

PUREMALT PRIVACY AND COOKIES POLICY

What is in this policy?

Contents

What is in this policy?	1
Introduction	3
Who are we?	3
What does this policy cover?	3
What does this policy not cover?	3
What personal data do we collect/store?	3
Where does PureMalt collect user's data from?	4
Have we obtained it fairly?	4
Do we have a defined policy on retention periods for all items of personal data, from customer, prospect, and vendor data to employee data? Is it compliant with the GDPR? Are we ensuring we aren't holding it for any longer than is necessary and keeping it up to date?	
Do we review and audit the data we hold regularly?	4
How long will PureMalt keep my personal information?	4
Are we keeping data safe and secure?	4
Are we collecting or processing any special categories of data (biometric or genetic data) and do we meet the relevant criteria for it?	4
Are we transferring the personal data outside the EU and if so, do we have adequate protections in place?	5
Do we update our privacy policy to comply with GDPR?	5
How can PureMalt use my personal information?	5
When will PureMalt use my information to contact me?	5
Will I be contacted for marketing purposes?	5
When does PureMalt share my personal information with others?	5
What are my rights?	6
Cookies	6
Cookies Policy	6
What is a cookie?	6
Consent to process your data	7
Control your cookie settings	7

PureMalt Products Ltd Victoria Bridge Haddington East Lothian Scotland EH41 4BD











Responsible Ingredient Innovation

What is a cookie?	7
Cookies and similar technologies	7
How does this website use cookies?	8
Your browser settings	10
Functional cookies	10
Analytical cookies	10
Advertising cookies	10
Third party	11
How can I contact PureMalt?	11
What types of personal information do we collect?	11
How/when do we collect personal information?	12
Purposes for which your personal information is used	13
Legal basis for the processing of personal information	14
Disclosure of your personal information	14
International data transfers	15
Public areas of our websites and apps	15
Information security	16
Your rights	16
How to make a complaint	17
How long will we retain your personal information for?	17
Interfaces with Third-Party Websites and Services	17
Cookie overview	17
How to contact us:	17















Introduction

Our customers are at the heart of what we do. This Privacy and Cookie Policy applies to personal information collected by or on behalf of PureMalt. It sets out what we do with your personal information, how we keep it secure and explains the right that you have in relation to your personal information.

Who are we?

We are PureMalt Products Ltd., award winning manufacturers of food and beverage ingredients, for the Alcohol-Free, Brewing, Meat-Free, Savoury and Bakery, Confectionery and Dessert industry segments. We believe in responsible ingredient innovation for healthier, more natural recipes. Based in East Lothian, Scotland, we supply malt extracts to more than 70 countries globally.

What does this policy cover?

This policy covers PureMalt Products Ltd.'s use of cookies and their commitment to maintain the privacy of user's data.

What does this policy not cover?

This policy does not cover PureMalt Products Ltd.'s commitment to maintaining employee's privacy.

What personal data do we collect/store?

We collect:

- Personal information (Names, email address, address, phone numbers and other relevant personal information)
- Device information (Operating system, device type and other relevant personal information)
- Webpage usage (how you interact with our page so we can continuously make improvement to our user's experience we will collect data on: page views, session length, email data, website interactions and any other relevant website or online usage)
- Information you supply to PureMalt
- Device information (collected from website usage)
- Location information (collected from website usage)
- How you use PureMalt services (collected from website usage)















Where does PureMalt collect user's data from?

Through our website and digital/online presence (through www.puremalt.com as well as websites including google ads, google analytics, Facebook, Instagram, and LinkedIn).

We will collect information you provide to us through form submissions and interactions with our website www.puremalt.com as well as through email interaction.

Have we obtained it fairly?

We will only obtain data submitted with consent, and we comply with the <u>Data Protection Act 2018</u> to only hold necessary and relevant information allowing us to provide useful and relevant content.

You have the right to unsubscribe or request we delete your records at any time.

Do we have a defined policy on retention periods for all items of personal data, from customer, prospect, and vendor data to employee data? Is it compliant with the GDPR? Are we ensuring we aren't holding it for any longer than is necessary and keeping it up to date?

PureMalt update data when new data is provided, and only keep the data for as long as necessary. Data will be deleted upon request. Unless we are not allowed to.

We will hold the data for as long as necessary and as data becomes no longer relevant, the data will be removed from the database.

Do we review and audit the data we hold regularly?

We monitor the data we hold and regularly undertake tasks to clean the database as to not hold unnecessary or outdated data.

How long will PureMalt keep my personal information?

PureMalt will only hold the data for as long as it is necessary and relevant for PureMalt to use the data for communication or marketing uses.

Are we keeping data safe and secure?

Access to our contact database is password protected (multi factor authenticated) and only available to a select group of PureMalt employees, for whom it is necessary to be able to process the information.

The information provided is also available to our software/application providers (<u>Croft Communication Services</u>, <u>HubSpot</u>, <u>Facebook</u>, <u>LinkedIn</u>, <u>Instagram</u>, <u>Google ads</u>, <u>Google analytics</u>, <u>Zoom</u>, <u>Microsoft</u> and more). We are careful in our selection of applications/software providers as to protect your data.

Are we collecting or processing any special categories of data (biometric or genetic data) and do we meet the relevant criteria for it?

We do not collect or process any biometric or genetic data.















Are we transferring the personal data outside the EU and if so, do we have adequate protections in place?

Where possible we will not transfer data outside the EU. However, through working with some of our partners e.g HubSpot where it is necessary to transfer data outside of the EU wherever personal data is transferred outside its country of origin, each party will ensure such transfers are made in compliance with the requirements of data protection laws.

Do we update our privacy policy to comply with GDPR?

This is the first iteration of our privacy policy, we endeavour to update this policy as relevant or as there are changes made to the UK Data Protection Act. This is a controlled document and will be reviewed annually.

How can PureMalt use my personal information?

- To deliver our services and products, and to provide you with information about them
- To deal with your requests, complaints, and enquiries
- To personalise services and give you things more tailored to your tastes
- To contact you about various subjects

When will PureMalt use my information to contact me?

- To update you on any changes to PureMalt
- To contact you about any service or activity you've signed up for.
- To answer you when you've contacted us, or to respond to a comment or complaint
- To invite you to take part in surveys about PureMalt
- For marketing purposes

We'll only contact you when necessary or when you've given us permission.

Will I be contacted for marketing purposes?

PureMalt reserves the right to contact you for marketing purposes unless you have unsubscribed from emails or updated your preferences to remove yourself from marketing communications.

When does PureMalt share my personal information with others?

PureMalt never sell your personal information. PureMalt does share it with others in these ways:

- When you make something public (Like a post or comment which the public can see).
- When we use other companies to power our services (Including: HubSpot, Google ads, Google analytics, Zoom, Microsoft, LinkedIn, Facebook, Instagram and more).











EH41 4BD



In order for us to give you quality experiences and to understand how you are using our services we often use other companies to process your personal information on our behalf. For example, sending you emails about things we think might interest you, to ask you what you think about our services, or to analyse data on how people use our digital services so we can improve them.

We make sure that your personal information is looked after as if we were handling it directly. We carefully select these companies, only share with them what they need to do the work and we make sure they keep your information secure.

What are my rights?

Remember, you're in control of your personal information.

You have the right to:

- Request a copy of your information.
- To ask us to correct information that's wrong, to delete it or to request that we only use it for certain purposes.
- To change your mind and ask us to stop using your information. For example, unsubscribing from any marketing emails or turning off personalisation.

Bear in mind, sometimes we might not be able to help. Like if the law tells us we can't.

Cookies

This Privacy Policy provides you with information about the cookies we use and why. Our Privacy Policy sets out full details of the other information we may collect and how we may use your personal information.

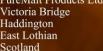
Cookies Policy

PureMalt use cookies to give you a better online experience. To make full use of the PureMalt website, your computer, tablet or mobile phone will need to accept cookies. We feel that it is important that you know what cookies our website uses and for what purposes we store cookies. This will help to protect your privacy, while at the same time providing you with the best online experience.

What is a cookie?

Cookies are small text files containing small amounts of information which are downloaded and may be stored on your user device e.g. your computer (or other internet enabled devices, such as a smartphone or tablet). At PureMalt we may use similar techniques, such as pixels, web beacons and device fingerprints. For the sake of consistency, all these techniques combined will be hereafter referred to as 'cookies'.















Consent to process your data

Control your cookie settings

This website stores cookies on your computer. These cookies are used to collect information about how you interact with our website and allow us to remember you. We use this information to improve and customize your browsing experience and for analytics and metrics about our visitors both on this website and other media.

If you decline, your information won't be tracked when you visit this website. A single cookie will be used in your browser to remember your preference not to be tracked.

PureMalt needs the contact information you provide to us to contact you about our products and services. You may unsubscribe from these communications at any time.

PureMalt is committed to protecting and respecting your privacy, and we'll only use your personal information to administer your account and to provide the products and services you requested from us. From time to time, we would like to contact you about our products and services, as well as other content that may be of interest to you.

Please be aware that your browser settings may not offer you the same ease of use as the cookie settings on our website. If you simply disable all cookies or all our cookies in your browser settings, you may find that certain sections or features of our website(s) will not work, because your browser may prevent us from setting functionally required cookies. Therefore, it is recommended to use the cookie settings on our website instead of disabling all cookies via your web browser.

Cookies we use

What is a cookie?

A cookie is a text-only string of information that a website transfers to the cookie file of the browser on your device's hard disk. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a randomly generated unique number. The other technologies we use serve a very similarly function but work slightly differently.

Cookies are useful because they allow a website to recognise a user's device. You can find more information about cookies at: www.allaboutcookies.org.

Cookies and similar technologies

Like many other websites and apps, we use cookies, scripts, pixel tags, etags, web beacons and similar technologies (collectively referred to as "cookies") to help us gather and store information about visitors to our websites and apps and certain third-party websites with whom we have partnered.

This section explains what cookies are and gives details of the specific cookies we use on our website. It also sets out why we use these cookies and provides information on the cookie choices that you and all our website visitors have.

We use two broad types of cookies:









- o First party cookies, served directly by us to your device when you visit our website; and
- Third party cookies, served by a third party on our behalf when you visit our website and certain third-party websites with whom we have partnered.

These cookies can be divided into session cookies and persistent cookies. Session cookies are temporary cookies that remember your user choices and preferences and are then deleted as soon as you leave the site. Persistent cookies stay in one of your browser's subfolders until you delete them manually or until they expire.

We use a range of cookies on our website, including strictly necessary cookies, performance / analytics cookies, functional cookies and advertising cookies. The cookies may be set by us or by a third party, including advertising cookies, which are used by our advertising partners to show online adverts based on your activity. When you first visit our website, you will be asked via our Cookie Preference Centre (the 'CPC') if you agree to non-essential cookies — and we will not use these cookies unless and until you provide your consent. You can also change your mind at any time using the CPC or the settings on your internet browser or device (see more details under 'How to manage cookies' below).

If you have any questions about our use of cookies, please get in touch with us using the details at the end of this notice.

How does this website use cookies?

This website uses the following cookies for the following purposes:

- Strictly Necessary cookies: These cookies are essential to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies, our website cannot function properly and services you have asked for, like shopping baskets or e-billing, cannot be provided. Examples of Strictly Necessary Cookies we may use on this website include Content Management Cookies which are required by the site for the content management system to work and Template Preference Cookies which are necessary for mobile sites and enable the site to look and feel the way it is intended to.
- o Performance and Analytics cookies: These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and any error messages visitors receive from web pages. These cookies don't collect information that directly identifies a visitor. Information collected by these cookies is often aggregated and therefore becomes anonymous. It is only used to improve how a website works and understand how most people use our website. One example of this is Google Analytics, which we use to help analyse use of the site. This analytical tool uses cookies to collect standard internet log information and visitor behaviour information which is then aggregated so that it does not identify any individuals. The information about your use of the website and your IP address is transmitted to Google and is used by us to evaluate visitors' use of the website, compile statistical reports on website activity and create a profile of aggregated visitors based on demographics and interests. We also use a tool called Google Display Network Impression Reporting to help us understand which adverts we place on other websites in the Google Display











Network are better at attracting visitors to our website. View an overview of Google Analytics' privacy commitments here. To opt out of being tracked by Google Analytics across all websites visit here.

- Functional cookies: These cookies allow the website to remember choices you make (such as your username, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or posting a comment. The information these cookies collect may be and they cannot track your browsing activity on other We may place a cookie to remember your preferences (Preference Cookie) so that you do not need to re-enter your details (country/age and language preferences) on our gateway page. You can choose this by selecting 'Remember me on this device', but it is not suitable if you share your computer with someone else. This cookie does not collect your date of birth and expires automatically after 12 months.
- Advertising cookies: These cookies are used to deliver content that is more relevant to you and your interests based on your previous browsing across the web as well as keywords we may be able to gather from the URLs of webpages from which you accessed this website, your IP address and any search engine used to reach this website. Also, these cookies may be used to deliver online interestbased advertising to you (either within this website or when you visit third party websites, including third party social media platforms) or to limit the number of times you see an advertisement. They stay on your computer unless you delete them and they remember that you have visited a website.

We may also use certain service providers to set cookies on our behalf via third party partner websites. These cookies enable us to analyse visits to specific sections of those websites and collect certain information regarding purchases of our products. The types of information collected by such cookies may include: shopping cart information, what product pages have been viewed, whether a purchase of our product has been made, which of our products have been searched for.

We may also use social sharing plugins and cookies. The Social Sharing plugin works by linking you with social media sites such as Facebook, Twitter, Instagram and Pinterest and allows interaction between your activity on social media sites and on our website through your direction. For example, using your Facebook username and password to login to our website, and using the Facebook 'Like' and 'Share' buttons on our site. Social Sharing cookies are used to remember that you are logged in to our site.

If you visit a page which we maintain on a social media site such as Facebook, it is likely that cookies will also be set on your device. These cookies are set by the social media network and so, to change the cookies that you receive from these sites, even on our pages, you will need to change use the settings provided by the social media site.









Your browser settings

If you are using a web browser (e.g. Google Chrome, Mozilla Firefox or Microsoft Edge), you have the ability to accept or decline cookies by modifying the settings in your browser. Please refer to your browser instructions or help screen to learn more about the functions which your browser provides to manage cookies. If you use different browsers and/or different devices you may need to ensure that each browser is adjusted to suit your cookie preferences. For instructions on how to manage cookies in your browser. Please note that you may not be able to use all the interactive features of our site if all cookies are disabled.

If you are using a mobile app, the operating system of your mobile device (e.g. Apple iOS, Google Android or Microsoft Windows) provides privacy settings which let you manage how mobile apps use technologies similar to cookies to recognise your device and in certain cases make interest-based advertising available within mobile apps you use. Please refer to the instructions or help pages of your mobile operating system to learn more about the functions which it provides to manage these privacy settings.

We are committed to safeguarding your privacy. If you have any comments, queries, or complaints about our collection or use of personal information please contact us using the contact details at the end of this document.

By clicking 'Accept' on the cookie banner, you give your consent to PureMalt to place and/or read cookies from the website you are visiting. PureMalt uses several different types of cookies. Some of these are session cookies which are temporary and allow us to link your actions during a browser session. Session cookies are erased when you close the browser. Other cookies are persistent cookies which remain on your device for the period of time specified in the cookie. The website uses cookies for the following purposes:

Functional cookies

Functional cookies are essential and help you navigate the website. They enhance the user friendliness of the website for visitors. These cookies also help to support website security and basic functionality.

Analytical cookies

Analytics cookies help us to understand the behaviour of our visitors and the usage of the website in an aggregated manner. For instance, we can use these cookies to gain insight into how our visitors use our website. This means we can find out what works and what doesn't, it allows us to continuously improve the website, and measure how effective our marketing and communication is.

Advertising cookies

Advertising cookies will remember your product and page preferences and in general that you visited the website.













EH41 4BD



Third party

Third party social networks (e.g. Facebook, YouTube, Twitter, LinkedIn) may also place cookies. This enables you to share content of the Website on social networks. These third parties may use cookies for their own purposes. PureMalt has no influence over how these social media networks make use of your data. For more information regarding the cookies set by the social media networks please refer to their own privacy and cookie policies.

Third parties that set cookies via our website may also try to find out what your interests are in this way, and this information may also be used to present you with content or advertisements that appear more likely to be of interest to you on other, non-PureMalt websites. In this case, the information about your current website visit may be combined with information from previous visits to websites other than ours.

How can I contact PureMalt?

You can contact us by using the information at the bottom of this document.

What types of personal information do we collect?

Personal information is information about an identifiable individual, as defined by applicable law. The personal information we collect includes:

- (a) information you provide to us; and
- (b) information we automatically collect/generate or information we obtain from third parties.

We have set out below more details regarding these types of personal information:

- Information you provide to us These types of personal information may include:
 - contact details (such as your name, postal addresses, phone numbers and email addresses),
 - o demographic information (such as your date of birth, age or age range and gender),
 - o online registration information (such as authentication information),
 - o information provided as part of online questionnaires (such as responses to any customer satisfaction surveys or market research),
 - competition entries/submissions, and
 - in certain cases, your marketing preferences.
- Information we automatically collect/generate or obtain from third parties These types of personal information may relate to your device (such as your PC, tablet, or other mobile device), your use of our websites and apps (as well as certain third-party websites with whom we have partnered), and/or your personal preferences, interests, or geographic location. Examples of these types of information include:
 - name and age (or predicted age range),
 - information about your device, operating system, browser, and IP address,









- unique identifiers associated with your device,
- details of web pages that you have visited,
- o which products you have looked at online (including information about products you have searched for or viewed, purchased, or added to an online shopping basket),
- how long you spend on certain areas of a website or app together with the date and time of your visit/usage,
- personal information contained within user-generated content (such as blogs and social media postings),
- o social media username or ID, and
- social media profile photo and other social media profile information (such as number of followers).

How/when do we collect personal information?

- o **Information you provide to us** There are various situations in which you may directly provide personal information to us. These include when you:
 - enter a competition or take advantage of a promotion,
 - o fill in an online questionnaire (such as a customer satisfaction survey),
 - o contact us with an enquiry or ask us to provide you with information,
 - register on a website or leave any reviews or comments,
 - o attend any of our promotional events,
 - o forward an item to a friend,
 - o inform us of your marketing preferences, and/or
 - o communicate with us via social media websites, third party apps or similar technologies.

We will indicate where any personal information we have requested is mandatory or optional. In some circumstances this may mean we are unable to provide you with a certain service or product.

Information we automatically collect/generate - When you browse or use our websites (as well as certain third party websites with whom we have partnered) we (and our partners) use cookies and similar technologies to collect information automatically from one or more of your devices associated with you (see below for more details regarding the use of cookies and similar technologies). We also use certain automated techniques and technologies to infer or generate additional information about you, for example by analysing or predicting certain personal aspects such as your personal preferences or interests.

In addition, we receive IP addresses from all users because this information is automatically reported by your browser each time you view a web page. For most users accessing the internet, the IP address will be different every time you log on. IP addresses are generally recorded in files called "log files".

Information we obtain from third parties - In addition to the information we collect as described above, we may also partner with and use the services of various third parties to collect personal data about you from















other sources, we will only obtain such information where we have your consent and/or another legal ground to do so. This information may include:

- Data from other organisations who have obtained your permission to share information about you with us;
- Data we receive when someone refers you for our products and services;
- Data we may require from other organisations to fulfil our legal obligations; and/or
- Where your information is publicly available.

Here are a few places third party data may come from:

- Public information sources, such as the Electoral Roll.
- o Third party social media platforms.
- Other third-party websites that we have partnered with.

Purposes for which your personal information is used

The different purposes for which we use your personal information are set out below:

- Marketing Communications: We may use your personal information to communicate with you through channels such as email, SMS and post about our products and services. You have the right to opt out at any time from receipt of further marketing communications.
- Marketing analysis: We may use your personal information for marketing analysis, for example, to assess trends amongst our consumers and what people are saying about our products, to evaluate the impact and effectiveness of our marketing campaigns and promotions, and to analyse the number and types of visitors to our websites and/or users of our apps (including the locations from which such visitors/users access our websites and apps).
- Online interest-based advertising: We may also use your personal information (and share it with our service providers as described below) in order to determine if you are a member of a particular social media platform so that we can display our advertising to you on that service or to identify consumers who share similar interests and characteristics with you for the purposes of making our advertising more relevant to consumers - examples of this are Facebook's "Custom Audiences" and "Lookalike Audiences" products which we may use in certain countries subject to local law.

Online ad verification: We use personal information to monitor our digital advertising to ensure that it does not appear on unsuitable websites or near inappropriate content, and also to ensure that our advertising is visible and seen by real people online (as opposed to 'bots' or similar fraudulent techniques).

Comply with legal obligations and protect against legal claims or liability: We may use your personal information to comply with our legal obligations, protect us against legal claims, or to detect, protect, or defend us and/or other third parties against error, negligence, breach of contract, theft, fraud, or other illegal













or harmful activity, to comply with our audit and security requirements, or to audit compliance with our corporate policies, procedures, legal, or contractual obligations.

Customer service: We will use your personal information to provide specific services that you request from us, as well as to provide additional services that may be of interest. We will also use your personal information to maintain your accounts, or for the fulfilment of such transactions (e.g. delivery) or to answer any questions you may have. We may also use your personal information to notify you about changes to our services, our terms and conditions or this Privacy and Cookie Policy.

Corporate transactions: We may use your personal information in the event of a sale, merger, consolidation, change in control, transfer of substantial assets, financing, reorganization, or liquidation whereby we transfer, sell, or assign to a third-party information concerning your relationship with us.

Technical maintenance: We use personal information for system administration purposes and to diagnose service or technology problems reported by our users or engineers, these types of problem may be associated with the IP addresses controlled by a specific web company or ISP.

Legal basis for the processing of personal information

We will only process your personal information where we have a legal basis to do so. The legal basis will depend on the purposes for which we have collected and use your personal information. In almost every case the legal basis will be one of the following:

Consent: For example, where you have provided your consent to receive certain marketing from us. You can withdraw your consent at any time, including by clicking on the "unsubscribe" link at the bottom of any marketing email we send you.

Our legitimate business interests: Where it is necessary for us to understand our customers, promote our services and operate effectively, provided in each case that this is done in a legitimate way which does not unduly affect your privacy and other rights. For example, we will rely on this legal basis when we conduct certain market analysis to understand our consumers in sufficient detail so we can create new products and improve the profile of our brands.

Performance of a contract with you: This would also apply where we need to take steps prior to entering into a contract with you. For example, where you have purchased a product from us and we need to use your contact details and payment information in order to process your order and send the product to you.

Compliance with law: Where we are subject to a legal obligation and need to use your personal information in order to comply with that obligation.

Disclosure of your personal information

We value your personal information and only share it with third parties in certain circumstances. From time to time we may disclose personal information to:







Third parties where you have provided your consent. For example, we will obtain your permission before we allow a third party that is not an affiliate to send you any marketing and promotional information relating to that third party's products or services;

- Our service providers and subcontractors, including our affiliates, and/or third party websites (such as social media platforms or search engines) retained to perform functions on our behalf, or to provide services to us (such as warehousing and delivery) marketing and advertising (including by delivering online interest-based advertising on third party websites and social media platforms where you have consented to the use of advertising cookies set by Diageo or our partners); credit card and data processing; age verification; monitoring our digital advertisements to ensure that they do not appear on unsuitable websites or near inappropriate content and also to ensure that our advertising is visible and seen by real people online (as opposed to 'bots' or similar fraudulent techniques); software development; website hosting and management; information technology and office services; legal, accounting, audit and other professional service providers; and other services related to our business), provided such service providers and subcontractors have entered into written agreements with us and do not collect, use, or disclose the personal information for any purpose other than to perform such functions on our behalf, to provide services to us, or as otherwise required or permitted by law;
- Third parties who, in our reasonable judgment, are providing or seeking the information as your authorised or appointed legal agent;
- A person or entity, including our affiliates, in the event of a sale, merger, consolidation, change in control, transfer of substantial assets, financing, reorganisation, or liquidation whereby we transfer, sell, or assign to such third-party information concerning your relationship with us, including without limitation, personal information that you provide and other information concerning your relationship with us; and

Law enforcement, governmental or regulatory agencies, or other third parties in order to comply with applicable law, or where we believe such action is necessary in order to comply with applicable law, or to detect, protect, or defend us and/or other third parties against error, negligence, breach of contract, theft, fraud, or other illegal or harmful activity, to comply with our audit and security requirements, or to audit compliance with our corporate policies, procedures, legal, or contractual obligations.

International data transfers

Public areas of our websites and apps

Information that you post on or through the public areas of our websites and apps (e.g., chat rooms, bulletin boards, discussion groups), or on social media platforms generally is accessible to, and may be collected and used by, others, and may result in unsolicited messages or other contact from others. You should not provide personal information about yourself in public (or interactive) areas of our websites, apps or social media pages.













Information security

We take information security seriously and take precautions to keep your personal information secure. We have put in place appropriate physical, technical, and organisational measures to safeguard the information we collect. However, we have no control over the privacy of any communication while it is in transit to us. We therefore recommend that you do not include confidential, proprietary, or sensitive information in any such communications.

Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at the contact details below.

In the unlikely event that we believe that the security of your personal information in our possession or control may have been compromised, we may seek to notify you of that development. If such a notification is appropriate, we will endeavour to do so as promptly as possible under the circumstances, and, to the extent we have your email address, we may notify you by email.

You are reminded that, in accordance with the Conditions of Use for this website and/or app, you are responsible for maintaining the strict confidentiality of your account password, and you are responsible for any activity under your account and password. It is your sole responsibility to control the dissemination and use of your password, access to and use of your account, and to notify us when you wish to cancel your account. We will not be responsible or liable for any loss or damage arising from your failure to comply with this obligation.

Your rights

Depending on the jurisdiction in which you are located, you have certain rights in relation to your personal information. These rights may include:

- the right to withdraw your consent to any processing of your personal information (where you had provided consent);
- the right to object to the processing of your information for certain purposes;
- the right to access your personal information, and the ability to erase, restrict or in certain cases receive a machine-readable copy of your personal information;
- o the right to ask us to rectify any information about you that you think is inaccurate; and
- the right to unsubscribe from any of our marketing communications at any time.

If you wish to exercise any of these rights you may contact us through the contact details at the bottom of the page. We will handle any request to exercise your rights in accordance with applicable law in your country and any relevant legal exemptions.















How to make a complaint

You have the right to complain to a data protection authority if you think we have processed your personal information in a manner which is unlawful or infringes your rights.

However, if you have such concerns we suggest that you initially contact us (using the contact details below in the "How to contact us" section) so that we can investigate, and hopefully resolve, your concerns.

How long will we retain your personal information for?

We will retain your personal information for the period necessary to fulfil the purposes outlined in this Privacy and Cookie Policy unless a longer retention period is required or permitted by law. After this period it will be deleted or in some cases anonymised.

For example, where you have made a purchase with us, we will keep a record of your purchase for the period necessary for invoicing, tax and warranty purposes. We may also keep a record of correspondence with you (for example if you have made a complaint) for as long as is appropriate to protect us in the event of a legal claim.

Where we have collected the personal information based on your consent and we have no other lawful basis to continue with that processing, if you subsequently withdraw your consent then we will delete your personal information. However, please note that where you unsubscribe from our marketing communications, we will keep a record of your contact details to ensure we do not send you further marketing communications in future.

Interfaces with Third-Party Websites and Services

Our websites may contain links, references, and content from other websites and services outside of our control. Please be aware that we have no control over these websites and services and our Privacy and Cookie Policy does not apply to them.

We will not be liable to you for any issues arising in connection with their use of your information and we encourage you to read the Privacy and Cookie Notices and Conditions of Use of any linked, referenced, or interfacing websites and services you visit or use.

Cookie overview

We will keep our cookies under review and make updates from time to time. Any changes to cookies will be posted in our privacy policy and to the extent reasonably possible, will be communicated to you. You can consult our website for the latest version. If you have any further questions and/or comments, please contact us using the information at the end of this document.

How to contact us:

By email henry.elderfield@puremalt.com By phone +44 (0)1620 82 46 96 By post PureMalt Products Ltd, Victoria Bridge, Haddington, East Lothian, Scotland, EH41 4BD.

The most recent version of this privacy policy is dated 27/07/2022











