



CAV SYSTEMS LTD

Privacy Notice

CUSTOMERS

DECEMBER 2022
cav-systems.com

C45427.0029.13009338.7AV Systems Limited

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CAV Systems Limited is registered in England & Wales. Unit 1a, Linden Park, Number One Industrial Estate, Consett, County Durham, England DH8 6SZ. Registration no: 10715185 Vat No: 210 541 660



PRIVACY NOTICE - CUSTOMERS

Welcome to the CAV Systems Group's privacy notice.

CAV Systems Group respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or when you contact us directly and to tell you about your privacy rights and how the law protects you.

This privacy notice aims to give you information on how we collect and processes your personal data through your use of this website or any direct interactions with us, including any data you may provide through this website when you complete our enquiry form or contact us by email or contact us using our business card or purchase our products and services or send us technical drawings.

It is important that you read this privacy notice together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This privacy notice supplements other notices and privacy policies and is not intended to override them.

Who we are

CAV Systems Group is made up of different legal entities. This privacy notice is issued on behalf of the CAV Systems Group so when we mention "CAV Ice Protection Limited", "CAV Advanced Technology Limited", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in the CAV Systems Group of companies responsible for collecting and/or processing your personal data. Each entity is the controller of the personal data

CAV Systems Group Limited's registered office is at Unit 1A, Linden Park, Number One Industrial Estate, Consett, County Durham, DH8 6SZ and we are a company registered in England and Wales under company number 10744121. It is the parent company of two UK-registered trading entities, each of which is listed on the Information Commissioner's Data Protection Public Register with the following registration numbers:

CAV Ice Protection Limited - Z2031703

CAV Advanced Technologies Limited - Z2031691

CAV Ice Protection Limited's registered office is at Unit 1A, Linden Park, Number One Industrial Estate, Consett, County Durham, DH8 6SZ and we are a company registered in England and Wales under company number 6714461.

CAV Advanced Technologies Limited 's registered office is at Unit 1A, Linden Park, Number One Industrial Estate, Consett, County Durham, DH8 6SZ and we are a company registered in England and Wales under company number 6714060.



Contact details

If you have any questions about this privacy notice or our privacy practices, please contact our designated responsible team in the following ways:

Full name of legal entity: CAV Systems Group

Email address: dataprotection@cav-systems.net

Postal address: Unit 1a, Linden Park, Number One Industrial Estate, Consett, County Durham, England, DH8 6SZ

Telephone number: 01207 599140

Updates to this privacy notice

We may change this privacy notice from time to time. Any changes will become effective when we post the revised privacy notice on our website. Your use of our services following these changes means that you accept the revised privacy policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-Party Linking

This privacy notice does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service, to which CAV Systems Group's services link. The inclusion of a link of our services does not imply endorsement of the linked website or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Twitter, LinkedIn, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any personal data you disclose to other organisations through or in connection with our social media channels.

When you leave our website, we encourage you to read the privacy policy of every website you visit.

Information that we collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this privacy notice.

The personal data that we collect from you may include: -



- **Identity Data** includes full name, job title, signature, driver's license, or other form of official identification (ID) and photographs.
- **Contact Data** includes billing address, delivery address, email address, fax number and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your internal account ID, purchases or orders made by you, preferences and your customer number.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.)

Consequences of you not providing your personal data

You are not obligated to provide your personal data to the CAV Systems Group, however, as this information is required for us to provide you with our products and services, we will not be able to offer some or all of our services without it.

How is your personal data collected?

We collect information in the following ways: -

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by making a website enquiry or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:



- purchase our products or services;
- sign up to our mailing list or publications;
- request marketing, brochures, quotations or query responses to be sent to you;
- contact us directly by email, phone, fax or post;
- attend our trade shows;
- visit our offices;
- interact with our social media platforms (e.g. Twitter or LinkedIn); or
- give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our use of cookies below for further details.
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How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

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- to comply with a legal obligation under an official authority for the CAA/EASA/FAA to maintain detailed records of manufacturing, engineering and quality processes so that all parts supplied can be tracked if required; and
- where it is necessary for our legitimate interests to send you marketing information where we have assessed that it is beneficial to you as a customer and your interests and fundamental rights do not override those interests.



We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Analytics** - We use Google Analytics to help us understand how our website is used. We use the data to improve our website and to tailor our marketing messages to you. You can find more information about Google Analytics [here](#).
- **Marketing** - We use cookies to help us market our products and services to you. We use the data to improve our marketing and to tailor our marketing messages to you.
- **Performance** - We use cookies to help us improve our website. We use the data to improve our website and to tailor our marketing messages to you.
- **Essential** - We use cookies to help us improve our website. We use the data to improve our website and to tailor our marketing messages to you.

This is accomplished with the use of Google Analytics. Read Google's overview of privacy and safeguarding data [here](#).

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

Cookie Name	Purpose	Retention period and additional information
Woocommerce_cart_hash	This cookie assist WooCommerce determine when the purchase cart contents and/or data changes	Session Functionality WooCommerce
Woocommerce_items_in_cart	This cookie determines changes to the purchase cart contents.	Session Functionality



		WooCommerce
Wp_woocommerce_session	This cookie contains unique identifiers for each website users so that it can identify where to find the purchase cart in the database for each website user.	2 days Analytical or performance WooCommerce
WooCommerce_recently_viewed	This cookie powers the recently viewed products widget.	Session Targeting WooCommerce
Store_notice	This cookie allows website users to dismiss the privacy notice.	Session Functionality WooCommerce This is only used on occasions.
tk_ai	This cookie is essential to store randomly generated anonymous ID's.	Session Strictly necessary WooCommerce
gtag.js	This cookie is used to distinguish unique website users.	2 years Targeting Google Analytics
gac<property-id>	To store and track audience reach.	90 days Targeting Google Analytics
icwp-wpsf-notbot	This cookie is used to identify website bots.	Strictly necessary Shield Security Plugin
shield-notbot-nonce	This cookie is used to identify website bots.	Strictly necessary Shield Security Plugin

Please note that third parties may also use cookies, over which we have no control. These third parties may include, for example, advertising networks and providers of external services like web traffic analysis services.



You can choose to agree to our use of cookies by clicking on the following buttons:

Accept

Decline

However, if you use your browser settings to decline all **cookies** (including essential **cookies**) you may not be able to access all or parts of our website.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Sharing and disclosing your personal data

We do not share or disclose any of your personal data without your consent, other than for the purposes specified in this privacy notice or where there is a legal requirement for us to do so. We use third parties to provide the below services and business functions; however, all processors acting on our behalf only process your personal data in accordance with instructions from us and comply fully with this privacy notice, the relevant data protection legislation and any other appropriate confidentiality and security measures.

- **Internal Third Parties** include our suppliers, agents and contractors where there is a legitimate reason for their receiving the information, our IT service providers who host the back up of our servers and ERP system and data storage providers who scan and retain all hard copy documentation.
- **External Third Parties** include service providers such as IT and system administration services, professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services and HM Revenue & Customs, regulators and other authorities based in the UK who require reporting or processing activities in certain circumstances.
- **Specific Third Parties** include regulatory bodies such as CAA, FAA, EASA, BSI to ensure we adhere to their standards and that these standards are maintained and checked as well as using companies such as Multiview for website traffic monitoring purposes, United Parcel Service of America Inc, FedEx Corp, United States Postal Service, DHL International GmbH, TNT Holdings B.V., Royal Mail, Google LLC, Facebook Inc, Mail Chimp and Minute Man Press.



- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

Transfers outside the UK

We hold customer personal data that may be replicated with our group company in the USA, which means that we may transfer your personal data outside the UK. Additionally, there may be customer personal data that is transferred outside the UK to third parties, such as customers or suppliers.

We are committed to protecting the privacy and confidentiality of personal data when it is transferred. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

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You may obtain a copy of these measures by contacting us.

Safeguarding Measures

We take your privacy seriously and take every reasonable measure and precaution to protect and secure your personal data. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so including: laptop encryptions; restricted PC access via log ins; permissions based application and electronic file access; IT authentication; firewalls; anti-virus/malware; locked cupboards/storage and building access control system

How long we keep your personal data

We only ever retain personal data for as long as is necessary to fulfil the purposes we collected it for, in accordance with our Data Protection Policy. We have review and retention policies in place to meet these obligations.

We are required to retain any of your personal data regarding any legal, regulatory, tax, accounting or reporting requirements, production, engineering, quality processes and purchases from suppliers and sales to customers indefinitely due to the requirements of CAA/EASA/FAA and



the traceability of products used in the aerospace industry. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Where you have provided us with your details for direct marketing, we will keep such personal data until you notify us otherwise and/or withdraw your consent.

Your rights

Under certain circumstances, you have rights under data protection legislation in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please contact us.

Lodging A Complaint

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

No fee usually required

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 could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond



We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.