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1. Privacy notice

1.1 Who are we?

Cleveland Cable Company was established in 1978, we have 40 years of knowledge in the Industry and we are a global supplier of cables and cable accessories. We deliver complete cable solutions to some of the world's most demanding industries with a portfolio of customers across the world.

As the industry has developed, we have developed, introduced new ranges and new technology to keep up with the growing demand from our customers worldwide.

The Head Office and principal stocking location is located at Middlesbrough in the North East of England. This site covers an area of twelve acres and includes over 160,000 square feet of warehousing.

We now have hundreds of staff at locations around the UK and in the Middle East. In the 40 years we have been trading we have created a network of trusted suppliers who we work with to ensure we are gaining the best possible lead times, deliveries and economies of scale, all of which we pass onto our customers. We work to high standards and are Quality Management ISO 9001 and Environmental 14001 approved.

Our QA/Compliance Manager / GDPR Owner and data protection representatives can be contacted directly here:

- gdpr@clevelandcable.com
- 00 44 1642 254234

The personal data we collect will be used for the following purposes:

- Company Name (Supplied by you, for trading purposes)
- Address (Supplied by you, for trading purposes)
- Company Contacts (Supplied by you, for trading purposes)
- Phone Numbers and Fax Numbers (Supplied by you, for trading purposes)
- Email Addresses (Supplied by you, for correspondence to orders and account queries)
- VAT Number ((Supplied by you, for trading purposes)
- Bank Details (Supplied by you, for payment of invoices)
- CCTV Footage when you visit our premises (For the purpose of Health and Safety)
- The only Cookie that our website uses is placed by Google Analytics to help us track our visitor's behavior, anonymously. We do this so that we can react and give you a better experience online.

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2.0 Our legal basis for processing for the personal data:

Cleveland Cable Company Limited identifies the legal basis for processing personal data before any processing operations take place by clearly establishing, defining and documenting:

- the specific purpose of processing the personal data and the legal basis to process the data under:
- consent obtained from the data subject;
- performance of a contract where the data subject is a party;
- legal obligation that Cleveland Cable Company Limited is required to meet;
- protect the vital interests of the data subject, including the protection of rights and freedoms;
- official authority of Cleveland Cable Company Limited or to carry out the processing that is in the public interest;
- necessary for the legitimate interests of the data controller or third party, unless the processing is overridden by the vital interests, including rights and freedoms; national law.

any special categories of personal data processed and the legal basis to process the data under:

- explicit consent obtained from the data subject;
- necessary for employment rights or obligations;
- protect the vital interests of the data subject, including the protection of rights and freedoms;
- necessary for the legitimate activities with appropriate safeguards;
- personal data made public by the data subject;
- legal claims;
- substantial public interest;

2.1 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Cleveland Cable Company Limited to process personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by going to our website www.clevelandcable.com/downloads and downloading and completing the "Data Subject Consent Withdrawal Form and sending it to gdpr@clevelandcable.com

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2.2 Disclosure

We may pass your personal data on to third-party service providers contracted to Cleveland Cable Company Limited in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfill the service they provide on our behalf. When they no longer need your data to fulfill this service, they will dispose of the details in line with Cleveland Cable Company Limited's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

We may have to disclose your information by law or because a court or the police or other law enforcement agency has asked us for it.

2.3 Retention period

Cleveland Cable will keep your personal data only for as long as is reasonably necessary for the purposes outlined in this policy, or for the duration required by law, whichever is the longer.

2.4 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Cleveland Cable Company Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

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2.5 Complaints

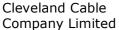
In the event that you wish to make a complaint about how your personal data is being processed by Cleveland Cable Company Limited (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Cleveland Cable Company Limited's data protection representatives QA/Compliance Manager / GDPR Owner.

The details for each of these contacts are:

	Supervisory authority contact details	[Data Protection Officer (DPO)] / [GDPR Owner] contact details
Contact Name:	Information Commissioner's Office	Jason Hodgkinson
Address line 1:	Wycliffe House	Riverside Park Road
Address line 2:	Water Lane	Middlesbrough
Address line 3:	Wilmslow	Cleveland
Address line 4:	Cheshire	TS2 1QW
Address line 5:	United Kingdom	United Kingdom
Email:	https://ico.org.uk/global/contact- us/email/	gpdr@clevelandcable.com
Telephone:	00 44 303 123 1113	00 44 1642 254234

2.6 Privacy statement

Read more about how and why we use your data here http://www.clevelandcable.com/privacy







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3 Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, Cleveland Cable Company Limited, will collect and use your personal data to:

- Company Name (Supplied by you, for trading purposes)
- Address (Supplied by you, for trading purposes)
- Company Contacts (Supplied by you, for trading purposes)
- Phone Numbers and Fax Numbers (Supplied by you, for trading purposes)
- Email Addresses (Supplied by you, for correspondence to orders and account queries)
- The only Cookie that our website uses is placed by Google Analytics to help us track our visitor's behaviour, anonymously. We do this so that we can react and give you a better experience online.

Why does Cleveland Cable Company Limited need to collect and store personal data? In order for us to provide you with products and services we need to collect personal data for correspondence and/or detailed service provision. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Cleveland Cable Company Limited would contact you for additional consent.

Will Cleveland Cable Company Limited share my personal data with anyone else? We may pass your personal data on to third-party service providers contracted to Cleveland Cable Company Limited in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Cleveland Cable Company Limited's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

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How will Cleveland Cable Company Limited use the personal data it collects about me? Cleveland Cable Company Limited will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. Cleveland Cable Company Limited is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

<u>Under what circumstances will Cleveland Cable Company Limited contact me?</u>
Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

<u>Can I find out the personal data that the organisation holds about me?</u>
Cleveland Cable Company Limited at your request, can confirm what information we hold about you and how it is processed. If Cleveland Cable Company Limited does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Cleveland Cable Company Limited or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.

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 Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Cleveland Cable Company Limited accepts the following forms of ID when information on your personal data is requested: Passport, driving licence, birth certificate or bank statement or utility bills.

Contact details of the Data Protection Officer

Contact Name:	Mr Jason Hodgkinson
Address line 1:	Riverside Park Road
Address line 2:	Middlesbrough
Address line 3:	Cleveland
Address line 4:	TS2 1QW
Address line 5:	United Kingdom
Email:	<pre>gdpr@clevelandcable.com</pre>
Telephone:	01642 254234

Cleveland Cable Company Limited

