

Policy version: 28/03/2024

<https://cogentconnective.com/> (**our website**) is provided by COGENT CONNECTIVE LIMITED trading as Cogent Connective (**'we', 'our' or 'us'**). We are the controller of personal data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used. COGENT CONNECTIVE LIMITED is a limited company registered in Scotland with company number SC774434 and registered office address at Unit 5 Gateway Business Park, Beancross Road, Grangemouth, Scotland, FK3 8WX.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your use of our website. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator 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**).

Given the nature of our website, we do not expect to collect the personal data of anyone under 13 years old. If you are aware that any personal data of anyone under 13 years old has been shared with our website please let us know so that we can delete that data.

This privacy policy is primarily written for adults, including parents and guardians of child users.

This privacy policy is divided into the following sections:

- What this policy applies to
- Personal data we collect about you
- How your personal data is collected
- How and why we use your personal data
- Marketing
- Who we share your personal data with
- How long your personal data will be kept
- Transferring your personal data out of the UK
- Cookies
- Your rights
- Keeping your personal data secure
- How to complain
- Changes to this privacy policy

- How to contact us
- Do you need extra help?

What this policy applies to

This privacy policy relates to your use of our website only.

Throughout our website we may link to other websites owned and operated by certain trusted third parties to make additional information available to you). Those third party websites may also gather information about you in accordance with their own separate privacy policies. For privacy information relating to those third party websites, please consult their privacy policies as appropriate.

Personal data we collect about you

The personal data we collect about you depends on the particular activities carried out through our website. We will collect and use the following personal data about you:

- your name, address and contact information, including email address and telephone number and company details
- any delivery addresses specified for your order
- your gender
- location data
- your account details, such as username and login details
- your billing information, transaction and payment card or other payment method information
- bank account and payment details
- details of any information, feedback or other matters you give to us by phone, email, post or via social media
- your activities on, and use of, our website
- your professional online presence, eg LinkedIn profile
- information about the services we provide to you
- information about how you use our website and technology systems

You must provide this personal data so that we may provide you with our services unless we tell you that you have a choice.

Sometimes you can choose if you want to give us your personal data and let us use it. Where that is the case we will tell you and give you the choice before you give the personal data to us. We will also tell you whether declining to share that personal data will have any effect on the services that we provide to you.

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

How your personal data is collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you contact us (including via email), send us feedback, purchase services from, post material to our website and complete customer surveys, and
- indirectly, such as your browsing activity while on our website; we will usually collect information indirectly using the technologies explained in the section on '**Cookies**' below

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason, eg:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Creating and managing your account with us	To perform our contract with you or to take steps at your request before entering into a contract
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Enforcing legal rights or defend or undertake legal proceedings	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to protect our business, interests and rights

What we use your personal data for	Our reasons
<p>Customising our website and its content to your particular preferences based on a record of your selected preferences or on your use of our website</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —your consent as gathered by the separate cookies tool on our website—see 'Cookies' below —where we are not required to obtain your consent and do not do so, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price <p>If you have provided such a consent you may withdraw it at any time by changing the setting on the cookies tool accessible via our website (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)</p>
<p>Retaining and evaluating information on your recent visits to our website and how you move around different sections of our website for analytics purposes to understand how people use our website so that we can make it more intuitive or to check our website is working as intended</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —your consent as gathered by the separate cookies tool on our website—see 'Cookies' below —where we are not required to obtain your consent and do not do so, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price <p>If you have provided such a consent you may withdraw it at any time by changing the setting on the cookies tool accessible via our website (this will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn)</p>
<p>Communications with you not related to marketing, including about changes to our terms or policies or changes to the services or other important notices</p>	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price

What we use your personal data for	Our reasons
Protecting the security of systems and data used to provide the services	<p>To comply with our legal and regulatory obligations</p> <p>We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
Statistical analysis to help us understand our customer base	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you at the best price
Updating and enhancing customer records	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to perform our contract with you or to take steps at your request before entering into a contract —to comply with our legal and regulatory obligations —where neither of the above apply, for our legitimate interests, eg making sure that we can keep in touch with our customers about existing orders and new products
Disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, eg to record and demonstrate evidence of your consents where relevant	To comply with our legal and regulatory obligations
Marketing our services to existing and former customers	<p>For our legitimate interests, ie to promote our business to existing and former customers</p> <p>See 'Marketing' below for further information</p>
To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or 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	<p>Depending on the circumstances:</p> <ul style="list-style-type: none"> —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, ie to protect, realise or grow the value in our business and assets

What we use your personal data for	Our reasons
In such cases information will be anonymised where possible and only shared where necessary	

How and why we use your personal data—in more detail

More details about how we use your personal data and why are set out in the table below.

Purpose	Processing operation	Lawful basis relied on under the UK GDPR	Relevant categories of personal data
Communications with you not related to marketing, including about changes to our terms or policies or changes to the products or other important notices	Addressing and sending communications to you as required by data protection laws, ie: —the UK GDPR or Data Protection Act 2018	Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(b))	—your name, address and contact information, including email address and telephone number and company details —your account details (username)
	Addressing and sending communications to you as required by law, if applicable	Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(b))	—your name, address and contact information, including email address and telephone number and company details —your account details (username)
	Addressing and sending communications to you about changes to our terms or policies or changes to the products or other important notices (other than those addressed above)	Our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can so we can deliver the best service to you	—your name, address and contact information, including email address and telephone number and company details —your account details (username)
Performance of our services under our contract	Using your personal data and your customer's data as expressly stated in our terms of business, to fulfil our services as part of our contract	Performance of a contract	Any of the personal data we collect about you or your customers

How and why we use your personal data—sharing

See **'Who we share your personal data with'** for further information on the steps we will take to protect your personal data where we need to share it with others.

Marketing

We will use your personal data to send you updates (by email, text message, telephone or post) about our services, including exclusive offers, promotions or new products or services.

We have a legitimate interest in using your personal data for marketing purposes (see above **'How and why we use your personal data'**). This means we do not need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

- contacting us (see **How to contact us** below)
- using the 'unsubscribe' link in emails or 'STOP' number in texts, or
- updating your marketing preferences on our preference centre accessible here [\[link\]](#)

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell it with other organisations for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see **'Your rights'** below.

Who we share your personal data with

We routinely share personal data with:

- third parties we use to help deliver our services to you, eg payment service providers, warehouses and delivery companies, ~~sub-contracting platforms such as Freelancer.com and functionality testing solutions such as Wise Software (UK) Ltd~~
- other third parties we use to help us run our business, eg marketing agencies or website hosts and website analytics providers
- our bank

We only allow those organisations to handle your personal data if we are satisfied they take appropriate measures to protect your personal data.

We or the third parties mentioned above occasionally also share personal data with:

- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations

- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) 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—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations

Who we share your personal data with—further information

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used. For example, we tend to delete any unnecessary data upon termination or expiry of your contract with us.

If you stop using your account we will delete or anonymise your account data after no more than seven years.

Transferring your personal data out of the UK

Countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK. In those cases we will comply with applicable UK laws designed to ensure the privacy of your personal data.

We may transfer your personal data to our service providers located outside the UK if, for example, they host your data on our behalf.

Under data protection laws, we can only transfer your personal data to a country outside the UK where:

- the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an '**adequacy regulation**') further to Article 45 of the UK GDPR.
- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
- a specific exception applies under relevant data protection law

Where we transfer your personal data outside the UK we do so on the basis of an adequacy regulation or (where this is not available) by placing appropriate safeguards in place, together with enforceable rights and effective legal remedies for you. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on **'Changes to this privacy policy'** below.

Transferring your personal data out of the UK—further information

If you would like further information about data transferred outside the UK, please contact us (see **'How to contact us'** below).

Cookies

A cookie is a small text file which is placed onto your device (eg computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

For further information on cookies, our use of 'cookies', when we will request your consent before placing them and how to disable them, please see our [Cookie Policy here](#).

Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object to use	The right to object: —at any time to your personal data being used for direct marketing (including profiling) —in certain other situations to our continued use of your personal data, eg where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims

<p>Not to be subject to decisions without human involvement</p>	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you</p> <p>We do not make any such decisions based on data collected by our website</p>
<p>The right to withdraw consents</p>	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>You may withdraw consents by contacting us.</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>

For further information on each of those rights, including the circumstances in which they do and do not apply, please contact us (see '**How to contact us**' below). You may also find it helpful to refer to the guidance from the UK's Information Commissioner on your rights under the UK GDPR.

If you would like to exercise any of those rights, please email, call or write to us—see below: '**How to contact us**'. When contacting us please:

- provide enough information to identify yourself and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it.

We also 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.

If you want detailed information from Get Safe Online on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government.

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner (ICO).

The UK's Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

We are registered with the ICO. Our registration number is ZB663537.

Changes to this privacy policy

We may change this privacy policy from time to time—when we make significant changes we will take steps to inform you, for example by including a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.

How to contact us

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details
Address: 1 Friarton House, Friarton Road, Perth, PH2 8BB
Email: support@cogentconnective.com
Phone: 01738 210218

Do you need extra help?

If you would like this policy in another format (for example audio, large print, braille) please contact us (see '**How to contact us**' above).