





PRIVACY NOTICE - EXTERNAL

This privacy notice provides you with all the information necessary to understand how your personal data will be processed by J. Wray & Nephew Limited. It also explains how your personal data is used, shared and how you can contact us in case of any need with regards to your personal data.




The type of personal data processed, and the purposes of the processing may vary depending on the services being accessed by you. For example, the way your personal data is collected will vary if you are interested in participating in an event or if you request to receive a newsletter.





	DATA CONTROLLER	J. Wray & Nephew Limited is responsible for the processing of personal data required for its activities and determines how your personal data is used and processed for this purpose.
	DATA PROTECTION OFFICER	The Data Protection Officer can be reached at: JWNDPO@campari.com
	CATEGORIES OF PERSONAL DATA	<ul style="list-style-type: none"> • Contact details including name, email, telephone number, shipping, and billing addresses. • Login and account information, including screen name, password, and unique user ID. • Other personal details including gender, hometown, date of birth. • Payment or credit card information and purchase history. • Images, photos, and videos. • Personal preferences and other information related to you and your personal life. • Technical navigation data (e.g. IP address), in accordance with your cookie preferences.
	DATA SOURCE	The data is provided by you, cookies from the website, or your devices where applicable.




HOW YOUR DATA IS PROTECTED



We have implemented security measures and controls to ensure data remains appropriately protected which include:

- Role- Based Access Controls
- Files containing personal data are encrypted and password protected, as required.

	PURPOSE OF THE PROCESSING		LEGAL BASIS		DATA RETENTION
	Reply to your information request: provide you with the information you have requested through a contact form or other communication channels, e.g. when you ask general questions like “where can I find a given product?” or you make a Data Subject request (as outlined below)		<ol style="list-style-type: none"> 1. Consent. 2. The provision of personal data for this purpose is necessary to allow the Data Controller to properly manage requests for information and provide you with adequate feedback. Failure to provide data for 		For the time necessary to process your request or, at maximum, for one year.

			
PURPOSE OF THE PROCESSING	LEGAL BASIS	LEGAL BASIS	DATA RETENTION
	<p>this purpose will make it impossible for the Data Controller to manage and follow up your request for information.</p> <p>3. Legitimate interest.</p>		
<p>Newsletters: sent by e-mail or other communication channels, communications of an informative nature ("Newsletter") to those who explicitly request it, by entering their e-mail address, phone number, name etc. in the appropriate data collection form.</p>	<p>1. Consent.</p>		<p>Until you ask to be unsubscribed from the newsletter service.</p>
<p>Competitions/Events: allow, with regard to the required data indicated as mandatory (*), the registration to the competition, as well as the management of the organisational activities related to the competition.</p>	<p>1. Consent. 2. The performance of a contract to which you are a party, or the performance of pre-contractual measures taken at your request.</p>		<p>At least one year after the award of the prize. There may be a need to retain such information for a longer period due to legal requirements, if so, this will be indicated.</p>
<p>Direct marketing: contact you for commercial and/or promotional purposes, e.g. by sending you - by automated means of contact (such as SMS, MMS, and e-mail) - promotional and commercial communications relating to the services/products offered by the Controller.</p>	<p>1. Consent (optional and revocable at any time).</p>		<p>Until you withdraw your consent.</p>
<p>Profiling: perform analysis of your preferences, habits, behaviours, interests inferred, for example, from online clicks on post/contents of the Data Controller's website(s) and social pages, in order to send you commercial communications personalised and/or carry out targeted promotional actions.</p>	<p>1. Consent (optional and revocable at any time).</p>		<p>Until you withdraw your consent.</p>
<p>Aggregated research: understand customer behaviour and preferences for aggregated research and analysis. For more information, see below "Understand customer behaviour and preferences".</p>	<p>1. Legitimate interest. This includes processing for marketing, research, and business development purposes.</p>		<p>For the time necessary for the anonymisation of the data.</p>
<p>Communication/publication of photos or videos portraying you</p>	<p>1. Consent. 2. The performance of a contract to which you are a party, or the performance of pre-contractual measures taken at your request.</p>		<p>Period provided in the usage and release waiver for the use of your image.</p>
<p>Optimise our websites/apps: in order to run our websites/apps we install cookies to optimise the performance and personalise the content.</p>	<p>1. Consent. 2. Legitimate interest. This includes processing for marketing, research, and business development purposes.</p>		<p>Retention period indicated in the Cookie Policy of the website/app).</p>
<p>Evaluate customer's satisfaction: we collect your data to evaluate our level of services (e.g. competitions, events, product sales) after an interaction with you.</p>	<p>1. Consent 2. Legitimate interest. This includes processing for marketing, research, and business development purposes.</p>		<p>At maximum, for one year.</p>

	PURPOSE OF THE PROCESSING		LEGAL BASIS	 DATA RETENTION
<p>Protection of rights: to exercise or defend a right in or out of court.</p>	<p>1. The legitimate interest of the Data Controller in exercising or defending its rights, in view of actual and concrete needs for protection. JWN has considered that its legitimate interest does not affect your rights and freedoms.</p>	<p>The data are retained for the time necessary to settle the claims definitively (e.g., for the entire duration of the pre-litigation and litigation phase, until appeal action terms have been exhausted).</p>		
<p>Legal obligation: fulfilment of obligations to comply with applicable laws (e.g. financial obligations, the communication of data to authorities and public security bodies etc).</p>	<p>1. Comply with legal obligations.</p>	<p>The period of time required by the applicable laws.</p>		
<p>Additional Processing We may also use your personal data in other ways and will provide specific notice at the time of collection and obtain your consent where necessary. Once the above retention periods have expired, the data will be destroyed, deleted or anonymised. Additionally, you have the right to withdraw consent to processing for specific purposes, as outlined below.</p>				

	<p>NATURE OF DATA PROCESSING</p>	<p>The data you provide is acquired by us on a voluntary basis. If you refuse to provide us with the necessary information to provide a service requested by you, we will not be in a position to provide such service. Some technical information could be automatically collected when you connect with our websites and apps. Personal data may be used without knowledge or consent in situations when legally required or permitted, or when personal data has been anonymised or pseudonymised, so it is no longer associated with the user. This means we have removed personal identifying information so the data we're left with cannot be tied back to you as an individual.</p>
	<p>RECIPIENTS OF PERSONAL DATA</p>	<p>The data may be processed by external parties operating as data controllers such as, by way of example, Authorities and supervisory and control bodies and, in general, parties, including private parties, entitled to request the data, Public Authorities that expressly request the Controller for administrative or institutional purposes, in accordance with the provisions of current national legislation, as well as persons, companies, associations or professional firms that provide assistance and advice. Personal data may also be shared with third parties when it is necessary to provide services to users, and/or for other legitimate interests. Third parties include service providers, professional advisors, and other members of J. Wray & Nephew's network. J. Wray & Nephew will recommend appropriate technical and organisational measures to protect any data which may be shared in this process. Furthermore, when you participate in a competition or event, your data may be published on social media channels (e.g. Facebook, Instagram, YouTube), in accordance with the relevant terms & conditions. As a result, such social media companies are operating as autonomous data controllers.</p> <p>The data may also be processed, on behalf of the Data Controller, by external subjects designated as Processors, to whom appropriate operational instructions are given. These subjects are essentially included in the following categories:</p> <ol style="list-style-type: none"> companies offering maintenance services for websites and information systems; companies offering support in carrying out market studies; companies that provide management and maintenance services for the Controller's database; companies offering e-mail services; companies offering management services for the marketing automation platform; and companies that provide organisational support and reception services for events. <p>Third parties that may access personal data are fulfilling the following services:</p> <ul style="list-style-type: none"> Record-keeping and security purposes; Collection and storage of waiver information;

- For corroborating information provided on forms;
- Announce Competition winners;
- To facilitate business process outsourcing;
- Liability reporting to the parent company and regional management;
- Investigation;
- To facilitate communication efforts; and
- To facilitate the registration for free wi-fi.

These parties do not retain, share, or use personal data beyond the defined purpose of fulfilling the service. We share only aggregated demographic data with our partners and advertisers. This data is not linked to the identity of any individual user.

Where third party cookies are installed (with your consent), your data may be processed by third parties to whom the data is communicated. On our website, you may encounter links to other websites. Be aware that we are not responsible for the content or privacy practices of these other sites. We encourage all users to read the privacy notices of any other sites that collect your personal data.



DATA TRANSFER






Personal data may be processed in countries outside the jurisdiction you are in where we and our third-party service providers have operations.

If you are located in the EEA, United Kingdom or Switzerland, your personal information may be processed outside of those regions, including in the United States (where certain IT and technology service providers are located)

In the event of such a transfer, in any case, we will ensure that transfers will only take place where they are covered by an adequacy decision under the applicable law (e.g in relation to the United States, the adherence to the Data Privacy Framework for the jurisdictions that have entered into it) or where appropriate safeguards are in place to ensure adequate levels of protection and safeguards, including contractual safeguards under the applicable law, including stipulating standard contractual clauses, supplemented where necessary by additional technical, legal and organisational measures to ensure that the level of protection of personal data is at least equivalent to the level of protection provided under the laws of the State of the data exporter.

Moreover, your data may be transferred to third countries where the Campari Group is present. The entities of the Campari Group have regulated such transfers to ensure adequate levels of protection and safeguards, including contractual safeguards under the applicable law, including the stipulation of standard contractual clauses, supplemented where necessary by additional technical, legal and organisational measures aimed at ensuring that the level of protection of personal data is at least equivalent to that of the law of the data exporter's country.

For any further information on the transfer of your personal data, you can send an e-mail to the following address: datasubjectrequest@campari.com

	<p>DATA SUBJECTS' RIGHTS</p>	<p>We aim to maintain data that is accurate and up to date. Under the circumstance that your personal data changes (e.g. moving addresses), please notify us of any changes.</p> <p>In certain instances, you have the legal right to the following:</p> <ul style="list-style-type: none"> • Request all data we have collected about you, if any. • Request correction to the personal data we have collected about you. • Request we delete or remove personal data when there is no legitimate need for us to continue processing it. • Object to the processing of personal data. • Request transfer of your personal data. • Opt-out of contact with us at any time. • Express any concern about any data we have collected about you. <p>You may exercise specific rights on personal data collected by contacting J. Wray & Nephew via: Email: datasubjectrequest@campari.com Phone: (876) 926-9007-9 Write to us: J. Wray & Nephew Limited, 23 Dominica Drive, Kingston 5, Jamaica</p>
	<p>RIGHT TO CLAIM TO THE SUPERVISORY AUTHORITY</p>	<p>If you think that your personal data has been unlawfully processed, depending on the applicable law, you have the right to lodge a complaint to the Office of the Information Commissioner https://oic.gov.jm.</p>
	<p>AUTOMATED DECISION-MAKING</p>	<p>Personal data collected will not be subject to any automated decision-making techniques that are able to negatively affect you in any way.</p>
	<p>UNDERSTAND CUSTOMER BEHAVIOUR AND PREFERENCES</p>	<p>We use some publicly available personal information to take strategic marketing and communication decisions based on aggregated analysis of customer interests, preferences, and behaviour. In fact, we adopt so called "social listening tools" that collect and analyse publicly available information shared by users on social networks. For example, through such tools, we will be able to understand how a given word or hashtag (e.g. #cocktails) is used on social networks and how people react to a post made by us on our social media channels.</p>
	<p>VERSION OF THE DOCUMENT</p>	<p>Last updated: October 2024 Version: 2.0 Any changes to this privacy notice can be found on our website at https://www.camparigroup.com/en/news/2019-12-31/j-wray-nephew-limited</p>