



Coexlion Limited Privacy Notice Policy

September 2023

Alterations v2

Doc 1	Review date adjusted. Minor formatting Operating address added
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BACKGROUND:

Coexlion Limited understands that certain business information obtained via normal business to business operations is not always in the public domain. It is important how this data is collected, stored, and used. We value all clients, associates, and business contacts, and all our employees will only collect and use such data in ways that are described here, and in a way that is consistent with our obligations, values, and your rights under the law.

This Policy goes hand in hand with our IT Policy, Data Protection and Data Breach Polices. All available upon request. See section 11 for contact details.

1. Information About Us

Company Name: Coexlion Limited, registered in England & Wales under company number 13312046.

Registered address: 48 Woodland Avenue, Burbage, Hinckley, Leicestershire, LE10 2BD, England.

Company Registration Number: 13312046

VAT number: 387113586.

Operating Address: Unit 18, Space Business Centre, Plato Close, Tachbrook Business Park, Royal Leamington Spa, Warwickshire, CV34 6YA

Managing Director: Thomas Llewellyn.

Email address: thomas@coexlion.com.

Telephone number: 07812064405.

Postal address: As above.

Professional Membership: Institute of Mechanical Engineers

IMechE Membership Number 80295266.

2. What Does This Notice Cover?

This Privacy Information explains how we use your data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your data. The UK GDPR applies to personal data, its collection, use, storage and sharing status. For the purpose of this privacy policy the



collection, storage, use, and processing of such data are extended to business data.

3. Clarification of what is Personal Data.

Personal data is defined by the UK GDPR and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers. For the purpose of this privacy policy the collection, storage, use, and processing of such data are extended to business data.

The data that we use is set out in Part 5, below.

4. What Are My Rights.

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the data we hold about you or your company. Part 10 will tell you how to do this.
- c) The right to have your data rectified if any of your data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to ask us to delete or otherwise dispose of any of your data that we hold unless it is required by law to be kept for tax or other business purposes for a specified time. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e., prevent) the processing of your data.
- f) The right to object to us using your data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that data to re-use with another service or business in many cases.

Rights relating to automated decision-making and profiling. We do not use your data in this way.

For more information about our use of your data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

It is important that data is kept accurate and up to date. If any of the data we hold about you or your company changes, please keep us informed as long as we have that data.

Further information about your rights can also be obtained from the Information Commissioner’s Office.

If you have any cause for complaint about our use of your data, you have the right to lodge a complaint with the Information Commissioner’s Office. We would welcome the opportunity to resolve your concerns ourselves however, so please contact us first, using the details in Part 11.



5. What Data Do You Collect and How?

We may collect and hold some or all of the data set out in the table below, using the methods also set out in the table. We do not collect any 'special category' or 'sensitive' personal data.

Data Collected	How We Collect the Data
Identity Information including - Names, titles, positions within the organisation.	Confidential email / hard copy vendor details form / verbal confirmation.
Contact information including - Site address, email address, telephone numbers.	Confidential email / hard copy vendor details form / verbal confirmation.
Business information including - Business trading name, registration number, VAT registration number, parent company information.	Confidential email / hard copy vendor details form.
Payment information including - Bank account information, invoicing / purchase order details, payment terms.	Confidential email / hard copy vendor details form.
Profile information including - Association with us (consultancy, training or other).	Confidential email / hard copy vendor details form.
Data from third parties including - All of the above If party to a subcontractor agreement.	Confidential email / hard copy vendor details form, contract terms when in a third-party agreement.
Company policies and procedures.	Confidential email / hard copies

6. How Do You Use the Data?

Under the Data Protection Legislation, we must always have a lawful basis for using your data. The following table describes how we may use your data, and our lawful bases for doing so:

What We Do	What Data We Use	Our Lawful Basis
Administering our business.	Company details as per section 5	To be included in our vendor data base as an associate or client
Supplying our services to you.	Company specific technical data for providing engineering design consultancy services. And /or company basic information as detailed in section 5 to provide training services.	To provide services offered.
Managing payments for our services.	Bank account information, company VAT registration number, purchase orders, accounting liaison officer contact details.	To manage invoices and payments made from or to us.



Tailoring our services for you.	Contact details of relevant employees. Product / technical data for tailored quotations of contracts Business data - numbers and level of experience of employees for training services, with company detailed tailored requirements. Address for on-site visits.	To contact the most appropriate person. To provide contract specific quotations. To provide contract specific quotations.
Communicating with you.	Postal address, email address, contact telephone numbers.	To provide business services requested and/or quotations.
Supplying you with information by email and/or post that you have opted-in-to (you may opt-out at any time by emailing admin@Coexlion.com).	Contact information	Services provided / changes in services and/or policies / newsletters / Blogs.

With your permission and/or where permitted by law, we may also use your data for marketing purposes, which may include contacting you by email, telephone, text message, or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out. We will always obtain your express opt-in consent before sharing your data with third parties for marketing purposes and you will be able to opt-out at any time.

7. How Long Will You Keep the Data?

We will not keep your data for any longer than is necessary in light of the reason(s) for which it was first collected and in line with relevant laws and regulations. Your data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

Type of Data	How Long We Keep It
Identity Information including - Names, titles, positions within the organisation.	Indefinitely, unless expressly requested for the information to be removed, and in line with relevant business record and transaction retention requirements by UK law.
Contact information including - Site address, email address, telephone numbers.	Indefinitely, unless expressly requested for the information to be removed, and in line with relevant business record and transaction retention requirements by UK law.
Business information including - Business trading name, registration number, VAT registration number, parent company information.	Indefinitely, unless expressly requested for the information to be removed, and in line with relevant business record and transaction retention requirements by UK law



Payment information including - Bank account information, invoicing / purchase order details, payment terms.	Indefinitely, unless expressly requested for the information to be removed, and in line with relevant business record and transaction retention requirements by UK law.
Profile information including - Association with us (consultancy, training or other).	Indefinitely, unless expressly requested for the information to be removed, and in line with relevant business record and transaction retention requirements by UK law
Data from third parties including - All of the above If party to a subcontractor agreement.	Indefinitely, unless expressly requested for the information to be removed, and in line with relevant business record and transaction retention requirements by UK law
Company policies and procedures.	Indefinitely, unless expressly requested for the information to be removed, and in line with relevant business record and transaction retention requirements by UK law

8. How and Where Do You Store or Transfer the Data?

We may store some or all of your data in countries outside of the UK. These are known as “third countries”. We will take additional steps to ensure that your data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation as follows:

We will use specific approved contracts which ensure the same levels of personal data protection that apply under the Data Protection Legislation. For further information, please refer to the [Information Commissioner's Office](#).

The security of your data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

9. Do You Share the Data?

We may share your data with other companies in our group to provide subcontracted business services. This includes our sister company 'Coexlion Private Limited, (CPL)' located in Bangalore, India.

If any of your data is shared with a third party, as described above, we will take steps to ensure that your data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If we sell, transfer, or merge parts of our business or assets, your data may be transferred to a third party. Any new owner of our business may continue to use your data in the same way(s) that we have used it, as specified in this Privacy Policy.

In some limited circumstances, we may be legally required to share certain data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.



10. How Can I Access the Data?

If you want to know what data we have about you, you can ask us for details of that data and for a copy of it (where any such data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 10 business days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your data and data protection, including to make a subject access request, please use the following details (for the attention of The Company Secretary):

Email address: admin@coexlion.com.

Telephone number: +44 (0) 7814112800.

Postal Address: 48 Woodland Avenue, Burbage, Hinckley, Leicestershire, LE10 2BD.

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects data protection.

Any changes will be made available by a request to the email address detailed in section 11. This Privacy Notice was last updated September 2023.

13. Supersession Non-Disclosure Agreements

This Privacy Policy will be applicable to any communication between Coexlion and a business associate / client, along with our Standard Terms and Conditions of business where applicable.

Should a Non-Disclosure Agreement (NDA) exist between ourselves and another Party, then the NDA will supersede this policy. Any data considered non confidential will remain under the details of this Privacy Policy to maintain good business practices and in line with our core values.



This policy has been approved & authorised by:

Name:	Thomas Llewellyn
Position:	Managing Director
First release:	1 st September 2022
Reviewed:	September 2023
Next review:	September 2024

Signature: