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Privacy Statement

This is the 'Privacy Statement' of Cooke Aquaculture Scotland & Freshwater Limited. Our contact details are: Cooke Aquaculture Scotland, Crowness Road, Hatston, Orkney, KW15 1RG.

This privacy statement explains how we collect and use personal information about you.

What personal information we collect

- Client and prospective client Email addresses
- Client Contact information to setup Credit Agreement
- CCTV images/footage as part of our surveillance policy to secure assets, crime prevention and health and safety.

Where we collect personal information from

- Contact name, telephone number, email from "Contact Us" form on our web site <https://cookeaquaculturescotland.com>
- Customer Credit Agreement Form to obtain key contact and company data to facilitate credit check and contract setup
- Cooke Aquaculture Scotland CCTV. Obtained using surveillance in compliance with our CCTV policy.

How we use your personal information

How we use your information	Our reasons	Legitimate interests
To provide our goods and services to you To provide you with information essential to our services To provide advice and guidance about our services	Your consent Performing contractual obligations Legitimate interests Our legal duties	To meet our contractual obligations to you To comply with laws and regulations that apply to us
To exercise our rights and to perform our obligations arising from any contracts entered into between either you and us	Performing contractual obligations Legitimate interests Our legal duties	To meet our contractual obligations to you or third parties. To ensure that we benefit from the terms of the contracts we have entered into and properly manage the risks and liabilities associated with them To keep our business records up to date
To provide you with after-care support	Your consent Performing contractual	To provide efficient customer care and services

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	obligations Legitimate interests	
To provide you with information that you request from us	Your consent Legitimate interests	To provide efficient customer care and services
To notify you of changes or updates to our service	Your consent Legitimate interests	To provide efficient customer care and services
For fraud prevention purposes	Our legal duties Legitimate interests	To deal appropriately with our responsibilities in relation to financial crime To protect our reputation To comply with laws and regulations that apply to us
To carry out credit checks	Your consent Legitimate interests	To assess the financial worthiness of those to whom we may provide services to assess their ability to pay any sums due for those services
Financial administration, including managing customer payments, calculating fees and interest and collecting and recovering money that is owed to us	Performing contractual obligations Legitimate interests Our legal duties	To meet our contractual obligations to you or third parties. To ensure that we benefit from the terms of the contracts we have entered into and properly manage the risks and liabilities associated with them To comply with laws and regulations that apply to us
In the proper management of our business and that of the Cooke Group generally For corporate activity, such as a sale, transfer, merger or re-organisation of our business	Legitimate interests Our legal duties	To manage our business efficiently and properly in accordance with normal business practices, legal requirements and to optimise its value for shareholders To ensure that we run our business in accordance with good business principles and meet corporate governance, accounting and audit standards
To allow you to participate in interactive features of our service, when you choose to do so	Your consent Performing contractual obligations	To provide efficient customer care and services



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	Legitimate interests	
To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes	Your consent Performing contractual obligations Legitimate interests	To provide efficient customer care and services To ensure that our technology operates efficiently and without error To assess which of our services may be of interest to you and to tell you about them To develop new products and services and improve existing ones To obtain customer feedback
To improve our services and website to ensure that content is presented in the most effective manner for you and for your device		To provide efficient customer care and services To develop new products and services and improve existing ones To obtain customer feedback
The "Contact Us" form on the https://cookeaquaculturescotland.com will email contact details to our Sales Team	Legitimate interests	The Contact details will allow us to call or email you back. This will not enter you into any marketing campaigns.
CCTV images/footage is used at our Cooke Aqua facilities for crime prevention, health and safety	Legitimate interests	CCTV is used for crime prevention and to protect site assets and staff
Client addresses are used to email paperwork pertaining to your order	Performing contractual obligations	We utilise the email address to email Order acknowledgments, Packing slips, Treatment Sheets, Sales and Invoice and Financial Statements

Who we share your personal information with

Billing email addresses, and company contact details are processed by our application servers hosted by Cooke Aquaculture Inc Canada.

If you do not provide your personal information

- Credit Agreement – If the company contact information is insufficient, then we cannot proceed with a credit check and contract agreement
- Web site contact us – If no contact details are supplied, then we cannot call or email you back



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How long we retain your personal information for

- CCTV footage is overwritten after 14 days
- CCTV exported incident will be retained for 3 months unless we require to retain footage due to an ongoing investigation
- Customer contact details – Will be retained for the duration of continuing business with Cooke Aquaculture Scotland. If no business is conducted after 1 year, then we will remove the contact details
- More generally, 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. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

Holding personal information outside the EEA

Processing Orders

Cooke Aquaculture Scotland ordering system is hosted by our parent company Cooke Aquaculture Inc Canada. Once the service agreement is established, Cooke Aquaculture Scotland will enter the email addresses and contact name so we process your order and email you with your invoice.

Safeguards: Data is fully encrypted over a DVPN WAN network from Scotland to the data center in New Brunswick Canada.

Billing

Customer email addresses will be processed, so we can email financial statements from our billing platform. This application is hosted securely by our parent company Cooke Aquaculture Inc Canada.

Safeguards: Data is fully encrypted over a DVPN WAN network from Scotland to the data center in New Brunswick Canada.

There is an adequacy decision by the European Commission in respect of commercial organisations in Canada, meaning that, in the context of your personal information, Canada is deemed to provide an adequate level of protection for your personal information.

Using our website

We process the personal data from the “Contact Us” form to email or call you back. Form data submitted is deleted after 30 days. The internet pages of <https://cookeaquaculturescotland.com> use cookies.

Your rights

Access to your information – You have the right to request a copy of the personal information about you that we hold.

Correcting your information – We want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.



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Deletion of your information – You have the right to ask us to delete personal information about you where:

- You consider that we no longer require the information for the purposes for which it was obtained
- We are using that information with your consent and you have withdrawn your consent – see [Withdrawing consent to using your information below](#)
- You have validly objected to our use of your personal information – see [Objecting to how we may use your information below](#)
- Our use of your personal information is contrary to law or our other legal obligations.

Objecting to how we may use your information – You have the right at any time to require us to stop using your personal information for direct marketing purposes. In addition, where we use your personal information to perform tasks carried out in the public interest or pursuant to the legitimate interests of us or a third party then, if you ask us to, we will stop using that personal information unless there are overriding legitimate grounds to continue.

Restricting how we may use your information – in some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal information about you that we hold or assessing the validity of any objection you have made to our use of your information. The right might also apply where this is no longer a basis for using your personal information but you don't want us to delete the data. Where this right is validly exercised, we may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

Portability – if we process personal information that you provide to us on the basis of consent or because it is necessary for the performance of a contract to which you are party, and in either case that processing is carried out by automated means, then you have the right to have that personal information transmitted to you in a machine readable format. Where technically feasible, you also have the right to have that personal information transmitted directly to another controller.

Withdrawing consent using your information – Where we use your personal information with your consent you may withdraw that consent at any time and we will stop using your personal information for the purpose(s) for which consent was given.

Please contact us in any of the ways set out in the [Contact information and further advice section](#) if you wish to exercise any of these rights.

Changes to our privacy statement/& contact information

We keep this privacy statement under regular review and will place any updates on this website. Paper copies of the privacy statement or more information may also be obtained from the HR Department at the address stated above.

Complaints

We seek to resolve directly all complaints about how we handle personal information but you also have the right to lodge a complaint with the Information Commissioner's Office.

UPDATED MAY 2018