



WEBSITE PRIVACY & COOKIES POLICY

At HighlandLIT we take the security of the information you share with us very seriously. Anyone wanting information on the data HighlandLIT holds about them, or wanting to change that data, should email HighlandLIT on: mailbox@highlandlit.com

1. Introduction

1. HighlandLIT are committed to safeguarding the privacy of our website and service users, the information provided by us within this policy will explain how we will handle your personal data.
2. We will ask you to give your consent to our use of cookies on our website in accordance with the terms of this policy when you first visit our website.

2. How we use your personal data:

1. **Usage Data** – Meaning the way you use our website and the services provided on the website. This includes your IP address, geographical location, browser type and version, your operating system, where you were referred to our website from (i.e Google Search), the length of time you spent visiting the website, the number of pages you viewed and the navigation path that you followed. As well as relevant information like timing, frequency of visits and the pattern of your use. The source of the usage data is Google Analytics. This usage data may be processed by us for the purpose of analysing the use of our website and services, the legal basis for the processing of the usage data is consent-based and for monitoring and improving our website and services.
2. **Enquiry Data** – Information contained in any enquiry you submit to us regarding our services. Enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal basis for processing this information is consent and to ensure the proper administration of the provision of services we provide you.
3. **Notification Data** – Information that you provide to us for the purpose of subscribing to our e-mail notifications and newsletters. Notification data may be processed for the purposes of sending you relevant notifications and newsletters. The legal basis for processing this information is consent and to ensure the proper administration of the provision of the services that we provide you.
4. **Correspondence Data** – Information contained in or relating to any communication that you send to us. Correspondence data may include the communication content and the metadata associated with the communication. Our website will generate the metadata associated with the communication made using the website contact forms. Correspondence data may be processed for the purposes of communicating with you and for record-keeping. The legal basis for processing this information is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.



5. **Customer relationship data** - The customer relationship data may include your name, your contact details, and information contained in communications between us. The source of the customer relationship data is you. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, keeping records of those communications and promoting HighlandLIT services to customers. The legal basis for this processing is consent and the proper management of our customer relationships.
6. **Transaction data** - The transaction data may include your contact details. The merchant site for on-line purchases is [Ecwid](#); and on-line payment is processed by [Paypal](#). The transaction data may be processed for the purpose of supplying the purchased services and keeping proper records of those transactions. The legal basis for this processing is at your request and our legitimate interests, namely the proper administration of our website and service.
7. In addition to the specific purpose for which we may process your personal data set out in this Section 2, we may also process your personal data where such processing is necessary for the compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interest of another natural person.
8. Mailing lists are managed by Mailchimp and subscribers can elect to receive no further communication from HighlandLIT by clicking on the unsubscribe button at the foot of newsletters. The subscriber's data will then be deleted from the Mailchimp list as soon as possible thereafter. A link to the Mailchimp Privacy Policy can be found here: [Mailchimp](#)
9. Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing Your Personal Data to Others

1. We may disclose your personal data to our insurers or professional advisers insofar as is reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
2. As part of our monitoring process, we ask attendees at events for information which includes: postcode, gender, age group, nationality and membership status. Feedback comments are recorded. This written information is then transferred to, and anonymized within, a computerized data spreadsheet. This information is held securely. Any paper copies containing this information are shredded within a maximum period of twelve months. This 'anonymous' information is sometimes shared, where necessary, or a requirement, with funders of HighlandLIT for feedback purposes. It is used to ensure due diligence and continual improvement of service.

4. Retaining and Deleting Personal Data

1. This section sets out our data retention policy and procedures, which are designed to help ensure we comply with our legal obligations in relation to the retention and deletion of personal data.
2. Personal data that we process for any purpose or purposes shall not be kept



for longer than is necessary for that purpose or those purposes.

1. Usage Data will be retained by us for the duration of your membership with us and any request to remove this information will be dealt with efficiently and your data will be deleted.
2. Account Data will be retained by us for the duration of your membership with us, any request to remove this information will be dealt with efficiently and your data will be deleted.
3. Service Data will be retained by us for the duration of your membership with us and any request to remove this information will be dealt with efficiently and your data will be deleted.
4. Enquiry Data will be retained by us for the duration of the enquiry response process, if the enquiry does not result in the provision of a product or service to you or your company the data will be deleted from our system. If the enquiry results in the acceptance of a provision of service for you or your company the enquiry data will be transferred to account data which we will hold for the duration of the membership period.
5. Correspondence Data will be kept for a period of 12 months when it will be deleted from our system.

Notwithstanding the other provisions of this section 4 we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. Amendments

1. We may update this policy from time to time by publishing a new version on our website.
2. You should check this page occasionally to ensure you are happy with any changes to the policy.
3. We may notify you of changes to this policy by e-mail or through our social media channels.

6. Your Rights

Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.



1. You may instruct us to provide you with any personal information we hold about you, the provision of such information will be subject to the supply of appropriate identification.
2. We may withhold personal information that you request to the extent permitted by law.
3. You may instruct us at any time not to process your personal information for marketing purposes.
4. You have the right to withdraw consent to data processing at any time.
5. You have the right to erasure of personal information data that we hold about you.
6. You may instruct us to correct any personal information we hold about you that is incorrect.
7. You may exercise any of your rights in relation to your personal data by written notice, by e-mail to: mailbox@highlandlit.com

7. Cookies

1. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. They can be persistent (remain valid until a set expiry date) or session (expiring when the browser is closed). Cookies do not typically contain any information that personally identifies a user, but personal information we store about you may be linked to the information stored by and obtained from cookies.
2. We use cookies for authentication, security, advertising and analysis as well as your consent to the use of cookies more generally, the cookies used for these purposes are known as identify cookies.
3. Our service providers may use cookies and those cookies may be stored on your computer when you visit our website. The merchant site for on-line purchases is [Ecwid](#); on-line payment is processed by [Paypal](#). For more information on managing cookies: www.allaboutcookies.org
4. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>

8. Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);



- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

9. International transfers of your personal data

1. The hosting facilities for www.highlandlit.com (our website) are situated in: Israel, USA, Lithuania, Germany, Brazil and the Ukraine. Wix.com Ltd. is based in Israel, which is considered by the European Commission to be offering an adequate level of protection for the personal information of EU Member State residents. <https://www.wix.com/about/us>. The website is subject to the WIX terms of use: <https://www.wix.com/about/terms-of-use>. WIX Privacy Policy can be found here: <https://www.wix.com/about/privacy>

10. Third party websites

1. Our website includes hyperlinks to, and details of, third party websites.
2. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

11. Our Details

This website is owned and operated by: HighlandLIT, which is managed by a voluntary Committee elected by the membership at the Annual General Meeting.

1. You can contact us here: <https://www.highlandlit.com/contact> or by e-mail to: mailbox@highlandlit.com
2. This Privacy Policy has been adapted from one free policy and one purchased policy provided by SEQ Legal - www.seqlegal.com