

AG Barr Website is operated and owned by A.G. BARR p.l.c.

### **About this policy**

Please read this Policy carefully. If you have any questions, get in touch with us (see Contact Us below for details).

### **Who we are**

We're A.G. BARR p.l.c. We're a company registered in Scotland with the following details:

Company number: SC005653

Registered office: Westfield House, 4 Mollins Road, Cumbernauld, G68 9HD

We're the data controller of your personal data. That means we're responsible for your personal data under the UK's data protection laws.

### **The ICO**

The Information Commissioner's Office (the ICO for short) is the organisation responsible for overseeing the UK's data protection laws. We refer to them throughout this Policy. [You can find more about the ICO at its website.](#)

### **How we collect your data**

We'll collect your personal data when you:

- Browse this website;
- Take part in the promotion we're running;
- Contact us, for whatever reason, for example, through our website or via our brand's social channels;
- You give or receive any gifts or entertainment; and
- You attend one of our events.

### **The personal data we collect**

We may collect personal data in connection with the performance of any activity that is part of our operations. We limit the personal data we collect to what we need in order to achieve one or more of the purposes set out in this Policy (see Why we process your personal data below for details). In this Privacy Policy, "Personal Data" refers to any information relating to an identified or identifiable individual. We may collect the following types of personal data:

#### **1. Personal details**

##### **This could include:**

- Your name;
- Your date of birth;
- Your contact details (for example, your email, postal address, and phone number);
- The contents (including, but not limited to, text, videos, images, photos, data or documents) of any message you include through the 'contact us' section of our website or which you otherwise choose to upload or provide to us, or;
- Details you provide when completing customer surveys, promotions or offers;

- Your correspondence and communications with our brand;
- Personal data you may have shared via a public platform such as our brand's social channels;
- Online browsing activities on our website; and
- Details of gifts or experiences made available to you.

## **2. Identification Information**

**This could include your Internet Protocol (IP) address, and details of which version of web browser you used.**

Special category data, such as health information, information about sexual orientation, or biometric data, is considered to be especially sensitive under UK data protection law and so requires to be handled with particular care. We don't collect any special category data from you. So, please try not to provide any special category data. We will immediately delete any special category data you do provide. You can read more about special category data at the ICO's website.

### **Why we process your personal data:**

We can only process your personal data where we have a lawful basis to do so. We determine the lawful basis for processing your personal data based on the purposes for which we process it. Our purposes for processing your personal data are as follows:

- To administer the promotion we're running and to do the other things we outline in the Promotion Terms and Conditions;
- To manage or improve our website;
- To allow you to participate in interactive features of our website where you choose to do so;
- To contact you if you ask us to using the 'contact us' section of our website or if you contact us using any other means;
- To analyse and use any information you provide if you complete a survey (for example, we might develop new products based on responses to our surveys);
- To comply with our obligations under Anti-Bribery Legislation by recording all gifts in our internal registers;
- To carry out our obligations under any contract entered into between you and us;
- To facilitate the sending of gifts or prizes;
- To load our website accurately for you, and to perform analytics on our website usage to optimise our website, and
- you will receive marketing communications from us if you have requested information from us and you have opted in to receive marketing communications. You can opt out of marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us at [dataprotection@agbarr.co.uk](mailto:dataprotection@agbarr.co.uk).

In almost all cases, our lawful basis for processing your personal data will be one of the following:

### **Legitimate interest**

This means the processing is necessary for our legitimate interests or the legitimate interests of a third party. Examples of this type of processing include:

- To monitor how visitors use this website,
- To manage or improve this website,
- To promote, market and advertise our products;
- Improve our brand and develop new products;
- To supply goods or services to customers and consumers;
- To understand our consumers' behaviours and preferences;
- To monitor the nature of, and trends in, complaints;
- To implement changes or actions in response to your feedback, and
- To retain records of how we have dealt with complaints

You have the right to object to us using your personal data for the above purposes. If you wish to object to any of the above processing, please contact [dataprotection@agbarr.co.uk](mailto:dataprotection@agbarr.co.uk). If we comply with your objection, this may impact our ability to complete the tasks above for your benefit.

### **Contract**

This means the processing is necessary:

- Because you've asked us to take certain steps before entering into a contract with you, or
- To enable us to perform a contract we've entered into with you.

Examples of this type of processing include:

- To enable you to take part in the promotion we're running (in accordance with the Promotion Terms and Conditions),
- To deliver winners of the promotion a prize (in accordance with the Promotion Terms and Conditions), and
- To monitor visitor compliance with the various terms and policies posted on this website.

### **Consent**

This means you have given us your consent to the processing (see **Consent** below for details). Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending you marketing and promotional materials about AG Barr and our other similar products either through email or one of our social media channels.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **How long we keep your personal data**

We'll only keep your personal data for as long as is reasonably necessary to achieve the purposes for which it was collected. The retention periods we apply and take account of include:

- Legal and regulatory requirements and guidance,
- Limitation periods that apply in respect of taking legal action, and
- Our ability to defend ourselves against legal claims, and deal with complaints, good practice, and the operational requirements of our business.

In some circumstances we'll anonymise your personal data for research or statistical purposes, in which case we may use this information indefinitely.

We keep information you provide if you enter a promotion we're running for a period of 3 months following the final closing date of the promotion (in accordance with the Promotion Terms and Conditions).

### **Sharing your personal data**

We may share your personal data with:

- Other companies within our group;
- Any third parties we've appointed to help us, for example, with a promotion we are running or to manage our social channels;
- Any law enforcement agency, court, regulator, government authority or other organisation if we believe we need to in order to meet a legal or regulatory requirement, or otherwise to protect our rights or the rights of anyone else; and
- Any organisation that buys, or to which we transfer all, or substantially all, of our assets and business.

Wherever we use a third party to process your personal data on our behalf, they'll only process it in accordance with our data processing agreement, and we'll take steps to ensure they handle your personal data in the right way.

### **Automated Decision Making**

Your personal data will not be subject to any automated decision making. We do not use or rely on your personal data when running the draw as part of the promotion.

### **Storing your personal data, security, and international transfers**

We'll store your personal data in our offices and on secure servers provided or supported by third parties acting under our instructions.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and

other third parties who have a business need to know. They also will only process your personal data on our instructions and they are subject to a duty of confidentiality.

Many of such third parties are based outside the UK or EEA so their processing of your personal data will involve a transfer of data outside the UK or EEA. Where your personal data is transferred or stored outside the UK or EEA, we'll ensure appropriate measures are put in place to protect it. For example, we'll only transfer your personal data outside the UK or EEA where a UK Government or European Commission approved method of validating the transfer has been put in place.

**Date of Policy**

July 2025.