**Version 0.0**

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Privacy & Cookie policy

including gdpr requirements

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# introduction

*This Privacy Policy has been written in conformance with the UK’s Information Commissioner’s Office (ICO) Guide to the General Data Protection Regulation (GDPR).*

*This policy explains how CoProCo handles and uses your* ***personal data*** *and your rights in relation to that information. Under data protection law, CoProCo CIC Ltd. is the controller of that information and responsible for its use and protection.*

## Our commitment to data protection

CoProCo CIC Ltd. (**CoProCo**) is committed to protecting and respecting your privacy.

This Privacy Policy explains why and how CoProCo will use the **personal data** that CoProCo have obtained from you or others, with whom CoProCo share it and the rights you have in connection with the information CoProCo use. Please read the following carefully.

This policy describes the way CoProCo handle and use the **personal data** that CoProCo obtain from all the different interactions you may have with CoProCo as a business, including when you visit our offices, social media pages or CoProCo website currently located at www.CoProCo.uk (**CoProCo website**) or when you contact us, register on any mailing lists, submit an idea, pledge to a project or take part in any of our competitions or promotions.

CoProCo, CoProCo Limited, are the controller in relation to the processing activities described below. This means that CoProCo decide why and how your **personal data** is processed. Please see the section at the end of this policy for our contact and legal information.

This policy was last updated on the date that appears at the top of this page.

# Terms, Acronyms & Definitions

Terms and acronyms used throughout this document are highlighted in **bold** text and shall be defined as follows:

|  |  |
| --- | --- |
| **Term** | **Definition** |
| **CoProCo** | CoProCo CIC Ltd. a company registered in England & Wales under company number 11273614. |
| **CoProCo website** | [www.coproco.uk](http://www.coproco.uk)  |
| **Social Media** | Any CoProCo account registered on the following public platforms: Facebook, Instagram, Twitter and/or LinkedIn |
| **Personal data** | Any information relating to an identified or identifiable natural person. As further defined in Article 4 of GDPR. |
| **GDPR** | General Data Protection Regulation. [Regulation (EU) 2016/679](https://ec.europa.eu/info/files/regulation-eu-2016-679-protection-natural-persons-regard-processing-personal-data-and-free-movement-such-data_en) dated 27 April 2016  |
|  |  |
|  |  |
|  |  |

# How and when CoProCo collect personal data about you

***CoProCo*** *receives* ***personal data*** *about you that you give to us, that CoProCo collect from your use of our* ***CoProCo website*** *and* ***social media*** *pages and that CoProCo may obtain from other sources. CoProCo only collect* ***personal data*** *which CoProCo need and that is relevant for the purposes for which CoProCo intend to use it.*

## Personal data that you give to us

This is **personal data** about you that you give to us when:

* submitting **personal data** via our **CoProCo website**
* following us, interacting with us and posting on our **social media**
* participating in surveys for research purposes
* you visit our offices
* CoProCo interact with you at events
* corresponding with us by phone, email or in any other way.

This information is provided by you entirely voluntarily.

This includes information provided via the **CoProCo website**, participating in projects, using any of the communication tools CoProCo provide, pledging funds to a project or cancelling a pledge and when generally using our **CoProCo website**. For example, you may give us your **personal data** by filling in forms, uploading profile information and other content to the **CoProCo website**, managing your account online, engaging in correspondence with us by phone, email or otherwise and meeting with us at events (e.g. you may provide us with your business card).

If CoProCo do not receive this information, you may be unable to register with the **CoProCo website**, list or raise funds, pledge funds to projects, communicate with other users or communicate with us effectively or allow us to comply with our own obligations.

## Information that CoProCo collect about you

CoProCo may automatically collect the following information:

* details of your visits to our CoProCo website, including, but not limited to traffic data, location data, CoProCo blogs and other communication data, and the resources you access;
* technical information, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Please see our Cookies for further information; and
* details regarding when and how you consented to receive marketing communications from us (including the time and date you provided your consent).
* CoProCo may also view any **personal data** which you allow to be shared, such as the information you upload to the **CoProCo website** (such as your user profile), and information you share on third party social networks.

When you visit our social media pages CoProCo collect:

* the information you post on those pages;
* information regarding your interactions with the content CoProCo post; and
* statistical information regarding all our followers’ activities (but from which CoProCo cannot identify you as CoProCo only have access to this information in aggregated form).

## Personal data CoProCo may receive from other sources:

CoProCo may obtain certain **personal data** about you from other sources (including those outside of our business) which may include our suppliers and our clients. The third parties that may send us **personal data** about you are as follows:

|  |  |
| --- | --- |
| **Source of personal data** | **The circumstances in which CoProCo may obtain personal data (as about you from this source** |
| Other members | Members of the website may share **personal data** about you with us, for example if you misuse the website or breach CoProCo’s Code of Conduct.  |
| Our funding partners | CoProCo may receive your **personal data** from our funding partners if you have indicated to them that you would like us to contact you about funding opportunities. |
| Social media networks (publically available source) | CoProCo may view your social media profile registration data where you choose to register with our website using your existing social media profile and log-in details  |

Please note CoProCo do not knowingly collect **personal data** about children or **personal data** that is ‘sensitive data’ from a legal perspective or that relates to criminal convictions or offences. Please do not provide this information to us whether directly or by posting it to the CoProCo website. If CoProCo receive this type of information, CoProCo will promptly delete it.

# Categories of personal information CoProCo use about you

*CoProCo process different types of personal information about you. To make it easier to understand the information that CoProCo use about you, CoProCo have categorised this information in the table below and provided a short explanation of the type of information each category covers.*

CoProCo process the following categories of personal information about you:

|  |  |
| --- | --- |
| **Category** | **Personal information included in this category** |
| Behavioural | your activities, actions and behaviours |
| Biographical | your life experiences |
| Contact | information which can be used to address, send or otherwise communicate a message to you |
| Banking/Billing | information used to send/receive funds to/from you |
| Fraud | information relating to the occurrence, investigation or prevention of fraud |
| Identity | information that verifies your identity including formal identification documents or unique identification numbers linked to you  |
| Legal | information relating to legal claims made by you or against you or the claims process |
| Fundraising | information relating to your pledges and fundraising |
| Marketing Preferences | your preferences in respect of any marketing communications form us from time to time in relation to products or services which CoProCo believe may be of interest to you  |
| Correspondence | information contained in our correspondence or other communications with you about projects and other activities on our website, our services or our business  |

# Use of your personal information

*CoProCo use your personal information for a variety of reasons. CoProCo rely on different legal grounds to process your personal information, depending on the purposes of our use and the risks to your privacy. You will only receive unsolicited marketing communications from us if you have consented and can opt-out of receiving them at any time. CoProCo do not share your personal information with companies that would send their marketing to you.*

CoProCo use your personal information in the following ways:

## Where you have provided CONSENT

CoProCo may use and process your personal information for the following purposes where you have **consented** for us to do so:

* to contact you via email with marketing information about our projects, funding opportunities and business;

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Your rights over your personal information](#_Your_rights_in_1) for further details.

## For the performance of our CONTRACT

CoProCo will use your personal information where this is necessary for us to **perform our contract** with you or to **carry out any pre-contract steps** you’ve asked us to so that you can enter into that contract, for the following purposes:

* to register and set you up as a user on our website;
* to publish details of your pledges (unless you choose to pledge anonymously), your projects and the rewards you wish to offer;
* to process your pledges and share your details with our payment processors so that payments can be made from you;
* to share your personal information with our funding partners to obtain funding for your projects;
* to run our competitions and promotions that you enter from time to time and to distribute prizes.

## To comply with LEGAL OBLIGATIONS

CoProCo will use your personal information to comply with our legal obligations:

* to keep a record relating to the exercise of any of your rights relating to our processing of your personal information;
* to perform anti-money laundering and related checks where the law requires these;
* to anonymise, pseudonymise and destroy your personal information in accordance with our retention policies and data protection law;
* to handle and resolve any complaints relating to the services CoProCo provide.

## To pursue a LEGITIMATE INTEREST

CoProCo may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business for the following purposes:

Processing necessary for us to promote our business, brand and activities and measure the reach and effectiveness of our campaigns.

* for analysis and insight conducted to inform our marketing strategies, and to enhance and your visitor experience;
* to tailor and personalise our marketing communications based on your attributes;
* to supply your details to social media and other online platforms operated by other companies for them to contact you with our targeted advertising online, unless you object. You may receive advertising based on information about you that CoProCo have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us;
* to identify and record when you have received, opened or engaged with our CoProCo website or electronic communications.

Processing necessary for us to support our members with their enquiries

* to respond to correspondence, you send to us and fulfil the requests you make to us.

Processing necessary for us to respond to changing market conditions and the needs of our guests and visitors

* to analyse, evaluate and improve our website and other services so that your visit and use of our website, fundraising support and other services and social media pages, are more useful and enjoyable (CoProCo will generally use data amalgamated from many people so that it does not identify you personally);
* to undertake market analysis and research (including contacting you with surveys) so that CoProCo can better understand you as a guest;
* for the purposes of developing new initiatives and features on our website (for example new types of fundraising options or support).

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

* to administer our website and our social media pages and for internal operations, including troubleshooting, testing, statistical purposes;
* for the prevention of fraud and other criminal activities;
* to verify the accuracy of data that CoProCo hold about you and create a better understanding of you as an account holder or visitor;
* for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access, including to archive, destroy, pseudonymise or anonymise your personal information;
* to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, CoProCo will keep a record of this on our suppression lists in order to be able to comply with your request);
* for the purposes of corporate restructure or reorganisation or sale of our business or assets;
* for efficiency, accuracy or other improvements of our databases and systems, for example, by combining systems or consolidating records CoProCo hold about you;
* to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings;
* to inform you of updates to our terms and conditions and policies; and
* for other general administration including managing your queries, complaints, or claims, and to send service messages to you.

**Marketing communications**: If you give your consent, CoProCo may use your personal information to contact you by email to send you newsletters or to notify you with details of projects, services and competitions. CoProCo try to adapt any marketing material that CoProCo send to you, for example by notifying you of projects that apply to your interests and in your location. If you do not wish to receive email communications from us, please inform us by using the unsubscribe link inside the email messages CoProCo send, by using our comments form or, if you have a registered account on our website, by changing your Profile settings from within your account.

If you opt-out of receiving marketing communications from us, CoProCo keep your email address on our suppression list for a defined period to ensure that CoProCo comply with your wishes. Please see further the periods for which CoProCo retain your personal information.

# Disclosure and sharing of your personal information by us

*CoProCo only disclose and share your personal information outside our business in limited circumstances. If CoProCo do, CoProCo will put in place a contract that requires recipients to protect your personal information, unless CoProCo are legally required to share that information. Any contractors or recipients that work for us will be obliged to follow our instructions. CoProCo do not and will never sell your personal information to third parties.*

**CoProCo may disclose your information to the following:**

* Our funding partners with whom CoProCo work to make further sources of funding available for projects. Our partners include private sector organisations such as banks, retailers, media companies and also organisations in the public sector such as local councils. CoProCo also administer and promote competitions with some of our partners from time to time. When we do so CoProCo and the relevant partner may make joint decisions regarding how CoProCo use your personal information in connection with those competitions and will provide a further notice to you explaining the relationship between us;
* project owners for them to contact you in connection with their project and backers to allow them to identify the project owners responsible for the projects to which they pledge, in each case in accordance with our Terms;
* our third-party service providers, agents and subcontractors (**Suppliers**) for the purposes of providing services to us or directly to you on our behalf, including the operation and maintenance of our website and social media pages. Our Suppliers can be categorised as follows:

|  |  |
| --- | --- |
| **Recipient / relationship to us** | **Industry sector (& sub-sector)** |
| Accountants and legal and security advisers and consultants | Professional Services (Accountancy, Security & Legal) |
| Advertising, PR, digital and creative agencies | Media (Advertising & PR) |
| Banks, payment processors and financial services providers (Stripe, Mangopay, PayPal) | Finance (Banking & Payment Processing) |
| Business intelligence and performance services (Segment, Tableau, Redshift, BIG Consultancy, Geckoboard, Redash, Zapier)  | IT (Business Performance) |
| Cloud software system providers, including database, email and document management/monitoring providers (Mandrill, Mailchimp, Google, Dropbox)  | IT (Cloud Services) |
| Delivery and mailing services providers (Royal Mail) | Logistics (Delivery Service) |
| Event booking service provider (Eventbrite) | Events (Booking) |
| Facilities and technology service providers including scanning and data destruction providers  | IT (Data Management) |
| Fraud and identity verification services (Stripe, Mangopay) | IT (Verification) |
| Tax administration (HMRC) | Government (Tax Administration) |
| Health and safety claims administrators and consultants | Health & Safety (Claims) |
| Insurers and insurance brokers | Insurance (Underwriting & Broking) |
| Market and customer research providers | Media (Market Resarch) |
| Online survey platforms and services (Survey Monkey, Typeform, Nesta, TSIP) | IT (Survey) |
| Social media platforms (Facebook, Twitter and LinkedIn) | Media (Social Media) |
| Team and remote collaboration tools and services (Trello, Basecamp, Asana, YouTrack, Slack, Google Docs)  | IT (Collaboration) |
| CoProCo website and data analytics platform providers, and CoProCo website performance tools (Google Analytics, Hotjar, Ask Nicely, Unbounce)  | IT (Data Analytics) |
| CoProCo website and App developers | IT (Software Development) |
| CoProCo website marketing, search and integration services (Algolia, Google remarketing, Unbounce, Wordpress)  | IT (Software Development and Marketing) |
| CoProCo website hosting services providers (Amazon Services, CloudAbove) | IT (Hosting) |
| File and data transfer providers (WeTransfer, Google Docs) | IT (Cloud) |

The Suppliers above are located in the European Economic Area or the USA.

When CoProCo use Suppliers, we only disclose to them any personal information that is necessary for Suppliers to provide their services and only where CoProCo have a contract in place that requires them to keep your information safe and secure.

**CoProCo may disclose the personal information to other third parties as follows:**

* any third party who is restructuring, selling or acquiring some or all of our business or assets or otherwise in the event of a merger, re-organisation or similar event; and
* if CoProCo are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation or request, including by the police, courts, tribunals or regulators.

# Transfers of your personal information outside of Europe

*Except in a limited number of cases, CoProCo do not transfer your personal information outside of Europe. In the event CoProCo need to, we shall take measures to protect your personal information.*

All the personal information collected about you by us or on our behalf may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen where any of our group companies are located in a country outside of the EEA or if any of our servers or those of our third-party service providers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the UK and so they may not protect the use of your personal information to the same extent.

If CoProCo transfer your information outside of the EEA in this way, CoProCo will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy. These steps include imposing contractual obligations on the recipients of your personal information or ensuring that the recipients are subscribed to ‘international frameworks’ that aim to ensure adequate protection. For example, those of our third-party service providers who receive your personal information in the USA may subscribe to the “EU-US Privacy Shield” framework. Where they do not, CoProCo ensure that we impose contractual obligations on them that are broadly equivalent as required by UK data protection law. Please contact us using the details at the end of this policy for more information about the protections that CoProCo put in place and to obtain a copy of the relevant documents.

If you use our services whilst you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

# Security and links to other CoproCo sites

*CoProCo take the security of your personal information seriously and use a variety of measures based on good industry practice to keep it secure. Nonetheless, transmissions over the internet and to our website may not be completely secure, so please exercise caution. When accessing links to other websites, their privacy policies, not ours, will apply to your personal information.*

CoProCo employ security measures to protect the personal information you provide to us, to prevent access by unauthorised persons and unlawful processing, accidental loss, destruction and damage. When CoProCo have provided (or you have chosen) a password or pin allowing you access to certain parts of the website, you are responsible for safeguarding it and keeping it confidential and you promise not to allow it to be used by third parties. Unfortunately, the transmission of information via the internet is not completely secure. Although CoProCo will do everything possible to protect your personal information, CoProCo cannot guarantee the security of any personal information during its transmission to us online. You accept the inherent security implications of using the internet and will not hold us responsible for any breach of security unless CoProCo are at fault.

Our website and social media pages may contain links to other CoProCo websites run by other organisations which CoProCo do not control. This policy does not apply to those other CoProCo websites‚ so CoProCo encourage you to read their privacy policies. CoProCo are not responsible for the privacy policies and practices of other CoProCo websites (even if you access them using links that CoProCo provide) and CoProCo provide links to those CoProCo websites solely for your information and convenience. CoProCo specifically disclaim responsibility for their content, privacy practices and terms of use, and CoProCo make no endorsements, representations or promises about their accuracy, content or thoroughness. Your disclosure of personal information to third party CoProCo websites is at your own risk.

In addition, if you linked to our website from a third party CoProCo website, CoProCo cannot be responsible for the privacy policies and practices of the owners and operators of that third party CoProCo website and recommend that you check the policy of that third party CoProCo website.

## Personal data retention periods

*CoProCo will not hold your personal information in an identifiable format for any longer than is necessary for the purposes for which CoProCo collected it. For certain purposes CoProCo retain your personal information for a very short period whilst for others CoProCo retain it for a period of 7 years after the information is no longer required for business reasons so that CoProCo can deal with any legal proceedings that could arise.*

CoProCo retain your personal information for the following periods:

|  |  |
| --- | --- |
| **Type of personal data** | **How long do CoProCo keep your personal information?** |
| Registration information | 7 years from the date your account is closed for any reason. |
| Information (other than registration information) relating to projects/project owners including pledged amounts | For unsuccessful projects, 7 years from the date your account is closed for any reason. For successful projects, indefinitely (but please see exceptions below). |
| Information relating to backers (other than registration information) including pledge history | 7 years from the date your account is closed for any reason. |
| Identity documents | If CoProCo require these for financial or fraud verification purposes, 7 years. If CoProCo require these to share with our payment processors for client verification purposes, 6 months. If CoProCo require these to verify your identity for a request by you in connection with your rights over your personal information (see below), 2 years. |
| CoProCo web traffic and device information | 26 months from the date of collection. |
| Social media handles | Until you stop following our social media account or page. |
| Marketing preferences | For as long as you have not opted-out and if you opt-out, indefinitely after CoProCo place you on our suppression list to ensure CoProCo honour your wishes. |
| Complaints and queries | 2 years, except where these relate to legal claims, in which case 7 years. |

**The only exceptions to the periods mentioned above are where:**

* you exercise your right to have the information erased (where it applies) and CoProCo do not need to hold it in connection with any of the reasons permitted or required under the law (see further [Your rights in relation to your personal information](#_Your_rights_in_2));
* you exercise your right to require us to retain your personal information for a period longer than our stated retention period (see further [Your rights in relation to your personal information](#_Your_rights_in_2));
* CoProCo bring or defend a legal claim or other proceedings during the period CoProCo retain your personal information, in which case CoProCo will retain your personal information until those proceedings have concluded and no further appeals are possible;
* CoProCo archive the information, in which case CoProCo will delete it in accordance with our deletion cycle; or
* in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

# Your rights in relation to your personal information

*You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, CoProCo may ask you for information to verify your identity and, where applicable, to help us to search for your personal information. Except in rare cases, CoProCo will respond to you within 30 days after CoProCo have received this information or, where no such information is required, after CoProCo have received full details of your request. You have the following rights, some of which may only apply in certain circumstances:*

1. **To be informed about the processing of your personal information (as set out in this policy);**
2. **To have your personal information corrected if it is inaccurate and to have incomplete personal information completed;**

The accuracy of your information is important to us and CoProCo make it easy for you to review and correct the personal information that CoProCo hold about you in your Profile. If you change your name or address/email address, or you discover that any of the other information CoProCo hold is inaccurate or out of date, you can let us know by contacting us in any of the details described at the end of this policy but CoProCo ask you to first check that you cannot correct your details using the tools in your Profile.

When downloading a list of backers on their project, project owners will see the address details of those members who pledged on their project. Please note that if you change your address after the project owner has downloaded this data (this usually happens once their project is successful) the details the project owner may become out of date, until the project owner downloads a new list of data - so CoProCo would recommend also contacting the project owner to inform them of a change to your contact details.

1. **To object to processing of your personal information;**

Where CoProCo rely on our legitimate interests as the legal basis for processing your personal information for particular purposes, you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which CoProCo are sure CoProCo can continue to process your personal information, CoProCo will temporarily stop processing your personal information in line with your objection until CoProCo have investigated the matter. If CoProCo agree that your objection is justified in accordance with your rights under data protection laws, CoProCo will permanently stop using your data for those purposes. Otherwise CoProCo will provide you with our justification as to why CoProCo need to continue using your data.

You may object to us using your personal information for direct marketing purposes and CoProCo will automatically comply with your request. If you would like to do so, please email us via the unsubscribe link in all communications or contact us at info@coproco.uk. Unsubscriptions may take up to 14 calendar days to process.

1. **To withdraw your consent to processing your personal information;**

Where CoProCo rely on your consent as the legal basis for processing your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can also unsubscribing (as detailed in 3 above).

You can also opt out of receiving our newsletter at any time by editing your Profile settings (login, click your name at the top right of the CoProCo website then choose Profile settings).

You can choose to receive or opt-out of future marketing from Projects you have pledged on.

The project owner will be responsible for handling your information after they receive it from us. The project owner, when downloading a list of backers on their project will see who has elected to receive further updates.

You can also choose to receive or opt-out of updates from Projects you have pledged on.

Please note that our standard receipt emails and notifications or a Project closing successfully or unsuccessfully contain important financial information regarding your pledge and so cannot be turned off.

If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

1. **To restrict processing of your personal information;**

You may ask us to restrict the processing your personal information in the following situations:

* where you believe it is unlawful for us to do so
* you have objected to its use and our investigation is pending
* you require us to keep it in connection with legal proceedings.

In these situations, CoProCo may only process your personal information whilst its processing is restricted if CoProCo have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

1. **To have your personal information erased;**

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, CoProCo will make reasonable efforts to comply with your request.

1. **To request access to your personal information and information about how CoProCo process it;**

You have the right to ask for a copy of the information that CoProCo hold about you by emailing or writing to us at the address at the end of this policy. CoProCo may not provide you with a copy of your personal information if this concerns other individuals or CoProCo have another lawful reason to withhold that information.

Remember, you can access a lot of your personal information through your account.

* You can see a record of the projects you have supported
* You can also review and edit the personal information you have provided to CoProCo via your Profile settings.

If you wish to make a Subject access request please first check you cannot get the data from the areas listed above. If you wish to access data not listed there please be specific in your request and send us a message to info@CoProCo.uk. CoProCo will then, in adherence with the ICO guidelines, respond to your request.

1. **To electronically move, copy or transfer your personal information in a standard, machine-readable form;**

Where CoProCo rely on your consent as the legal basis for processing your personal information or need to process it in connection with a contract in place directly with you, you may ask us to provide you with a copy of that information in a structured data file. CoProCo will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and CoProCo will do so if this is technically possible. CoProCo may not provide you with a copy of your personal information if this concerns other individuals or CoProCo have another lawful reason to withhold that information.

1. **Rights relating to automated decision making, including profiling.**

CoProCo do not envisage that any decisions that have a legal or significant effect on you will be taken about you using purely automated means, however we will update this policy and inform you if this position changes.

You have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Information Commissioner’s Office (**ICO**), the data protection regulator in the UK, are available on the [ICO](https://ico.org.uk/) website, where your personal information has or is being used in a way that you believe does not comply with data, however, CoProCo encourage you to contact us before making any complaint and CoProCo will seek to resolve any issues or concerns you may have.

# Changes to our Privacy Policy

*Please check this page regularly for changes to this policy. CoProCo will email you with changes if we hold a valid email address for you.*

CoProCo may review this policy from time to time and any changes will be notified to you by posting an updated version on our website and, where appropriate, by contacting you by email. Any changes will take effect 7 days after CoProCo post the modified terms on our website or after the date CoProCo notify you by email. CoProCo recommend you regularly check this page for changes and review this policy each time you visit our website.

# Contact and legal information

*You can contact us with your queries in relation to this policy or for any other reason using our CoProCo web form or by post or email.*

To contact us in relation to this policy, including to exercise any of your rights in relation to your personal information, please contact us or write to us by email at info@CoProCo.uk.

*CoProCo Limited’s company registration number is 11273614 and registered office address is CoProCo CIC Ltd., 4 Eastdean Avenue, Epsom, Surrey, KT18 7SN, U.K.*