

Cowcross Privacy Policy

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THE COWCROSS PRIVACY NOTICE

- is written in clear, simple language and is easy to understand
- is open about how we collect, store and use data
- complies with the UK and EU General Data Protection Regulation (GDPR)

WHO ARE 'WE'?

When we refer to 'we', that means Cowcross Limited. By 'you' or 'customer' we mean your company or organisation. Cowcross Limited is a data controller under the UK data protection framework, which includes the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and amendments introduced by the Data (Use and Access) Act 2025.

HOW WE COLLECT DATA

Personal data collected as part of a commercial relationship with Cowcross

In order to provide the required service and manage commercial relationships, We collect and process the following personal data: Surname, name, email address, telephone number, position and company name.

This data is processed for the purpose of managing its business relationship, providing the subscribed service or product, and sending surveys or satisfaction studies.

Unless prohibited by law, the personal data collected for these purposes are processed for at most six years after the end of the commercial relationship.

Cowcross may disclose some of your data to third parties, including for the purposes of debt recovery, to assess the quality of the provided contact data or for commercial communications by a limited number of Cowcross partners.

For more information about these partners, please contact dataprivacy@cegid.com.

Cowcross or its partners may also send you commercial communications.

These promotions are sent based on our legitimate interest in sending you communications related to your business activities. You may unsubscribe at any time by clicking on the unsubscribe option available in all our communications.

The personal data collected for this purpose are processed for at most three years after the end of the commercial relationship or the last communication sent by the subject concerned.

Personal data collected while providing Store Excellence services

To provide the required service, we may collect and process the following personal data: Surname, name, email address, telephone number, position, company name, usage data (log).

These personal data are processed in accordance with Cowcross' contractual obligations and legitimate interests, for the purposes of :

- Traceability of actions on the application and data
- Generation of statistics
- Analysis of individual or aggregated data collected during product use
- Security of the application and data
- Management of the contractual relationship
- User account management
- Sending communications about Cowcross offerings

The data are retained for as long as the service is used, except for logs, which are retained for at most one year.

Most of the information we collect is directly from you or your employer. Sometimes we might collect personal data about you from other sources, such as publicly available materials or trusted third parties like our marketing and research partners. We use this information to supplement the personal data we already hold about you, in order to better inform, personalise and improve our services, and to validate the personal data you provide.

When third-party products are contracted through one of Cowcross' offerings, the relevant commercial partners may process these same data. In this case, processing terms are defined by the relevant partner.

MARKETING

All marketing processing is undertaken as Joint Controllers with our parent company (Cegid SAS) for marketing purposes. This means we jointly determine the purposes and means of processing. As part of this, we utilise Marketing Services Providers in contractual relationships managed by Cegid. For more information and to exercise your rights, please see the [Cegid Privacy Policy](https://www.cegid.com/global/privacy-policy/) (<https://www.cegid.com/global/privacy-policy/>) you may contact the Cegid DPO: dataprivacy@cegid.com

HOW DO WE SHARE YOUR DATA?

We do not share your data with third party marketers. There are times we may share your data with third parties. We will only disclose your data to:

- **Data Sharing with Our Parent Company:** We share personal information with our parent company (Cegid SAS) for marketing purposes. Please see the Marketing section above for more information.
- **Services providers** Cowcross may share personal data with third parties who provide services, including:
 - on Cowcross's behalf, as part of the performance of the client contract (hosting, consulting, subcontracting, etc.) and in accordance with its terms ;
 - to help Cowcross fulfil the financial and administrative conditions of the contract (debt recovery, invoicing, etc.) ;
 - support in the development of new products or services.
- **Public authorities** In certain situations, Cowcross may be required to disclose personal data in response to a request by a public authority, a subpoena, or any other lawful request pursuant to the applicable legislation.

In such cases, Cowcross will disclose the necessary data, particularly when it believes in good faith that disclosure is necessary to protect your rights, ensure your safety or the safety of others, investigate fraud, or meet a legal requirement.
- Other people where we have your consent

For more information about the recipients, please contact dataprivacy@cegid.com

DATA SUBJECTS RIGHTS

When Cowcross acts as a data controller

Under the conditions set forth in articles 15 and 22 of the GDPR, data subjects have the right to:

- access their personal data processed by Cowcross
- request the rectification, erasure or restriction of processing of personal data carried out by Cowcross
- in certain circumstances, object to the processing of their personal data
- request the portability of personal data
- withdraw their consent when it is the legal basis of the processing

All requests related to these rights may be made by filling out the form available on the following page: <https://www.cegid.com/global/privacy-policy>.

Cowcross reserves the right to ask for clarifications in relation to any request and to verify the identity of the

requester. When responding, we will take steps that are reasonable and proportionate to locate the requested information. If clarification is needed, the response time will be paused (“stop the clock”) until we receive the necessary details.

An “Unsubscribe” link is also available in our marketing emails.

Complaints

If you believe we have not handled your personal data properly or have infringed your rights, you have the right to complain to us first. You can submit a complaint using the [form here](#) or emailing dataprivacy@cegid.com.

We will acknowledge your complaint within **30 days**, investigate without undue delay, and keep you informed of progress. Once we have provided an outcome, if you remain dissatisfied, you may escalate your complaint to the Information Commissioner’s Office (ICO): <https://ico.org.uk>.

When Cowcross acts as data processor

In the event Cowcross receives a request from a data subject whose data is processed in the course of performing the contract between Cowcross and the client, Cowcross will communicate this request to the client at the earliest opportunity upon its receipt and, taking into account the nature of the processing and the terms of the contract, will take appropriate technical and organisational measures to assist the client with fulfilling its obligation to respond to these requests, insofar as this is possible.

The client remains nevertheless responsible for replying to the data subject concerned.

SECURITY

Security is a priority for us when it comes to your personal data. We’re committed to protecting your personal data and have appropriate technical and organisational measures in place to make sure that happens. To read more about our commitment, please contact us and we can share our Information Security Policy with you.

If a security breach causes an unauthorised intrusion into our system that materially affects you, then Cowcross will notify you as soon as possible and later report the action we took in response.

For any questions about the Cowcross Privacy Policy, or how we process your personal data please send an email to dataprivacy@cegid.com and we’ll get back to you as soon as possible.

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