

# Protecting your privacy

# All Print Supplies Ltd

#### 1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data and keep it safe.

We know that there's a lot of information here but we want you to be fully informed about your rights, and how All Print Supplies Ltd uses your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us. It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

# 2. Explaining the legal bases we rely on

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

#### Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters.

When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

## Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you order an item from us for delivery, we'll collect your address details to deliver your purchase, and pass them to our courier.

#### Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting All Print Supplies Ltd to law enforcement.

#### Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will use your purchase history to send you or make available personalised offers.

We also combine the shopping history of many customers to identify trends and ensure we can keep up with demand or develop new products/services.

We will also use your address details to send you direct marketing information by post, telling you about products and services that we think might interest you.

# 3. When do we collect your personal data?

- When you visit any of our websites, and use the online chat facility.
- When you create an account with us.
- When you purchase a product by phone/email or fax but don't have (or don't use) an account.
- When you engage with us on social media.
- When you contact us by any means with queries, complaints etc.
- When you ask one of our employees to email you information about a product or service.
- When you enter prize draws or competitions.
- When you choose to complete any surveys we send you.
- When you comment on or review our products and services. Any individual may access personal data related to them, including opinions. So if your comment or review includes information about the employee who provided that service, it may be passed on to them if requested.
- When you fill in any forms. For example, if an accident happens on site, an employee may collect your personal data.
- When you've given a third party permission to share with us the information they hold about you.
- We collect data from publicly available sources (such as Land Registry) when you have given your consent to share information or where the information is made public as a matter of law.
- When you enter our premises which usually have CCTV systems operated for the security of both customers and employees. These systems may record your image during your visit.

# 4. What sort of personal data do we collect?

- If you have an account or cash account with us: your name, billing/delivery address, orders and receipts, email and telephone number.
- Details of your interactions with us through our sales office, customer collection desk or online through social media.
  - For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, items/brands that may be of interest to you, how and when you contact us.
- Details of your sign making equipment and printers.
  - For example, which printer you currently have.
- Your comments and product reviews.
- Your image may be recorded on CCTV when you visit our premises.
- Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

## 5. How and why do we use your personal data?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below. Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

For example, if you've asked us to let you know when an item comes back into stock, we can't do that if you've withdrawn your general consent to hear from us.

## Here's how we'll use your personal data and why:

- To process any orders that you make by telephone, email, verbally or by fax. If we don't collect your personal data during the order processing, we won't be able to process your order and comply with our legal obligations.

  For example, your details may need to be passed to a third party to supply or deliver the product that you ordered and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.
- To respond to your queries, refund requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.

- To protect our business and your account from fraud and other illegal activities. This includes using your personal data to maintain, update and safeguard your account. We'll do all of this as part of our legitimate interest. For example, when an order is placed and a 3rd party collects the product from our premises
- To protect our customers, premises, assets and Employees from crime, we operate CCTV systems on our premises which record images for security. We do this on the basis of our legitimate business interests.
- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- If we discover any criminal activity or alleged criminal activity through our use of CCTV, fraud monitoring and suspicious transaction monitoring, we will process this data for the purposes of preventing or detecting unlawful acts. We aim to protect the individuals we interact with from criminal activities.
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text, telephone and through our sales offices about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on.

  Of course, you are free to opt out of hearing from us by any of these channels at any time.
- To send you relevant, personalised communications by post in relation to updates, offers, services and products. We'll do this on the basis of our legitimate business interest. You are free to opt out of hearing from us by post at any time.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message. If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.
- To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.
- To develop, test and improve the systems, services and products we provide to you. We'll do this on the basis of our legitimate business interests.
- To comply with our contractual or legal obligations to share data with law enforcement.

  For example, when a court order is submitted to share data with law enforcement agencies or a court of law.
- To send you survey and feedback requests to help improve our services. These messages will not include any
  promotional content and do not require prior consent when sent by email or text message. We have a legitimate
  interest to do so as this helps make our products or services more relevant to you.
   Of course, you are free to opt out of receiving these requests from us at any time by by updating your preferences
  in your online account

Sometimes, we'll need to share your details with a third party who is providing a service (such as delivery couriers). We do so to maintain our appointment with you. Without sharing your personal data, we'd be unable to fulfil your request.

# 6. Combining your data for personalised direct marketing

We want to bring you offers and promotions that are most relevant to your interests at particular times. To help us form a better, overall understanding of you as a customer, we combine your personal data gathered across the Company as described above, for example your purchase history.

## 7. How we protect your personal data

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas over port443 using 'https' technology.

Access to your personal data is password-protected and we are PCI compliant and as such do not support Protocols TLS1.0, TLS1.1, SSL2.0 SSL3.0 and weak Cypher encryption suites.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

# 8. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning.

## Some examples of customer data retention periods:

#### Orders

When you place an order, we'll keep the personal data you give us for five years so we can comply with our legal and contractual obligations.

#### Inactive accounts

If you've not used your account for more than five years, it will be flagged as inactive and we'll contact you to ask whether you want to keep it open. Unless you reply to say 'yes', we'll close the account and delete or anonymise the personal data associated with it.

# 9. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties.

For example, delivery couriers, for fraud management, to handle complaints.

#### Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

#### Examples of the kind of third parties we work with are:

- IT companies who support our business systems.
- Operational companies such as delivery couriers.
- Suppliers

#### Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

For further information please contact our Data Protection Officer.

# 10. Where your personal data may be processed

Sometimes we will need to share your personal data with third parties and suppliers outside the European Economic Area (EEA).

#### International orders

If you are based outside the UK and place an order with us, we will transfer the personal data that we collect from you to the Company in the UK.

#### Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such as Australia or the USA.

For example, this might be required in order to fulfil your order, process your payment details or provide support services.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times. If you wish for more information about these contracts please contact our Data Protection Officer.

Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

# 11. What are your rights over your personal data?

#### An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- Review by an Employee of any decision made based solely on automatic processing of your data (i.e. where no human has yet reviewed the outcome and criteria for the decision).

You can contact us to request to exercise these rights at any time as follows:

To ask for your information please contact The Data Protection Officer, All Print Supplies Ltd, 7b Fairlie Road, Slough SL1 4PY or email <a href="mailto:DPO@allprint.co.uk">DPO@allprint.co.uk</a> To ask for your information to be amended contact our sales team by email sales@allprint.co.uk

If we choose not to action your request we will explain to you the reasons for our refusal.

## Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

#### Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

#### Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

#### Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## 12. How can you stop the use of your personal data for direct marketing?

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails from All Print Supplies Ltd.
- Write to The Data Protection Officer, All Print Supplies Ltd, 7b Fairlie Road, Slough SL1 4PY

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

## 13. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to <a href="www.ico.org.uk/concerns">www.ico.org.uk/concerns</a> (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.

# 14. If you live outside the UK

#### For all non-UK customers

This Privacy Notice will only be available in English.

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods you've requested. In the ordinary course of business, we may transfer your personal data from your country of residence to ourselves and to third parties located in the UK.

By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

This may occur because our information technology storage facilities and servers are located outside your country of residence, and could include storage of your personal data on servers in the UK.

We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.

We'll ensure that any third parties process your personal data only in accordance with their legitimate interests. These third parties may be subject to different laws from those which apply in your country of residence.

Please note that we do not take active steps to ensure that any overseas recipient of your personal data complies with the laws which apply in your country.

## 15. Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- Email us on: DPO@allprint.co.uk
- Or write to us, at:

Data Protection Officer All Print Supplies Ltd 7b Fairlie Road Slough SL1 4PY