

**This is the Privacy & Cookies Policy of Adcock Refrigeration and Air Conditioning Ltd. We respect the privacy of our customers and are registered under current legislation. This policy only applies to our websites and not to the websites of other companies, individuals or organisations to which we provide links.**

## **Introduction**

Welcome to our privacy notice.

We, at **Adcock Refrigeration and Air Conditioning Ltd** respect your privacy. We are committed to protecting your personal data. This privacy notice informs you about how we look after your personal data when you visit our website (regardless of where you visit it from) or otherwise interact with us and it tells you about your privacy rights and how the law protects you.

### **1. Purpose of this privacy notice**

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website and otherwise in our dealings with you, including any data you may provide through this website when you visit our site or when you choose to sign up to our newsletter.

This website is not intended for children and we do not knowingly collect data relating to children.

You may include an encouragement for the user to read the policy carefully and contact you with any questions or concerns about your privacy practices.

## **Controller**

**Adcock Refrigeration and Air Conditioning Ltd** is the controller of and responsible for your personal data (collectively referred to as “Adcock “, “we”, “us” or “our” in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

## **Contact details**

Our full details are:

Full name of legal entity: **Adcock Refrigeration and Air Conditioning Ltd**

Name of DPO: Bob Wright

Email address: [bobwright@adcock.co.uk](mailto:bobwright@adcock.co.uk)

Postal address: Head Office, The Maltings, Station Road, Great Shelford, Cambridge, CB22 5LR

Telephone number: [01223 550220](tel:01223550220)

*You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so **please contact us in the first instance**.*

## **Changes to the privacy notice and your duty to inform us of changes**

This version was last updated on 25 May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## **Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. What information do we collect?**

### **The data we collect about you**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes name, job title and company name (if company purchase).

- **Contact Data** includes company address (if company purchase) or residential billing and delivery address (if consumer purchase), email address.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of publications you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your identifying customer number, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and our products.
- **Marketing Data** includes your preferences in receiving marketing from us.
- **Communications Data** includes all correspondence that you may have with us whether by email or post or otherwise.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

You may want to provide the user with relevant definitions in relation to personal data and sensitive personal data.

### **If you fail to provide personal data**

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have

or are trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel the contract you have with us, but we will notify you if this is the case at the time.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Correspondence and Financial Data by filling in forms on the website or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - wish to buy our services;
  - create an account on our website;
  - subscribe to our publications;
  - request marketing to be sent to you; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy below for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers such as Google based outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services based inside the EU.
- Identity and Contact Data from data brokers or aggregators based inside the EU.
- Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### 4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (i.e. where you wish to buy our publication or subscribe to our publications).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

See below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us on 01223 550220 or [media@adcock.co.uk](mailto:media@adcock.co.uk).

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us on 01223 550220 or [media@adcock.co.uk](mailto:media@adcock.co.uk). If you need details about the specific legal grounds we are relying on to process your personal data where more than one ground has been set out in the table below.

### **What legal basis do we have for processing your personal data?**

The following legal basis are applied in using your data:

- consent
- contract
- legitimate interests

- vital interests
- public task
- legal obligation

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a)Identity (b)Contact (c)Communications	Performance of a contract with you
To contact you by phone	(a)Identity (b)Contact (c)Marketing	Necessary for our legitimate interests (to increase our customer base by contacting potentially interested parties)
To process and deliver your order including: (a)Manage payments, fees and charges (b)Collect and recover money owed to us	(a)Identity (b)Contact (c)Financial (d)Transaction (e)Communications	(a)Performance of a contract with you (b)Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a)Notifying you about changes to our terms or privacy policy (b)Asking you to leave a review or take a survey	(a)Identity (b)Contact (c)Profile (d)Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products)
To enable you to partake in a prize draw, competition or complete a survey	(a)Identity (b)Contact (c)Profile (d)Usage (e)Marketing (f)Communications	(a)Performance of a contract with you (b)Necessary for our legitimate interests (to study how customers use our products, to develop them and grow our business)
To send you email marketing and/or our newsletters	(a)Identity (b)Contact (c)Profile (d)Usage (e)Marketing (f)Communications	Where we have obtained your explicit consent.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a)Identity (b)Contact (c)Technical	(a)Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b)Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a)Identity (b)Contact (c)Profile (d)Usage (e)Marketing and Communications (f)Technical	Necessary for our legitimate interests (to study how customers use our products, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, publications, marketing, customer relationships and experiences	(a)Identity (b)Usage	Necessary for our legitimate interests (to define types of customers for our publications, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)

To make suggestions and recommendations to you about goods or services that may be of interest to you	(a)Identity (b)Contact (c)Technical (d)Usage (e)Profile (f)Marketing	Necessary for our legitimate interests (to develop our products/services and grow our business)
To contact you by phone	(a)Identity (b)Contact (c)Marketing	Necessary for our legitimate interests (to increase our customer base by contacting potentially interested parties)

**Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

We only send email marketing or newsletters where you have checked the tick box on all order forms to agree to marketing communications from us should you wish to receive such communications.

We may also send marketing and newsletters by post or we may call individuals in companies where we have reasonable grounds for believing they may wish to purchase or subscribe to our publications.

**Opting out**

You can ask us to stop sending you marketing messages or contacting you with marketing at any time by following the opt-out links on any marketing message sent to you or by contacting us on [01223 550220](tel:01223550220) or via email [media@adcock.co.uk](mailto:media@adcock.co.uk) at any time.

**Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see below.

**Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original

purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us [01223 550220](tel:01223550220) or via [media@adcock.co.uk](mailto:media@adcock.co.uk).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- We do not sell your personal data to third parties.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

We do not transfer your personal data outside the European Economic Area (EEA).

## 7. Data security

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

## 8. Data retention

### How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.

- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please Contact our DPO Bob Wright on [bobwright@adcock.co.uk](mailto:bobwright@adcock.co.uk) .

### **No fee usually required**

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 is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

## **10. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we

assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## THIRD PARTIES

### External Third Parties

- Service providers acting as processors based in the United Kingdom who provide postal delivery services, telemarketing, email marketing, IT support, cloud-based data management services, data broking and data cleansing services or debt recovery services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.

## YOUR LEGAL RIGHTS

You have the right to:

**Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**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 continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to

processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**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 ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products to you. We will advise you if this is the case at the time you withdraw your consent.

## 11. Cookies

### What are cookies?

Cookies are tiny text files which are downloaded onto your computer, tablet or mobile phone via your browser when you visit a website. They enable specific details about your visit to our website to be

recorded, retrieved and analysed by our site during subsequent visits or by other sites that recognise the cookie.

Cookies are essential to the effective operation of our website. Cookies on this site also help to tailor the products and services offered and advertised to our customers, both on this website and elsewhere.

Cookies can't harm your computer and they don't identify individual users.

**Cookies on our website**

Here's a list of the cookies we use across all of our Adcock website, along with a description of what they do. We've divided them into those that are needed for you to be able to use our website (*strictly necessary*) and those that help us analyse how the site is doing and how we might improve it (*performance*).

<b>Strictly Necessary – Cookies that are needed for you to use our website</b>	
<b>Cookie name</b>	<b>Cookie Purpose</b>
	<p>These cookies check if you're a subscriber to our paid for publications, and if you are, they remember a valid password has been entered as you move between pages on our website during a visit.</p> <p>If you're a subscriber to paid services and you disable these cookies you won't be able to view content that your subscription entitles you to view.</p>
<b>Performance – Cookies that help us analyse how our website and services are doing and how we might improve them</b>	

Cookie name	Cookie Purpose
	<p>These are Google Analytics cookies. These cookies help us take and analyse visitor information. For example, they tell us how many visitors our site has, how many times they visit, how long they stay on our site and which pages are most popular. They also tell us if our marketing efforts are working, so they tell us where a visitor has come from, for example, from a link, a website search or an ad. This information helps us improve our website and your visit, and makes our marketing campaigns more relevant.</p> <p>For more details about how Google use the information they collect, see the <a href="#">Google privacy policy</a></p>

**More information on cookies, including how to manage them**

As explained above, cookies help you to get the most out of our website. If you disable our cookies you may find that certain sections of our website don't work, for example, you may have difficulties viewing subscription only articles. It also means that other areas of the site may not work as well as you would like.

However, if you would like to disable cookies the 'help' option on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, and how to disable cookies altogether. We've set out below how to manage cookies on the most common browsers.

If you would like to learn more about cookies in general, or how to disable targeted advertising cookies, you can visit [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

The links we've included open in new windows. Please note that we are not responsible for the content of third party websites.

Managing cookies using your browser

*Google Chrome*

- <https://support.google.com/chrome/answer/95647?hl=en-GB>

*Microsoft Internet Explorer 11*

- <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>

*Mozilla Firefox*

- <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

*Opera*

- <http://www.opera.com/help/tutorials/security/privacy/>

*Safari on OSX Yosemite*

- [https://support.apple.com/kb/PH19214?locale=en\\_US](https://support.apple.com/kb/PH19214?locale=en_US)

### **Linking to other websites / third party content**

If you link to external sites and resources from your website, be specific on whether this constitutes endorsement, and if you take any responsibility for the content (or information contained within) any linked website.

### **Future updates to our Cookies and Privacy Policy**

We're giving you this information as part of our initiative to comply with recent legislation, and to make sure we're honest and clear about your privacy when using our website and our services.

We monitor developments in privacy and cookie-related best practice closely and if we think changes to our policy would be of benefit to you we'll make a change to our policy.