

PSE

ESTABLISHED 1995

DATA POLICY

OCTOBER 2018

This Privacy Policy sets out the data processing practices of Print Management Europe Ltd t/a Print Strategy Europe (PSE). Please note that all data thus captured will be used and held in accordance with the requirements of the Data Protection Act 2018.

Print Strategy Europe offers a wealth of experience and innovation in the field of print, direct mail marketing and pos. The team is constantly looking to source the best materials, to discover the latest technology and to find the most cost-effective solutions for customers and a dedication to print that is second to none.

PSE is the controller and our Data Protection Officer is Guy Barker. If you have any requests concerning your personal data or any queries with regard to how we handle your data you can contact the DPO by phone on 01905 795 700 email Data@printstrategy.eu or write to us at Guy Barker, Print Strategy Europe, 10 roman Way, Berry hill Industrial Estate, WR9 9AJ, Droitwich.

DEFINITIONS AND INTERPRETATION

1. In this privacy policy, the following definitions are used:

Data collectively all information that you submit to PSE via the Website.

This definition incorporates, where applicable, the definitions provided in the Data Protection Act 1998;

Cookies a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain

features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies);

PSE, PSE, a company incorporated in England and Wales with company registration number 3106264 whose registered office

we or us is at Ashford House, 95 Dixons Green, Dudley, West Midlands, DY2 7DJ;

UK and EU the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic
Cookie Law Communications (EC Directive) (Amendment) Regulations 2011;

User or you any third party that accesses the Website and is not either (i) employed by PSE and acting in the course of their employment or (ii) engaged

as a consultant or otherwise providing services to PSE and accessing the Website in connection with the provision of such services; and

Website the website that you are currently using, www.printstrategy.eu, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:

1. the singular includes the plural and vice versa;
2. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;
3. a reference to a person includes firms, companies, government entities, trusts and partnerships;
4. “including” is understood to mean “including without limitation”;
5. reference to any statutory provision includes any modification or amendment of it;
6. the headings and sub-headings do not form part of this privacy policy.

SCOPE OF THIS PRIVACY POLICY

1. This privacy policy applies only to the actions of PSE and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

DATA COLLECTED

1. We may collect the following Data, which includes personal Data, from you:

1. Name
2. Date of Birth;
3. Job Title;
4. Profession;
5. Contact Information such as email addresses and telephone numbers;
6. Demographic information such as post code, preferences and interests;
7. IP address (automatically collected);
8. Web browser type and version (automatically collected);
9. Operating system (automatically collected);
10. A list of URLs starting with a referring site, your activity on this Website, and the site you exit to (automatically collected);
11. in each case, in accordance with this privacy policy.



[www.](#)

OUR USE OF DATA

in each case, in accordance with this privacy policy.

1. For purposes of the Data Protection Act 1998, PSE is the “data controller”.
2. We will retain any Data you submit for 12 months.
3. Unless we are obliged or permitted by law to do so, and subject to any third party disclosures specifically set out in this policy, your Data will not be disclosed to third parties. This does not include our affiliates and / or other companies within our group.

- 4 All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see the clause below **(Security)**.
5. Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons:
 1. internal record keeping;
 2. improvement of our products / services;
 3. transmission by email of promotional materials that may be of interest to you;

THIRD PARTY WEBSITES AND SERVICES

- 1.PSE may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services do not have access to certain personal Data provided by Users of this Website.

LINKS TO OTHER WEBSITES

1. Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

CHANGES OF BUSINESS OWNERSHIP AND CONTROL

- 1.PSE may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of PSE. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.
- 2.We may also disclose Data to a prospective purchaser of our business or any part of it.
- 3.In the above instances, we will take steps with the aim of ensuring your privacy is protected.

CONTROLLING USE OF YOUR DATA

- 1.Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following:
- 2.use of Data for direct marketing purposes; and
- 3.sharing Data with third parties.

If at any point you would like to opt-out of receiving communications from us, or would like to change the channels (such as email or post) that we use to contact you, please contact Guy Barker Data@printstrategy.eu or write to Guy Barker, Print Strategy Europe, 10 Roman Way, Berry Hill Industrial Estate, Droitwich, WR9 9AJ.

Your Rights and Choices

We offer you certain choices in connection with the personal information we collect from you, such as how we use the information and how we communicate with you. To update your preferences, ask us to remove your information from our mailing lists or submit a request, please contact us in the manner specified below.

- **Email Opt-Out**

You can at any time tell us not to send you marketing communications by email by clicking on the unsubscribe link within the marketing emails you receive from us or by contacting us as indicated below.

- **Postal Mail Opt-Out**

You can ask **Print Strategy Europe** to stop sending you marketing communications by postal mail by following the instructions that may be included in a particular promotion. You also can request that we refrain from sending you promotional postal mail by sending an email to Data@printstrategy.eu.

- **Withdrawing Consent**

You may withdraw any consent you previously provided to us, or object at any time on legitimate grounds, to the processing of your personal information. We will apply your preferences going forward.

- **Reviewing, Updating and Modifying Personal Information**

Subject to applicable law, you may have the right to request access to and receive details about the personal information we maintain about you, update and correct inaccuracies in your personal data, and have the information blocked or deleted, as appropriate. The right to access personal information may be limited in some circumstances by local law requirements. We may take reasonable steps to verify your identity before granting access or making corrections.

You may request to review, change or delete your personal information by sending an email to Data@printstrategy.eu.

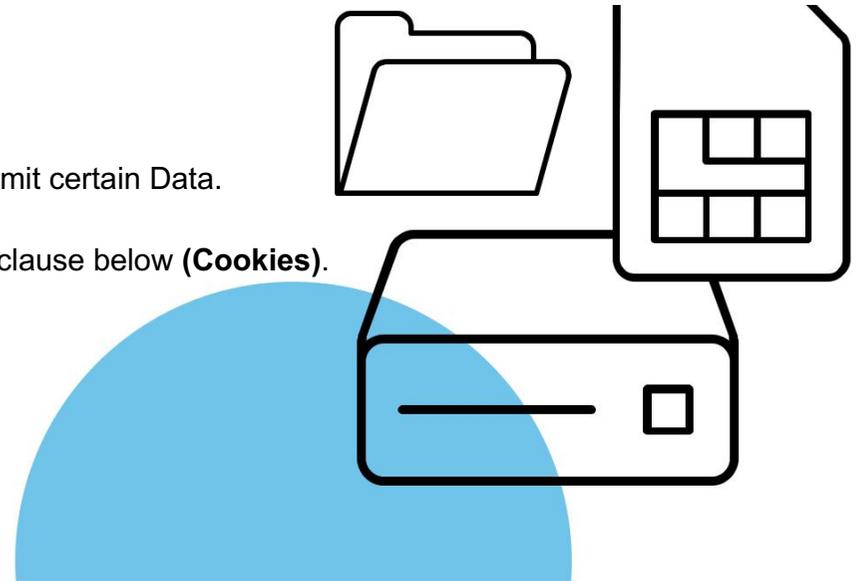
Data Transfers

How We Protect Personal Information

We maintain appropriate administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. However, no security system is perfect and we cannot promise that information about you will remain secure in all circumstances, including the security of your data during transmission to us or the security of data on your mobile device.

FUNCTIONALITY OF THE WEBSITE

- 1.To use all features and functions available on the Website, you may be required to submit certain Data.
- 2.You may restrict your internet browser's use of Cookies. For more information see the clause below (**Cookies**).



ACCESSING YOUR OWN DATA

1. You have the right to ask for a copy of any of your personal Data held by PSE (where such Data is held) on payment of a small fee, which will not exceed £15.
2. Requests should be made in writing to: data@printstrategy.eu

1. Retention periods

We will keep your personal data in connection with the services/products you have bought for 7 years after the last purchase. We need to retain this data for our own accounting purposes and for legal and tax purposes.

In terms of personal data we use for marketing, we will keep this data for as long as we are able to market to you and if you withdraw your consent or opt-out of marketing communications, we will delete your contact details from our system.

2. Data subject's rights

You have rights in respect of your personal data. We will need to confirm your identity before we can consider your request so, if you wish to exercise any of these rights, we will need [add in what forms of identity you would require to ensure they are the data subject. These can be passport, driving licence, utility bill.]

The right to be informed – you have the right to be told about the collection and use of the personal data you provide. This privacy policy sets out the purpose for which we process your personal data, how long we will keep your data, who we will share your data with. If you have any questions on how and why we process your data please contact the DPO Guy Barker on email at Data@printstrategy.eu or mail Guy Barker, Print Strategy Europe, 10 Roman way, Berry Hill Industrial Estate, Droitwich, WR9 9AJ. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>

Right of access – you have the right to know whether we are processing your personal data, and to a copy of that data. We would need as much information as possible to enable us to locate your data. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact Guy Barker at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>

Right to rectification – you have the right to have any incorrect personal data corrected or completed if it is incomplete. You can make this request verbally or in writing. We will need as much information as possible to enable us to locate your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact the DPO at the contact details above. If you want to

know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-rectification/>

Right to erasure – this right, often referred to as the right to be forgotten allows you to ask us to erase personal data where there is no valid reason for us to keep it. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact Guy Barker at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-erasure/>

Right to restrict processing – you have the right to ask us to restrict processing of your data. We will look at any request and inform you of our decision within 28 days of receiving the request. If you want to exercise this right, please contact Guy Barker at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-restrict-processing/>

Right to data portability – you have the right to move, copy or transfer your personal data from one IT environment to another. This right applies to data that you have provided to us and that we are processing on the legal basis of consent or in the performance of a contract and that processing is by automated means. We will respond to your request within 28 days of receipt of your request. If you want to exercise this right, please contact Guy Barker at the contact details above. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-data-portability/>

Right to object – you have the right to object to our processing of your personal data based on (1) legitimate interests, and (2) direct marketing (including profiling);

1. Legitimate interests/legal task – your objection should be based on your particular situation. We can continue to process the data if we can demonstrate compelling legitimate grounds which override your interests.
2. Direct marketing – you have an absolute right to ask us to stop processing for the purposes of direct marketing. We will action your request as soon as possible.

3. Processing based on consent

Where we process your personal data based on your consent you have the right to withdraw that consent at any time without reason. You can opt-out by using the unsubscribe/opt-out in any marketing we send you and you can contact Guy Barker at the contact details above.

4. The right to lodge a complaint to the supervisory authority

If you are unhappy with any aspect of our handling of your data you can make a complaint to the Information Commissioner's Office - <https://ico.org.uk/concerns/>

SECURITY

1. Data security is of great importance to PSE and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website.
2. If password access is required for certain parts of the Website, you are responsible for keeping this password confidential.
3. We endeavour to do our best to protect your personal Data. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of your Data transmitted to the Website.

COOKIES

Type of Cookie

Purpose

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. Find out more about cookies on <http://www.allaboutcookies.org/>

Most browsers will allow you to turn off cookies. If you want to know how to do this please look at the menu on your browser, or look at the instruction on <http://www.allaboutcookies.org/> Please note however that turning off cookies will restrict your use of our website.

Analytical/performance
are using it.

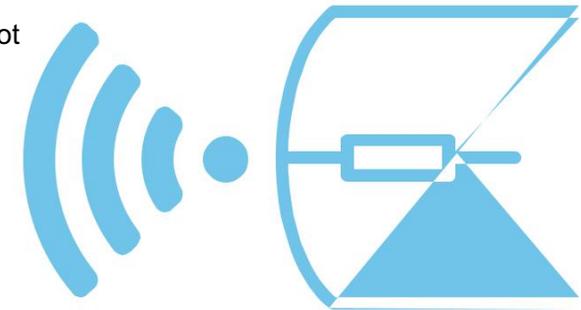
They allow us to recognise and count the number of visitors and to see how visitors move around our website when they

cookies
looking for easily.

This helps us to improve the way our website works, for example, by ensuring that users are finding what they are

Targeting cookies

These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.



We process personal information for certain legitimate business purposes, which include some or all for the following:

- Where the processing enables us to enhance, modify, personalise or otherwise improve our services. Communications for the benefit of our customers.
- To better understand how people, interact with our website.
- To provide postal communications, which we think will be of interest or benefit to you.
- To determine the effectiveness of promotional campaigns and advertising.

Whenever we process data for these purposes we will ensure that we always keep your Personal Data right in high regard and take account of these rights. You have the right to object to this processing if you wish, and if you wish to do so please get in touch with Guy Barker Data@printstrategy.eu or write to Guy Barker, Print Strategy Europe, 10 Roman Way, Berry Hill Industrial Estate, Droitwich, WR9 9AJ. Please bear in mind that if you object this may affect our ability to carry out tasks above for your benefit.

1.This Website may place and access certain Cookies on your computer. PSE uses Cookies to improve your experience of using the Website and to improve our range of products. PSE has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.

2.All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.

3.Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling PSE to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

4.This Website may place the following Cookies:

5.You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

6. You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
7. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

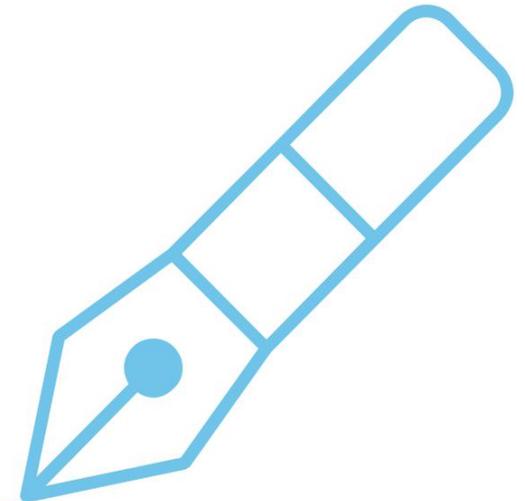
GENERAL

1. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
2. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
3. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
4. This privacy policy is governed by and interpreted according to English law. All disputes arising under this privacy policy are subject to the exclusive jurisdiction of the English courts.

CHANGES TO THIS PRIVACY POLICY

PSE reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

You may contact PSE by email at info@printstrategy.eu.



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