



## Privacy Policy

In this privacy policy “we”, “us” or “our” refers to Crombec Limited.

Our company details are as follows:

- registered in England and Wales
- company number: 12342931
- registered office address: 6 The Kilns, Calne, SN11 8HJ
- trading address: 6 The Kilns, Calne, SN11 8HJ

Get in touch:

- Email: [info@crombecengineering.com](mailto:info@crombecengineering.com) (we will endeavour to reply to your email within 48 hours)
- Phone: 01249 321 220 (you can contact us Monday – Friday between 9am – 5pm)
- Online enquiry form: <https://crombecengineering.com/contact>

For the purposes of data protection law we will be a controller of your personal information (this means we make decisions about how and why your information is used, and that we have a duty to ensure your rights are protected).

Your privacy is important to us.

This privacy policy explains how and why we collect and use personal information, and what we do to ensure it is kept private and secure.

Our business is constantly developing and improving to reflect that and any changes in law and regulation we may need to make changes to this privacy policy from time to time; you can see when it was last updated by checking the date at the bottom of this page. If you submit your personal details to us be sure to check back to this page to see if anything has changed.

### 1. Collecting and using your information

1.1. We collect the following information about you and use it in the following ways:



- 1.1.1.If you place an order on us for products you will need to provide us with your personal details (name, delivery address, email address and phone number) and (unless you pay by PayPal) your payment details (credit/debit card number and name and address of the card holder). We will use this information to contact you about your order and to deliver the products to you.  
  
We will also keep a record of your order including your product purchase history and will use this for our internal business purposes including to improve our products and to ensure that we have sufficient stocks of products available.
    - 1.1.2.If you are a business customer and you apply for credit you will need to provide us with the personal details of your directors or officers (name, home address, date of birth). We will use this information to carry out credit checks with credit reference agencies to assist in our decision as to whether, and on what terms, to give your business credit.
    - 1.1.3.If you contact us to request information about us or our products or to make a complaint you will need to provide us with your name, email address, business or home address and phone number. We will use this information to answer your enquiry, send you the requested information or literature or to respond to your complaint. If you provide us with any other personal information we will use that information to answer your enquiry or to respond to your complaint. Please only provide us with information that you believe is necessary for us to respond to you and which you are happy for us to process in accordance with the terms of this privacy policy.
    - 1.1.4.If you fill in a form on our website you will need to provide us with the information requested in the form marked as “required”, “mandatory” or similar. We will use the information for the purposes described on the relevant form.
    - 1.1.5.If you visit our website we will collect the IP address used to access our website together with the dates and times of access. We will use this information for website administration, to help improve our website, to analyse browsing actions and trends and to gather statistical information as to where people are accessing our site from for internal use.
  - 1.2. Before you disclose to us the personal information of another person, you must obtain that person’s consent to both the disclosure and the processing of that person’s personal



information in accordance with this privacy policy. By disclosing such person's personal information to us you confirm that you have the necessary consents to do so.

## **2. Sharing with third parties**

2.1. We will not share your information with any third parties except:

2.1.1. where we have your permission;

2.1.2. where required in order to fulfil your order including for the purposes of processing payment from you (unless you pay by PayPal in which case we will not receive your payment details) and delivering the products to you;

2.1.3. to debt collection agencies;

2.1.4. if you are a business customer, to credit reference agencies (to assist in our decision as to whether, and on what terms, to give your business credit);

2.1.5. to our professional advisers for the purposes of obtaining professional advice or establishing, exercising or defending legal rights; or

2.1.6. where we are required by law and to law enforcement agencies, government entities, tax authorities or regulatory bodies.

2.2. We will not share your information with third parties for marketing or market research without your explicit consent.

## **3. Promotional and marketing information**

3.1. If you have purchased goods from us we will, unless you choose to opt out, send you email updates with special offers and details of our products.

3.2. You can also choose to receive promotional and marketing information from us by opting-in to such communications via our website or when setting up an account on our website. When you opt-in you will be able to choose what methods we use to contact you; either phone or email. Please only provide us with your phone number and/or email address if you are happy for us to contact you by that method of communication. You can change your preferences or opt-out at any time by using the details set out below.

3.3. We sometimes contact business customers and business contacts without their prior consent in order to promote our services and build relationships. If you are a business customer or contact and we have contacted you it is because we think these communications may be of interest or relevance to you. You can change your preferences or opt-out at any time by using the details set out below.



3.4. If you change your mind about how you would like to receive such information or you no longer wish to receive this information, you can tell us at any time:

3.4.1. if you receive a marketing email from us and no longer wish to receive such emails from us; by using the "Unsubscribe" link in the email;

3.4.2. by contacting our Customer Services team (by email to [info@crombecengineering.com](mailto:info@crombecengineering.com) with the word "Unsubscribe" in the subject line or by phone on 01249 321 220);

3.4.3. by posting a letter to us including your full name, email address and the word "Unsubscribe"; or

3.4.4. by clicking the "unsubscribe" link in the marketing emails you receive from us.

You can also contact us using these details if you wish to complain about a marketing communication you have received in error.

#### 4. Accessing your information and other enquiries

##### 4.1. If you:

4.1.1. would like to find out what information we hold about you;

4.1.2. believe that any of the information that we hold about you is incomplete, inaccurate or out of date;

4.1.3. have any queries about how we use your information which you do not think are answered in this policy; or

4.1.4. would like us to delete your information from our systems;

please contact our Customer Services Team by email to [info@crombecengineering.com](mailto:info@crombecengineering.com) or by phone on 01249 321 220).

4.2. We will always try to respond to your request to your satisfaction however there may be situations where we are unable to do so (for example if we are required by law to keep your information).

4.3. If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you should contact the UK Information Commissioner's Office, which oversees data protection compliance in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk).

#### 5. Keeping your information safe

5.1. We employ a variety of physical, technical and organisational measures to keep your information safe and to prevent unauthorised access to or use or disclosure of it. Electronic



data and databases are stored on secure computer systems and we control who has access to them (using both physical and electronic means).

- 5.2. Any payment information you provide will be sent to us via a secure SSL connection which provides an encrypted link between your web browser and our web servers.
- 5.3. We cannot absolutely guarantee the security of the internet or external networks or your own device, accordingly any online communications (e.g. information provided by email or through our website) are at your own risk.
- 5.4. You shall be responsible for keeping any user access information for your account secure and confidential.
6. How long will we keep your information?
  - 6.1. We will keep your information for as long as it is required for the purpose(s) we collected it for (or for a related compatible purpose, such as keeping a record of a transaction); for legal reasons this will usually be for 7 years. We will never keep payment card information.
  - 6.2. We regularly review what data we have and delete that which is no longer necessary.
7. Where will we keep your information?
  - 7.1. We will usually keep your information within the European Union (EU). If we or one of our subcontractors (such as a payment processor or courier) need to transfer it outside of the EU then we will take steps to make sure adequate levels of privacy protection, in line with UK data protection law, are in place. These safeguards will usually be contractual and/or the result of a European Union decision which allows the transfer of your information (for example, a US organisation which is certified under the EU-US Privacy Shield framework).
  - 7.2. We use SurveyMonkey, an email services platform based in the US, to manage and send email communications. If you receive emails powered by SurveyMonkey, this will mean your information has been transferred to the US. However, SurveyMonkey Inc is certified under the EU-US Privacy Shield scheme, meaning it has taken steps to ensure your information is adequately protected. You can learn more about SurveyMonkey by visiting its privacy policy at <https://surveymonkey.co.uk/mp/policy/privacy-policy/>. If you would like to learn more about the Privacy Shield scheme please visit <https://privacyshield.gov/welcome>.
8. Cookies and Online Technologies
  - 8.1. Our website uses Google Analytics to help analyse how users use our website. This analytical tool uses 'cookies', which are text files placed on your computer, to collect



standard internet log information and visitor behaviour information in an anonymous form. The information generated by the cookie about your use of our website (including your IP address) is transmitted to Google. This information is then used to evaluate visitor use of the website and to compile statistical reports on website activity.

- 8.2. We will not (and will not allow any third party) to use the statistical analytics tool to track or to collect any of your personally identifiable information. We will not associate any data gathered from our website with any personally identifying information from any source as part of our use of the Google statistical analytics tool. Google will not associate your IP address with any other data held by Google. Neither we nor Google will link, or seek to link, an IP address with the identity of a computer user.
- 8.3. We also use “cookies” to provide essential functionality on our website. Your payment information is not stored in these cookies at any time.
- 8.4. You have the ability to accept or decline cookies by modifying the settings on your web browser. If you use different web browsers or different devices to access our website you will need to change the settings on each of your web browsers and devices.
- 8.5. If you disable some or all cookies you may not be able to access parts of our website and/or you may reduce the features and functionality of our website.
- 8.6. We use Facebook Pixel which gathers information about website use. The information gathered relating to our website is used to create data about our website demographics and location. Pixel data is used to support Facebook advertising and to provide a positive experience for users when on the Facebook platform.
- 8.7. We use social media features, such as the Facebook Like button and other widgets, which may collect your IP address and browsing behaviour on our website. Social media features and widgets are either hosted by a third party or hosted directly on our website. Your interactions with these features are governed by the privacy policy of the organisation providing it.
- 8.8. If you are a customer we may use your email address to omit you from seeing marketing adverts online.
- 8.9. We may use your personal data for the purposes of automated decision-making in relation to the Facebook advertising platform or Google AdWords should you visit our website or like any of our social media profiles. Automated decision-making may involve you seeing



branded messages and adverts from us that relate to online pages you will have visited or which match demographic and interest preferences.

#### 9. Third party websites

Our website may contain links to third party websites. The privacy policy for those websites will be different to our privacy policy and you should read the applicable privacy policy before submitting information to any such third party.

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