

PRIVACY POLICY

Following changes to data protection law, we at Cousins Engineering have updated our privacy notice to reflect changes to strengthen your privacy rights that will give you more control over how our organisation will use your personal data. Our commitment will be ongoing on how we use your data and keep it safe and to address the new standards introduced by European data protection law known as General Data Protection Regulation (GDPR).

[Cousins Engineering Privacy Notice](#)

Cousins Engineering respect your privacy and are committed to protecting your personal data. Contents of this privacy notice will include how we collect, use, process and transfer personal data.

[Important information and who we are](#)

Purpose of privacy notice

We will collect and process your personal information about you in order to provide you with goods and services you request from time to time. The purpose of the privacy notice is to let you know how we will use your personal information and your rights with respect to your personal information.

Regulations acknowledge that children may not be able to give consent for their data to be processed as they cannot be expected to understand the risks and consequences. Therefore, they state that “where the child is below the age of 16 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child”. Essentially: if you’re under 16, your parent or guardian has to give consent for the company to use your data. We do not knowingly collect or use personal data for children under 16 years.

It is important to read this privacy notice so that you are fully aware of how and why we are using your data.

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Controller

Cousins Engineering is the controller and responsible for your personal data (collectively referred to as “Cousins Engineering”, “we”, “us” or “our” in this privacy notice).

We have a data privacy personnel who is responsible for answering any question in relation to this privacy notice. If you have any questions about this privacy notice or/and any requests about your legal rights, please do not hesitate to contact the data privacy manager. Details as follows:

Company Address:
23, Bunting road,
Kingsthorpe,
Northampton,
NN2 6EE

Email address: privacy@cousinsengineering.co.uk

You have the right to make a complaint at any time to Information Commissioner’s office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). However, we would appreciate the opportunity to address any concerns you have before you approach the ICO so please contact in the first instance.

It is important that the personal data we hold about you is accurate and current. Please keep us updated if your personal data changes during your relationship with us.

Our website www.cousinsengineering.co.uk may include links to third party websites, plug-ins and applications. By clicking on the links or enabling those connections may allow third parties to collect or share your personal data. We do not control these third party websites and are not responsible for their privacy statements. When you exit our website, we advise you to read the privacy notice of every website you visit.

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The data we collect about you

Personal data or personal information means any information about an individual could identify a person. It does not include data where the identity has been removed (anonymous data).

Below is a categorised list of the personal data we may collect, use, store and transfer about you:

Identity Data includes first name, middle name, last name, maiden name, username or similar identifier, title, date of birth and gender.

Contact Data includes billing address, delivery address, email address and phone numbers.

Financial Data includes bank account details.

Transactional Data includes details about payments to and from you and other details of products and services you have purchased from us.

Technical Data includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operation systems and platform and other technology on the devices you use to access our website.

Profile Data includes your purchases or orders made to you, your interests, preferences, feedback and survey responses.

Usage Data includes information about how you use our website, products and services.

Marketing and Communication Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

From time to time we may use and share **Collective Data** such as statistical or demographic data for any purpose. Collective Data may originate from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may collect your Usage Data to calculate the percentage of users accessing a specific feature on our website. However, if we combine or connect Collective Data with your personal data so that it can directly or indirectly identify you. We handle the combined data as personal data that will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you, this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political views, trade union membership, information about your health and genetic and biometric data. Also we do not collect any information regarding criminal convictions or offences.

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Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this instance, we may have to cancel a product or service you have with us but we will notify you if this is the case.

How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct Interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or fax. This is personal data you provide when you:
Make a request for our products or services;
Request marketing to be sent to you;
Enter a competition, promotion or survey or give us some feedback;

We may receive personal data about you from various third parties or publicly available sources such as:
Technical Data from companies such as Google who provide analytical information.
Contact, Financial and Transaction Data from providers of technical, payment and deliveries services.
Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register.

How we use your personal data.

We will only use your personal data when the law allows us to, most commonly in the following circumstances:

Where we need to perform the contract we are about to enter into or have entered into with you;
Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
Where we need to protect your vital interests;
Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

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Reasons for which we will use your personal data is set below, a description of all ways we plan to use your personal data and the legal grounds we rely on to do so. We have also identified what our legitimate interests are where appropriate.

We may use your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out below.

Purpose; to register you as a new customer or provide you with a quote.

Type of data; Identity and Contact.

Lawful basis for processing including basis for legitimate interest; performance of a contract with you.

Purpose; to process and deliver your order including manage payments, fee and charges. Collect and recover money owed to us.

Type of data; Identity, Contact, Financial, Transaction and Marketing and Communications.

Lawful basis for processing including basis for legitimate interest; a) performance of a contract with you b) necessary for our legitimate interests (to recover debts due to us).

Purpose; to manage our relationship with you will include a) notifying you about changes to our terms or privacy policy b) asking you to leave a review or take a survey.

Type of data; Identity, Contact, Profile and Marketing and Communications.

Lawful basis for processing including basis for legitimate interest; a) performance of a contract with you b) necessary to comply with a legal obligation c) necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).

Purpose; to enable you to partake in a prize draw, competition or complete a survey.

Type of data; Identity, Contact, Profile, Usage and Marketing and Communications.

Lawful basis for processing including basis for legitimate interest; a) performance of a contract with you b) Necessary for our legitimate interests, to study how customers use our product/services, to develop them and grow our business.

Purpose; to administer and protect our business and our website including troubleshooting, data, analysis, testing, maintenance support, reporting and hosting of data.

Type of Data; Identity, Contact and Technical.

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Lawful basis for processing including basis for legitimate interest; a) necessary for legitimate interests for running our business, provision of administration and IT services, network security to prevent fraud and in the context of a business reorganisation or group restructuring exercise b) necessary to comply with legal obligation.

Purpose; to deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.

Type of Data; Identity, Contact, Profile, Usage, Marketing and Communications and Technical.

Lawful basis for processing including basis for legitimate interest; necessary for our legitimate interested to study how customers use our products/services to develop them, to grow our business and to inform our marketing strategy.

Purpose; to send marketing and communications to inform you of special offers, promotions, new products.

Type of Data; Identity, Contact, Profile, Usage and Marketing and Communications.

Lawful basis for processing including basis for legitimate interest; necessary for our legitimate interests to develop products and services, applications and designs that attract and retain customers.

Purpose; to use data analytics to improve our website, products/services, marketing, customer relationships and experiences.

Type of Data; Technical and Usage.

Lawful basis for processing including basis for legitimate interest; necessary for our legitimate interests to define types of customers for our products and services, to keep our website updates and relevant, to develop our business and to inform our marketing strategy.

Purpose; to make suggestions and recommendations to you about goods and services that may be of interest to you.

Type of Data; Identity, Contact, Technical, Usage and Profile.

Lawful basis for processing including basis for legitimate interest; necessary for our legitimate interests to develop our products/services and grow our business.

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Marketing

We endeavour to provide you with choices regarding certain personal data uses, especially when it comes to marketing and advertising.

We may use your Identity, Contact, technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion and in each case you have not opted out of receiving that marketing.

Third-party marketing

We will get your opt-in consent before we share your personal data with any company outside the Cousins Engineering for marketing purposes.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

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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 would like an explanation as to how the processing for the new purpose is compatible with the original purpose then 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 rules above, where this is required or permitted by law.

Disclosures of your personal data

Sometimes we may have to share your personal data with trusted third parties or where we are required to do so by law. Examples of third parties we may share your personal data with are:

- 1) IT companies who support our website and other business system.
- 2) Operational companies such as delivery couriers.
- 3) Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services to us.
- 4) HM Revenue and Customs, regulators and other who require reporting of processing activities in certain circumstances.
- 5) Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them.

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If a change happens to our business, then the new owners may use your personal data on the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Internal transfers

We do not transfer your personal data outside the European Economic Area (EEA).

Data security

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 will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

How long will you use my personal data?

We will only retain your personal data for as long as necessary to fulfil the purpose we collected it for, including for the purposes of satisfying and legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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In some circumstances we may anonymise your personal data so that it can no longer be associated with for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

You legal rights

Upon certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Also, you have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. However, we may not be able to comply with your request of erasure for specific legal reasons which you will be notified, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest or third party and there is something about your particular situation which makes you want to object to processing in this ground as you feel it impacts on your fundamental rights and freedom. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following situations a) if you want us to establish the data's accuracy; b) where our use of data is unlawful but you do not want us to erase it; c) where you need us to hold the data even if we no longer require it as you need to establish, exercise or defend legal claims; or d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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Request the transfer of your personal data to you or a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where you are relying on consent to process your data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set above, please contact us.

You will not have to pay a fee to access your personal data or to exercise your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or to exercise your other rights. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you unless we have your consent or are otherwise required or permitted to by law. You can obtain further information about how we assess our legitimate interests against potential impact on you in respect of specific activities by contacting us.

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Performance of Contract means processing your personal data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subjected to.