



Privacy Policy

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our customers, suppliers, website visitors and other stakeholders.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our customers, suppliers, website visitors and other stakeholders; in other words, where we determine the purposes and means of the processing of that personal data.

2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

3. How we use your personal data

- 3.1 In this Section 3 we have set out:
 - (a) the general categories of personal data that we may process;
 - (b) the purposes for which we may process personal data; and
 - (c) the legal bases of the processing.
- 3.2 We may process your account data ("**account data**"). The account data may include your name, email address, job title, telephone number, employer name and employer address. The source of the account data is you, your employer or a third party stakeholder in the provision of our services. The account data may be processed in providing our services and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.3 We may process your personal data that are provided in the course of the use of our services ("**service data**"). The service data may include your name, email address, job title, telephone number, employer name and employer address. The source of the service data is you, your employer or a third party stakeholder in the provision of our services. The service data may be processed in providing our services and communicating with you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.4 We may process information contained in any enquiry or request for quotation you submit to us regarding goods and/or services ("**enquiry data**"). The enquiry data may include your name, email address, job title, telephone number, employer name and employer address. The enquiry data may be processed for the purposes of offering, marketing and selling relevant goods and/or services to you. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.



- 3.5 We may process information relating to transactions, including purchases of goods and services, that you enter into with us ("**transaction data**"). The transaction data may include your name, email address, job title, telephone number, employer name and employer address, your payment details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.6 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is consent.
- 3.7 We may process information to control and monitor access to our office and factory locations ("**access data**"). The access data may include your name, signature, employer name and image. The legal basis for this processing is our legitimate interests, namely the proper administration of our business.
- 3.8 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include your name, email address, job title, telephone number, employer name and employer address. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our business and communications with users.
- 3.9 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.10 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.
- 3.11 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. Providing your personal data to others

- 4.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal bases, set out in this policy.

4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

4.3 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

5. Retaining and deleting personal data

5.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.3 We will retain your personal data as follows:

- (a) Website visitors and other contacts made purely for the purposes of marketing will be retained up to the date where consent is withdrawn.
- (b) Contacts associated with the construction of fire safety products (including but not limited to architects, building contractors, fire engineers, construction site managers, suppliers, customers and installation contractors) will be retained for the life of the relevant buildings in which these products are installed.
- (c) Staff and contractor human resources records will be retained for a period of 6 years post employment. Images of staff and other site visitors on CCTV will be retained for a maximum period of 30 days.
- (d) Site visitor records will be retained for a maximum period of 14 days.

5.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

6. Amendments

6.1 We may update this policy from time to time by publishing a new version on our website.

6.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7. Your rights

7.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly,

you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

7.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;
- (g) the right to complain to a supervisory authority; and
- (h) the right to withdraw consent.

7.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.

7.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

7.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.

7.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

7.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing

is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

7.8 To the extent that the legal basis for our processing of your personal data is:

- (a) consent; or
- (b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract,

and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.9 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

7.10 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.11 You may exercise any of your rights in relation to your personal data [by written notice to us.

8. Website Visitors

8.1. You may choose whether or not to provide personal information to Coopers Fire on their website. The notice we provide where we collect personal information on the web should help you to make this choice. If you choose to have a relationship with Coopers Fire, such as a contractual or other business relationship or partnership, we will naturally continue to contact you in connection with that business relationship. Coopers Fire will accept, acknowledge and maintain any customer's request to opt-out of future communication from Coopers Fire by offering an 'unsubscribe' link on the bottom of marketing communications (i.e. email newsletters).

8.2 Wherever your personal information may be held within Coopers Fire or on its behalf, we intend to take reasonable and appropriate steps to protect the personal information that you share with us from unauthorised access or disclosure.

8.3 By using this website, you consent to the terms of our Privacy Policy and to Coopers Fire processing personal information for the purposes given above. Should the Privacy Policy change, we intend to take every reasonable step to ensure that these changes are brought to your attention by posting all changes prominently on our website for a reasonable period of time.

8.4 For control of our business, our website logs IP addresses, which is the automatic number assigned to your computer when you surf the web. The IP address allows us to anonymously track visitors' usage on our



website. Your IP address is not connected to any personally identifiable or online contact information, like a name and address, so you remain anonymous at all times.

9. About Website Cookies

The Coopers Fire website uses Google Analytics cookies. These are small files that a website inserts on your hard-drive when you visit a website. The Google Analytics cookies are used to track visits to our site and your journey through it. You may delete and block all cookies from this site, but parts of the site may not work if you do so. By using and/or registering on our site, you agree to the use of cookies by us.

- 9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

10. Cookies that we use

- 10.1 We use the following cookies:

Cookies set by Google Analytics (analytics.js)

Cookie Name: `_ga`
Description: Used to distinguish users.
Expiration Time: 2 years.

Cookie Name: `_gid`
Description: Used to distinguish users.
Expiration Time: 24 hours.

Cookie Name: `_gat`
Description: Used to throttle request rate.
Expiration Time: 1 minute.

Cookie Name: `AMP_TOKEN`
Description: Contains a token that can be used to retrieve a Client ID from AMP Client ID service. Other possible values indicate opt-out, inflight request or an error retrieving a Client ID from AMP Client ID service. Expiration Time: 30 seconds to 1 year.

Cookie Name: `_gac_`
Description: Contains campaign related information for the user. If you have linked your Google Analytics and AdWords accounts, AdWords website conversion tags will read this cookie unless you opt-out. Expiration Time: 90 days.

Cookies set by Google Analytics (ga.js)

Cookie Name: __utma

Description: Used to distinguish users and sessions. The cookie is created when the JavaScript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.

Default Expiration Time: 2 years from set/update.

Cookie Name: __utmt

Description: Used to throttle request rate.

Default Expiration Time: 10 minutes.

Cookie Name: __utmb

Description: Used to determine new sessions/visits. The cookie is created when the JavaScript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.

Default Expiration Time: 30 mins from set/update.

Cookie Name: __utmc

Description: Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.

Default Expiration Time: End of browser session.

Cookie Name: __utmz

Description: Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the JavaScript library executes and is updated every time data is sent to Google Analytics.

Default Expiration Time: 6 months from set/update.

Cookie Name: __utmv

Description: Used to store visitor-level custom variable data. This cookie is created when a developer uses the _setCustomVar method with a visitor level custom variable. This cookie was also used for the deprecated _setVar method. The cookie is updated every time data is sent to Google Analytics.

Default Expiration Time: 2 years from set/update.

Other cookies

Cookie Name: downloadverifyform

Description: Used to check whether the user has supplied their first name, last name and email address in order to obtain technical drawings. This cookie is created when the user attempts to download a technical drawing.

Default Expiration Time: End of browser session.

Cookie Name: has_js

Description: Used to check whether the users browser has javascript enabled. This cookie is created upon visiting the website.

11. Managing cookies

- 11.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);



- (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
- (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

11.2 Blocking all cookies may have a negative impact upon the usability of many websites.

11.3 If you block cookies, you may not be able to use all the features on our website.

11.4 If you wish for your visit to our site NOT be tracked, send a "Do Not Track" request with your browsing traffic.

12. Our details

12.1 This website is owned and operated by Coopers Fire Limited. Coopers Fire Limited is part of the Lowe and Fletcher Group of Companies.

12.2 We are registered in England and Wales under registration number 02010274, and our registered office is at Edward House, Penner Road, Havant, Hampshire, England. PO9 1QZ

12.3 Our principal place of business is at Edward House, Penner Road, Havant, Hampshire, UK. PO9 1QZ

12.4 You can contact us:

- (a) by post, to the postal address given above;
- (b) by telephone, on +44 (0)2392 454405
- (c) by e-mail to info@coopersfire.com