

Privacy Policy

About this privacy policy

This privacy policy has been written to provide you with information about how HDW Digital Marketing Limited (“Cotton Digital”, “we”, “us”, “our”) handles or intends to handle personal information relating to our clients and visitors to our website (<https://cottondigital.co.uk/>) in accordance with the UK General Data Protection Regulation (“**UK GDPR**”). This policy relates specifically to our collection and use of personal information of our clients and visitors to our website.

About us

We are HDW Digital Marketing Limited, trading as Cotton Digital. We are a private limited company (company number 14998327). Our registered office address is 1 School Lane, Burnley, Lancashire BB11 1UF.

Our legal status

We are a “data controller” for the purposes of the Data Protection Act 2018 and the UK GDPR for any information gathered by registering as a client and for any personal information inputted into website by visitors.

What information is collected from users?

We collect, store, use and process the following personal information about clients and visitors to the website:

- Identity and contact details that you provide when using the website. This includes information such as name, email, address, telephone number and any other identification details provided at the time of using the website;
- Information that you provide when using the website. This includes any information you provide in our online contact form;
- Information about the way in which you use the website;
- Information about services you purchase from us;
- Financial details including details of services you have purchased from us, the cost and payment methods;
- Information about your device. This includes technical information about the type of mobile device you use, a unique device identifier, mobile network information and your mobile operating system;
- Records of your correspondence with us, either through the website or by telephone, e-mail or post;
- Details of your use of the website including, but not limited to, cookies, traffic data, location data and other communication data and the resources and services that you access via the website; and
- Your marketing and communication preferences.

Cookies

We use cookies to distinguish you from other users of the website and to remember your preferences. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. This includes the following cookies:

- Strictly necessary cookies - These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of electronic payments.

- Analytical or performance cookies - These allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies - These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Targeting cookies - These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests.

How do we collect user's information?

We will collect personal information through different methods including:

- Direct interactions via the website;
- Through the services we provide to our clients in accordance with our terms and conditions; and
- Automated technologies or interactions. As users interact with the website, we may automatically collect technical information about your equipment, browsing actions and patterns.

Purposes for processing

We have set out below a description of all the ways we plan to use your information, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. We may process your information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To register you as a new client	Identity data Contact details Marketing and communications preferences Device data	Consent Performance of a contract with you
To deliver our services to you	Identity Contact Financial Transaction Device	Performance of a contract with you Necessary for our legitimate interests (to recover debts due to us)

To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Contact details Technical data	Performance of a legal obligation Necessary for our legitimate interests of running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise
To manage our relationship with clients and visitors to our website, including responding to correspondence	Contact details Records of correspondence Marketing and communications preferences	Necessary for our legitimate interests (to keep records updated and to analyse how clients use our services) Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions)
To use data analytics to improve our website, marketing, relationships and experiences	Technical data	Necessary for our legitimate interests to better understand visitors to our website and their use of our services, to keep our website up to date, to develop our business and to inform our marketing strategy
To contact you to inform you about similar products and services we believe might be of interest to you via email or text message	Contact details Marketing and communications information	Consent Necessary for our legitimate interests to develop our products and services and to grow our business

Our marketing communications

We may use the personal information of clients and website visitors to contact you to inform you about services we believe might be of interest to you via email or text message (we call this marketing communications). Clients and website visitors may receive marketing communications from us unless you have opted out or unsubscribed to receiving that marketing.

You can ask us to stop sending you marketing communications at any by following the unsubscribe links on any marketing communications sent to you or by contacting us at any time.

Where you opt out of receiving these marketing communications, this will not apply to personal information provided to us as a result of the provision of our services and we will still be required to contact you in relation to the services we provide.

What happens if users fail to provide personal information?

If you do not provide the personal information requested, or you withdraw your consent for the processing of your personal information, where this is necessary for website functionality, we will not be able to provide our products and services to you.

Sharing personal information

Where necessary or required, we may share your personal information as follows:

- With third party service providers, in connection with services performed on our behalf. For example, website hosting, our email provider, our software provider, our IT provider and analytics and search engine providers that assist us in the improvement and optimisation of our website.
- With government bodies and law enforcement agencies.
- With our insurers and legal advisers.
- With 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 policy.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To meet our legal obligations.
- In connection with legal proceedings (or where we are instructed to do so by Court order).

Our relationships with third party service providers are governed by contractual provisions with us and they only have access to personal information to perform the described purposes and may not use it for other purposes.

Where we store personal information

The personal information that we collect is stored on client management system which is located within the UK and European Economic Area (EEA). However, there may be some circumstances where it is necessary to transfer and store personal information at a destination outside the UK or the EEA. In these circumstances, we will take all steps reasonably necessary to ensure that personal information is treated securely and in accordance with data protection law and, in the event that personal information is transferred outside the UK or the EEA, shall ensure that this is carried out subject to the requirements of the UK GDPR.

How long we keep it for

We will only retain 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.

Your rights

Under the UK GDPR and the Data Protection Act 2018, you have the following rights:

- **Right of access** - You have the right of access to information we hold about or concerning you.
- **Right of rectification or erasure** - If you feel that any data that we hold about you is inaccurate you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data.
- **Right to restriction of processing** – In certain circumstances, you have a right to request that we refrain from processing your data.
- **Right of portability** – In certain circumstances, you have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller.
- **Right to object** – In certain circumstances, you have a right to object to our processing of your personal data.
- **Right to withdraw consent** - In the circumstances where you may have provided consent to the collection, processing and transfer of personal information for a specific purpose has been provided, you have the right to withdraw consent for that specific processing at any time.

Please note, there are some specific circumstances where these rights do not apply and we can refuse to deal with your request.

To exercise any of these rights, please contact info@cottondigital.co.uk

Complaints

If you have a concern about the way we are collecting or using personal information, we would ask that you raise your concern with us in the first instance by using the contact details below.

You also have a right to lodge a complaint with the Information Commissioner's Office (ICO) should you feel that we have not handled your information in line with legislative and regulatory requirements. They can be contacted at:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
0303 123 1113 | www.ico.org.uk

Contact Details

For further information on how to request your personal information, exercise any of your data protection rights or request further information in relation to how and why we process your information, you can contact us by emailing info@cottondigital.co.uk

Changes to this privacy policy

We may change this privacy policy from time to time. This privacy policy was last updated in November 2023.