# Who is collecting the data?

Cog Effects is an effects pedal manufacturer based in Sheffield, Yorkshire - referred to as "Cog Effects", "Cog", "we", "our" or "us" in this policy. This Privacy Policy provides information on when and why we collect your personal information and how we use it.

# Can anyone else access my data?

We never share any personal data with third parties. However, we use third parties to process product orders (Ecwid) and payments (Paypal, HSBC), host our mailing lists (MailChimp) and website (Yola) and provide web analytics (Yola, Google Analytics), and to manage emails and store data (Google G Suite and Microsoft OneDrive). For more information on this, see the *Third-Party Processors* section below.

What data do we collect?	Why do we collect it?	How long do we keep it?
We collect names and postal,	Records of orders are held for	These records will be kept for 5
email and IP addresses and phone numbers of customers	business MI purposes, and a database of custom orders is	years following the 31 <sup>st</sup> January after the end of the financial
•	held to monitor orders and	
ordering online, along with records of all products ordered	maintain customer service, to	year in which the order/payment was processed
	keep customers informed of	(ie a maximum of 6 years 10
	progress, and to be able to	months)
	provide after-sale support.	montinsy
		After this time, records will be
	Invoices (containing personal	anonymised and personal data
	data) are held for compliance	destroyed.
	with HMRC requirements	
If you choose to subscribe to	To contact you about new	Until you unsubscribe. You can
our mailing list, we will keep a	products/developments and	unsubscribe to general mailings
record of your email addresses,	special offers;	at any time of the day or night
and gather statistics around	To monitor and improve our e-	by clicking the unsubscribe link
email opening and clicks.	newsletter	at the bottom of any of our e-
Any correspondence you send	To help us provide good	newsletters. Once a year, we will delete all
to us (for example, by email or	customer service – for example,	emails older than 5 years
web form)	tailored advice, custom quotes	cinalis older than 5 years
	and after-sale support	
When someone visits our	We do this to find out things	Once a year, we will delete any
website, we use third-party	such as the number of visitors	data that we hold directly and
services (Google Analytics and	to the various parts of the site,	which is older than 5 years.
Yola) to collect standard	and whether people have	
internet log information and	accessed our site via links from	For links to Google and Yola's
details of visitor behaviour	other places on the web. This	policies please see below.
patterns.	allows us to focus our work on	
This information is only	the things our customers or potential customers are	
processed in a way which will	interested in	
not identify anyone. We do not		
make any attempt to find out		
the identities of those visiting		
our website.		

# When will you hear from us?

Unless you have signed up to our mailing list, you won't receive any marketing communications from us. If you have placed an order with us, we may contact you directly to discuss it and our third-party shopping cart provider, Ecwid, will send you automatic emails detailing the progress of your order. We will respond to emails and messages that you send directly.

## What are your rights?

You have the following rights:

- the right to ask for a copy of personal data that we hold about you (the right of access);

- the right to request that we delete personal data held on you; where we no longer have any legal reason to retain it (the right of erasure or to be forgotten);

- the right to ask us to update and correct any out-of-date or incorrect personal data that we hold about you (the right of rectification);

- the right to opt out of any marketing communications that we may send you and to object to us using or holding your personal data if we have no legitimate reasons to do so (the right to object);

- the right (in certain circumstances) to ask us to 'restrict processing of data'; which means that we would need to secure and retain the data for your benefit but not otherwise use it (the right to restrict processing); and

- the right (in certain circumstances) to ask us to supply you with some of the personal data we hold about you in a structured machine-readable format and/or to provide a copy of the data in such a format to another organisation (the right to data portability).

If you wish to exercise any of the above rights, please contact us at tom@cogeffects.co.uk

You will not have to pay a fee to access your personal data (or to exercise any of the other rights), however we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **Third-party processors**

We use the following third parties to enable us to provide our services. Please see their privacy policies for more information:

MailChimp (maintain mailing list and deliver newsletter) - <u>https://mailchimp.com/legal/privacy/</u> Ecwid (process orders, provide shopping cart utility) - <u>https://www.ecwid.com/eu-privacy-policy</u> Paypal (process payments and send invoices) - <u>https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev</u>

Google (Google Analytics, G Suite for business, email) - <u>https://policies.google.com/privacy?hl=en</u> Microsoft (OneDrive file storage) – <u>https://privacy.microsoft.com/en-gb/privacystatement</u> Yola (website hosting and data analytics) - <u>https://www.yola.com/privacy-policy</u>

If you place an order, we will also need to share your address with delivery providers.

We will share data with Governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers where we are required to do so: -

- to comply with our legal obligations;
- to exercise our legal rights (for example in court cases);
- for the prevention, detection, investigation of crime or prosecution of offenders; and
- for the protection of our employees and customers.

## Cookies

Our website uses cookies to collect information, to allow us to track visitor statistics and to allow you to share contact on social media.

Our hosting service, Yola, places a cookie to track visitor information across all Yola-hosted sites.

Our shopping cart system, provided by Ecwid (www.ecwid.com), uses cookies to store encrypted information such as the products in your cart, your category layout preference, and the ID of our store. We do not access this information and it is accessible only by Ecwid.

Detailed information is set out in our Cookie Policy.

### Complaints:

Should you wish to make a complaint about data handling and you are unable to resolve the matter with us directly, or if you have any questions or concerns regarding your personal information, you may contact the UK Information Commissioner's Office.

This policy is reviewed periodically and when changes to legislation require it. The most recent update was May 2018.