

PRIVACY POLICY

We understand that your privacy and the security of your personal information is extremely important. This notice sets out what we do with your personal information, what we do to keep it secure, from where and how we collect it, as well as your rights in relation to the personal information we hold about you.

This policy applies if you interact with us through our online store, over the phone, online, or otherwise by using any of our websites or interacting with us on social media (our "Services").

PRIVACY POLICY OVERVIEW

If you don't want to read all the detail, here are the things we think you'd really want to know:

- The Group is currently made up of Cowley Timber + Partners Ltd and CABU Ltd.
- Your personal information is, where appropriate, shared within the Group.
- You have a number of rights over your personal information. How you can exercise these rights is set out in this notice.
- We do send direct marketing, if we're allowed to. And we do this to inform you of our products and services. If you want us to stop you can let us know by emailing us: mail@cowleytimber.co.uk or mail@cabu.co.uk

PRIVACY POLICY IN FULL

WHO ARE WE?

When we say 'we' or 'us' in this policy, we're referring to the separate and distinct legal entities that make up the Group. Which of the Group of Companies controls your personal information depends on the circumstances in which you are dealing with us. For example, if you are dealing with our shop, then it will be Cowley Timber + Partners Ltd, or if it is to do with one of our Modular Buildings it will be CABU Ltd. If you would like more information about the Group, please email us mail@cowleytimber.co.uk or mail@cabu.co.uk Alternatively our address and telephone numbers can be found below.

The companies which make up The Group currently are:

Cowley Timber + Partners Ltd. Unit 13, Abbots Way, Newark Business Park, Newark, Nottinghamshire. NG24 2EL. mail@cowleytimber.co.uk Tel: 01522 720022

CABU Ltd. 20a Northburgh Street, London EC1V 0EA. mail@cabu.co.uk Tel: 0203 019 1970

WHAT SORTS OF PERSONAL INFORMATION DO WE HOLD?

- Information that you provide to us such as your name, address, telephone number, email address, bank account and payment card details and any feedback you give to us, including by phone, email, post, or when you communicate with us via social media;
- Information about the services that we provide to you (including for example, the things we have provided to you, when and where, what you paid, the way you use our products and services, and so on);
- Information required to make decisions about your application for products and services offered by Cowley Timber + Partners Ltd and CABU Ltd.
- Your account login details for our services, including your user name and chosen password;
- Information about whether or not you want to receive marketing communications from us;
- Your contact details and details of the emails and other electronic communications you receive from us.
- Information from other sources such as specialist companies that provide customer information (like credit reference agencies such as Experian, fraud prevention agencies, marketing and research companies), social media providers as well as information that is publicly available.

OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

Whenever we process your personal information we have to have something called a "legal basis" for what we do. The different legal bases we rely on are:

- **Consent:** You have told us you are happy for us to process your personal information for a specific purpose;
- **Legitimate interests:** The processing is necessary for us to promote our business, but not where our interests are overridden by your interests or rights.
- **Performance of a contract:** We must process your personal information in order to be able to provide you with one of our products or services;
- **Public information:** Where we process personal information which you have already made public; and
- **Legal obligation:** We are required to process your personal information by law.

HOW DO WE USE YOUR PERSONAL INFORMATION?

There are a number of ways in which we use your personal information, depending on how you interact with us. – for example, if you do not provide your name, address and account details when purchasing one of our products online, we will not be able to sell you that product as we would be unable to process your payment or deliver the product to you.

We may use your information in the following ways:

- **To provide our products and services** - we need to use your personal information to make our products and services available to you. If you then decide to order any of our products or services then we're delighted, thank you. After that, we need to provide them to you, process your payment and we need to use your details to do all this.
- **Contacting you** - we use your personal information to contact you: either to conduct market research or to tell you about our products and services. We may also contact you in relation to any questions you have raised with us.

COOKIES AND SIMILAR TECHNOLOGIES

We use cookies to help give you the best experience on our websites. You may block cookies by activating the setting on your browser which allows you to refuse the placing of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our website.

WHO MIGHT WE SHARE YOUR PERSONAL INFORMATION WITH?

Between the group, Cowley Timber + Partners Ltd and CABU Ltd - we will share your personal information in certain circumstances with the other companies within the Group so that we can provide you with a high quality, personalised and tailored service (including relevant marketing) across our Group.

- Service providers – such as Visa and MasterCard – in order to process your payments;
- Where relevant, Credit reference agencies.
- Social media providers – such as Facebook, Instagram and Twitter – where we interact with you on social media;
- Third party vendors who help us to manage and maintain the Group IT infrastructure;
- Logistics and delivery providers who enable us to deliver products you order on our website;
- Providers of temporary staff, who need access to certain personal information to carry out their role within the business;
- Where relevant, our professional advisors, such as lawyers and consultants;
- Companies that deploy our email campaigns for us because they need to know your email address to carry out these services;

Other organisations and individuals - we may share your personal information in certain scenarios. For example:

- If we are required to by law, under any code of practice by which we are bound or where we are asked to do so by a public or regulatory authority such as the police or the Department for Work and Pensions;
- If we need to do so in order to exercise or protect our legal rights, users, systems and services.
- In the event we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

For the purposes described in this privacy policy, the data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps necessary to ensure your data is treated securely and in accordance with this privacy policy.

KEEPING YOU INFORMED ABOUT OUR PRODUCTS AND SERVICES

From time to time, we would like to tell you about the great offers, ideas, products and services of Cowley Timber + Partners Ltd and CABU Ltd that we think you might be interested in. Where we have your consent or it is in our legitimate interests to do so, we may do this through the post, by email, text message or by any other electronic means.

We won't send you marketing messages if you tell us not to, but if you receive a service from us we will still need to send you occasional service-related messages. If you wish to amend your marketing preferences, you can do so by contacting us. Mail@cowleytimber.co.uk or mail@cabu.co.uk

Please note that it can take a little while for all marketing to stop once you either withdraw your consent or tell us you'd like to opt out of marketing. This is because some marketing may already be in transit.

YOUR RIGHTS

You have a number of rights under data protection legislation which, in certain circumstances, you may be able to exercise in relation to the personal information we process about you

These include:

- the right to access a copy of the personal information we hold about you;
- the right to correction of inaccurate personal information we hold about you;
- the right to restrict our use of your personal information;
- the right of data portability; and
- the right to object to our use of your personal information.

Where we rely on consent as the legal basis on which we process your personal information, you may also withdraw that consent at any time.

If you are seeking to exercise any of these rights, please contact us using the details in the "Contact Us" section below. Please note that we will need to verify your identity before we can fulfil any of your rights under data protection law. This helps us to protect the personal information belonging to our customer against fraudulent requests.

HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION FOR?

Where we process your information under contract, we will keep your personal information for the purposes set out in this privacy policy and in accordance with the law and relevant regulations. We will not retain your personal information longer than necessary.

Where we process your information under Legitimate interest, we will retain your data unless or until you explicitly withdraw your consent by unsubscribing. Any email marketing sent to you will include a link that will allow you to unsubscribe. Any Literature we post will provide an email address to allow you to unsubscribe.

Where we process your information under Legitimate interest, we will retain your data unless or until you explicitly unsubscribe. Any email marketing sent to you will include a link that will allow you to unsubscribe. Any Literature we post will provide an email address to allow you to unsubscribe.

SECURITY

We take protecting your personal information seriously and continuously maintain our security systems and processes. Some of the controls we have in place are:

- We limit physical access to our buildings and user access to our systems to only those that we believe are entitled to be there;
- We use technology controls for our information systems, such as firewalls, user verification, strong data encryption, and separation of roles, systems & data;
- We utilize industry "good practice" standards to support the maintenance of a robust information security management system; and
- We enforce a "need to know" policy, for access to any data or systems.

CONTACT US

If you would like to exercise one of your rights as set out in the "Your rights" section above, or you have a question or a complaint about this policy, or the way your personal information is processed, please contact us by one of the following means:

If your enquiry relates to Cowley Timber + Partners Ltd:

By email: mail@cowleytimber.co.uk
By post: Data Protection Officer, Cowley Timber + Partners Ltd, Unit 13, Abbots Way, Newark Business Park, Newark, Nottinghamshire NG24 2EL

Or if your enquiry relates to CABU Ltd:

By email: mail@cabu.co.uk
By post: Data Protection Officer, 20a Northburgh Street, London EC1V 0EG

You also have the right to lodge a complaint with the UK regulator, the Information Commissioner. Go to ico.org.uk/concerns to find out more.

POLICY CHANGE

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

November 2018.