

## GENERAL DATA PROTECTION REGULATION –

### PRIVACY NOTICE FOR CUSTOMERS OF PLASCON PACKAGING SOLUTIONS LIMITED

#### 1. NOTICE

##### **Purpose of Notice**

We, Plascon Packaging Solutions Limited, (also known as PPSL) company number: 10557364 whose registered office is at, Equipoise House, Grove Place, Bedford MK40 3LE, is the controller and accordingly responsible for the personal information about you which we may hold (**personal data**).

We are required under data protection legislation (and in particular the General Data Protection Regulation, which came into force on 25th May 2018) to notify you of the information contained in this privacy notice.

This notice explains to you how we collect and process your personal data through your use of our website and prior to, during and after the supply of products or the provision of services by us and your rights in relation to that personal data.

This privacy notice supplements any other notices we may have previously provided to you and should be read in conjunction with them.

##### **Website and Third Party Links**

Our website uses cookies and may include links to third party websites and applications, which may also use cookies. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We do not control these third-party websites or applications and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every third party website you visit.

#### 2. DATA WE COLLECT

##### **Personal Data**

“Personal data” means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

##### **Relevance of Data**

The personal data we collect about you will depend on the products we supply and the services we provide. We will however only collect personal data, which is relevant in the context of our business relationship with you.


##### **Categories of Data**

We will collect and process the following categories of personal data:

**Identity Data** including personal contact details such as name and title.

**Contact Data** including addresses, telephone numbers, and personal email addresses.

**Financial Data** including bank account details, your debit or credit card information, your credit rating information (which we acquire from credit reference agencies) and other banking information.

Plascon Packaging Solutions Ltd Bell Chambers, First Floor - Suites 1 & 3, 39 Lower Gungate, Tamworth B79 7AS - UK	T: +44 (0) 1827 50067 F: +44 (0) 1827 50373	W: www.plasconpackaging.co.uk E: sales@plascon-uk.com	
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**Transaction Data** including your billing history and products and services you use and anything else relating to your account.

**Profile Data** including information you provide to us in your communications with us, including for example information you provide to us when participating in market or product surveys.

**Technical data** including information on how you use our products and services.

**Marketing and Communications Data** including your preferences in receiving marketing information from us and our third parties and your communication preferences.

### **Special Categories of Personal Data**

We do not collect any of this data about you (which includes in particular details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership), nor do we collect any information about criminal convictions or offences.

### **Failure to provide Data**

Where we need to collect personal data by law or under the terms of our contract (or proposed contract) to provide products or services to you and you fail to provide that data when requested, we may not be able to perform the contract we have, or are trying to enter into, with you. In such event, we may have to terminate the contract (or any negotiations in relation to a proposed contract) but we will notify you if this is the case at the time.

### **Change of Data**

It is important that personal data we hold about you is accurate and up to date and we ask you to keep us informed if your personal data changes during your relationship with us.

## **3. HOW WE COLLECT YOUR DATA**

### **Direct Interaction**

You may give us your Identity, Contact, Financial and Transaction Data when you use our website, when you purchase our products or use our services, or during the sales process, or in the course of our providing products and services to you throughout the period of your contract with us.

### **Third Parties or Publicly Available Sources**

We may receive personal data and additional information from third parties including credit reference agencies or other background agencies and business directories.

## **4. HOW WE USE YOUR DATA**

### **Legal Basis**

We will only use your personal data for a particular reason and where there is a legal basis to do so.

We will use your personal data in the following circumstances in particular:

Where we need to perform a contract we have entered into with you or are taking steps to enter into with you.

Where we need to comply with a legal obligation or are required to do so by law.

Where you have consented to such use.

Where it is necessary for the purposes of our own legitimate business interests (or those of a relevant third party) except where the law requires such interests to be overridden by your interests, rights or freedoms.

### **Marketing and Advertising**

We will only use your Identity, Contact, Technical and Profile Data to determine which products, services or offers we think you may want or need or be of interest to you.

You will only receive marketing messages from us if you have requested information, or purchased products or services, from us and you have not opted out of receiving such messages.

### **Opting Out**

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data already provided to us as a result of a product/service purchase, warranty registration, product/service experience or other commercial transaction.

### **Cookies**

As previously indicated, our website uses cookies, which allows us to distinguish you from other users of the website. This helps us to improve the website and provide you with as worthwhile and relevant an experience as we can when you browse the website.

For information on the cookies we use and the purposes for which we use them, please refer to our Cookie policy, details of which may be found on our website or through our Data Protection Compliance Manager, whose details are set out below.


## **5. DATA SHARING**

### **Sharing Personal Data with Third Parties**

We may share your personal data with third parties where required by law, or where it is necessary to perform our contract with you or where we have a legitimate business interest in doing so.

"Third parties" may include third party service providers, being parties for example which provide software, technical or professional services to us, and may also include other members of the Plascon Group, where it is required for example as part of the sales or project process or fulfilling our contract with you.

Any third-party service provider with whom your personal data has been shared will be required to take appropriate security measures to protect such data in line with our policies and the law and to process your personal data only for specified lawful purposes and not for their own purposes.

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We will not transfer your personal data outside the EU without your consent and then only on terms approved by us.

## 6. DATA SECURITY

### Security Breach

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed and to deal with any suspected data security breach.

We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### Limiting Access

We limit access to personal data to only those of our employees or agents on a strictly need to know basis. They will only process your personal data on our instructions and will be subject to a duty of confidentiality.

## 7. DATA RETENTION

### Length of Retention

We will only retain your personal data for as long as is necessary to fulfil the purposes it was collected for, including the purposes of satisfying any legal, accounting, or reporting requirements.

By law, for example, we are required for tax purposes to keep certain information about our customers (including Contact, Identity, Financial and Transaction Data) for a period of time after they cease being customers.

### Determination of Retention Period

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of your personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purpose for which such data is being processed and any applicable legal requirements.

## 8. YOUR RIGHTS IN CONNECTION WITH DATA

### Access, Correction, Erasure and other Rights

By law you have the right in certain circumstances to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected, if it is wrong.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no lawful reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to the data being processed (see below).

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and your particular circumstances justify your objecting to processing on this ground.

**Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example, if you want us to establish its accuracy or the lawful basis for processing it.

**Request the transfer** of your personal data to another party.

### Procedure

If you want us to verify, correct or request erasure of your personal data, or object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact our Data Protection Compliance Manager in writing.

### No Fee Usually Required

You will not have to pay a fee to access your personal data or exercise any of your other rights referred to above. However, we may charge a reasonable fee if your request is unfounded or excessive.

### Refusal of Request

We may also refuse your request for access in certain circumstances where your request is unfounded or excessive.

## 9. WITHDRAWAL OF CONSENT

### Right to Withdraw

In those circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a particular purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please notify our Data Protection Compliance Manager in writing.

### Processing following Withdrawal

Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose you originally agreed to, unless there remains another lawful basis for doing so.

## 10 DATA PROTECTION COMPLIANCE MANAGER AND QUESTIONS

### Details and Contact Information

If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Compliance Manager, at Plascon Packaging Solutions Ltd, Bell Chambers Suites 1 & 3, 39 Lower Gungate, Tamworth Staffordshire B79 7AS or email [sales@plascon-uk.com](mailto:sales@plascon-uk.com)

## 11 COMPLAINTS

### Right to Complain

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). However, as we take our obligations seriously in relation to your personal information, we would ask and encourage you to contact us first if you have any issues or concerns so that we may address and try to resolve these before you approach the ICO.

## 12 EFFECTIVE DATE AND UPDATE

### Effective Date

This version is effective 25th May 2018.

### Update

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates