



## **PRIVACY POLICY**

Last updated: 7 November 2023

### **Introduction:**

CA Clase UK Limited ("CAC") respects your right to privacy. This Privacy Notice explains who we are, how we collect, share, and use personal data about you, and how you can exercise your privacy rights. This Privacy Notice applies to information we collect as part of your engagement with us, where you use our services, and/or where you visit one of our offices. It also applies to information we collect on our website at <https://www.caclase.co.uk> and through your use of any online service we make available to you such as a customer portal or platform (collectively "Website").

If you have any questions or concerns about our use of your personal data, then please contact us using the details under the "How to contact us" heading below.

We recommend that you read this Privacy Notice in full to ensure you are completely informed about your personal data.

### **Table of contents**

- 1. Introduction and what does CAC do?**
- 2. Personal data we collect and process**
- 3. How we use your personal data (our purposes) and our legal basis for processing it**
- 4. Who we share your personal data with**
- 5. How we keep your personal data secure**
- 6. International data transfers**
- 7. Data retention**
- 8. Your data protection rights**
- 9. Updates to this Privacy Notice**
- 10. How to contact us**

### **1. Introduction and what does CAC do?**

CA Clase UK Limited ("CAC") is registered in the United Kingdom under company number 3074862 and at Unit 2 Mornington Place, Waterberry Drive, Waterlooville, Hampshire PO7 7XX. CA Clase is a technically competent specialist electronics marketing, sales and distribution company who act as the manufacturer's representative within the UK/Europe. Supplying and supporting premium communication, navigation, and entertainment products into the marine leisure, commercial and land mobile sectors.

We are committed to protecting any data that we collect. We operate as both a Controller and Processor of information, dependent upon the nature of the transaction that is being undertaken We collect the minimum amount of information that is commensurate with providing a satisfactory service.

For more information about CA Clase, please see the "About Us" section of our Website at <https://caclase.co.uk>



## 2. Personal data we collect and process

The personal data we collect from you, either directly or indirectly, will depend on your relationship with us, the services you use or engage us to provide, and how you interact with us and/or with our website. We collect personal data about you from the following different sources:

- **Information that you provide directly.**

We collect personal data directly from you when you choose to provide us with this information online and through our other interactions with us (such as data collected when you subscribe to the latest updates from CAC, where we engage with you as a current customer or supplier/service provider to manage our relationship or where you are a prospective customer or suppliers/service providers, any enquiries and communications you have with us).

- **Information that we collect indirectly**

We collect your personal data indirectly, including through automated means from your device when you use our website and when you visit our offices (via CCTV cameras). We also collect data indirectly from your device when you use our services.

- **Information from third parties**

We also collect your personal data from third party sources, i.e., our service providers, and others who provide assistance with the provision of our services. Where you use our service provided by a re-seller, we will also collect information from them to provide our services to you. Information received from third parties will be checked to ensure that the third party either has your consent or are otherwise legally permitted or required to disclose your personal data to us.

To the extent you engage with us through your social media account, we may collect information from your social media account.

In general, we will use the personal data we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal data. However, we may also use your personal data for other purposes that are compatible with those we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

The table below describes the categories of personal data we collect from and about you when you use our services and/or interact with CAC.

| Personal Data Description   | Source   |
|---|--|
| <b>Identity and Contact</b> Data such as your name, email address, phone numbers, work address, company details.  | Directly from you<br>Third parties<br>Automatic collection |
| <b>Business relationship Data</b> such as billing information, financial information, company details and any other information needed to manage our business relationship, including account information to give you access to any online services we provide. | Directly from you<br>Third parties<br>Automatic collection |



|  |   |
|--|---|
| <p><b>Customer Service Data</b> such as any communications with us, any queries you raise, including through our live chat, email or call history with us. This will include information as to how you contact us and the channel of communication that you use and any information that you send us (for example, if you provide a screenshot).</p>   | <p>Directly from you</p>                          |
| <p><b>Communications Data</b> such as details about your device, when you use our services including phone number, SIM number, IMEI number, device specific plan information, records containing date, duration, apps used, and calls made and other such data usage data.</p> <p>This also includes internet connections records such as applications that are using data on the network.</p> | <p>Automatic collection</p>                       |
| <p><b>Content Data</b> such as the content of text messages or voice calls is not collected or processed by CAC, save where necessary to comply with law (such as an interception warrant under policy investigatory powers).</p>  | <p>Automatic collection</p>                       |
| <p><b>Advertising and Marketing Data</b> such as your interests based on your use of our website, services, survey responses, preferences in relation to receiving marketing materials from us, communication preferences, your preferences for products or services and your subscription details.</p>  | <p>Directly from you<br/>Automatic collection</p> |
| <p><b>CCTV Data</b> collected in our facilities to prevent theft and fraud and more generally to protect our property and assets, employees, customers, suppliers, and visitors.</p>   | <p>Automatic collection</p>                       |
| <p><b>Device Data</b> collected using tags and pixels, including your IP address, your ISP, and the browser you use to visit our website, device type, unique device identification numbers or other identifiers including advertising identifiers.</p>  | <p>Automatic collection</p>                       |
| <p><b>Location Data</b> collected when using our services platforms or Website from which we can identify your precise geographic location. This data is used solely to determine the QOS (Quality of Service) of the equipment and services being provided. Whilst tracking can be turned off at your request this may affect our ability to manage your QOS.</p>                             | <p>Automatic collection</p>                       |



|  |   |
|--|---|
| <p><b>Go Cardless</b> data in relation to direct debit payments is processed by Go Cardless. They are an independent data controller and take direct responsibility for complying with the law for the processing it undertakes. The Go Cardless privacy policy may be viewed at <a href="http://www.gocardless.com/en-eu/legal/privacy">www.gocardless.com/en-eu/legal/privacy</a>.</p> | <p>Directly from you<br/>Third Parties<br/>Automatic collection</p> |
| <p><b>Card Payments</b> data in relation to card payments is processed by Sage Pay (Elavon) on a secure, encrypted website and they have their own privacy policy in line with GDPR regulations.</p>   | <p>Directly from you.</p>   |

We do not collect any sensitive personal data about you, such as health-related information or information about your race or ethnicity, or sexual orientation.

### 3. How we use your personal data (our purposes) and our legal basis for processing it

We use the personal data that we collect from and about you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your information. Depending on our purpose for collecting your information, we rely on one of the following legal bases:

- **Contract** - we require certain personal data to provide our services and support the services you purchase or request from us.
- **Consent** – in certain circumstances, we may ask for your consent (separately from any contract between us) before we collect, use, or disclose your personal data, in which case you can voluntarily choose to give or deny your consent without any negative consequences to you.
- **Legitimate interests** – we may use or disclose your personal data for the legitimate business interests of either CAC or a third party, but only when we are confident that your privacy rights will remain appropriately protected. If we rely on our (or a third party's) legitimate interests, these interests will normally be to: operate, provide and improve our business, including our services and Website; communicate with you and respond to your questions; use insights to improve or develop marketing activities and promote our products and services; detect or prevent illegal activities (for example, fraud); and/or to manage the security of our IT infrastructure, and the safety and security of our employees, customers, suppliers and visitors. Where we require your data to pursue our legitimate interests or the legitimate interests of a third party, it will be in a way which is reasonable for you to expect as part of the running of our organisation and which does not materially affect your rights and freedoms. We have identified below what our legitimate interests are; or
- **Legal obligation** – there may be instances where we must process and retain your personal data to comply with laws or to fulfil certain legal obligations.

The following table provides more details on our purposes for processing your personal data and the related legal bases. The legal basis under which your personal data is processed will depend on the data concerned and the specific context in which we use it.



| Purpose/Activity   | Type of personal data   | Lawful basis for processing including basis of legitimate interest  |
|--|---|---|
| <b>Customers / Suppliers / Service Providers (prospective, existing, and former)</b>   |   |   |
| To engage you to provide services to you or to receive services from you.  | Identity and Contact Data<br>Business Relationship Data                           | Performance of a contract with you.<br><br>Our legitimate interests to operate and provide our business and communicate with you, where our communications are not necessary to perform or enter a contract with you.                       |
| Provision of services to you or receipt of services from you.  | Identity and Contact Data<br>Business Relationship Data<br>Customer Services Data | Performance of a contract with you.<br><br>Our legitimate interests to operate and provide our business and communicate with you, where our communications are not necessary to perform or enter into a contract with you.                  |
| Respond to your communications regarding our or your business engagement, including Service updates, confirmations, invoices, and support and administrative messages, communicating with you in respect of your enquiries, requests, or complaints. | Identity and Contact Data<br>Business Relationship Data<br>Customer Services Data | Performance of a contract with you.<br><br>Our legitimate interests to operate and provide our business and communicate with you or your employer -where our communications are not necessary to perform or enter into a contract with you. |
| To provide you access to any online services we provide such as a customer portal or platform  | Identity and Contact Data<br>Business Relationship Data<br>Customer Service Data  | Performance of a contract with you.<br><br>Our legitimate interests to provide you with access to our online services, to assist you in managing your account with us.  |



| Purpose/Activity   | Type of personal data  | Lawful basis for processing including basis of legitimate interest  |
|--|--|---|
| <b>End Users</b>   |  |   |
| Provision of services and management of your use of the services on your behalf and/or on behalf of our customers.                                     | Identity and Contact Data<br>Customer Service Data<br>Communications Data<br>Location Data | Performance of a contract with you (where you engage with us directly) Our legitimate interests to operate and provide our services, including providing access to you or our customer to our online services such as our portal. |
| <b>Visitors</b>  |  |   |
| To keep the CAC premises, secure through CCTV  | CCTV Data  | Our legitimate interests to detect or prevent illegal activities and ensure the safety and security of our staff, customers, suppliers, service providers and visitors.   |
| <b>Website visitors</b>  |  |   |
| Contact you about our services or in response to your queries when you reach out through our website or sign up to our updates.                        | Identity and Contact Data<br>Marketing and Advertising Data<br>Customer Service Data       | Consent (where required under applicable law)<br><br>Otherwise, our legitimate interests to operate and provide our responses and to communicate with you.  |
| Personalise and customise your experience on our website   | Device Data<br>Website Usage Data<br>Marketing and Advertising Data<br>Location Data       | Consent (where required under applicable law)<br><br>Otherwise, our legitimate interests to operate, provide and improve our website and to use the insights to improve or develop marketing activities and promote our business. |
| <b>All</b>   |  |   |
| Comply with legal and regulatory obligations to which we are subject, including our obligations to respond to your requests under data protection law. | Identity and Contact Data<br>Business Relationship Data<br>Content Data                    | Legal obligation.   |



| Purpose/Activity   | Type of personal data  | Lawful basis for processing including basis of legitimate interest   |
|--|--|--|
| <b>All</b>   |  |  |
| Protect our legal rights (including where necessary, to share information with law enforcement and others), for example to defend claims against us and to conduct litigation to defend our interests.   | Identity and Contact Data<br>Business Relationship Data<br>Customer Service Data<br>CCTV Data<br>Communications Data               | Our legitimate interests to protect our business interests.  |
| To carry out any marketing or improvement of CAC's current service offering and business.  | Marketing and Advertising Data   | Our legitimate interests to improve our services and promote CAC.  |
| To keep our business, including our website, premises, staff, customers, suppliers, service providers and visitors secure offline and online and address threats to safety or safety of others, as well as to detect and prevent fraudulent or illegal activities. | Identity and Contact Data<br>Business Relationship Data<br>Customer Service Data<br>CCTV Data<br>Device Data<br>Website Usage Data | Our legitimate interests or those of a third party to operate and provide our business, including our website. To detect or prevent illegal activities and/or to manage the security of our IT infrastructure, and the safety and security of our staff, customers, suppliers, service providers and visitors. |

#### 4. Who we share your personal data with

We share your personal data with the following categories of recipients:

- **Third party service providers, and partners** who provide data processing services necessary to provide you with our services (for example, to support the delivery of, provide functionality for our services or Website) or who otherwise process personal data for purposes described in this Privacy Notice. Our third-party service providers and partners include:
  - suppliers of transmission capacity and connectivity services who we engage to provide communications services to you. They are responsible for the operation of the networks and services that they provide access to and for any processing of personal data that may occur in the delivery of their services. A list of the network providers is available upon request.
  - Couriers and freight forwarders where necessary for delivery of goods.
  - IT service providers who support our systems and services.
  - Banks, financial institutions, payment service providers who process data as part of the running of our business and provision of our services.
  - Professional advisers such as outside counsel, accountants, and auditors.



- **third party services** when you use third party services linked through our website, your personal data will be collected by the provider of such services. Please note that when you use third party services, their own terms and privacy notices will govern your use of their services.
- any **competent law enforcement body, regulatory, government agency, court or other third party** (such as our professional advisers) where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
- a **buyer** (and its agents and advisers) in connection with any actual or proposed purchase, merger, or acquisition of any part of our business, provided that we inform the buyer it must use your personal data only for the purposes disclosed in this Privacy Notice; or
- any **other person with your consent** to the disclosure (obtained separately from any contract between us).

## 5. How we keep your personal data secure

CA Clase UK Limited will not collect any information about individuals except where it is knowingly provided by them and is directly related to the service we have been instructed to supply. All personal information collected is stored on a secure server, held in accordance with the GDPR and is treated as confidential. All reasonable and recommended precautions are taken to prevent unauthorised access to the information. This safeguard may require you to provide additional forms of identity should you wish to obtain information about your account details.

## 6. International data transfers

In some cases, where your personal data is transferred to third parties, it is processed in countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

Our third-party service providers and suppliers operate around the world. This means that when we collect your personal data, we will process it in any of these countries.

Where we transfer your personal data to countries and territories outside of the European Economic Area and the UK, we ensure that we only do so in compliance with applicable data protection laws.

Where we provide communications services that enable the transmission of communications data internationally, it is your or your organisation's responsibility to ensure that you have in place lawful grounds to transfer any personal data in your communications to the intended recipients of your communications.

## 7. Data retention

Unless otherwise advised, we will hold your personal information for as long as a reasonable business need exists such as managing our relationship with you, providing warranty cover, managing our operations, performing analysis and auditing tasks and adhering to legal and regulatory requirements (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

In certain circumstances, we will need to keep your information for legal reasons after our contractual relationship has ended. The specific retention periods depend on the nature of the information and why it is collected and processed and the nature of the legal requirement. For example: we keep your information when we have a legal obligation to do so; where we need to in accordance with our contractual obligations with you and/or where we need to maintain a record of Communications Data to





evidence usage for billing and invoice queries; to deal with and resolve requests and complaints; to protect individuals' rights and property and for litigation or regulatory matters (for example we would retain your information if there was an ongoing legal claim, and the information was relevant to the claim. This information would be retained until the legal claim had been concluded).

When we have no ongoing legitimate business need or legal reason to process your personal data, we will either delete or anonymise it or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

## 8. Your data protection rights

Individuals have the following data protection rights. To exercise any of them see specific instructions below or contact us using the contact details provided under the "How to contact us" heading below.

- You may **access, correct, update or request deletion** of your personal data.
- You can **object to processing** of your personal data, ask us to **restrict processing** of your personal data or **request portability** of your personal data, (i.e., your data to be transferred in a readable and standardised format)
- You have the right to **opt-out of marketing communications** we send you at any time by putting your request in writing to [sales@caclase.co.uk](mailto:sales@caclase.co.uk). If you choose to opt out of marketing communications, we may still send you non-promotional emails, such as emails about your account or our ongoing business relations.
- If we have collected and processed your personal data with your consent, then you can **withdraw your consent** at any time by using the contact details provided under the "How to contact us" heading below. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a supervisory authority** about our collection and use of your personal data. For more information, please contact your local supervisory authority. Contact details for supervisory authorities for the UK [here](#). Certain supervisory authorities may require that you exhaust our own internal complaints process before looking into your complaint.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## 9. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, regulatory, technical, or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if, and where, required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the "last updated" date displayed at the top of this Privacy Notice.

## 10. How to contact us

If you have any questions or concerns about our use of your personal data, please contact us using the following details: [sales@caclase.co.uk](mailto:sales@caclase.co.uk). You may also write to us at CA Clase UK Ltd, 2 Mornington Place, Waterberry Drive, Waterlooville, Hants PO7 7XX.