

OVERVIEW:

Capricorn Controls Limited (“**Capricorn**”, “**we**”, “**us**” or “**our**”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers, suppliers, business contacts and other people we may need to contact. We will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. INFORMATION ABOUT US

Capricorn Controls Limited.

Limited Company registered in England under company number 3149637

Registered address: Unit 1-9c, Thorpe Close, Banbury, OX16 4SW, UK

Main trading address: Unit 1-9c, Thorpe Close, Banbury, OX16 4SW, UK

VAT number: GB747522127

Data Protection Officer: Frank Oliver

Email address: frank@capricorn-controls.com

Telephone number: +44 (0) 1295 272 360

Postal Address: Unit 1-9c, Thorpe Close, Banbury, OX16 4SW, UK

2. WHAT THIS NOTICE COVERS

This Privacy Information explains how we use your personal data: how it is collected, how it is held and how it is processed. It also explains your rights under the law relating to your personal data.

3. WHAT PERSONAL DATA IS

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. YOUR RIGHTS

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 12.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 12 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 12 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. we do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 12.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. WHAT PERSONAL DATA WE COLLECT

We may collect some or all of the following personal data and this may vary according to your relationship with us:

- Name and job title
- Contact information including email address
- Demographic information, such as post code
- Other information relevant to client enquiries

6. HOW THIS INFORMATION IS COLLECTED

This information may be collected, stored and used when you contact us by email or telephone for product information, technical assistance or to place a Purchase Order. Our website www.capricorn-controls.com does not collect data and does not use cookies.

7. How we use your Personal Data

Under the GDPR, we must always have a lawful basis for using personal data. This lawful basis is in our **Legitimate Business Interests** to use it. Your personal data may be used for the following purposes:

- Providing and managing your account
- Supplying our products and services to you. Providing product warranty and technical assistance. Your personal details are required in order for us to enter into a contract with you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying information by post, email or text message that you have requested from us.

8. How long we keep your Personal Data

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- Personal information will be held for a maximum of 7 years. This includes customers who are members of the public rather than those trading under a company name.
- Company information as recorded in our Design Files and on Dispatch Notes will be retained in paper &/or electronic form for a minimum of 25 years. This length of time is to help ensure that any product we have ever manufactured could be re-manufactured and be compatible with the original product. Also, with customised and bespoke designs it is important that the original customer can be informed if any other company is enquiring about, or attempting to purchase a replacement part.

9. How and where we store or transfer your Personal Data

Capricorn Controls Ltd will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

The European Commission has deemed to provide an adequate level of personal data protection. More information is available from the [European Commission](#)

However, personal data that you enter could be processed or transferred outside of the EU by BigCommerce (our On-Line Shop), eBay (our eBay Shop) or by PayPal. See Part 15.

10. SHARING YOUR PERSONAL DATA

We will never lease, distribute or sell your personal information to third parties unless we have your permission or the law requires it.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. HOW TO ACCESS YOUR PERSONAL DATA

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

Although subject access requests can be made verbally, we would advise that a request may be dealt with more efficiently and effectively if it is made in writing and sent to the email or postal addresses shown in Part 12. Requests that are made directly by you should be accompanied by evidence of your identity. If this is not provided, we may contact you to ask that such evidence be forwarded before we comply with that request.

Requests made in relation to your data from a third party should be accompanied by evidence that the third party is able to act on your behalf. If this is not provided, we may contact the third party to ask that such evidence be forwarded before we comply with the request.

FEE: There is not normally any charge for a subject access request. If your request is manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

TIMESCALE: We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

Information you will receive

- a) whether or not your data is processed and the reasons for processing your data;
- b) the categories of personal data concerning you;
- c) where your data has been collected from and if it was collected from you;
- d) Anyone who your personal data has been disclosed to, or will be disclosed to, including anyone outside the EEA and the safeguards utilised to ensure data security;
- e) how long your data is kept for (or how that period is decided);
- f) your rights in relation to data rectification, erasure, restriction of and objection to processing;
- g) your right to complain to the Information Commissioner if you are of the opinion that your rights have been infringed;

Circumstances in which your request may be refused

We may refuse to deal with your subject access request if it is manifestly unfounded or excessive, or if it is repetitive. Where it is our decision to refuse your request, we will contact you without undue delay, and at least within one month of receipt, to inform you of this and to provide an explanation. You will be informed of your right to complain to the Information Commissioner and to a judicial remedy.

We may also refuse to deal with your request, or part of it, because of the types of information requested. For example, information which is subject to legal privilege or relates to management planning is not required to be disclosed. Where this is the case, we will inform you that your request cannot be complied with and an explanation of the will be provided.

12. HOW TO CONTACT US

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of: **Frank Oliver**

Email address: frank@capricorn-controls.com

Telephone number: +44 (0) 1295 272 360

Postal Address: Unit 1-9c, Thorpe Close, Banbury, OX16 4SW, UK

13. SECURITY

We will always hold your information securely.

To prevent unauthorised disclosure or access to your information, we have implemented strong physical and electronic security safeguards.

We also follow stringent procedures to ensure we work with all personal data in line with the EU General Data Protection Regulation 2018.

14. LINKS FROM OUR SITE

Our website may contain links to other websites

Please note that we have no control of websites outside the www.capricorn-controls.com domain. If you provide information to a website to which we link, we are not responsible for it's protection or privacy.

Always be wary when submitting data to websites. Read the site's data protection and privacy policies fully.

15. EXTERNAL PROVIDERS

We use BigCommerce to run our 'On-Line Shop'. BigCommerce is based in the US and are a participant in the EU-US Privacy Shield Framework. They are committed to providing best-in-class service and Data Protection. You can check their participation in the Privacy Shield <https://www.bigcommerce.com/privacy/> on the official site of The International Trade Administration (ITA), U.S. Department of Commerce.

On our home page we also provide a link "**ebay latest offers here**" to our ebay shop. Please click here to view the [ebay Privacy Policy](#) .

Payment transactions are made through PayPal and their privacy policy is here [PayPal Privacy Notice](#) .

16. CHANGES TO THIS POLICY

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available to view or download from our website.
