

PRIVACY NOTICE: OUR CUSTOMERS & SUPPLIERS

If you are a business customer or supplier, please see the additional information [below](#) that is specific to you.

About Us

(1) Who will collect and control information about you?

CPL Industries Limited is the parent for a number of companies operating within the market for the sale of solid fuels, charcoal and a number of other products.

CPL Industries Limited (**CPL**) is responsible for setting the policies that govern how data collected about individuals is managed. Most trading with consumers will be undertaken by CPL Distribution Limited.

All companies owned by CPL will collect and hold information in accordance with the policies set by it.

Data Collection

(1) What information will we collect about you?

When you buy or express an interest in products from CPL, it will collect the following information:

- Your name and address and other contact details (such as your mobile or land line phone number or email address) you might provide to us
- Details of your credit or debit card used to pay for your products and/or your bank account details when paying by direct debit
- Any specific details regarding how you would like your products delivered or any particular information you have provided to CPL about deliveries and purchases
- Search history and other electronic data when you have used the internet to look at and buy products from CPL
- Details of any comments, information or complaints you have raised with CPL regarding your purchases
- Details of any research / customer surveys you have completed
- Google analytics can also be used to collect data about your internet address (but will not identify you by name) so that unique visits to our websites can be tracked
- Electronic data can also include cookies which helps us to understand where customers have come from and the pages they are interested in (see the section on cookies at the end)

(2) What will we do with the information collected about you?

We will use the information you provide to help us engage with you as a customer. This will include:

- ensuring you receive the products you have ordered
- providing you with information about products you might be interested in (including running promotional activities)
- billing you for the products supplied by us

- managing the delivery of products to your address
- ensuring that our systems can provide you with information of interest and make buying from us as easy as possible
- undertaking research to help us understand customer preferences and requirements
- completing analysis of the effectiveness of the marketing we undertake and to develop and improve our products offered to you

(3) Who will receive the information collected about you?

The information we receive will be stored in CPL's electronic systems. The information will be accessible by:

- CPL's finance team in relation to purchases and payments made
- CPL's marketing team so they understand what customers like and need from CPL's products
- CPL's call centre to the extent they need to contact and speak to you about orders and deliveries
- CPL's depots so that deliveries can be made to you
- Other relevant CPL members of staff when they need to deal with any queries or complaints regarding CPL or they need to manage any part of delivering products to you
- CPL may also share your information with third parties to the extent it helps us to let you know about our products or enables us to manage the supply of products to you (this could include delivery companies, credit reference agencies, market research companies and other trusted suppliers to CPL).

(4) Reasons we collect and store information about you

We collect and store the information to enable us to sell products to you and to manage the customer relationship. From time to time, we might collect together data in an anonymous way to look at customer trends so we understand how we can develop our products and services for you.

Information will only be held for as long as is necessary as described below. Information will only be shared with third parties to the extent it is necessary to sell and deliver products to you and to manage the customer relationship. We will never sell your data to third party marketing agencies.

CPL will therefore process your data either on the basis of fulfilling its contractual obligation to supply products to you or on the basis of its legitimate interests as part of managing the ongoing customer relationship with you.

(5) How long will your information be kept?

We will hold your name and contact details and purchase history for up to seven years from our last transaction with you. We will not though store your credit or debit card details on our or any third party servers or computer systems.

We will keep the information for up to seven years because we find that some customers like to buy in bulk and subsequently like to hear about offers or products that might be of interest to them some years after their first purchase. So our experience has been that customers welcome us getting back in touch with them (even if their transaction with CPL was some time ago). We may also need to keep some personal information to bring or defend legal claims or to handle enquiries from government bodies.

After seven years, and if we have had no contact from you, records that identify you will be destroyed. You also have the right to ask us to erase your information - this is set out below.

Your Rights

(1) You have the right to:

- Access your personal information held by us.
- Require us to correct any mistakes in your information that we hold.
- Require the erasure of personal information concerning you in certain situations.
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine readable format and have the right to transmit those data to a third party in certain situations.
- Object in certain other circumstances to our continued processing of your personal information.
- Object at any time to processing of personal information concerning you for direct marketing
- Otherwise restrict our processing of your personal information in certain circumstances.

You can obtain further information about these rights from www.ico.gov.uk

If you wish to exercise any of these rights you can email us at:

cplenquiries@cplindustries.co.uk

or write to us at:

CPL Industries
Legal Department – Data Protection
Westthorpe Fields Road
Killamarsh
Sheffield
S21 1TZ

If you do so, please let us know:

- Your name and contact details
- Proof of your identity (such as a utility bill)
- The information you request or the actions you would like us to take.

Complaining

(1) If you wish to complain, you can write or email us at the details set out above.

If you are not satisfied with your response you can contact the Information Commissioner at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

Keeping your information secure

(1) We have appropriate security measures in place to prevent personal information from being accidentally lost or used in an unauthorised way.

We limit access to your personal information to those who have a genuine need to know.

All employees are subject to a duty of confidentiality and will use your information solely for the purpose described in this privacy notice.

Computer systems are password protected and are managed to ensure that they have the latest security updates and to minimise unauthorised access to information.

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

Cookies

1. What is a cookie?

Cookies are small text files stored on your browser or the hard drive of your computer or other device when you visit CPL's website. These allow the site to recognise you as a user either for the duration of your visit (using a "session cookie") or for repeat visits (using a "persistent cookie").

2. Why are cookies used?

Cookies enable you to undertake transactions on CPL's websites and make best use of the website's functionality. They are intended to provide you with a better customer experience.

Cookies can also recognise the device you are using. They can also store the content of an online shopping bag whilst the website is further viewed.

Cookies can also record the pages you've visited and the products viewed and the time spent browsing. They can therefore be used by us to keep track of the website domains from which people visit our websites and enable us to manage visitor activity on our website. They can help us to understand the demand for pages and the topics of interest on our websites.

Further information about cookies can be found at www.allaboutcookies.org.uk

3. Do cookies have to be used?

There is no obligation to use cookies. Cookies can be turned off in web browser settings - although this will affect how our websites will work.

BUSINESS AND COMMERCIAL CUSTOMERS

If you are a sole trader buying from CPL, much of the above information will also be relevant to you in relation to the data we collect, what we do with it, who will receive it, why we collect the data and how long the data will be kept. The sections on your rights will also apply.

However, for most companies the information held by CPL will not be personal data as the information will be about the relevant company.

To the extent personal data is kept, we describe our approach below.

(1) What information will we collect about you?

We will hold your name, e-mail address and any other contract details (such as your mobile or land line telephone number) that have been provided by you over the telephone, emails or other correspondence.

We may also store details (whether in a customer relationship database or otherwise) about your attendance at CPL events or any of our conferences, meetings, workshops or other occasions when you meet with CPL staff.

(2) What will we do with the information collected about you?

We will use the information to help manage our business relationship with the business for which you work. This will include managing the relationship with you whilst you represent your employer. The information may be used to:

- liaise with you on business transactions
- invite you to meetings or events
- record business opportunities

(3) Who will receive the information collected about you?

The information we receive will be stored in CPL's electronic systems. The information may be accessible by:

- CPL's finance or sales and marketing team or other managers and administrators that are handling CPL business with your company
- CPL may also share your information with third parties to the extent it is necessary to manage the relationship with your business (this may include sub-contractors and professional advisors)

(4) Reasons we collect and store information about you

We collect and store the information to enable us to manage the relationship with your company.

CPL will process your data either on the basis of its legitimate interests in managing the trading relationship with your company or for the purpose of its contract rights and obligations owed to your employer. Your data may also be used in order to comply with legal obligations (for example in the event of a dispute or legal claim).

(5) How long will your information be kept?

We will hold your name and contact details for up to seven years or longer if it is necessary for the purposes of any legal claims or to interpret and understand a contract.

Your rights are set out above.

This privacy notice is dated 22 May 2018.