

## **COSGROVE COSTING LIMITED - PRIVACY POLICY**

Cosgrove Costing Limited is committed to protecting and respecting the privacy of all individuals who utilise our services either directly or through legal third parties. This policy, sets out the basis on which we process any data that is provided to us, or that we collect in connection with any work we undertake on your behalf. The following provides our overview and practices regarding your personal data and how we will treat it.

### **GDPR Key Principles**

- Principle 1: Process data fairly, lawfully and transparently.
- Principle 2: Data may be collected for specified, explicit and legitimate purposes and must not be further processed in a manner that is incompatible with those purposes.
- Principle 3: Data must be adequate, relevant and limited to what is necessary for the purposes for which it is collected.
- Principle 4: Data must be accurate and where necessary, kept up to date.
- Principle 5: Data must be kept in a form that permits identification of individuals for no longer than is necessary.
- Principle 6: Data must be processed in a manner that ensures appropriate technical and organisational security.

By providing documentation to us or by visiting the Cosgrove Costing Limited website you are accepting and consenting to our practices as described in this policy.

For the purpose of the Data Protection Act 2018 (the Act) and the provisions of Regulation (EU) 2016/679 (the General Data Protection Regulation or GDPR), the Data controller is Cosgrove Costing Limited at The Pinetree Centre Durham Road Birtley Co. Durham DH3 2TD

Our nominated representative for the purpose of the Act is Ian Cosgrove.

### **COLLECTING YOUR INFORMATION**

We may collect and process the following data about you:

#### *1. Information you give us.*

If you submit data to us either by letter, telephone, email or by any other methods we will collect these details such as your name, contact details, your email address or your postal address.

You may give us information about you by filling in forms on our web-site or by corresponding with us by phone, e-mail or otherwise. This includes any information provided when contacting us through our website. The information you give us may include your name, address, phone number and e-mail address.

## *2. Information we collect about you.*

Personal data is always stored securely and we will never ask for any data that is not needed or necessary for us to undertake our work for you.

From the website we obtain data through the use of cookies and from your IP address, as further detailed in the 'Cookies' and 'IP Addresses' sections below. This allows us to collect aggregate and statistical data, which does not identify you, for statistical analysis and strategic development purposes.

### **DATA USAGE**

Collected data is only used for the purposes for which it is collected in connection with instructions we may receive to undertake work on your behalf.

We may use the data you submit to our website to respond to your enquiries or complaints.

### **SECURITY OF YOUR DATA**

Your information is held securely by us. We have taken all reasonable steps, and have in place appropriate security measures, to protect your information.

You can review the information at any time and if necessary you have the right to amend or cancel the agreement. Please see "Your Rights" section below.

Your data is protected under the Act and GDPR. The regulations give you a number of rights as set out below in the "Your rights" section

### **THE LEGAL BASIS ON HOW WE PROCESS YOUR DATA**

We hold and process your data subject to the following legal basis:

- To perform any contract or potential contract we enter into with you
- To comply with our legal and regulatory responsibilities
- For our legitimate interests including website operation and business compliance

### **DISCLOSURE OF YOUR INFORMATION**

We will not disclose your data to any other third parties unless:

- we are required to do so by law,
- disclosure is necessary for the purpose of, or in connection with, legal proceedings,
- it is to exercise or defend legal rights or
- we have your consent
- If Cosgrove Costing Limited or substantially all of its assets are acquired by a third party, in which case personal data held by us about visitors to our website will be one of the transferred assets.

## **YOUR RIGHTS**

You are entitled to view the personal data we hold about you and request that we amend it or delete it, subject to some exceptions. You also have the right to request that we restrict our processing of your data or to object to that processing.

Your data is protected under the Act and GDPR. The regulations give you a number of rights set out below, if you wish to exercise any of these rights please contact us using the details provided above.

- Right of access - you can access your personal data that we hold.
- Right to rectify - you have the right to rectify or correct any information we hold about you that is inaccurate.
- Right to be forgotten - you have the right to request that we delete your personal information. This right is not absolute and we may not be able to delete your personal information if this would prevent us from complying with our legal obligations.
- Right to restrict or object to processing - you have the right to object to our processing of your data, or restrict the processing we carry out.
- Right to data portability - you have the right to move, copy or transfer your data to another data processor
- You may ask us not to process your information for marketing purposes.
- You may make a complaint to the Information Commissioner [www.ico.org.uk](http://www.ico.org.uk).

If you wish to exercise any of these rights please contact the nominated representative as set out above.

Please note we may require further data from you in order to verify your identity before disclosing, amending or deleting any of your data.

## **WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") for example "The Internet cloud storage". By continuing to use our services and by submitting your personal data, you agree to this transfer, storing or processing.

If we transfer your data outside the EEA, we will take all reasonable steps to ensure that any such transfer is made securely and that there is adequate protection in place in order to protect your personal data, as required by the Act and GDPR.

We keep data in accordance with our internal retention procedures, which are determined by our legal, regulatory and professional obligations and accord with good practice. The retention periods differ depending upon the nature of the data we hold and the reasons why we are holding it, and are subject to change. When your data is no longer needed, we will destroy your data using our data destruction processes.

## **COOKIES**

Like most websites, our website uses cookies to capture certain data about its use and its users to improve the functionality of our website and your experience when using it. Cookies may store preferences and other data about your use of our website and we use this data to improve your experience of our website by making it personalised to you.

By using our website, you consent to our use of cookies. You can manage cookies by changing your browser settings to disable or delete cookies.

## **IP ADDRESSES**

When you visit our website our server will temporarily record your IP address (similar to a phone number, it is a unique number that allows your computer or device to communicate via the internet). If you are accessing our website from a business IP address, we also capture details of which organisations have visited our website.

## **WEBSITE SECURITY**

We are committed to ensuring that your data is secure. In order to protect the data you input to our website from unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss, we have put in place appropriate technical, physical and managerial procedures. All our employees and any third parties we engage to process your data are obliged to respect the confidentiality of your data.

However, the internet is not a secure environment and we cannot therefore guarantee total security of any data transmitted to our website. Whilst we utilise the latest virus protection software, we cannot guarantee our website is free of computer viruses or other harmful applications so such transmission is at your own risk.

## **CONTACT US**

If you have any questions or queries you have about this policy. Please address these to [enquiries@cosgrovecosting.co.uk](mailto:enquiries@cosgrovecosting.co.uk)

If we cannot resolve a complaint you can contact the Information Commissioner's Office at [www.ico.org.uk](http://www.ico.org.uk).

## **CHANGES TO THE POLICY**

We may change our policy from time to time. Any changes made will be binding on you and you are expected to review this page from time to time to take note of any amendments.

**DATED: 25 May 2018**