



UK General Privacy Notice

Introduction

This privacy notice applies to the following CPI Group companies ("CPI"):

Name	Company No
CPI Group (UK) Ltd	5567817
CPI Antony Rowe Ltd	2823354
CPI Books Ltd	2196742
CPI Colour Ltd	1031732
CPI William Clowes Ltd	3369829
CPI UK Management Co Ltd	2859682
CPI Fulfilment and Distribution Ltd	13511644

We refer to these as Group Companies, each one being a Group Company. All these Group Companies have their registered offices at 110 Beddington Lane, Croydon CR0 4TD, and can be contacted at that address, or by email at privacy@cpi-print.co.uk.

You may also raise any queries with a member of our customer services team.

In this privacy notice:

"Business Associate" means (prospective) customers and (prospective) suppliers to any Group Company;

"Privacy Laws" means the Data Protection Act 2018 and the UK General Data Protection Regulation.

"you"/"yours" means you and/or any party you represent, such as your employer.

CPI respects the privacy of its Business Associates and is committed to protecting their personal data. This privacy notice will inform you as to how we look after your personal data when you interact with us whether face to face, by telephone, post, email or our websites and tell you about your privacy rights and how the law protects you.

Purpose

This privacy notice explains how CPI collects and processes your personal data, including any data you may provide when making an enquiry or placing an order with us whether for yourself, or on behalf of an employer or customer. This privacy notice supplements CPI's Standard Terms and Conditions of Trading and is not intended to override them.

Data Controller

CPI is the data controller and responsible for your personal data. It may also be a processor, processing your data. We do not engage in any of the activities requiring us to appoint a data protection officer. Each manager within the CPI companies is responsible for ensuring compliance with the Privacy Laws in the department or business unit under his/her control.



Please contact us if you have any queries about this policy or how we process your data. 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to Your Personal Data

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

Third-party Links

Our websites 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 any of our websites, we encourage you to read the privacy notice of every website you visit.

The Data We Collect About You

Personal data, or personal information, 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).

We 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, username or similar identifier, title.
- Contact Data includes billing, correspondence and email addresses, email address and telephone numbers.
- Financial data includes credit reference reports, payment history, and bank details.
- Transaction Data includes details of enquiries and orders for goods and services, correspondence surrounding enquiries and orders, billing enquiries, dispute resolution data.
- Technical Data when interacting through our websites includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser, plug-in types and versions, operating system and platform and other technology on the devices you use to access our websites.

We may 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. We do not collect any 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.



Failure to Provide Personal Data

Where we need to collect personal data by law, or in order to perform a contract 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 for the provision of goods or services.

How is Personal Data Collected?

Your personal information may be disclosed to us through correspondence, emails, telephone calls and interaction with our websites either directly by you or by a party you represent such as your employer. In this section we refer to "you", but this includes any person or organisation you represent.

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

- Direct interactions. You may give us your Identity, and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you or your employer enquire about or order goods and services from us.
- Automated technologies or interactions. As you interact with our websites, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

How we use your personal data

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:

- Where we need to provide you with information you have requested or to perform the contract we are about to enter into or have entered into with you, your employer or customer.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, and we may need to transfer your personal data between Group Companies and with our sub-contractors, legal advisors, auditors, bank and other professional advisors.

Purposes for Which We Will Use Your Personal Data

The table in the Schedule annexed to this policy gives a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so.

We have also identified what our legitimate interests are where appropriate.

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.



Legitimate Interest means the interest of our Group Companies in conducting and managing our business to enable us to give you the best service/product and the best and 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.

Performance of Contract 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.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Marketing

We may share your information with external third parties as described in the summary at the end of this document.

Opting out

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

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a book printing contract, product/service experience or other transactions.

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 websites may become inaccessible or not function properly.

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.

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.

Disclosures of Your Personal Data

We may have to share your personal data with Group Companies who provide IT and system administration services and undertake management reporting.

We may share your information with External Third Parties. External Third Parties means:

- Service providers based in the UK who provide IT and system administration services.



- Professional advisers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- Other parties to whom sharing data is absolutely necessary to enable us to fulfil our contractual obligations to you, such as carriers who will deliver goods to you, subcontractors, and outworkers.
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.

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.

International Transfers

We do not transfer your personal data outside the UK or European Economic Area (EEA), save in very limited circumstances to our global network printing partners to whom contact details of individual customers' members of staff may be sent for the purpose of performing contractual obligations, and then only where data processing agreements are in place.

Data Security

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.

How Long Do We Keep Your Personal Data?

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

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In general, we retain all correspondence, orders and emails for six years or such longer period as required by law. We retain financial information for as long as you continue to do business with us.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data (see Request Erasure 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.



Your Legal Rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right 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 data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good 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 successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data.

However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

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



Fees

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 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.

Schedule

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you or your employer as a new customer or supplier	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/ services)
To enable you to partake in a prize draw, competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how customers, use our products/services, to develop them and grow our business)
To administer and protect our business and our websites (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation

To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our websites, products/services, marketing, customer relationships and experiences	a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our websites updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
Other (e.g to fulfil a price request or respond to a tender)	To depend on the exact purpose/activity	To depend on the exact purpose/activity