
PRIVACY POLICY

BACKGROUND:

Prior Packaging Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information About Us

Prior Packaging Ltd.

Registered in England under company number 966207

VAT number: 345 6138 53.

Email address: sales@priorpackaging.com

Telephone number: 01634 720222.

2. What Does This Notice Cover

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 6, below.

4. What Are Your Rights

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 13.
- b) The right to access the personal data we hold about you. Part 11 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose

of any of your personal data that we have. Please contact us using the details in Part 13 to find out more.

- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling; (we do not use your personal data in this way).

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **Why we collect Personal Data**

We collect information when you place an order for products or services or if you contact us through our website so that we can liaise with you and deal with your request or query. If you consent to provide us with your personal information, we will collect that information for our own use only and the for the purposes described in this Policy.

6. **What Personal Data Do We Collect?**

We may collect some or all of the following personal data, this may vary according to your relationship with us:

- Name
- Address
- Email address
- Telephone number
- Business name
- Job title
- Payment information

7. **How Do We Use Your Personal Data**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary to fulfil an order (a contract) with you. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products and/or services to you. Your personal details are required in order for us to enter into a contract with you.
- Communicating with you. This may include responding to emails or calls from you.

- Supplying you with information by email and/or post.

We do not share your personal data with any third parties except where necessary to supply products/samples (for example, courier/transport companies)

We may also use your personal data to allow us to contact you by email, telephone, text message and/or post with information, news, and offers on our products and/or services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

8. **How Long Will We Keep Your Personal Data**

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- To conform with Company Law on the retention of records;

9. **How and Where We Store or Transfer Your Personal Data**

We will only store your personal data in the UK. This means that it will be fully protected under the GDPR.

10. **Do We Share Your Personal Data?**

We will not share or sell any of your personal data to any third parties for any purposes, subject to the following exceptions:-

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We may contract with third parties to supply products and/or services to you on our behalf. These may include, for example, payment processing or delivery of products. In some cases, those third parties may require access to some or all of your personal data we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

11. **How Can You Access Your Personal Data**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13. There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 10 working days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

12. **How We Use Cookies On Our Website**

Our website (www.priorpackaging.com) uses cookies to anonymously track user data for Google Analytics. No personal data is stored and it is completely anonymous.

In general, cookies are used to retain user preferences, store information for things like shopping carts, and provide anonymised tracking data to third party applications like Google Analytics. As a rule, cookies will make your browsing experience better. However, you may prefer to disable cookies on this site and on others. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at www.aboutcookies.org the About Cookies website which offers guidance for all modern browsers.

13. **How Do You Contact Us**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Ricky Commissar)

Email address: sales@priorpackaging.com

Telephone number: 01634 720222.

Postal Address: Unit 75, Riverside 3,

Sir Thomas Longley Road

Rochester,

Kent

ME2 4BH

14. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

23 May 2018