

Welcome to CDL's privacy policy.

This privacy policy applies to customers, prospective customers, suppliers, prospective suppliers, website users and visitors to our premises.

CDL respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

1. Important information and who are we?

Purpose of this privacy policy

This privacy policy describes the type of Personal Data we may collect from you and our practices for collecting, using, maintaining, protecting, and disclosing that Personal Data to the extent that we act as a data controller (for example, in respect of account management and billing information).

This privacy notice does not apply where we process Personal Data on the instruction of customers in the context of providing products and/or services where we act as a data processor.

It also describes the choices available to you regarding our use of your Personal Data and how you can access and update it and explains your rights in relation to your Personal Data and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain Personal Data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR). We are also subject to the EU General Data Protection Regulation (EU GDPR) in relation to products and services we offer to individuals in the European Economic Area (EEA).

The website is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing Personal Data about you so that you are fully aware of how and why we are using your Personal Data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

CDL is made up of different legal entities, namely Cheshire Datasystems Limited, CDL Production Services Limited, CDL Vehicle Information Services Limited and CDL Internet Services Limited (collectively “CDL Group”). This privacy policy is issued on behalf of the CDL Group so when we mention “CDL”, “we”, “us” or “our” in this privacy policy, we are referring to the relevant company in the CDL Group responsible for processing your Personal Data. We will let you know which entity will be the controller of your personal data when you purchase a product and/or service from us or otherwise have dealings with us.

We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights please contact the data protection officer using the details set out in section 9 ‘Your legal rights’ details’ below.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 23 October 2023.

It is important that the Personal Data we hold about you is accurate and current. Please keep us informed if your Personal Data changes during your relationship with us.

Third-party links and Third Parties

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy.

statements. When you leave our Website, we encourage you to read the privacy policy of every website you visit.

Definitions

We will use these terms throughout this privacy policy, so that we can more easily describe how we treat Personal Data about the different groups of people with whom we interact.

Customer means the person, company, organisation or firm who purchases the products and/or services and assumes responsibility under the contract. The Customer also includes employees of the company, organisation or firm and prospective customers.

Data Subject means the individual who the Personal Data relates to.

Personal Data means any information relating to an identified or identifiable individual.

Special Category Personal Data means Personal Data revealing racial or ethnic origin, political opinions, religious beliefs or trade union membership, genetic data, biometric data (where used for identification purposes) and data concerning health, sex life or sexual orientation.

Supplier means the person, company, organisation or firm which supplies or intends to supply goods and services to CDL.

Visitor means any visitor that attends one of CDL's premises. A Visitor is typically a Customer or Supplier but can be a member of the public.

Website means www.cdl.co.uk, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

Website User means any third party that accesses the Website.

2. The Personal Data we collect about you

Personal Data, or personal information, means any information about an individual from which that person can be identified. It does not include Personal Data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

2.1 Information about Website Users

- **Identity Data** includes first name, maiden name, last name, job title, next of kin, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details, fraud check details.
- **Transaction 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, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our own Website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.

- **Usage Data** includes information about how you use our Website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Email content, postal content and telephone content data** which includes information that you have provided or that we have requested from you by email, post or telephone.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy policy.

2.2 Information about Customers

- **Identity Data** includes first name, maiden name, last name, job title, next of kin, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details, fraud check details.
- **Transaction 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, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our own Website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

- **Email content, postal content and telephone content data** which includes information that you have provided or that we have requested from you by email, post or telephone.
- **Image Data** includes images obtained from CCTV which can include vehicle registration numbers.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your Personal Data but is not considered Personal Data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy policy.

2.3 Information about Suppliers

- **Identity Data** includes first name, last name, job title and date of birth.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details, fraud check details.
- **Transaction Data** includes details about payments to you.
- **Email content, postal content and telephone content data** which includes information that you have provided or that we have requested from you by email, post or telephone.
- **Image Data** includes images obtained from CCTV which can include vehicle registration numbers.

2.4 Information about Visitors

- **Identity Data** includes first name, last name, job title and date of birth.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Email content, postal content and telephone content data** which includes information that you have provided or that we have requested from you by email, post or telephone.
- **Image Data** includes images obtained from CCTV which can include vehicle registration numbers.
- **Special Category Data** includes information about your dietary requirements (which may include health information) and details of health or medical conditions.

If you fail to provide Personal Data

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 Personal 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 products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your Personal Data collected?

We collect Personal Data directly from Customers, Suppliers, Visitors and Website users using different methods including through:

Direct interactions. You may give us your Identity, Contact, Financial, Profile, Location Data, Special Categories of Data and Email Data by filling in forms or by corresponding with us by post, phone, email, text or otherwise. This includes Personal Data you provide when you:

- apply for our products or services;
- create an account on our Website;
- subscribe to our service or publications;
- sign up to our newsletters;
- request marketing information or literature to be sent to you;
- request a quotation;
- when you register and log into our online services including but not limited to Service Now and the Client Product Hub Portal, and provide Personal Data to us in this way;
- when you supply or propose to supply goods and/or services to us;
- when you visit our premises;
- enter a competition, promotion or survey; or
- give us feedback or contact us by email, telephone or post.

Automated technologies or interactions. As you interact with our Website or online services, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using server logs and other similar technologies.

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- (a) analytics providers such as Google based outside the UK;
 - (b) advertising networks based in the UK; and
 - (c) search information providers such as Google based inside the UK.
- Identity and Financial Data from a third party, e.g., sanctions screening providers; credit reference agencies and customer due diligence providers.
 - Financial Data from a third party with your consent.
 - Technical Data, Profile Data, Profile Data and Image Data via our IT systems, e.g. from door entry systems and reception logs, and through monitoring of our Website and other technical systems, such as computer networks and connections, CCTV and access control systems, communications systems, email and instant messaging systems.
 - Contact, Financial and Transaction Data from providers of technical, payment and delivery Services based inside and outside the UK.
 - Identity and Contact Data from data brokers or aggregators based inside the UK.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.
 - Identity Data, Contact Data and Financial Data risk data from providers of payment support.

4. How we use your Personal Data

We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform a 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 comply with a legal obligation.

Some Personal Data is designated as “Special Category Data”. This is Personal Data which is subject to higher levels of protection because it is more sensitive. This includes information about health, race, religion and political opinions. We don’t usually collect any Special Category Data, but we do need to know about any dietary requirements that you have if we are providing you with a meal at our premises. Usually this will only tell us what food is required (e.g. “gluten-free” or “no pork”) but occasionally it might include some Special Category Data (e.g. “coeliac disease” or “Muslim”).

You should note the following points specifically about this type of data:

- We will only use this data to make sure you are provided with a safe and suitable meal for you. Usually this is only used in conjunction with your name so that we know who needs to be served with a particular meal.
- If you are providing dietary requirements about yourself or anyone else, where possible you should only tell us the food required and not any information about the reason for the food being required.
- If you do give us information about the reason for the food being required and this reveals a health issue or your or someone else's religion, you should make sure that you and/or that other person are aware of the fact that we will process this data and happy for us to do so.

We also need to know of any disabilities you have if you are attending our premises so we can make reasonable adjustments to ensure your safety.

When the Personal Data is classed as Special Category Data we must additionally have a legal condition to process it. The legal conditions which we rely on are also set out in data protection law.

[Click here](#) to find out more about the types of lawful basis that we will rely on to process your Personal Data.

Generally, we do not rely on consent as a legal basis for processing your Personal Data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing and promotional emails at any time by contacting us.

Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your Personal Data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your Personal Data. Please contact us if you need details about the specific legal ground we are relying on to process your Data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new Customer and provide products and/or services to you	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to enable you to register with the business in anticipation of completing an order, enabling the formation and performance of a contract with you) (b) Performance of a contract with you
To register the Customer as a new user of CDL's online services	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (to enable you to register with the business in anticipation of completing an order, enabling the formation and performance of a contract with you) (b) Performance of a contract with you
To process and deliver the order to Customers about the products and/or service including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with Customers, Suppliers and Website Users which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(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)
To enable Customers and Website Users to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers use our products/Services, to develop them and grow our business)
To administer and protect our business, the Website and online services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our 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 a legal obligation
To deliver relevant website content and advertisements to Customers and Website Users and measure or	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how customers use our products/services, to

understand the effectiveness of the advertising we serve to you	(d) Usage (e) Marketing and Communications (f) Technical	develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and Services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to Customers and Website Users about products or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications (e) Email	Necessary for our legitimate interests (to develop our products/Services and grow our business)
<p>Anonymising Personal Data of Customers, Suppliers, Visitors and Website Users</p> <p>When required, we anonymise Personal Data so that individuals cannot be identified before we use it for management information and analysis of our products and services. Analysis of anonymous Personal Data provides us with insights about our business, and with opportunities to improve our products and services and the health and wellbeing of the people who use them. Analysis of anonymous Personal Data also allows us to demonstrate the value of the products and services we provide to our Customers. The way that we anonymise Personal Data aligns with regulatory guidance and is achieved using different techniques, for example removing identifying data or overwriting it with randomised non-identifiable data.</p>		Anonymisation still constitutes use of your Personal Data; we rely on the legal bases that we relied on when your data was originally collected.
Enquiry handling and ongoing support	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to assist you with product and service selection, to recommend suitable products for your

	(d) Email	requirements, to assist and support you with your purchase, to provide the support that we aim to deliver to all customers, and to ensure the safety of our customers when using our products and services)
For quality, training and security purposes. We may record phone calls that you have with our customer services representatives and use some of these for quality monitory and training purposes, and as a record of our conversation	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications (f) Email content, postal content and telephone content	(a) Necessary for our legitimate interests (to process Personal Data for service improvements) (b) Necessary to comply with a legal obligation
Preventing and detecting fraud against you or us	(a) Identity (b) Financial	(a) Necessary for our legitimate interests (to minimise fraud that could be damaging for you and/or us)
Conducting checks to identify our Customers and Suppliers and verify their identity Screening for financial and other sanctions or embargoes	(a) Identity (b) Contact (c) Financial	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation
Other activities necessary comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law	(a) Identity (b) Contact (c) Financial	(a) Necessary for our legitimate interests (b) Necessary to comply with a legal obligation
To enforce legal rights to defend or undertake legal proceedings	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Necessary for our legitimate interests (to protect our business, interests and rights) (b) Necessary to comply with a legal obligation
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Necessary to comply with a legal obligation
Ensuring business policies are adhered to, e.g. policies covering security and internet use	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (to make sure we are following our own internal

		procedures so we can deliver the best service to you)
Ensuring the confidentiality of commercially sensitive information	(a) Identity (b) Contact (c) Transaction (d) Technical (e) Profile (f) Usage	(a) Necessary for our legitimate interests (to protect trade secrets and other commercially valuable information) (b) Necessary to comply with a legal obligation
Preventing unauthorised access and modifications to systems	(a) Identity (b) Contact (c) Transaction (d) Technical (e) Profile (f) Usage	(a) Necessary for our legitimate interests (to protect and detect criminal activity that could be damaging for you and/or us) (b) Necessary to comply with a legal obligation
Protecting the security of systems and data used to provide the products and services	(a) Identity (b) Contact (c) Transaction (d) Technical (e) Profile (f) Usage	(a) Necessary for our legitimate interests (to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us) (b) Necessary to comply with a legal obligation
Updating customer records	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical (f) Profile (g) Usage (h) Marketing and Communications (i) Email content, postal content and telephone content	(a) Performance of a contract (b) Necessary for our legitimate interests (to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us) (c) Necessary to comply with a legal obligation
Statutory returns	(a) Identity Data (b) Contact Data	(a) Necessary to comply with a legal obligation

	(c) Transaction Data	
Credit reference checks via external credit reference agencies	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Necessary for our legitimate interests (to ensure our customers are likely to be able to for our products and services)
External audit and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	(a) Identity Data (b) Contact Data (c) Transaction Data	(a) Necessary for our legitimate interests (to maintain our accreditations so we can demonstrate we operate at the highest standards) (b) Necessary to comply with a legal obligation
To share your Personal Data with members of the CDL Group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency. In such cases information will be anonymised where possible and only shared where necessary	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Technical (f) Profile (g) Usage (h) Marketing and Communications (i) Email content, postal content and telephone content (j) Special Category Data	(a) Necessary for our legitimate interests (to protect, realise or grow the value in our business and assets) (b) Necessary to comply with a legal obligation
To provide you with meals at our premises and ensure the premises are safe for you	(a) Identity (b) Contact (c) Email content, postal content and telephone content (d) Special Category Data	(a) Necessary for our legitimate interests (to process your Personal Data to ensure you are provided with a safe and suitable meal and to ensure the safety of visitors when attending our premises). Additional Condition for Processing The data subject has given explicit consent.

Marketing

We strive to provide you with choices regarding certain Personal Data uses, particularly around marketing and advertising. We have established the following Personal Data control mechanisms:

Promotional offers from us

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 products or services from us and you have not opted out of receiving that marketing, if you provided us with details by subscribing to our newsletters, if you provided us with details when you entered a competition or registered for a promotion, and in each case, you have not opted out of receiving that marketing or promotional content.

Third-party marketing

We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message.

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 or service purchase, service experience or other transactions.

Cookies

We do not use cookies on our Website. If we do decide to use cookies in the future, we will introduce a cookies policy and ensure visitors to our Website are made aware and appropriately able to consent to their use.

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

In some circumstances you can ask us to delete your Personal Data: see [Your Legal Rights](#).

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

5. Disclosures of your Personal Data

We may share your Personal Data with the parties set out below for the purposes set out in the table *Purposes for which we will use your Data* above.

- Internal Third Parties as set out in the [Glossary](#).
- External Third Parties as set out in the [Glossary](#).
- Specific third parties listed in the table *Purposes for which we will use your Data* above.
- 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. If a change happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy policy.

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.

Before engaging third party service providers, we conduct risk assessments and put in place contractual arrangements and security mechanisms to protect your data in line with our data protection, confidentiality, and security standards.

6. International transfers

Some of our external third parties are based outside the UK so their processing of your Personal Data will involve a transfer of data outside the UK.

Whenever we transfer your Personal Data out of the UK, we take steps to ensure that it is protected. Such steps may include placing the party we are transferring Personal Data to under contractual obligations to protect it to adequate standards.

Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of the UK.

7. 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 continually test our systems and are ISO 27001 and ISO 27701 certified.

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.

8. Data retention

How long will you use my Personal Data for?

We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for a minimum of six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your Personal Data: see *your legal rights* below for further information.

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

9. Your legal rights

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data protection officer in the following ways:

Full name of legal entity: Cheshire Datasystems Limited

Email address: dataprotection@cdl.co.uk

Postal address: Kings Reach Road, Stockport, SK4 2HD

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Under certain circumstances, you have rights under data protection laws in relation to your Personal Data. Please click on the links below to find out more about these rights:

- *Request access to your Personal Data.*
- *Request correction of your Personal Data.*
- *Request erasure of your Personal Data.*
- *Object to processing of your Personal Data.*
- *Request restriction of processing your Personal Data.*
- *Request transfer of your Personal Data.*
- *Right to withdraw consent.*

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

No fee usually required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could 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 any of 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 you 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 could take us 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.

10. Glossary

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 any potential impact on you in respect of specific activities by contacting us.

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 obligation means processing your Personal Data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers: Anywhere365; Microsoft365; Twilio, Druva, ProxyClick, ServiceNow, Okta, AWS acting as processors based in and outside the UK who provide communications, IT and system administration services.

- Professional advisers acting as processors or controllers including lawyers, bankers, auditors and insurers based in and outside the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities [acting as processors or controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- CCTV monitoring provider, Electronic Security Installations Ltd, acting as a processor, based in the UK, who provide installation, maintenance and monitoring of CCTV systems.
- Business credit report provider, CreditSafe Business Solutions, acting as a processor, based in and outside the UK.
- Transport services acting as processors and controllers, based in and outside the UK.
- Third party suppliers or subcontractors, acting as processors and controllers, based in and outside the UK that may dispatch goods or provide services directly to you in pursuance of an order placed with us. In this instance we may provide your name, address, email address and telephone number to a supplier in order for that third party supplier or subcontractor to deliver a product and service directly to you. As part of this delivery of product or service, your details may also be passed to a postal or courier service to effect delivery of our product or service and in order to communicate delivery confirmations and/or estimated delivery times.
- 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. If this happens to our business, then the new owners may use your Personal Data in the same way as set out in this privacy policy.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your Personal Data (commonly known as a "data subject access request"). 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. You also 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. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. 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 scenarios:

- If you want us to establish the Personal Data's accuracy.
- Where our use of the Personal Data is unlawful but you do not want us to erase it.
- Where you need us to hold the Personal Data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your Personal Data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your Personal Data to you or to 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. Note that 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 we are relying on consent to process your Personal 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.