

Cromwell Privacy & Cookie Policy

Effective date: April 2026

Cromwell is committed to protecting your personal information and being transparent about how we use it.

This Privacy Policy explains how we collect, use, share, and protect your personal data when you use our websites, mobile applications, online services, or otherwise interact with us (together, the “**Services**”).

This policy is written in line with the **UK General Data Protection Regulation (UK GDPR)** and the **Data (Use and Access) Act 2025 (DUAA)**.

1. Who we are

Cromwell is the data controller responsible for your personal data.

If you have questions about this policy or how we use your information, you can contact us using the details provided at the end of this notice.

2. The personal information we collect

Depending on how you interact with us, we may collect the following categories of personal information:

- **Contact and account details**
(such as name, email address, telephone number, account credentials)
- **Order and transaction information**
(such as purchase history, delivery details, invoicing information)
- **Communications**
(including emails, calls, chat messages, and customer feedback)
- **Online and technical information**
(such as IP address, device identifiers, browser type, pages viewed, and cookies)
- **Marketing preferences**
- **Fraud and security-related information**, where relevant

We collect this information directly from you, automatically when you use our Services, or from trusted third parties where permitted by law.

3. How we use your personal information

We use personal information to:

- Provide and manage our Services
- Process orders, payments, and deliveries

- Communicate with you about your account or enquiries
- Improve our websites, services, and customer experience
- Personalise content and marketing, where permitted
- Maintain security, prevent fraud, and protect our systems
- Meet legal and regulatory obligations

Where required, we rely on a lawful basis under UK GDPR, including **contract**, **legal obligation**, **legitimate interests**, and where applicable, **recognised legitimate interests under the DUAA**.

4. Recognised legitimate interests (DUAA)

Under the Data (Use and Access) Act 2025, certain processing activities are permitted as **recognised legitimate interests** without the need for a separate balancing test.

Where applicable, Cromwell may rely on recognised legitimate interests for activities such as:

- Direct marketing
- Fraud prevention and security
- Internal administrative and operational purposes

We only rely on this basis where lawful and appropriate, and your rights remain protected.

5. Who we share your information with

We may share your personal information with:

- Other companies within the Cromwell group
- Service providers and partners who support our operations (such as IT, delivery, payment, and customer support providers)
- Professional advisers and auditors
- Regulators, law enforcement, or authorities where required by law

We do not sell your personal information.

All third parties are required to protect your data and use it only for agreed purposes.

6. International transfers

Where personal data is transferred outside the UK, Cromwell ensures appropriate safeguards are in place, such as contractual protections, to maintain an equivalent level of protection.

7. Cookies and similar technologies

We use cookies and similar technologies to:

- Enable essential website functionality
- Improve performance and user experience
- Understand how our Services are used

Some cookies used for analytics and functionality may not require consent where permitted under the DUAA.

You can manage cookies through your browser settings or our cookie controls.

8. Your data protection rights

You have rights under UK GDPR, including the right to:

- Access your personal data
- Request correction or deletion
- Object to or restrict certain processing
- Receive a copy of your data
- Withdraw consent where applicable

When responding to requests, Cromwell applies the DUAA principles of **reasonable and proportionate searches**.

To exercise your rights, please contact us using the details below.

9. Complaints

If you have concerns about how we handle your personal information, we encourage you to contact us first so we can address the issue.

You also have the right to raise a complaint with the **Information Commissioner's Office (ICO)**.

10. How we keep your information secure

We use appropriate technical and organisational measures to protect personal information against unauthorised access, loss, misuse, or disclosure.

11. How long we keep your information

We retain personal information only for as long as necessary for the purposes for which it was collected, including to meet legal, regulatory, or contractual requirements.

12. Changes to this Privacy Policy

We may update this Privacy Policy from time to time.

Any changes will be posted on this page, and we encourage you to review it regularly.

13. Contact us

If you have questions about this Privacy Policy or your personal data, please contact:

Email: gdpr@cromwell.co.uk

Address: Cromwell Tool Ltd, Attn: DPO / Compliance Director, 65 Chartwell Drive, Wigston, Leicester, LE18 2FS

ANNEX 1 - PERSONAL INFORMATION WE COLLECT

Category of personal information	How we use it	Legal basis for the processing
Contact and profile information. Personal information, such as your name, phone number, address, business information, and e-mail address, when you register for our Service, sign up for our mailing list, enter a contest, redeem a promotion, or enter a sweepstakes, or otherwise communicate or interact with us.	To create your account and to communicate with you directly about the Service.	The processing is necessary for the performance of a contract and to take steps prior to entering into a contract.
	To communicate with you including to answer any questions, issues or concerns you or other users have.	The processing is necessary for our legitimate interests, namely communicating with users.
	To send you marketing communications in accordance with your preferences.	The processing is necessary for our legitimate interests, namely marketing purposes.
	We use this information to conduct surveys and for market research purposes.	The processing is necessary for our legitimate interests, namely to conduct surveys and for market research purposes in order to better understand the needs of our customers, to learn about how our customers use our goods/services, to improve/develop our goods/services and ultimately, grow our business.
Comments, chat and opinions. When you contact us directly, e.g. by email, phone, mail or by completing an online form or participating in online chat, we will record your comments and opinions. We will also record comments and opinions you express when responding to surveys, entering a sweepstakes or taking part in promotions we run.	To address your questions, issues and concerns and improve our products and services. We may also use your use the comments and opinions to determine products and services that may be of interest to you and to send you marketing communications in accordance with your marketing preferences.	The processing is necessary for our legitimate interest, namely for marketing purposes and communicating with users.
Payment and transaction information. Information such as items purchased, date and time of your transaction, and payment information, such as your credit card or bank account details,	To complete the transaction.	The processing is necessary for the performance of a contract.
	To detect and prevent fraud.	

when you make an in-branch or online purchase.	To inform our advertising and marketing.	The processing is necessary for our legitimate interests, namely the detection and prevention of fraud and for marketing purposes.
Location Information. Information about your location. If you provide our mobile applications access to location services on your device, we and our third party providers may collect location data through GPS, WiFi, wireless network triangulation or other methods. We may also approximate your location based on your IP address.	We use your location information to provide personalised content and advertising, to enhance your shopping experience, to assist us with analytics such as foot traffic measurement, and to improve the effectiveness of our websites, branches, mobile applications, merchandise, advertising, and customer service.	The processing is necessary for our legitimate interest, namely to tailor our service to the user and to improve our service generally.
Information provided by social networks. When you interact with our Service through various social media networks, such as when you Like us on Facebook or when you follow Cromwell or share Cromwell content on Facebook, Twitter, Snapchat, LinkedIn, Instagram or other sites, we may receive information from those social networks including your profile information, picture, user ID associated with your social media account, friends list, and any other information you permit the social network to share with third parties.	We use this information to communicate or interact with you on the social network, to better understand the demographics of our visitors, and to personalize content and advertising. The data we receive is dependent upon your privacy settings with the social network. You should always review, and if necessary, adjust your privacy settings on third party websites and social media networks and services before linking or connecting them to our website or Service.	The processing is necessary for our legitimate interest, namely to tailor our service to the user and to improve our service generally.
Preferences. Preferences set for notifications, marketing communications and how our site is displayed.	We use this information to provide notifications, send marketing communications and display our site in accordance with your choices.	The processing is necessary for our legitimate interest, namely ensuring the user received the correct marketing communications.
Information provided by third parties. From time to time, we may receive information about you from third parties	We may combine this information with the information we collect from you directly. We use this information to contact you, to send you advertising or promotional	The processing is necessary for our legitimate interest, namely to tailor our service to the user and to improve our service generally.

and other users, for example we may obtain information from our suppliers, resellers, marketing partners, and other business partners or from other members of your company or organisation. We may obtain information from third parties to enhance or supplement our existing user information. For example, we may obtain mailing address information or we may work with third party partners who help us determine a location based on your IP address so that we are able to customise content for your location. We may also collect information about you that is publicly available.	materials or to personalise our Service, to pre-populate on line forms, and to better understand the demographics of our users.	
Information provided by other Grainger entities. We may receive information about you from other Grainger companies, businesses, brands and affiliated entities in our family of companies.	Information you provide to one brand may be used by another brand to provide you services or to communicate with you.	The processing is necessary for our legitimate interest, namely to tailor our service to the user.
Information about fraudulent or criminal activity relating to your account.	We will use information about fraudulent or criminal activity relating to your use of our Service for the purposes of detecting and preventing fraud or abuse.	The processing is necessary for our legitimate interest, namely the detection and prevention of fraud.
All personal information set out above.	We will use all the personal information we collect to operate, maintain and provide to you the features and functionality of the Service, to communicate with you, to monitor and improve our Service and business, and to help us develop new products and services.	The processing is necessary for our legitimate interest, namely to improve our service.

ANNEX 2 - PERSONAL INFORMATION COLLECTED AUTOMATICALLY

Category of personal information	How we use it	Legal basis for the processing
Information about how you access the Service. For example, the site from which you came and the site to which you are going when you leave our website, how frequently you access the Service, whether you open emails or click the links contained in emails, whether you access the Service from multiple devices, and other actions you take on the Service. Information about how you use the Service. For example, the pages you visit, the links you click, the ads you view and click on, purchase information and your checkout process, your location when you access or interact with our Service, and other similar actions. Information about the computer, tablet, smartphone or other device you use. Such as your IP address, browser type, Internet service provider, platform type, device type/model/manufacture, operating system, date and time stamp, a unique ID that allows us to uniquely identify your browser, mobile device or your account (including, for example, a persistent device identifier or an Ad ID), and other such information. Analytics information. We may collect analytics data, or use third-party analytics tools, to help us measure	We, or the third party partners we use, may use the data collected through tracking technologies to: a) remember information so that you will not have to re-enter it during your visit or the next time you visit the site; b) provide custom, personalised content and information, including targeted content and advertising; c) identify and contact you across multiple devices; d) provide and monitor the effectiveness of our Service; e) perform analytics and detect usage patterns on our Service; f) diagnose or fix technology problems; g) detect or prevent fraud or other harmful activities, and h) otherwise to plan for and enhance our service.	The processing is necessary for our legitimate interests, namely: to tailor our service to the user and to improve our service generally; to monitor and resolve issues; for marketing purposes; to communicate with users; to contact users; and for the detection and prevention of fraud.
traffic and usage trends for the Service and to understand more about the demographics and behaviors of our users.		