



Privacy Policy

1. Introduction

1.1 We are committed to safeguarding the privacy of our website visitors; in this policy we explain how we will handle your personal data.

1.2 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.

1.3 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.

2 The personal data that we collect

2.1 In this section we have set out the general categories of personal data that we process.

2.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers.

2.3 We may process data about your use of our website ("**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. Please see clause 10 of this policy for further information. The legal basis for our processing of usage data is our legitimate interests, namely the proper administration of our website and business.

2.4 We may process information contained in any enquiry you submit to us regarding services ("**enquiry data**"). The enquiry data may be processed for the purposes of offering, marketing and selling relevant services to you. The legal bases for this processing is consent and our legitimate interests.

2.5 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.

2.6 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. 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 website and business and communications with users.

3 Purposes of processing and legal bases

3.1 In this Section, we have set out the purposes for which we may process personal data and the legal bases of the processing.

3.2 **Operations** - We may process your personal data for the purposes of operating our website, providing our services, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business.

3.3 **Relationships and communications** - We may process contact data, account data, transaction data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our website visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our website, services and business.

3.4 **Direct marketing** - We may process contact data, account data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and service users

3.5 **Research and analysis** - We may process usage data and/or transaction data for the purposes of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our business. The legal basis for this processing is our legitimate interests, namely monitoring, supporting, improving and securing our website, services and business generally.

3.6 **Record keeping** - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.

3.7 **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.

3.8 **Insurance and risk management** - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our business against risks.

3.9 **Legal claims** - We may process your personal data 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 **Legal compliance and vital interests** - 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 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 and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

4.3 We may disclose notification or enquiry data to our suppliers or subcontractors, namely our email marketing contractor, insofar as is reasonably necessary for the purposes of facilitating the distribution of our email notifications and/or newsletters.

4.4 Your personal data held in our website database or identify personal data category or categories will be stored on the servers of our hosting services providers.

4.5 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 International transfers of your personal data

5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to a third country under UK and/or EU data protection law.

5.2 We may transfer your personal data from the European Economic Area (EEA) to the UK and process that personal data in the UK for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which the UK is not treated as a third country under EU data protection law or benefits from an adequacy decision under EU data protection law; and we may transfer your personal data from the UK to the EEA and process that personal data in the EEA for the purposes set out in this policy, and may permit our suppliers and subcontractors to do so, during any period with respect to which EEA states are not treated as third countries under UK data protection law or benefit from adequacy regulations under UK data protection law.

5.3 The hosting facilities for our website are situated in United States, Ireland and Israel. The competent data protection authorities have made an adequacy determination with respect to transfers to each of these countries. Transfers to the United States will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission in the EU-US Privacy Shield.

5.3 Our Email marketing subcontractor, Mailchimp who provide our website commentary function are situated in the United States and have servers and offices located in the United States. Information shared with these parties may be transferred to, stored, or processed in the United States. The European Commission has made an “adequacy decision” with respect to the data protection laws of each of the United States. Transfers to the United States will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission in the EU-US Privacy Shield.

5.4 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

6 Retaining and deleting personal data

6.1 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.

6.2 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.

6.3 In some cases it may not always be possible for us to specify in advance the periods for which your personal data will be retained however we will determine the period of retention based on the following criteria:

(a) we will retain enquiry data following a data subject's enquiry submitted to us. In circumstances where the data subject (or their business) has not become a customer of ours we would retain the enquiry data for our future reference for a period of five years;

(c) the period of retention of correspondence data will be determined based on whether there is an ongoing relationship as a result of the initial enquiry and on our assessment of whether we may need that data to comply with our legal obligations or for our legitimate business interests.

(d) account data will be retained for a minimum period of seven years following the date of closure of the relevant account, and for a maximum period of 10 years following that date.

(e) account data will be retained for a minimum period of seven years following the date of closure of the relevant account, and for a maximum period of 10 years following that date.

6.4 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.

7 Your Rights

7.1 In this Section 7, we have listed the rights that you have under data protection law.

7.2 Your principal rights under data protection law are:

(a) **the right to access** - you can ask for copies of your personal data;

(b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;

(c) **the right to erasure** - you can ask us to erase your personal data;

(d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;

(e) **the right to object to processing** - you can object to the processing of your personal data;

(f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;

(g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and

(h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

7.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

8 Amendments

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

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

9 About cookies

9.1 A cookie is a file containing an identifier (a collection 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

We use cookies for the following purposes:

10.1 Security – we use cookies as an element of the security measures used to protect fraudulent use of login credentials, and to protect our website and services generally.

10.2 Authentication and status – we use cookies to identify you when you visit our website and as you navigate our website; and

10.3 Analysis – we use cookies to help us to analyse the use and performance of our website and services; and

10.4 Cookie consent – we use cookies to store your preferences in relation to the use of cookies more generally.

10.5 The cookie table below provides you with information about the type, categories, purpose and duration of cookies placed by Corefield Procurement.

Name	Purpose	Duration	Category
XSRF-TOKEN	Security	Session	Essential
hs	Security	Session	Essential
bSession	used for system effectiveness measurement	30 minutes	Essential
SSR-caching	indicate the system from which the site was rendered	1 minute	Essential
svSession	user login	2 years	Essential

11 Cookies used by our service providers

11.1 Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

11.2 We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

11.3 We use Google Tag Manger to analyse the use of our website. Google Tag Manger gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

12 Managing cookies

12.1 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:

- [Cookie setting in Chrome](#)
- [Cookie setting in Firefox](#)
- [Cookie setting in Opera](#)
- [Cookie setting in Internet Explorer](#)
- [Cookie setting in Safari](#)
- [Cookie setting in Edge](#)

12.2 Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

13 Our details

13.1 This website is owned and operated by Corefield Procurement Ltd

13.2 We are registered in England and Wales under registration number 11872103, and our registered office is at Corefield, Butlers Marston, Warwickshire, United Kingdom CV35 0NL.

13.4 You can contact us:

- (a) by post, using the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.