# **CM**interactive

## **Privacy Policy**

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## 1) Introduction

1.1) In this policy, "we," "us," and "our" refer to CM Interactive Limited which is a limited liability company registered in England and Wales with Companies House, trading as CM Interactive.

1.2) CM Interactive is committed to protecting the privacy of our website visitors.

1.3) This privacy policy explains how CM Interactive uses and protects the information we collect from our customers and website visitors.

1.4) This policy applies when we act as a data controller with respect to the personal data of our website visitors and service users. As a data controller, we determine the purposes and means of processing that personal data. This policy applies to all of our websites.

1.5) By using CM Interactive's website and agreeing to this policy, you consent to our use of local storage as described within this policy.

#### 2) How we use Your Personal Data

- 2.1) In this Section 2 we have set out:
- (a) The types of personal data we may process.
- (b) The purposes for which we may process personal data.
- (c) The lawful bases for the processing.

2.2) We may process information contained in any enquiry you submit to us about our services ("enquiry data"). The enquiry data may be processed to provide quotations and enter into or perform a contract for our services with you. We may also use this data to market relevant services to you, for which the lawful basis is consent.

2.3) We may process information contained in or relating to any communication that you send to us ("correspondence data"). The correspondence data may include the content of the communication, and any metadata associated with it. The correspondence data may be processed to communicate with you and for record-keeping purposes.

The lawful basis for this processing is our legitimate interests, namely the proper administration of our website and business, and communication with users.

2.4) Your data is considered enquiry data if its not directly related to one of our products/services and considered correspondence data if it's a general question. We'll always obtain your consent before sending you marketing material.

2.5) Please do not supply any other person's personal data to us unless we specifically ask you to do so.

## 3) Providing Your Personal Data to Others

3.1) We may disclose your personal data to our insurers and/or professional advisors where reasonably necessary for the purposes of obtaining or maintaining insurance cover, managing risks, obtaining professional advice, or for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

3.2) In addition to the specific disclosures of personal data set out in Section 3.1, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or to protect your or another person's vital interests. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## 4) Retaining and Deleting Personal Data

4.1) This Section 4 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations regarding the retention and deletion of personal data.

4.2) Personal data that we process for any purpose or purposes will not be kept for longer than is necessary for that purpose or those purposes.

4.3) We will retain your personal data as follows:

(a) Enquiry Data will be retained for a minimum period of 12 months following the submission of the enquiry and for a maximum period of 10 years following the submission of the enquiry.

(b) Correspondence Data will be retained for a minimum period of 12 months following the date of submission and for a maximum period of 10 years following the last correspondence.

4.4) Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or to protect your or another person's vital interests.

## 5) Security of Personal Data

5.1) We are committed to ensuring that your information is secure. To prevent unauthorised access, alteration, or disclosure, we have implemented suitable physical, electronic, and managerial procedures to safeguard the information we collect online.

## 6) Amendments

6.1) We may update this policy from time to time by publishing a new version on our website.

6.2) You should check this page periodically to ensure you are satisfied with any changes to this policy.

6.3) We may notify you of changes to this policy by email.

## 7) Your rights

7.1) In this Section 7, we have summarised the rights that you have under the UK Data Protection Act 2018. Some of these rights are complex, and not all the details have been included in our summaries. Therefore, you should read the relevant law from the legislation.gov.uk website and guidance from the Information Commissioner's Office (ICO) for a full explanation of these rights.

7.2) Your principal rights under data protection law are:

(a) The right to access.

- (b) The right to rectification.
- (c) The right to erasure.
- (d) The right to restrict processing.
- (e) The right to object to processing.
- (f) The right to data portability.
- (g) The right to complain to a supervisory authority.

(h) And the right to withdraw consent.

7.3) You have the right to obtain confirmation as to whether or not we process your personal data and, where we do, access to the personal data, along with certain additional information.

That additional information includes details of the purposes of the processing, the categories of personal data concerned, and the recipients of the personal data. Provided that the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee.

7.4) You have the right to have any inaccurate personal data about you corrected and, considering the purposes of the processing, to have any incomplete personal data about you completed.

7.5) In some circumstances, you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions to the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise, or defence of legal claims.

7.6) In some circumstances, you have the right to restrict the processing of your personal data. Those circumstances are when you contest the accuracy of the personal data; processing is unlawful, but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise, or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise, or defence of legal claims; and restricted or legal person; or for reasons of important public interest.

7.7) You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the lawful basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights, and freedoms, or the processing is for the establishment, exercise, or defence of legal claims.

7.8) You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

7.9) You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

7.10) To the extent that the lawful basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contract, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used, and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

7.11) If you believe that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so with the Information Commissioner's Office (ICO).

7.12) To the extent that the lawful basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

7.13) You may exercise any of your rights in relation to your personal data by written notice or by email to us, in addition to the other methods specified in this Section.

## 8) Third Party Websites

8.1) Our website includes hyperlinks to, and details of, third-party websites.

8.2) We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## 9) Updating Information

9.1) Please notify us if the personal information that we hold about you needs to be corrected or updated using the contact methods described.

## 10) About Local Storage

10.1) Local storage is a widely used browser technology for storing data on your device.

## 11) Data That we Store

11.1) We use local storage for the following purposes:

(a) to store your preferences in relation to the acceptance of our terms

11.2) The following may be saved whilst browsing our website:

Name	Provider	Purpose	Type (essential or functional)	Expiry date
termsPreferences	cminteractive.uk (First Party)	Records the version of the terms and conditions you have accepted. It also stores your consent for the use of local storage, which prevents the initial terms and conditions popup from reappearing unnecessarily.	Functional	None

## 12) Managing Local Storage

12.1) Most browsers allow you to delete local storage data. The methods for doing so vary from browser to browser, and from version to version. You can obtain up-to-date information about deleting local storage data via your browser's help page. This is especially useful if you would like to delete the information we save onto your device.

## **13) Intended Audiences**

13.1) Our website and services are not intended for children. We do not knowingly collect personal data from children. If you are a parent or guardian and believe that your child has provided us with personal data, please contact us immediately using the methods outlined in Section 14. If we become aware that we have collected personal data from a child without parental consent, we will take steps to remove that information from our records. While Section 12.1 explains how to generally delete local storage data from your browser, for specific concerns about a child's data, contacting us directly as per Section 14 is the most effective way to ensure its removal.

## 14) Questions About this Agreement

14.1) If you have any questions about this agreement, please contact us:

(a) By email at help@cminteractive.uk

(b) By post Unit A, 82 James Carter Road, Mildenhall, Suffolk, United Kingdom, IP28 7DE.