PRIVACY POLICY

CoolCare Ltd (“we” “us” “our”) is committed to protecting and respecting your privacy.

For the purposes of data protection legislation, we are the data controller and we will process your personal data in accordance with the General Data Protection Regulation 2016 and any national law relating to the processing of personal data.

Please read the following carefully to understand our views and practices regarding your personal data; how we will use your data; and your rights whether you are a:

- Visitor to our website
- Enquirer
- Customer
- Supplier
- Any individual who has provided us with personal information.

1. How we collect data

1.1 Visitors to our website

1.1.1. We may collect and process personal data about you in the following circumstances:

- When you complete forms on our website (“Site”). This includes name, email address, telephone number, job position and company which is provided at the time of registering to use our Site, subscribing to our services, requesting further services;
- Whenever you provide information to us when reporting a problem with our Site, making a complaint, making an enquiry or contacting us for any other reason. If you contact us, we may keep a record of that correspondence;
- Details of your visits to our Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise, and the resources that you access (see section 2.2.2 on Cookies below); and
- Whenever you disclose your information to us, or we collect information from you in any other way, through our Site.

1.1.2 We may also collect data in the following ways:

- IP Address
  - We may collect information about your device, including where available your Internet Protocol address, for reasons of fraud protection. We may also collect information about your device’s operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions, and patterns, and does not identify any individual.
- Cookies
  - Our Site uses cookies to distinguish you from other users of our Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy: https://account.coolcare.co.uk/policy/cookies-policy/

- Website Links
  - Our Site may, from time to time, contain links to and from the websites of third parties. Please note that if you follow a link to any of these websites, such websites will apply different terms to the collection and privacy of your personal data and we do not accept any responsibility or liability for these policies. Please check before you submit your information to these websites.

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1.2 Customers

1.2.1. We will collect details such as name, email address, telephone number, job position and company when you order goods or services from us via our Site; written (including electronic) correspondence; online forms; and calls to our sales team. We will use this information to process your order and comply with our contractual obligations.

1.2.2 We will collect details such as name, email address, telephone number, job position and company, when you access our support services via our Site; written (including electronic) correspondence; online forms; and calls to our support, training, account management and Customer Success team. We will use this information to process your order and comply with our contractual obligations.

1.3 Suppliers

1.3.1. We will collect details such as name, email address, telephone number, job position and company in order to contact you about goods or services ordered with you and to place further orders. We will keep the personal data for 7 years further to being provided with the goods and services, subject to an annual review.

2. Legal basis for processing your personal data

2.1. In accordance with data protection legislation, we are required to notify you of the legal basis upon which we process your personal data. We process your personal data for the following reasons:

- for performance of a contract we enter into with you;
- where necessary for compliance with a legal obligation we are subject to;
- and for our legitimate interests (as described within this policy).

2.2 Where we rely on legitimate interests, we ensure that these are balanced against your rights and freedoms, including when deploying new technologies such as AI or employee monitoring tools.

3. How we use your data

3.1. Legitimate interests

3.1.1. We may use your personal data for the legitimate interests of CoolCare Ltd., to the extent permissible by law, in order to:

- Provide you with information, or services that you requested from us;
- Perform obligations of contract to which you are party; fulfil any legal obligations we are subject to;
- Allow you to participate in interactive features of our Site, when you choose to do so;
- Ensure that content from our Site is presented in the most effective manner for you and for your device;
- Improve our Site and services using AI technology to enhance efficiency and customer experience;
- Process and deal with any complaints or enquiries made by you; and contact you for marketing purposes where you have signed up for these (see section 5 for further details).

3.1.2. In order to perform our contract with you, we may also need to share personal data with third parties such as payment providers and postal service organisations to assist in the delivery of goods or services you have ordered.

3.1.3. We may also advertise your feedback on our website and marketing materials (subject to obtaining your prior consent where necessary).

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3.1.4. We may use your personal data [in an anonymous form] to analyse our customer profiles and for statistical purposes. We may share this anonymised statistical information with third parties as part of market research purposes.

3.1.5. We may enhance personal information we collect from you with information we obtain from third parties that are entitled to share that; for example, information from credit agencies, search information providers or public sources (e.g. for customer due diligence purposes), but in each case as permitted by applicable laws.

3.1.6 Where monitoring technologies are used, this is for security and operational purposes only, and staff are informed transparently of its scope and purpose

3.2. Marketing

3.2.1. In addition to the uses described in sections 2-5 above, we may use your personal data for our legitimate interests in order to provide you with details about our services, latest development releases, business updates, events and offers which we think may be of interest.

3.2.2. You have the right to opt-out of receiving the information detailed in section 5.1 at any time. To opt-out of receiving such information you can:

- Tick the relevant box situated in the form on which we collect your information;
- Clicking the unsubscribe button contained in any such communication received; or
- Email us at support@coolcare4.co.uk or call +44 (0) 113 385 3853 (Mon – Fri 9am-5pm) providing us with your name and contact details.
- Our website uses cookies to distinguish you from other users. Cookie banners now present “Accept” and “Reject” options with equal prominence and non-essential cookies are not set until consent is actively given.

3.3. Automated processing

3.3.1. We may utilise AI-driven automated decision-making processes to enhance our service delivery. However, we do not undertake automated decision making with your personal data without human oversight.

3.3.2 In addition to explaining how AI is used, we will also explain any specific impacts AI may have on you (eg tailored training recommendations, automated service suggestions)

3.4. Disclosure of personal data to third parties

3.4.1. We may disclose your information to third parties for the following legitimate interests of CoolCare Ltd.:

- To staff members in order to facilitate the provision of goods or services to you;
- To our affiliated entities to support internal administration;
- IT software providers that host our website and store data on our behalf; and
- To a prospective buyer of some or all of our business or assets, in which case personal data including personal data will also be one of the transferred assets.

3.4.2. We may disclose personal data to the police, regulatory bodies, legal advisors or similar third parties where we are under a legal duty to disclose or share personal data in order to comply with any legal obligation, or in order to enforce or apply our Website Terms and Conditions and other agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

3.4.3. 3.4.3. We will not sell or distribute personal data to other organisations without your approval.

3.5. Transfers outside of the European Economic Area

3.5.1. Where permitted by applicable law, we may transfer your personal data to the United States and other jurisdictions outside the European Economic Area (‘EEA’) for the purposes set out in this privacy policy.

3.5.2. We take steps to ensure that where your information is transferred outside of the EEA, appropriate measures and controls in place to protect that information in accordance with applicable data protection laws and regulations.

3.5.3. By using our website, products or services or by interacting with us in the ways described in this privacy policy, you consent to the transfer of your information outside the EEA in the circumstances set out in this privacy policy.

3.5.4. In the unlikely event that an international transfer is required, we will conduct a Transfer Risk Assessment (TRA) to ensure equivalent protection is in place before any transfer is made.

3.6. Data Security

3.6.1. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

3.6.2. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted to our Site; any transmission is at your own risk.

3.6.3. Information you provide to us is stored on our secure servers or those of carefully selected third-party processors. We ensure that we and these third-party processors implement appropriate physical, technical, and organisational measures to protect your information against accidental loss and unauthorised access, use, alteration, or disclosure.

We limit access to personal data to employees, agents, contractors, and other third parties who have a legitimate business need for such access. All third-party processors are bound by contractual obligations to protect your data and to process it only in accordance with our instructions and applicable data protection laws.

3.7. Use of Artificial Intelligence (AI)

3.7.1. We use Artificial Intelligence (AI) technologies to enhance our services and improve user experience. AI may be utilised in the following ways:

3.7.1.1. **Service Optimisation:** To automate processes, improve system efficiency, and deliver a smoother, more responsive experience.

3.7.1.2. **Customer Support:** To help respond to queries faster, personalise support, and streamline issue resolution.

3.7.1.3. **Data Insights:** To analyse trends and patterns that help us continuously improve our product and service offer.

3.7.1.4. **Training and Recommendations:** To provide tailored training recommendations and resources based on user interactions.

3.7.2. **Data Protection & Privacy:** When employing AI, we are committed to handling your data responsibly. Any data processed by AI systems is managed securely and in accordance with applicable data protection laws, including the UK GDPR and Data Protection Act 2018. We do not use AI to make automated decisions that could significantly affect you without human oversight.

3.7.3. **Your rights:** You have the right to inquire about how AI processes your data and can contact us for further information or clarification.

3.7.4. If we make any significant changes to the way we use AI, we will update this policy and inform you accordingly.

4. Access, accuracy and retention of data

4.1. Retention

4.1.1. We will retain your information as long as we require this to provide you with the goods or services ordered from us and for a period of 7 years afterwards, subject to an annual review. Where you have subscribed to receive marketing correspondence from us we will keep personal data until you unsubscribe from receiving such correspondence from us.

4.2. Access to, updating, deleting and restricting use of personal data

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

4.2.2. Data protection legislation gives you the right to object to the processing of your personal data in certain circumstances or withdraw your consent to the processing of your personal data where this has been provided. You also have the right to access information held about you and for this to be provided in an intelligible form. If you would like a copy of some or all of your personal information, please send an email to

support@coolcare4.co.uk. In certain circumstances we reserve the right to charge a reasonable fee to comply with your request.

4.2.3. You can also ask us to undertake the following:

4.2.3.1. Update or amend your personal data if you feel this is inaccurate;

4.2.3.2. Remove your personal data from our database entirely;

4.2.3.3. Send you copies of your personal data in a commonly used format and transfer your information to another entity where you have supplied this to us, and we process this electronically with your consent or where necessary for the performance of a contract; or Restrict the use of your personal data.

4.2.4. We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the personal data that we hold about you or make your requested changes. Data protection legislation may allow or require us to refuse to provide you with access to some or all the personal data that we hold about you or to comply with any requests made in accordance with your rights referred to above. If we cannot provide you with access to your personal data, or process any other request we receive, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

4.2.5. Please send any requests relating to the above to our Data Protection Lead at dataprotection@coolcare4.co.uk specifying your name and the action you would like us to undertake.

4.3. Right to withdraw consent

4.3.1. Where you have provided your consent to the collection, processing and transfer of your personal data, you have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, please contact us at support@coolcare4.co.uk.

4.4. Providing us with information about others

4.4.1. If you provide us with personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws in relation to such disclosure. In so far as required by applicable data protection laws, you must ensure that you have provided the required notices and have obtained the individual's explicit consent to provide us with the information and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read our Privacy Notice.

4.5. Changes to our privacy policy

4.5.1. We reserve the right to update this privacy policy at any time, and any changes we make to our privacy policy will be posted on this page. We will notify you if there are any changes to this policy that materially affect how we collect, store or process your personal data. If we would like to use your previously collected personal data for different purposes than those we notified you about at the time of collection, we will provide you with notice and, where required by law, seek your consent, before using your personal data for a new or unrelated purpose. We may process your personal without your knowledge or consent where required by applicable law or regulation.

4.6. Contact us

4.6.1. We have appointed a Data Protection Lead to oversee compliance with this privacy policy. If you have any questions, comments or requests regarding this policy or how we use your personal data please contact our Data Protection Lead at dataprotection@coolcare4.co.uk. This is in addition to your right to contact the Information Commissioners Office if you are unsatisfied with our response to any issues you raise at https://ico.org.uk/global/contact-us/

4.6.2. If you are a CoolCare customer and would like information on our role as a data processor through the use of our software, please refer to our service contract with you.

Date reviewed: 29.9.25
Reviewer: Fiona Allen, Operations Director
Updates: Updated to reflect changes in IC legislation.

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