



## PRIVACY NOTICE

Cogne U.K. Limited understands that your privacy is important to you and that you care about how your personal data is used and shared. We respect and value the privacy of all of our Customers and Suppliers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

### 1. Information about us

We are Cogne U.K. Limited, a limited company registered in England under company number 03298004 whose registered address is Uniformity Steel Works, Don Road, Newhall, Sheffield, South Yorkshire, S9 2UD United Kingdom.

Our VAT Number is: GB 684375008

#### Contact Details:

Email: [PrivacyTeam@cogne.co.uk](mailto:PrivacyTeam@cogne.co.uk)

By post: FAO the Privacy Team, Cogne U.K. Limited, Uniformity Steel Works, Don Road, Newhall, Sheffield S9 2UD

Telephone: 0114 221 2020

Website: [www.cogne.co.uk](http://www.cogne.co.uk)

We are a data controller of the information we hold about you as a customer, potential customer or supplier.

We are required under data protection legislation to notify you of the information contained in this privacy notice.

We are regulated by the Information Commissioner's Office (ICO).

### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

### 3. What is Personal Data?

Personal data means any information relating to an individual (also known as a 'data subject') who can be identified (directly or indirectly) in particular by reference to an identifier e.g. name, contact details but also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.



#### 4. Your Rights

Under data protection law, individuals have certain rights when it comes to how we handle their personal data. For example, an individual has the following rights:

- **The right to make a ‘subject access request’.** This entitles an individual to receive a copy of the personal data we hold about them, together with information about how and why we process it and other rights which they have (as outlined below). This enables them, for example, to check we are lawfully processing their data and to correct any inaccuracies.
- **The right to request that we correct incomplete or inaccurate** personal data that we hold about them.
- **The right to withdraw any consent** which they have given.
- **The right to request that we delete or remove** personal data that we hold about them where there is no good reason for us continuing to process it. Individuals also have the right to ask us to delete or remove their personal data where they have exercised their right to object to processing (see below).
- **The right to object to our processing** of their personal data for direct marketing purposes, or where we are relying on our legitimate interest (or those of a third party), where we cannot show a compelling reason to continue the processing.
- **The right to request that we restrict our processing** of their personal data. This enables individuals to ask us to suspend the processing of personal data about them, for example if they want us to establish its accuracy or the reason for processing it.
- **The right to request that we transfer** to them or another party, in a structured format, their personal data which they have provided to us (also known as the right to ‘data portability’). The applicability of this right depends on the legal grounds on which we process it.
- **The right to challenge a decision** based solely on profiling/automated processing, to obtain human intervention, and to express their point of view.

#### 5. What Personal Data Do We Collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us).

- Name;
- Business/company name, address, registration and VAT numbers;
- Job title;
- Profession;
- Contact information such as email address and telephone number;
- Demographic information such as post code;
- Payment information.



## **6. How Do We Use Your Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for your business needs.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and post.

## **7. How Long Will You Keep My Personal Data?**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Customer Data: 7 years from the date of last order placed, or where customers have specific requests for us to hold data we will try to do so as far as is reasonably practicable.
- Supplier Data: 7 years.

## **8. How and Where Do You Store or Transfer My Personal Data?**

Cogne U.K. Limited uses a wide range of security measures to improve the protection and maintenance of the security, integrity and accessibility of your personal data.

All your personal data is stored on our secure servers or on those of our suppliers or our business partners, and are accessible and usable according to our standards and our security policies (or equivalent standards for our suppliers or business partners).

We adopt, among others, measures such as:

- the strict restriction of access to your personal data, based on the need and for the only purposes communicated;
- perimeter security systems to prohibit unauthorised access from outside;
- permanent monitoring of access to information systems to identify and stop the abuse of personal data;
- tracking of access to your personal data by internal staff and verification of the purpose.



Where we have provided you (or you have chosen) a password that allows you access to our website, applications or services we provide, you will be responsible for the confidentiality of this password and for compliance with any other security procedure. We ask you not to share your password with anyone.

We retain your personal data only for the time necessary to achieve the purposes for which they were collected or for any other legitimate related purpose.

Storage times in relation to the different purposes listed above:

- (a) **Fulfillment of contractual obligations:** the data processed to fulfill any contractual obligation may be kept for the entire duration of the contract and in any case not later than 7 years, in order to verify any inclusions including accounting documents (for example invoices).
- (b) **Operational management and purposes strictly connected to the use of the website:** the data processed for this purpose may be kept for the duration of the contract and in any case not later than 7 years.

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

## 9. Do You Share My Personal Data?

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may sometimes contract with the following third parties to supply services to you on our behalf. These may include payment processing and delivery. In some cases, those third parties may require access to some or all of your personal data that we hold.

- Hauliers; provide transport on our behalf, therefore will be given access to customer/supplier addresses and product descriptions.
- Equifax and Coface; provide credit insurance therefore will be given access to Business information.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.



## 10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 30 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time.

## 11. How Do I Contact You?

Should you have any queries regarding this Privacy Notice, about Cogne U.K. Limited’s processing of your personal data or wish to exercise your rights you can contact Cogne U.K. Limited’s Privacy Team using this email address: [PrivacyTeam@cogne.co.uk](mailto:PrivacyTeam@cogne.co.uk)

Telephone: 0114 221 2020

By Post: Cogne U.K. Limited, Uniformity Steels Works, Don Road, Newhall, Sheffield S9 2UD

If you are not happy with our response, you can contact the Information Commissioner's Office: <https://ico.org.uk/>

## 12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our Website at [www.cogne.co.uk](http://www.cogne.co.uk)