Cobra Hydro UK Limited Privacy Policy

Cobra Hydro UK Limited ("We") are committed to protecting and respecting your privacy.

This privacy policy ("Privacy Policy"), together with our terms of use and any other documents referred to in this Privacy Policy, sets out the basis on which any personally identifiable information ("Personal Data") we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it in respect of your use of cobrahydro.co.uk ("Our Site").

By using this website, you are accepting the terms of this Privacy Policy. In the event of a conflict between the terms of this Privacy Policy and the Terms of use, the Terms of use will prevail.

OUR DETAILS

For the purposes of our business we are the data controller.

In respect of processing that we undertake on behalf of our clients we are the data processor and our client is the data controller who determines the purpose and means of the processing of personal data which they provide us with. There may be instances where we are a joint data controller with our client.

Our data protection officer is Lisa Reeves and can be reached at lisa.reeves@cobrahydro.co.uk.

HOW WE USE YOUR INFORMATION

The following sections set out why we are processing your information, what information we collect, the legal basis for and duration of our processing of your information and (if applicable) who your information will be shared with and where those recipients are based.

Which information do we process and for what purpose?

We process the following information from you:

Information you give us. Information that you provide by filling in forms on our site www.cobrahydro.co.uk (our site). This includes information you provide when you register to use our site, request marketing information, use our online chat feature, enter a competition, promotion or survey and when you report a problem with our site. The information you give us may include your name, address, company name, email address and phone number.

Details of Your Visit to our Website. We collect non-personally identifying information of the sort that web browsers and servers typically make available. This includes, but is not limited to, traffic data, location data, weblogs and records of how you navigate the pages on our site and how you interact with the pages.

IP addresses. We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

We process information you give us and that we collect about you for the following purposes:

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To carry out our obligations arising from any contracts entered into between you and us.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our service.

What are the grounds for processing your information?

We are processing your data on the following ground(s):

- you have previously given your consent to us processing your data the purposes stated in section 2.2, above; and/or
- the processing is necessary for achieving our legitimate interest in respect of the goods or services you have requested or purchased. In accordance with data protection law, we have carefully weighed your interests and fundamental rights and freedoms against our interest to process your information and are satisfied that we are justified in processing your information for this purpose.

Duration and further processing

We will regularly review the personal data which we are holding about you, and will delete it as appropriate. We will store your personal data for no longer than is necessary for us to fulfill the purpose for which it was obtained and given consent for provided that we have a reasonable commercial case for doing so.

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.

Who is your information shared with?

In order to achieve the purpose(s) set out in section 2.2 above, we will share your data only with the following people or group of people:

- our professional partners where necessary for the specific project in question; and
- our delivery partners where necessary to complete an order. (See section 2.10 for specific privacy policies of our third party providers)

Subject to paragraph 2.6, we will never sell, share, or rent your personal data without your prior consent. It should be noted that, because we do not control the privacy practices of third parties, we advise that you read and fully understand their privacy policies in addition to this privacy policy.

We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that

500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Cobra Hydro UK Limited or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Cobra Hydro UK Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We will not share your personal information with or sell it to third-party marketers.

We may use the following third-party service providers named below to process and store your data:

- Acclaim Logistics (Acclaim Logistics Ltd) Read their privacy policy: (<u>http://www.acclaim-logistics.com/wp-content/uploads/2018/05/Acclaim-Logistics-Privacy-Cookies-Policy-May-2018.pdf</u>)
- Rejuvenate (Rejuvenate Group Ltd) Read their privacy policy: (<u>https://www.rejuvenate.it/legal/data-protection-retention</u>)
- Sage One (Sage UK Ltd) Read their privacy policy: (<u>http://www.sage.com/company/privacy-notice-and-cookies</u>)

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Automated decision making

We do not make automated decisions about you based on your information.

Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmission to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

Under data protection law you have the following rights:

- the right to be informed as to what we do with your information. This includes but is not limited to the right to know what information we gather, process and store, what we do with it, who we share it with and how long we keep it for;
- if we are processing your data on the basis of your consent then you have the right to withdraw that consent at any time. Consent can be withdrawn by notifying us using the details set out in section 8 below. The lawfulness of our historic processing based on your consent will not be retrospectively affected by your withdrawal of consent;
- the right to access a copy of your information which we hold. This is called a 'subject access request'. Additional details on how to exercise this right are set out in section 5, below;
- the right to object to processing of your information where it is likely to cause or is causing damage or distress. You can notify us of your objection to us processing your personal data using the contact details set out in section 8;
- the right to prevent us processing your information for direct marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us using the details set out in section 8, below;
- the right to object to decisions being made about you by automated means. We will inform you if your information is subject to automated processing;
- the right, in certain circumstances, to have your information rectified, blocked, erased or destroyed if it is inaccurate;
- the right, in certain circumstances, to claim compensation for damages caused by us breaching data protection law;
- enhanced rights to request that we erase, rectify, cease processing and/or delete your information; and
- in certain circumstances, the right to request the information we hold on you in a machine readable format so that you can transfer it to other services. This right is called 'data portability'. Additional details on how to exercise this right are set out in section 5, below.

For further information on your rights under data protection law and how to exercise them, you can contact Citizens Advice Bureau (*www.citizensadvice.org.uk*) or the Information Commissioner's Office (*www.ico.org.uk*).

COOKIES

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

We use "cookies" to gather statistical information that helps us understand what users find interesting and useful on our website. Users can decline the cookies by adjusting the "accept

cookies" setting on their browser, however, this may affect the functionality of the website. We do not use this code to collect any personally identifiable information.

The Cookies We Set

If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out.

We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.

This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.

Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Analytics page.

From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimisations our users appreciate the most.

As we sell products it's important for us to understand statistics about how many of the visitors to our site actually make a purchase and as such this is the kind of data that these cookies will track. This is important to you as it means that we can accurately make business predictions that allow us to monitor our advertising and product costs to ensure the best possible price.

We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; Facebook, Twitter, Linkedin, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

ACCESS TO INFORMATION

You have the right to access information held about you by making a written request to us. You must send us proof of your identity, or proof of authority if making the request on behalf of someone else, before we can supply the information to you. Requests should be sent to **lisa.reeves@cobrahydro.co.uk**. In certain circumstances, you will be entitled to receive the information in a structured, commonly used and machine readable form.

We will be allowed to charge you for our reasonable administrative costs in collating and providing you with details of the requested information which we hold about you, if your request is clearly unfounded or excessive.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

COMPLAINTS

You have the general right to complain to us (in the first instance) and to the Information Commissioner's Office (if you are not satisfied by our response) if you have any concerns about how we hold and process your information. Our contact details are set out in section 8, below. The Information Commissioner's Office website is *www.ico.org.uk*.

CONTACT

Questions, comments and requests, including any complaints, regarding us or this privacy policy are welcomed and should be addressed to **lisa.reeves@cobrahydro.co.uk.**