

Cigol Controls Limited - Data Protection Statement

1. Revision Information

3rd June 2019	Revision 1 - added company registration number
29th May 2019	Original release

2. Purpose of this Statement.

This statement describes how we collect and use personal data about you, in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act 1998 or 2018 and any other national implementing laws, regulations and secondary legislation, as amended or updated from time to time in the UK ('Data Protection Legislation').

Please read the following carefully to understand our practices regarding your personal data and how we treat it.

3. About Us.

Cigol Controls Limited ("Cigol Controls") is a firm specialising in the design and manufacture of industrial controls systems. We are registered in England and Wales as a limited company (registration number: 1404834) and our registered office address is Quince House, King Street, Colyton, EX24 6LA.

For the purpose of Data Protection Legislation and this statement, we are the "data controller". This means that we are responsible for deciding how we hold and use personal data about you. We are required under the Data Protection Legislation to notify you of the information contained in this Data Protection Statement.

We have appointed a Data Protection Officer. Our Data Protection Officer is our Data Protection Point of Contact and is responsible for assisting with enquiries in relation to this Data Protection Statement or for any issue relating to our treatment of your personal data. Should you wish to contact our Data Protection Officer you can do so by using the contact details given in the final section of this statement.

4. How We May Collect Your Personal Data.

We obtain personal data about you, for example when

- you request a quotation or consultation in respect of the services or products we provide.
- our customers engage us to provide our services or products and we provide our services or products.
- you contact us by e-mail, telephone, skype, post or other communication means for any reason.



- from third parties and/or publicly available resources (for example your employer or from Companies House).

5. The Kind of Information We Hold About You.

The information we hold about you may cover a wide variety of types of data, including but not limited to any of the following:

- your personal details (such as name, address, date of birth, national insurance number, tax reference, NHS number, e-mail address, skype name, phone numbers etc).
- details of contact we have had with you in relation to the provision or the proposed provision of our services or products.
- details of any products or services you have received from us.
- our correspondence and communications with you (over any media).
- information about any complaints or enquiries you make to us.
- information from our research, surveys and sales / marketing activities.
- information we receive from other sources such as publicly available information, information provided by your employer or our customers or other contacts.

6. How We Use Personal Data We Hold About You.

We may process your personal data for purposes necessary for the provision of proposals relating to the future supply of services or products with you or your employer or our customers or contacts.

We may process your personal data for purposes necessary for the performance of our contract with you or your employer or our customers or contacts.

We may process your personal data to meet our legal obligations.

We may process your personal data for the purposes necessary for the performance of our contract with our customers or potential customers. This may include processing your personal data where you are an employee, sub-contractor, supplier or customer of our customer.

We may process your personal data for the purposes of our own legitimate interests provided that those interests do not override any of your own interests, rights and freedoms which require the protection of personal data. This includes processing for sales / marketing, business development, statistical and management purposes.

We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

We may use your personal data in order to

- carry out our obligations arising from any agreements entered into between you or your employer or our customers and us (which will usually be for the provision of our services or products).



- carry out our obligations arising from any agreements entered into between our customers and us (which will usually be for the provision of our services or products) where you may be a subcontractor, supplier or customer of our client.
- provide you with information related to our services and products or our events and activities that you request from us or which we feel may interest you, provided you have consented to be contacted for such purposes.
- seek your thoughts and opinions on the services and products we provide
- notify you about any changes to our services or products.

In some circumstances we may anonymise or pseudonymise the personal data so that it can no longer be associated with you, in which case we may use it without further notice to you.

If you refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with you. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process your personal data without your knowledge or consent, in accordance with this statement, where we are legally required or permitted to do so.

7. Data Retention.

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it was collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services and products provided.
- any statutory or legal obligations
- the purposes for which we originally collected the personal data
- the lawful grounds on which we based our processing
- the types of personal data we have collected
- the amount and categories of your personal data
- whether the purposes of the processing could reasonably be fulfilled by other means.

8. Change of Purpose.

Where we need to use your personal data for another reason, other than for the purpose for which we collected it, we will only use your personal data where that reason is compatible with the original purpose.

Should it be necessary to use your personal data for a new purpose, we will notify you and communicate the legal basis which allows us to do so before starting any new processing.



9. Data Sharing with Third Parties.

We will share your personal data with third parties where we are required by law, where it is necessary to administer the relationship between us or where we have another legitimate interest in doing so.

“Third parties” includes third-party service providers such as those that provide information technology and cloud services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect your personal data. We only permit our third-party service providers to process your personal data for specified purposes and in accordance with our instructions.

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

10. Data Security.

We have put in place commercially reasonable and 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 will 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 data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

11. Rights of Access, Correction, Erasure and Restriction.

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us using the contact details given in the last paragraph of this statement.

Under certain circumstances, by law you have the right to

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data we hold you about you.
- 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 to continue to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below).
- 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 basis. You also have the right to object where we are processing your personal information for direct marketing purposes.



- Request the restriction of processing your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy of the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

If you want to exercise any of the above rights please contact us using the contact details given in the last paragraph of this statement.

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 for access is clearly unfounded or excessive. Alternatively we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

12. Right to Withdraw Consent.

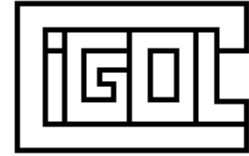
In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose (for example in relation to direct marketing that you have indicated you would like to receive from us), you have the right to withdraw your consent for that specific processing at any time. To withdraw consent please contact us using the contact details given in the last paragraph of this statement.

Once we have received notification that you have withdrawn consent, we will no longer process your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

13. Changes to this Statement.

Any changes we may make to our Data Protection Statement will be made available through our web site (www.cigol.com).

See section 1) (above) for details of the current revision information for this document.



14. Complaints.

If you wish to discuss ways in which we can improve our processing of your personal data or if you wish to make a complaint please contact us using the contact details given in the last paragraph of this statement.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at any time. The ICO's contact details are as follows:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 01625 545 745

website: <https://ico.org.uk/concerns>

15. Contact Us.

If you have any questions regarding this Data Protection Statement or regarding how we process your personal data please e-mail our Data Protection Officer:

Roger Swann

roger@cigol.com

Alternatively you can write to

Data Protection Officer
Cigol Controls Ltd.
Quince House
King Street
Colyton
EX24 6LA

Alternatively you can telephone 01297 552 319