general meeting;
  - 7. to resolve disputes and;
  - 8. for any purpose made known to you at the time of collection of your Personal Information (collectively referred to as “**Purposes**”).
- d. At any time, you may opt-out of receiving marketing communications from us by contacting us (see the CONTACTING US section below) and we will ensure that your name is removed from our mailing list.
- e. We use general, aggregated information to generate statistics and measure sales activity to help us manage our business. Such information does not include Personal Information.
- f. We may disclose your information:
  - 1. to affiliates, advisors, contractors, vendors or service providers for the purposes of operation and maintenance of our Website or our business, for

- cross-promotional purposes and to otherwise provide customer support and services to you;
  - 2. to other third parties with whom we have commercial relationships, for marketing, advertising and related purposes, unless you have indicated that you do not wish for us to disclose to such third parties for marketing and advertising purposes;
  - 3. social media websites; and
  - 4. as required or authorised under law or provided in co-operation with any governmental authority.
- g. If you fail to provide us with Personal Information stated in paragraph 3(a) above, we may not be able to perform and/or carry out any of the Purposes.

Unless covered by any of the preceding points, your information will not be disclosed to any third parties without first receiving your prior consent.

#### **4. MARKETING AND PROMOTIONAL COMMUNICATIONS**

- a. We may use the Personal Information provided to send you information on products and services, and special or promotional offers, newsletters or customer survey forms and questionnaires unless you have indicated that you do not wish to receive such materials.
- b. You may **opt out** of receiving any communications from us at any time by contacting us with your request (see the CONTACTING US section below).

#### **5. SECURITY OF YOUR PERSONAL INFORMATION**

- a. We will take reasonable steps to protect any Personal Information we receive from you via our Website or other sources from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form or retain third parties to hold that information on our behalf. Where required by applicable laws, Personal Information will be destroyed or de-identified when no longer needed.
- b. By providing us with Personal Information or using our services or our Website, you consent to the transfer, storage and processing of Personal Information to our password-protected, cloud-based filing systems.
- c. However, as the Website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us and you do so at your own risk.

## Customers and Members Data Protection Policy

GW/GOV/010

### 6. LINKS TO OTHER WEBSITES

- a. Our Website may contain links to websites operated by third parties (“**Third Party Websites**”). We are not responsible for the privacy practices or the content of Third Party Websites. Third Party Websites are responsible for informing you about their own privacy practices.

### 7. ACCESS AND CORRECTION

- a. You may request access to any Personal Information we hold about you at any time by contacting us (see the CONTACTING US section below). Where we hold information that you are entitled to access, we will endeavour to provide you with suitable means of accessing it (e.g. by emailing or mailing it to you).
- b. If you believe that the Personal Information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the Personal Information stating that you disagree with it.

### 8. COOKIES

- a. We use cookies in our Website to:-
  1. maintain your session and required details when you browse our Website or during registration (session cookie);
  2. collect website usage data for statistical/analytics purposes (analytics cookie);
- b. You may instruct your browser, by changing its setting, to stop accepting cookies or to prompt you before accepting a cookie from the websites that you visit. Note that our Website will not function properly if the cookie setting is disabled.

### 9. CONTACTING US

- a. If you have any questions about our Privacy Policy, or any concerns or a complaint regarding the treatment of your privacy by us please contact us at:- [info@glenwyvis.com](mailto:info@glenwyvis.com).

## 10 BACKGROUND INFORMATION

### 1. WHY DO WE PROCESS YOUR PERSONAL INFORMATION?

- a. **Manage your membership of the GlenWyvis community benefit society or administer your order for goods or services** – when you invest in the company or

make a purchase of one of our products, we will process your personal information, including your full name, postal and email address, contact information, payment and credit card information and other information that will be relevant in order for us to complete registering you for membership where appropriate and keeping proper records of your transactions with us.

- b. **Provide our marketing and promotional items to you** – we may send you information and updates on our products, including the latest newsletters, promotions or deals, competitions, responses to your inquiries, updates on our website, or changes to our terms and conditions and policies.
- c. **Enhance the provision of our services** – from time to time, we may perform market research in the form of surveys in order to obtain your thoughts on our products and services and how we can improve and further develop our services to serve our members and customers better. We may also conduct advertising campaigns and even promotional activities in relation to our products and services.
- d. **Others** – for any other purposes mentioned at paragraph 3(c) of the Privacy Policy or any other purposes made known to you at the time of collection of your personal information or as required by applicable laws.
- e. Please note that we will only process your personal information on one or more of the following legal principles:
  - 1. That you have provided your consent;
  - 2. The processing of your data is necessary for the performance of your instructions to us;
  - 3. To comply with our legal obligations (i.e. to keep tax records);
  - 4. The processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except where such interests are overridden by your interests or fundamental rights and freedoms.

## **2. HOW LONG WILL WE RETAIN YOUR PERSONAL INFORMATION?**

- a. We will retain your personal information for the duration that shall be necessary to achieve the purpose for which such information was collected, which shall usually be during the duration of our contractual relationship and for any period thereafter as permitted by applicable laws (i.e. until you have withdrawn your consent for us to retain your personal information).

## **3. WHAT RIGHTS DO YOU HAVE?**

- a. **Access, Correction and Erasure:** You have the right to obtain a copy of your personal information from us, receive information on how your personal data is being

## Customers and Members Data Protection Policy

### GW/GOV/010

processed, request for updates or corrections on your personal information, and also the right to request for erasure/deletion of your personal information.

- b. **Right to object to the processing of your data:** You have the right to request us to cease processing your information for direct marketing purposes, including profiling. We will no longer process your personal data unless we are able to demonstrate compelling legitimate grounds for the processing which overrides your interests, rights and freedoms for the establishment, exercise or defence of legal claims.
- c. **Right to restrict the processing of your data:** You have the right to request for us to restrict the processing of your data, (i) while we are in the process of verifying the accuracy of your data and subsequently updating your personal data; (ii) where the processing is unlawful and you oppose the erasure of your data and request to restrict the processing of the data instead; (iii) where we no longer require your data, but you may require for us to retain the same for the establishment, exercise or defence of legal claims; or (iv) where you have submitted an objection to processing pending the verification whether our legitimate grounds override your interests, rights and freedom.
- d. **Right not to be subjected to automated individual decision-making, including profiling:** With your consent, we are able to process your data and make automated decisions, including profiling, in order to be able to offer certain benefits based on your characteristics. However, you have a right to request for human intervention and can request for us to not subject your data to automated decision making/profiling.
- e. **Right to data portability:** You have a right to request for us to provide your personal data (which we obtained based on your consent) to a third party in a structured, commonly used and machine-readable format.
- f. **Right to withdraw your consent:** You are entitled to withdraw your consent to any processing that we conduct on your personal information.
- g. To do any of the above, please contact us at [info@glenwyvis.com](mailto:info@glenwyvis.com) (other details and contact information are available at paragraph 9 of our Privacy Policy).

#### 4. TRANSFER OF YOUR PERSONAL DATA

- a. If we have to make any transfers of personal data, we will ensure that we provide appropriate safeguards in accordance with the GDPR.

#### 5. MISCELLANEOUS

- a. If you have any concerns with our personal data policies or the exercise of your rights, you may contact us at [info@glenwyvis.com](mailto:info@glenwyvis.com) or the supervisory authority