

## **WSET Privacy and Data Protection Policy – Gray Mackenzie & Partners (GMP)**

At Gray Mackenzie & Partners, your privacy matters to us. We are fully committed to handling your personal information with care, confidentiality, and in accordance with UAE data protection laws and WSET's standards. We believe in being completely transparent about how your data is collected, used, and safeguarded.

All personal data is handled responsibly and securely in line with local UAE law and international best practices. By enrolling with us, you consent to this collection and use of your information solely for educational and administrative purposes related to WSET qualifications.

When you share your personal data with us or if we receive it from WSET we make sure it is:

- All personal information shared with WSET will be processed in accordance with WSET privacy policy.
- Kept accurate and up to date
- Stored securely and safely destroyed when no longer needed
- Limited to only what is necessary
- Protected against loss, misuse, unauthorized access, or disclosure
- Managed using appropriate technical and security measures

This policy outlines how we handle your personal data and what your rights are, including:

- Knowing what information, we collect
- Understanding how and why it is used
- Requesting access, correction, or deletion of your data

## 1. Who we are and how to contact us:

Gray Mackenzie & Partners beverage importer & distributor in UAE. Our office located in Abu Dhabi and our APP office also located in same building.

Gray Mackenzie & Partners  
P.O Box 247 Ahmed Mohammed Al Hamely Building  
Sector 19, Plot-68 Muroor Road, Abu Dhabi, UAE  
Tel Number - 02 4081400/522  
Mobile Number - +971506671084/+971547915875

## 2. How we collect your personal information:

- Through your sponsorer
- Candidates contact us directly
- When we receive data from WSET head office

## 3. Personal information we collect:

We may collect the following types of personal data:

- **Basic Identification Details:** This includes your full name, date of birth, gender, and contact information (such as phone numbers, email address, and postal address).
- **Enrolment and Purchase Information:** Records of any course bookings or purchases made by you or on your behalf through Gray Mackenzie & Partners.
- **Payment Information:** If you make a payment for any course or service, your card details may be used during the transaction. These are encrypted for security and not stored or retained. Any card data provided via phone or physical forms is securely destroyed after processing.
- **Account Details:** If you create an online or student account with us, we will collect your login credentials.

- **Marketing Preferences:** Any preferences you've indicated regarding how we may contact you about future courses, updates, or offers.
- **Communication Records:** Any correspondence you have with us, including queries, feedback, or support requests.
- **Health-Related Information:** Where necessary, we may collect health-related data to support your request for reasonable adjustments or special considerations for exams. This is done with your explicit consent and treated with strict confidentiality.
- **Demographic Data:** Information such as your nationality & Country of Birth may be requested in compliance with local regulatory requirements to ensure equal opportunity in qualification delivery. This data will never be used for discriminatory purposes.

#### 4. Why We Collect Your Personal Information:

- Registering you as a WSET candidate so you can take part in WSET qualifications and exams.
- Administering your exams, including any requests for reasonable adjustments or special consideration.
- Sharing your exam results and certificates with you and WSET.
- Providing post-results support, such as enquiries or appeals, and gathering your feedback.
- Processing your registration for WSET-related courses or events hosted by us.
- Sending you information about the courses or events you've registered for.
- Processing payments for courses, events, or materials you purchase.
- Improving your experience, including personalised services and support.
- Marketing communications (only with your consent) about relevant courses or updates.
- Investigating any misconduct or non-compliance in connection with WSET qualifications.

#### 5. Our Legal Basis for Processing Your Information:

We process your personal information under the following lawful grounds:

- **Legitimate Interests** – For essential educational and administrative purposes, such as registering you for exams and managing online learning services.
- **Consent** – For marketing or where required by law. You may withdraw your consent at any time.

- Contract – When providing you with services, such as course access or online platforms, based on the terms you agree to.
- Legal Obligation – When required by regulatory bodies (e.g., the UAE government or international regulators like Ofqual in the UK).

## **6. Special Categories of Personal Information:**

Some information you provide may be sensitive, such as:

- Health-related data (To request exam adjustments)

This data will only be collected and used when necessary and handled with extra protection, always in accordance with data protection laws.

## **7. Sharing Your Personal Information:**

To deliver services effectively, we may share your information with trusted third parties, including:

- WSET (for exam registration and certification)
- Examiners and invigilators
- IT and hosting service providers
- Regulators (Ofqual or UAE authorities)

We may also share information when required to:

- Comply with legal obligations or court orders
- Work with professional advisors (legal counsel)
- Manage mergers, sales, or business transitions

We always ensure third parties handle your data securely and within legal frameworks.

## **8. Keeping Your Information Secure:**

- Your information is stored securely using appropriate technical and organizational measures. Any third party we work with must meet strict security standards and sign agreements confirming their responsibility to protect your data. All personal information shared with WSET will be processed in accordance with WSET privacy policy.

You may request details about how and when your data has been shared.

## **9. International Data Transfers:**

As WSET is headquartered in the UK, some of your data may be processed outside the UAE. When this happens, we ensure adequate safeguards are in place to protect your privacy in accordance with UAE data protection law and international standards.

## **10. How Long We Keep Your Data:**

We only keep your personal data for as long as necessary. If you complete a WSET qualification, we may retain some records for longer to meet regulatory obligations. You may request more details about our data retention policy.

## **11. Your Rights as a Student:**

Under UAE data protection law, you have the following rights:

- Right to Be Informed – You have the right to know how your data is used.
- Right of Access – You may request a copy of the data we hold about you.
- Right to Rectification – You can ask us to correct inaccurate or outdated information.
- Right to Erasure – You may request deletion of your data, though we may retain some information to meet legal obligations.
- Right to Data Portability – You can request your data in a portable format for transfer to another provider.
- Right to Object – You may ask us to stop processing your data for certain purposes, including marketing or research.

You may also raise a complaint with the GMP APP [deepak@admmi.ae](mailto:deepak@admmi.ae) or with the UK's Information Commissioner's Office at <https://ico.org.uk>.

## **12. Policy Updates**

We may update this policy periodically to reflect changes in UAE law or WSET procedures. If significant changes are made, we will notify you through our website or learning platform.

If you have any questions or concerns about how your personal data is being handled, you can reach out to [deepak@admmi.ae](mailto:deepak@admmi.ae)