

MAY 24, 2018

WESTLETON DRAKE
WEBSITE POLICY
POLICIES AND PROCEDURES FOR GDPR COMPLIANCE



BACKGROUND:

Westleton Drake Ltd. understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits our website, www.westletondrake.com (“Our Site”) and will only collect and use personal data derived from your use of Our Site in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site.

1. Definitions and Interpretation

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

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 6, below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“personal data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
“We/Us/Our”	means Westleton Drake Ltd.

2. Information About Us

Our Site is owned and operated by Westleton Drake Ltd.

3. What Does This Policy Cover?

This Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. Your Right to Withhold Information

4.1 You may restrict Our use of Cookies.

5. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). Under the GDPR, no fee is payable, and We will provide any and all information in response to your request free of charge. Please contact Us for more details by emailing governance@westletondrake.com.

6. Our Use of Cookies

- 6.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our service.
- 6.2 We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.
- 6.3 All Cookies used by and on Our Site are used in accordance with current Cookie law.
- 6.4 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 6.5 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

6.6 The following first party Cookies may be placed on your computer or device:

Cookie Name	Purpose	Strictly Necessary
PHPSESSID	An anonymous PHP session to identify the user during the course of a single session, which helps the user experience when moving around the site.	Yes
<i>_stripe_sid</i> & <i>_stripe_mid</i>	These cookies assist us in being able to take your payment online – their purpose is functionality.	Yes

6.7 Our Site uses analytics services provided by Google. Website analytics refers to a set of tools used to collect and analyse anonymous usage information, enabling Us to better understand how Our Site is used. This, in turn, enables Us to improve Our Site and the products and services offered through it. You do not have to allow Us to use these Cookies, however whilst Our use of them does not pose any risk to your privacy or your safe use of Our Site, it does enable Us to continually improve Our Site, making it a better and more useful experience for you.

6.8 The analytics service(s) used by Our Site use(s) Cookies to gather the required information.

6.9 The analytics service(s) used by Our Site use(s) the following Cookies:

Cookie Name	First/third party	Provider	Purpose
<i>_ga</i>	First	Google	Analytics identifier – used to distinguish unique visitors to the website.
<i>_gid</i>	First	Google	Analytics identifier – used to distinguish unique visitors to the website.
<i>_gid</i>	First	Google	Used for “throttling” the use of Google analytics

- 6.10 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all cookies or only third-party cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.
- 6.11 You can choose to delete Cookies on your computer or device at any time, however you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.
- 6.12 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

7. Contacting Us

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at governance@westlondrake.com.

8. Changes to Our Cookie Policy

We may change this Cookie Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of our Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.