

# GDPR Policy

The privacy and security of your personal information is extremely important to us. This privacy policy explains how and why we use your personal data to make sure you stay informed and can be confident about giving us your information.

We'll never sell your personal data and will only share it with organisations we work with when it's necessary and the privacy and security of your data is assured.

## 1. Who are we and important information?

**Swanline Paper and Board** is the controller and responsible for your personal data (collectively referred to as Swanline, "Us", "we" or "Our" in this privacy notice). Our company registration number is 11094136.

This privacy notice aims to give you information on how we collect and process your personal data, including any data you may provide through our websites when you register, use the contact forms or sign up for our marketing material.

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions, when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Third-party links outside of our control**

This website may include links to third-party websites, plug-ins and applications. 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 and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

### **How to contact us.**

If you have any questions about the way in which we handle your data, or about our Privacy Policy, please contact

FAO Data Controller  
Swanline Paper & Board Limited  
Whitebridge Park  
Whitebridge Way  
Stone  
Staffordshire  
ST15 8LQ

Email: [materials@swanline.co.uk](mailto:materials@swanline.co.uk)

Phone: 01785 827938

## 2. What Information do we hold about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

Swanline Paper & Board may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity data** includes first name, last name, company
- **Contact data** includes billing and delivery address, email address and telephone numbers
- **Financial information** includes payment methods and the results of credit reference agency checks
- Information relating to orders and enquiries with us,
- “Cookie” information, for instance these will remember you’ve visited our website or performed a certain action. For more information see section below titled ‘Cookies’.

We also collect, use and share “Aggregated data” such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

### **Swanline Paper & Board does not collect:**

- Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **If you fail to provide personal data;**

If you do not wish us to collect and use your information in these ways it may mean that we will be unable to provide you with our products or services. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

### 3. How we collect your personal data

We use different methods to collect data from and about you including:

- **Directly:**
  - You may give us your data by filling in forms or by corresponding with us by post, phone, and email or otherwise. This includes personal data you provide when you:
    - Enquire on our websites or phone call
    - Subscribe to our newsletter
- **Indirectly:**
  - Through credit reference agencies or 3<sup>rd</sup> party companies.

### 4. How we use your personal data

Swanline Paper and Board commits to respecting the privacy of all its customers and to protecting any data about customers from outside parties. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances

- Performance of contract this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Legitimate Interest this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us on the address above.
- Comply with a legal or regulatory obligation this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email. You have the right to withdraw consent to marketing at any time by contacting us using the address above, or by opting out via the websites.

## **PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA**

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of Data	Lawful Basis for processing including basis of legitimate interest
To register you as a new customer or lead	Identity, Contact, Financial	To process your order or to take steps to enter into a contract -reason 6(1)b
Where it is necessary for us to meet our legal or regulatory obligations	Identity, Contact, Financial	Processing is necessary for compliance with a legal obligation - 6(1)(c)
Fulfilment of contract	Identity, Contact, Financial	Legitimate need to pass your information to a third party (for instance, a courier company or one of our selected suppliers).6(1)f.

### **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

#### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

#### **Opting out**

You can ask us to stop sending you marketing messages by following the opt-out links on any marketing message sent to you **or** by emailing [materials@swanline.co.uk](mailto:materials@swanline.co.uk) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us to process an order or enquiry.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

We receive and store certain types of information whenever you interact with [www.swanline.co.uk](http://www.swanline.co.uk). We may use technology to track the patterns of behaviour of visitors to our site. The information collected in this way can be used to identify you, unless you modify your browser settings. For example, like many Web sites, we use "cookies," and we obtain certain types of information when your web browser accesses [www.swanline.co.uk](http://www.swanline.co.uk). Cookies allow you to take full advantage of some of our best features, and we recommend that you leave them turned on.

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us using the address above.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **5. Who do we share your information with**

We may have to share your personal information with selected suppliers where there is a legitimate business need to do so.

For instance, we will need to share information with

- courier companies to deliver our products and companies selected to help fulfil your orders.
- credit and identity check agencies based in the UK for the prevention and detection of crime
- We will also share information with regulators such as:
  - the Information Commissioner's Office for the UK (the ICO),
  - HM Revenues and Customs,
  - Law enforcement

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

**We will never sell your information to third parties.**

## **6. International Transfers**

We do not transfer your data outside of the European Economic area (EEA) with the exception of selected courier companies for the fulfilment of orders.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **7. Data Security**

Swanline Paper and Board is committed to maintaining a secure environment in which to process Customer and Supplier information.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data Retention**

We will keep your personal information the duration of your time as a customer with us. We will store information longer than this when there is a legitimate business reason to do so, for instance, as a history of your enquiries or orders so that we can better advise you on future orders.

By law we have to keep certain basic information about our customers (including contact, identity, financial and transactional data) for 7 years for tax purposes.

The retention periods will vary depending on the type of information held and the legal requirement for that information. If you would like information on our data retention periods please contact us on the above address.

In some circumstances you can ask us to delete your data: see **Your Rights** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 9. Your Rights

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable (i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority; direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact us using the details above.

### **No fee required – with some exceptions**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of

your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **10. Changes to this notice and your duty to inform us of changes**

This version was last updated on 21<sup>st</sup> October 2019 and historic versions can be obtained by contacting us.

From 25 May 2018 there will be changes in data protection laws and we will then be able to respond to some of your requests (for example, a request for the transfer of your personal data). We are still working towards getting our systems ready for some of these changes.

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

## **11. Queries, requests or concerns**

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Representative using the above contact details.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](#) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.