



PRIVACY NOTICE

(Customer)

1. Scope

- 1.1 Charles Wilson Engineers Limited (referred to in this Privacy Notice as “we”, “us” or “CW Plant Hire”) are the data controller in relation to personal data (“Data”) we collect from the data subject (or “you”).
- 1.2 We are a privately owned rental business committed to offering customers the best equipment backed up by a high level of personalised service. We provide plant hire and tool hire nationwide.
- 1.3 We are committed to protecting and respecting your privacy.
- 1.4 We are registered in England and Wales under number 01393410 and have our registered office at Pendragon House, 65 London Road, St Albans, Hertfordshire, AL1 1LJ but please direct any Data enquiries or requests to:
CW Plant Hire, attention of the Data Protection Officer
Head Office
86 High Street
Harpenden
AL5 2SP
Telephone 01582 763122 or email: dpo@cwplant.co.uk
- 1.5 This notice sets out the basis on which we will process any Data we collect from you, or that you provide to us, or that we receive from other sources. Please read the following carefully to understand our views and practices regarding your Data and how we will treat it.

2. Data we collect about you

- 2.1 We will collect and process the following Data about you:
 - 2.1.1 **Information you give us.** This includes information about you that you give us by filling in forms on our website or by corresponding with us by phone, e-mail or otherwise. The information you give us may include your name, address, e-mail address phone number, financial and credit card information.
 - 2.1.2 **Information we collect about you.** This includes information about your visit to our website and any third-party information we have obtained about you from public sources and our own suppliers such as credit referencing agencies. Our website uses cookies, which are a string of information that a website retains on a visitor’s computer and that the visitor’s browser provides to the website each time the visitor returns. The website uses cookies to help us identify and track visitors and their website access preferences. Visitors to our website who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using our website.
 - 2.1.3 **Other information we may collect.** Most vehicles operated by our business are also fitted with 24/7 tracking and Dash Cam devices. In addition, all our sites are equipped with CCTV camera for 24/7 security purposes. We also record telephone calls for training and security reasons, in connection with accident investigations and to help with other queries you or we may have regarding services which we have agreed to provide. We consider that we have a legitimate interest to collect and process Data for these reasons.
- 2.2 Collecting Data is essential to us being able to supply our services.

3. How we use your information

- 3.1 A key requirement of UK Data Protection law is that we have a lawful basis for each aspect of processing of your Data.
- 3.2 Where Data is collected for the purpose of **fulfilling a contract with you**, we will use your Data on the basis that processing is necessary to fulfil that contract, which may include the following types of processing:
 - 3.2.1 To deliver goods/ services which have been ordered by you;
 - 3.2.2 To ensure that content from our website is presented in the most effective manner for you and for your computer;
 - 3.2.3 To carry out our obligations arising from any contract entered into between you and us (including for the purposes of debt collection); and
 - 3.2.4 To notify you about changes to our service.

- 3.3 Where we are required to process Data in order to comply with our **legal obligations**, we will use your Data on the basis that it is necessary to do so for the purposes of legal compliance, which may include storing your Data in order to establish, exercise or defend legal claims within the relevant statutory limitation periods.
- 3.4 Where we have a **legitimate interest** (which you may object to at any time as set out in paragraph 6 below) to process Data, we will use your Data on the basis that we have legitimate interest to do so which is not overridden by your rights and freedoms. We consider that we have a legitimate interest to record and process Data using vehicle devices, CCTV and telephone calls as referred to in paragraph 2.1.3 above. We also consider that we have a legitimate interest to provide you with information, updates or services that you request from us or which we feel may interest you and to inform you about new products, contracts and promotions which may interest them and may be of financial benefit to you as an existing customer.
- 3.5 Where we have obtained your **consent** (which may be withdrawn by you at any time as set out in paragraph 6 below) to processing data, we will use your data on the basis that you have given your consent.
- 3.6 We will never sell your information to third parties. However we may disclose your personal information to third parties in the following circumstances:
- 3.6.1 In the event that we sell any of our business or assets, in which case we may disclose your Data to the prospective buyers of such business or assets and to their legal advisers;
 - 3.6.2 In the event that we appoint a third party data processor to process your Data in accordance with our documented instructions and with the requirements of UK Data Protection law;
 - 3.6.3 If we are under a duty to disclose or share your Data in order to comply with any legal obligation;
 - 3.6.4 If it is necessary to disclose your Data to our professional advisers (for example, to our legal advisers or our accountants); and
 - 3.6.5 If it is necessary to do so in order to enforce or apply our terms and conditions of supply (if applicable) or to protect the rights, property, or safety of CW Plant Hire, our customers or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and exchanging information with debt recovery agencies.

4. Where we store your Data

- 4.1 We will take all steps reasonably necessary to ensure that your Data is treated securely and in accordance with UK Data Protection law.
- 4.2 The Data that we collect from you will be transferred to, and stored at, a destination inside the UK or the European Economic Area ("EEA") or, if transferred outside the UK or the EEA, to those states which the European Commission has deemed to have adequate data security protection or which are otherwise permitted under UK Data Protection law.
- 4.3 Unfortunately the transmission of information via the internet is not completely secure. Although we will do our best to protect your Data, we cannot guarantee the security of your Data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

5. How long we keep your Data

- 5.1 We will process your Data for no longer than is reasonably required. We consider this to be the amount of time that we need your Data in order for any processing which is carried out on the basis of one or more lawful basis set out in paragraph 3 above.
- 5.2 In respect of Data collected using vehicle devices and CCTV, our policy is to retain Data for four months, unless it is required for legal reasons.
- 5.3 In respect of telephone recordings, our policy is to retain Data for twelve months, unless it is required for legal reasons.
- 5.4 In respect of other Data which relates to a contract, our policy is to retain Data for seven years, unless it is required for legal reasons.

6. Your rights as a data subject

- 6.1 In order to exercise any of your rights, please write to our Data Protection Officer, or contact our Data Protection Officer by telephone or email, in each case using the details set out in paragraph 1 above.
- 6.2 You have the right to ask us not to process your Data for marketing purposes. You may object to our use of your Data for marketing purposes contacting us and informing us that you object to our processing of your Data for marketing purposes.
- 6.3 In respect of processing which we carry out on the basis that we have a legitimate interest, you may object to our processing for specified purposes or at all at any time. You may object by contacting us and informing us that you

are objecting to processing for one or more of the purposes for which we have legitimate interest to process your Data.

- 6.4 In respect of processing which we carry out on the basis that you have given consent, you have the right to withdraw consent to our processing for specified purposes or at all at any time. You may withdraw consent by contacting us and informing us that you are withdrawing your consent for one or more of the purposes for which consent was given.
- 6.5 You may request to have any incorrect information corrected or to have your information deleted.
- 6.6 You have the right to request a copy of information held about you by us. Generally we will provide this information free of charge, however in certain circumstances we reserve the right to charge a reasonable fee to meet our costs in providing you with details of the information we hold about you in accordance with UK Data Protection law.
- 6.7 In certain circumstances, you have the right to require us (and our third party data processors) to erase your Data without undue delay, although we reserve the right not to erase Data (or to inform our third party data processors) where processing remains necessary for purposes which are permitted by UK Data Protection law.
- 6.8 You have the right to request that your Data is made portable for the purposes of transferring Data to another supplier in relation to:
 - 6.8.1 Data which you have provided to us;
 - 6.8.2 Data which is processed on the basis of your consent or the performance of a contract; and
 - 6.8.3 Data which is processed by automated means.
- 6.9 In order to exercise any of your rights, we may require you to provide proof of your identity. Where required, we will accept at least one valid item of photographic ID (e.g. driving license or passport) and at least one valid supporting document (e.g. birth certificate or utility bill not older than three months).

7. Complaints

- 7.1 We will endeavour to only use Data that is relevant to our purpose and to ensure your Data is kept secure however sometimes errors occur. If you wish to raise a complaint on how we have handled your Data, you can write to our Data Protection Officer, or contact our Data Protection Officer by telephone or email, in each case using the details set out in paragraph 1 above.
- 7.2 If you are not satisfied with our response or believe we are not processing your Data as required by law, you can contact the Information Commissioners Office at:
Wycliffe House
Water Lane
Wilmslow
SK9 5AF
Telephone +44 (0) 303 123 1113 or email: <https://ico.org.uk/global/contact-us/email/>

8. Changes to our privacy notice

- 8.1 Any changes we make to our privacy policy in the future will be posted on our website, and where legally required, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

CW Plant Hire, attention of the Data Protection Officer
Head Office
86 High Street
Harpenden
AL5 2SP
Telephone 01582 763122 or email: dpo@cwplant.co.uk