



CP-PY-17/ POLICY
WEBSITE PRIVACY
Issue **2.0**

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1 COX POWERTRAIN LIMITED WEBSITE PRIVACY POLICY

This Privacy Policy (the “Policy” for the purposes of the General Data Protection Regulations) is issued by Cox Powertrain Limited, a UK compression ignition outboard engine manufacturing company with a global distributorship network.

Cox Powertrain Limited (“Cox”), trading as Cox Marine (together “**Cox**”, “**we**”, or “**us**”), is the "Data Controller" of our website users’ Personal Data (which we call “Personal Information” for clarity). This means that we are responsible for deciding how we hold and use Personal Information about you. We are required under data protection legislation to notify you of the information contained in this Policy.

This Policy describes how we collect and use personal information about you through your use of this website or contact us by email.

It is important that you read this Policy, together with any other Policy or fair processing notice we may provide on specific occasions when we are collecting or processing Personal Information about you, so that you are fully aware of how and why we are using your information. This Policy supplements the other notices and is not intended to override them.

It is important that you read this notice, so that you are aware of how and why we are using such information.

This Policy may be amended or updated from time to time to reflect changes in our business with respect to the processing of Personal Information, or changes in applicable law. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make to the terms of this Policy.

2 COLLECTION AND PURPOSES OF USE OF YOUR INFORMATION

What Personal Information we collect about you and how we use it depends on what you do on our website. Except as set out below, we do not collect “special categories” of Personal Information such as details of race, religious beliefs or political opinions, or details of any criminal offences or convictions.

We typically collect Personal Information about you from the following sources:

- **Data you directly provide;** for example, when you enter your Personal Information into our website or contact us by email. We also gather Personal Information automatically through the use of cookies and [analytic services](#).
- **Relationship data:** We may collect or obtain your Personal Information in the ordinary course of our relationship with you (e.g., while corresponding with you).
- **Data you make public:** We may collect or obtain your Personal Information that you choose to make public, including via social media (e.g., we may collect information from your social media profile(s), if you make a public post).
- **App data:** We may collect or obtain your Personal Information when you download or use any of our Apps.
- **Site data:** We may collect or obtain your Personal Information when you visit any of our Sites or use any features or resources available on or through a Site.
- **Registration details:** We may collect or obtain your Personal Information when you use, or register to use, any of our Sites, Apps, or services.
- **Content and advertising information:** If you choose to interact with any third-party content or advertising on a Site or in an App, we may receive Personal Information about you from the relevant third party.
- **Third party information:** We may collect or obtain your Personal Information from third parties who provide it to us (e.g., credit reference agencies; etc.).

3 CREATION OF PERSONAL INFORMATION

We may create Personal Information about you (e.g., from records of your interactions with us).

We may also create Personal Information about you, such as records of your communications and interactions with us, including attendance at events we hold or interviews while applying for a job with us. We may record telephone calls, meetings, and other interactions in which you are involved, in accordance with applicable law.

4 DATA ACCURACY

We take every reasonable step to ensure that your Personal Information are kept accurate and up-to-date and are erased or rectified if we become aware of inaccuracies.

We take every reasonable step to ensure that:

- your Personal Information that we process are accurate and, where necessary, kept up to date; and
- any of your Personal Information that we process that are inaccurate (having regard to the purposes for which they are processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Information.

5 NEWSLETTERS

If you wish to sign up to receive our email newsletter, we ask for your name, email address, employer, and details of why you are interested in us. We need your name and email address to be able to send you the newsletter.

Our lawful basis for using your Personal Information in this way is your express consent. We do not send you email newsletters that you do not specifically ask to receive. You can unsubscribe from our newsletters at any time, by clicking the unsubscribe link in the footer of our newsletters.

When signing up to our newsletters, we also ask you whether you wish to receive newsletters and other offers from specific third parties whose services might be of interest to you. If you agree to this, we will pass your details to those third parties who will contact you directly. Our lawful basis for passing your contact details to third parties is your express consent.

6 ENQUIRIES ABOUT OUR PRODUCTS AND SERVICES

When contacting us with an enquiry, you provide us with your name, phone number and email address. During negotiations, you may also provide us with additional Personal Information such as your personal bank account details.

We use the Personal Information which you have given us to respond to your enquiry. The use of your Personal Information in this way is necessary so that we can take steps at your request with a view to entering into a contract with you.

7 MARKETING

We may process your Personal Information to contact you with marketing information regarding our products and services that maybe of interest to you. You may unsubscribe free at any time.

We may also have a legitimate interest in using the Personal Information that we have gathered from our contact with you in order to build a list of commercial contacts and/or to gain insight into who is interested in our products and services to grow our business. If we sell products and/or provide services to you, we may send information to you regarding the products and our services and other information that may be of interest to you, using the contact details that you have provided to us and always in compliance with applicable law. In some limited cases, we may use your Personal Information to send you commercial offers which we think might be of interest. In compliance with the Privacy and Electronic Communications Regulations (“PECR”), we will only send you marketing emails in this way if you are a corporate subscriber within the meaning of PECR. If you are a consumer, sole trader, or member of a partnership (or an employee of any business which trades in these ways), we do not use

your Personal Information to send you marketing messages by email, unless you have provided your express consent for us to do so.

You have the right to opt-out of receiving marketing emails and can do so at any time by clicking the unsubscribe link at the bottom of the email. After you unsubscribe, we will not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any of our products and / or services you have requested.

We will get your express opt-in consent before we share your Personal Information with any company outside the Cox group of companies for marketing purposes.

8 KEEPING YOU INFORMED ABOUT CHANGES

If you opt to receive marketing emails from us, we may use your identity and contact details to contact you periodically to keep you updated about changes to our website, our policies, or the terms of use.

We use your Personal Information in this way to allow us to comply with legal obligations (when changes to the law require changes to our terms), and for our legitimate interests to keep our records updated.

9 CONTACTING US ABOUT JOB VACANCIES

If you contact us about job vacancies, you provide us with your name, phone number and email address. You might also supply us with your CV which includes details of your employment history, education, and other interests. We use this information which you have provided in order to assess your suitability for employment with us. Our lawful basis for using your Personal Information in this way is our legitimate interest in identifying suitable candidates for employment.

If we believe that you may be suited to a vacancy in the future, we may store your Personal Information on file for a period of up to 1 year. We use your Personal Information in this way because we have a legitimate interest in identifying suitable candidates for future vacancies.

If your application advances or we invite you to an interview, we may also gather further Personal Information including sensitive categories of Personal Information or details of criminal convictions or offences committed by you. In these circumstances, we will issue you with a separate privacy notice.

10 COOKIES

By using and browsing <http://www.coxmarine.com>, you consent to cookies being used. If you do not agree to our use of cookies, you must disable cookies or stop using the site.

We may process your Personal Information by our use of Cookies and similar technologies. Cookies are files that your Web browser places on your computer's hard drive. As you come to the site, your computer hands it's "cookie" to our server so we know whether you have been here before. Cookies are how we retain user preferences, store information for things like shopping baskets, and provide anonymised tracking data to third party applications like Google Analytics. Cookies also allow us to track your clicks as you go through the site; information supplied by cookies can help us to provide you with a better service and tell us more about our visitors.

We also use cookies to tell us whether you have visited us before, which pages you look at on our website, your journey around the website, and whether you came from a particular internet link or banner advertisement. For further information on cookies, please visit www.aboutcookies.org.

Our use of cookies may be capable of identifying you personally.

Our use of cookies is necessary for our legitimate interests:

- For technical purposes, so our website functions properly.
- To drive targeted advertisements from third parties, to make suggestions and recommendations about goods or services which may be of interest to you.
- To enable us to collect information about the browsing habits and activities of customers, so we can constantly improve our website and service.
- To define types of customers for our products and services.
- To develop our business and to inform our marketing strategy.

You can set your browser to refuse all or some cookies, or to alert you if websites set or access cookies. The site may not operate properly if cookies are switched off.

[How to change cookie preferences on your browser](#)

[How to delete cookies](#)

11 GOOGLE ANALYTICS

We use Google Analytics® to monitor website traffic. This involves the collection of technical information which might be personally identifying. Our use of your personal information in this way is necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, and to develop our business and to inform our marketing strategy).

At the suggestion of Google, Inc., we have included the following statement to explain about the service:

"This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above."

12 THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

13 OBTAINING CONSENT

We require your consent to send you marketing communications by email.

In most cases, however, we do not require your consent to use your Personal Information. Details of the lawful basis of our use of your Personal Information are set out above.

In some circumstances, we may approach you for your specific written consent to allow us to process certain Personal Information for a specific purpose. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

If you fail to provide certain information when requested, we may not be able to perform our obligations to you or to send you information that you would like to receive from us (such as newsletters). In cases where you would like us to provide you with a product or service, this may mean that we refuse to enter into or cancel any contract between us or refuse to provide you with a service that you would like us to provide.

14 DATA SHARING AND TRANSFER

Cox does not sell, lease, or license your Personal Information. We may share your Personal Information with third parties where required by law, to parties who are under contract to provide services to us (our “data processors”) where the use of your Personal Information forms part of their contractual duties, any third party providers of advertising, plug-ins or content used on our websites or our Apps, and with other companies in our group of companies where they have a legitimate interest in receiving that information.

We may also share your Personal Information with other third parties, for example, in the context of the possible sale or restructuring of the business.

Except as required by Google, for the use of [Google Analytics](#) we do not transfer your personal information to third parties outside the European Economic Area (“EEA”). Google is part of the EU-US Privacy shield which requires them to protect your personal information in a similar way as it is within the EEA.

Because of the international nature of our business, we may need to transfer or share your Personal Information within subsidiaries or a holding company of Cox (“the Cox Group Companies”). This may involve transferring your data outside the European Economic Area (**EEA**). Where we transfer your Personal Information from the EEA or the UK to recipients located outside the EEA or the UK who do not have adequate protection on a ‘like for like’ basis comparable to the GDPR, we will ensure your Personal Information is protected by requiring all Cox Group Companies and other recipients to follow the same rules when processing your Personal Information. These rules are called “Binding Corporate Rules”.

Please note that should you transfer any Personal Information directly to a Cox entity established outside the UK, we are not responsible for that transfer of your Personal Information. We will nevertheless process your Personal Information, from the point at which we receive those data, in accordance with the provisions of this Policy.

15 DATA SECURITY

We implement appropriate technical and organisational security measures to protect your Personal Information. Please ensure that any Personal Information that you send to us are both accurate and sent securely.

We have put in place appropriate security measures to maintain the security of all Personal Information from the point of collection to the point of destruction, to prevent your Personal Information from being accidentally or unlawfully destroyed, lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we have a policy to limit access to your Personal Information to those employees, agents, contractors and other third parties who have a legitimate reason to receive it. They will only process your Personal Information on our instructions, and they are subject to a duty of confidentiality.

Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Information, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is at your own risk, and you are responsible for ensuring that any Personal Information that you send to us are sent securely.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

We may disclose your Personal Information to authorities when necessary for compliance with our legal obligations.

16 RETAINING INFORMATION

We will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements and will promptly delete the same when such data is no longer necessary.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity, the potential risk of harm from unauthorised use or disclosure, the purposes for which we use your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

17 YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION

Under certain circumstances, by law, you have the right to:

- Request access to your Personal Information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request the erasure of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to stop processing Personal Information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground.
- Request the restriction of processing of your Personal Information. This enables you to ask us to suspend the processing of Personal Information about you, for example, if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your Personal Information to another party (in limited circumstances and where this is technically possible).

If you want to exercise these rights, please contact us [here](#).

However, it is your responsibility to ensure that the Personal Information which you provided to us, and we hold about you is accurate and current otherwise we may not be able to send you emails that you wish to receive.

18 YOUR RIGHT TO WITHDRAW CONSENT

Where you may have provided your consent to the collection, processing, and transfer of your Personal Information for a specific purpose (such as opting-in to receiving marketing emails), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us [here](#).

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. Your withdrawal of consent does not affect the lawfulness of our use of your Personal Information up to the time that you let us know that you have withdrawn your consent.

19 CHANGES TO THIS PRIVACY POLICY

We may update this Policy from time to time. If we make a material change to this Policy, we will inform you by posting a notice on this website. Those changes will go into effect on the effective date posted in the revised notice. The new notice will apply to all current and past users of the online application page and to all information collected before the date of the change. The new Policy will replace any prior policies that are inconsistent. Please check periodically for changes to this Policy, and especially before you provide any personal information to us. We may also notify you in other ways from time to time about the processing of your Personal Information.

20 CONTACTING US

We have not appointed a Data Protection Officer and are not currently required to do so. If you have any questions about this privacy policy or about how we handle your personal information, please contact us in our capacity as the data controller at:

The Data Controller,
Cox Powertrain Limited,
The Cecil Pashley Building,
8 Cecil Pashley Way, Brighton City Airport,
Shoreham By Sea,
BN43 5FF.

telephone +44 (0) 1273 454 424

or by email to: privacy@coxpowertrain.com.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data