

# **PRIVACY POLICY**

## **WELCOME**

This is the privacy policy of the Construction Plant-hire Association (CPA). It sets out our policy in relation to our use of our Members', Customers' and Visitors' data that we collect, or that is provided to us. By using our web site and any services we offer via the web site, you confirm that you agree to be bound by the terms of this privacy policy in relation to the information collection about you via the web site

## **1. ABOUT CPA**

1.1. The domain name [www.cpa.uk.net](http://www.cpa.uk.net) is a web site operated by The Construction Plant-hire Association (CPA) which is an un-incorporated body.

1.2. The CPA is a Trade Association with Members based in the British Isles.

1.3. Our postal address is at 27 / 28 Newbury Street, Barbican, London, EC1A 7HU.

1.4. References to CPA, we, us and our in this policy are to the Construction Plant-hire Association.

## **2. THE TYPES OF DATA WE MAY HOLD ABOUT YOU**

In this privacy policy we distinguish between three types of data:-

### **2.1. Corporate data**

This is data relating to companies and other businesses who are our Customers or Visitors (but not Members), which is not personal data under the Data Protection Act 1998.

### **2.2. Personal Data**

This is personal data as defined in the Data Protection Act 1998. Our nominated representative for the purposes of the Act is Mr David Smith.

### **2.3. Members' Data**

This is telephone, fax and e-mail addresses of individual or corporate Members for the purposes of the Privacy and Electronic Communications (EC Directive) Regulations 2003.

## **3. OUR COMMITMENT TO YOU**

The CPA takes privacy very seriously and is committed to processing:

3.1. Customers' data in accordance with this privacy policy,

3.2. Personal data in accordance with the Data Protection Act 1998, and

3.3. Members' data in accordance with the Privacy and Electronic Communications (EC Directive) Regulations 2003.

#### **4. HOW TO CONTACT US**

If you have any questions about any data we may hold about you, please contact us using our postal address (see paragraph 1.3 above) or using any of the contact fields within the website.

#### **5. HOW DO WE OBTAIN DATA ABOUT YOU?**

We can obtain data about you in the following ways:

5.1. If you register an e-mail address with us to receive or download information or documents from us or by corresponding with us by any other means;

5.2. When you place orders on our web site - this could include the products ordered;

5.3. When you report a problem with the web site; and

5.4. When you browse our web site - this might include details of the pages that you look at.

#### **6. WHAT DATA DO WE HOLD?**

In order for us to provide the best possible level of service, we gather and hold the following types of information:-

##### **6.1. Contact Information**

This includes but is not limited to:

(a) Your organisation, company, partnership, sole trader or other business or organisational name;

(b) Your postal, invoicing, and delivery addresses; and

(c) Your telephone, mobile, and fax numbers, and e-mail addresses, including details of individuals who are contacts for your business or organisation.

##### **6.2. Payment Information**

This comprises your payment history, and any credit check information.

##### **6.3. Order Information**

We generate and hold information specific to your orders, including a record of those orders and payments made.

#### 6.4. Web Site Usage Information

We may record your usage of our web site, the products you browse and your purchase history. This helps us to assist you with future purchases to reflect your company's needs.

We may also collect information about your computer, including where available your IP address, operating system and browser type, so as to further develop and improve our site.

The information which we may collect under this Clause 6.4 includes (but is not limited to):

6.4.1 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from this page and any phone number used to call our customer service number; and

6.4.2 technical information, including the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating systems and platforms.

#### 6.5. Relationship Information

We record information relating to any communications and dealings we have with you. This includes enquires, complaints and credit checks.

We may also collect information received from other sources including but not limited to information from third parties we work closely (including, for example, business parties, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information and credit reference agencies).

### **7. WHAT DO WE USE YOUR DATA FOR?**

#### 7.1. Customer Relationship Management

We use your data for the purposes of administering your account(s) with us, performing, administering and managing orders or applications submitted by you and verifying your identity.

#### 7.2. Data Analysis

We use your data along with other data we hold for analytical purposes in relation to our products and services; and to periodically carry out marketing analysis and review, develop and improve our web site and the services and products offered to you.

### 7.3. Site presentation

We use your data to make improvements to our site, and to ensure that content from our site is presented in the most effective manner for you and for your computer.

## **8. BULLETINS**

8.1. We also provide a periodic in-house magazine called “The Bulletin”, which outlines the latest industrial issues which may be of interest to you.

8.2. If you or anyone in your organisation would like to be a recipient of our Bulletin, then please send an email to [info@cpa.uk.net](mailto:info@cpa.uk.net), or submit your e-mail address in the “Contact Us” page of our website.

8.3. If you wish to opt-out of receiving any future editions of The Bulletin, then please contact the CPA office or e-mail to [info@cpa.uk.net](mailto:info@cpa.uk.net). You can subscribe again at any time by following the procedures outlined in 8.2.

## **9. WHO DO WE DISCLOSE YOUR DATA TO?**

### 9.1. General

We will not sell or pass on your details to third parties except as required by law or as deemed necessary by the CPA.

We will not send you any unsolicited mail or e-mail.

### 9.2. Third Party Service Providers

In order to perform your orders, collect payment, and provide you with a service, we may disclose your data to third parties such as business partners, suppliers, credit and debit card processing companies and credit reference agencies.

### 9.3. Credit References

To help us decide whether to accept orders from you or (where applicable) allow you credit terms, you acknowledge that we may undertake whatever searches and enquiries, and obtain whatever references or other information we consider necessary, including carrying out searches with credit reference agencies.

You can contact us for details of the credit reference agencies used by us.

Credit reference agencies may add to their records details of our search which will then be seen by other organisations making searches, and may be linked to records of others associated with you, including any person with whom you are linked financially, which may include members of your household.

We may use a credit-scoring or other automated decision making system.

#### 9.4. Administration and Legal

We may use and disclose to third parties any information we hold about you and your payment record for the purposes of administration and enforcement of this agreement and for other related purposes.

We may also supply your information including personal information to relevant authorities and other third parties where legally required or reasonably required in connection with any legal process or any legal obligations binding on us.

In the event that substantially all of our assets are acquired by a third party, your personal data will be one of the transferred assets.

#### 9.5. Statistics and usage information

We may accumulate statistics (including information derived from your data) about our sales, traffic patterns, and related website information.

We will do this for the purpose of carrying out assessments, analysis and research in relation to our organisation, products, services, Members and customers. This is to assist in the provision of services and products to you, and to facilitate reviews, developments and improvements to our web site and the services and products offered to you. We may share this information with analytics and search engine providers.

### **10. DATA SECURITY**

We are firmly committed to data security and we take steps to guard against unauthorised access to all Members', Customers' or Visitors' data. We protect the privacy of your information using highly secure, password-protected servers.

Please note however that, despite our efforts, the transmission of information via the internet can never be completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use the strict procedures and security features described above to try to prevent unauthorised access.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our web site, you are responsible for keeping this password confidential.

### **11. DATA ACCURACY AND UPDATING YOUR INFORMATION**

We will endeavour to keep the data we hold about you accurate and up to date.

With regards Members, you have the facility to check the information we have concerning your details by visiting our website and logging-in. Your details will appear

once you have logged on, where you can amend any inaccuracies regarding company data we hold about you by using this facility.

Alternatively, you can contact us by post or using any method set out on our site requesting that we update or modify your account information.

## **12. WEBSITE USAGE TRACKING**

Like most websites, we use cookies and internal tracking methods to track the way our website is used by our Members and visitors, so we can better understand how to make the service faster and more user friendly.

The information we gather is analysed either in the aggregate or at a visitor level, where we feel that the data we collect will help to enhance your browsing and potential purchasing experience.

## **13. COOKIES**

### **13.1. Usage**

In common with many other online services, we may use "cookies" to store and track information about your usage of our web site. Cookies are small pieces of information that are transferred from our web site to and stored by your browser in a small text file on your computer. The use of cookies is common in the computer industry. We use cookies to distinguish you from other users of the web site. This helps us provide you with a good experience when you browse the web site and also allows us to improve the web site.

### **13.2. Blocking Cookies**

If you do not want to use "cookies" most Internet browser programs will permit you to turn them off. Should you do this, you will still be able to access our website as normal, but some processes that depend on cookies may not work properly.

If you have not adjusted your browser settings so that it will refuse cookies, our system will issue cookies as soon you visit our site.

If you do not block the use of "cookies" and continue to use our site, you agree to our use of cookies.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

## **14. WHERE WE STORE DATA ABOUT YOU**

The data that we collect from you remains within the confines of the United Kingdom.

By submitting your personal data, you agree to us retaining it to facilitate and improve our services and products. We will take all steps reasonably necessary to ensure that your data is treated securely.

## **15. PERSONAL DATA - YOUR RIGHTS**

In relation to personal data, by law, individuals have the following rights in relation to their data personal. If you wish to exercise any of these rights, then please contact us using our postal address (see paragraph 1.3 above) or using any of the contact methods on our website. These rights are:-

15.1. Access to your data: The Data Protection Act gives you a right to be told what data we hold about you. If you wish to exercise this right, then please contact us using the steps set out above. We may charge you a fee equivalent to the maximum statutory fee from time to time towards our costs in dealing with your request.

15.2. Use causing distress: You have the right to ask us to stop using any data for any purpose where that purpose is causing you substantial distress. If you have any concerns regarding our use of your data, please contact us using the steps set out above.

15.4. Changes to your Information: You have the right to ask us to rectify, delete or block any of your personal information which is inaccurate or not up to date. You may make a request to us to change or modify your information at any time. Further, if you are aware at any time that any of the information that you have given to us has changed then please contact us using the steps set out above.

## **16. VISITING THIRD PARTY WEBSITES**

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

In addition, if you linked to this web site from a third-party web site we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party web site and recommend you check the policy of that third-party web site and contact its owner or operator if you have any concerns or questions.

## **17. CHANGES TO THIS PRIVACY POLICY**

The CPA reserves the right to change this privacy policy from time to time and will update this page accordingly. By using this web site, or accepting these terms, you agree to be bound by any such revisions in effect at the time of use and should therefore frequently visit this web page to determine the current policies applicable to users of the web site.

## **18. LEGAL STATUS OF THIS POLICY**

The policies and terms described above are not intended to and do not create any contractual or other legal rights in or on behalf of any party other than such rights as already exist by law separately to this privacy policy.

## **19. GENERAL**

This privacy policy shall be governed by English law and the parties agree to submit to the exclusive jurisdiction of the English Courts.

*This version of the Privacy Policy came into effect from [●] 2014*