

CSO Confidential Limited Privacy Notice.

CSO Confidential Ltd respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our websites and tell you about your privacy rights and how the law protects you.

1. Important information on who we are.

CSO Confidential Limited operates the EnergySecurity.co.uk web site and is the data controller and responsible for your personal data (referred to as CSOC in this privacy notice).

We have appointed a data protection officer 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, please contact the DPO using the details set out below.

Contact details

Our full details are:

CSO Confidential Ltd.

info@csoconfidential.com

CSO Confidential Ltd
P O Box 306
Alton
Hampshire
GU34 9GU
United Kingdom

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). 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 1st December 2018.

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

2. Privacy Relating to this Web Site

Third-party links

This website may include links to third-party websites. 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.

The data collected by the web site

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 data by using cookies, server logs and other similar technologies from Google Analytics (based outside of the UK/EU). The data we collect is anonymous.

Personal Information

There are forms available where you have chosen to specifically provide your data, like enquiry forms or registration forms. The data you give us is never sold or given to any third parties, and we store that data on secure storage that's GDPR compliant with restricted access.

We may collect, use, store and transfer different kinds of personal data about you that you have provided to us. These may include:

Identity Data includes [first name, last name, username or similar identifier].

Contact Data includes [billing address, delivery address, email address and telephone numbers].

Financial Data includes [payment card details].

Transaction Data includes [details about payments to and from you and other details of products and services 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]. These are only collected and analysed as aggregated information and is not connected to anything you choose to supply by filling in a form.

Aggregated Data may be derived from your personal activity 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.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health

and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

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 goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. 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 or in response to a request that you have made of us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending communications to you via email. You have the right to withdraw consent to communications at any time by contacting us at info@csoconfidential.com.

Purposes for which we will use your personal data

The following table provides 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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of CSOC legitimate interests
To register your interest in our services and activities	(a) Identity (b) Contact	Responding to your expression of interest or other communication.
To process and deliver your order including: (a) Manage payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover payments due to us)

<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Informing you of our activities and availability of new information</p>	<p>(a) Identity</p> <p>(b) Contact</p>	<p>(a) Performance of a contract with you or to fulfil your request for information.</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(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)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements or information to you and measure or understand the effectiveness of the information we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our information, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to</p>

relationships and experiences		develop our business and to inform our marketing strategy)
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Promotional offers from us

You will receive marketing communications from us if you have requested information from us or purchased [goods or services] from us.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside CSOC for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing or any contact messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of [a product/service purchase, warranty registration, product/service experience or other transactions].

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.

Change of purpose

We will only use your personal data for the purposes for which we collected it.,

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.

4. International transfers

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

5. 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.

6. 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.

In some circumstances you can ask us to delete your data: Please contact us should this be required.

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.

7. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see <https://www.gov.uk/data-protection> for additional information.

If you wish to exercise any of the rights set out above, please contact us.