

## ALL4LABELS UK LEEDS LIMITED PRIVACY POLICY

Thank you for visiting our website. This Privacy Policy applies between You, the User of this Website, and All4Labels UK Leeds Limited., the owner and provider of this Website. All4Labels UK Leeds Ltd. takes the privacy of your information very seriously. This privacy policy applies to our use of all Personal Data collected by us or provided by you in relation to your use of the Website.

**Please read this privacy policy very carefully.**

### Definition and Interpretation

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

|                                  |   |
|----------------------------------|---|
| Personal Data                    | Collectively all information that you can be identified from, that you submit to All4Labels UK Leeds Ltd. via the Website. The definition incorporates, where applicable, the definitions provided in the Data Protection Laws;   |
| 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 ( <b>Cookies</b> );  |
| Data Protection Laws             | Any applicable law relating to the processing of Personal Data, including, but not limited to the GDPR, the Data Protection Act 2018 (DPA) and any national implementing and supplementary laws, regulations and secondary legislations;  |
| GDPR                             | The UK General Data Protection Regulation;  |
| All4Labels Leeds Ltd., we, or us | All4Labels UK Leeds Ltd., a company incorporated in England and Wales with registered number 11923057 whose registered office is at Grangefield Industrial Estate, Richardshaw Road, Pudsey, Leeds, LS28 6QW, United Kingdom.   |
| UK and EU Cookie Laws            | The Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amended) Regulations 2011 & the Privacy and Electronic Communications (EC Directive) (Amended) Regulations 2018.  |
| User or you                      | Any individual that accesses the Website and is not either (i) employed by All4Labels UK Leeds Ltd. and acting in the course of their employment (ii) engaged as a consultant or otherwise providing services to All4Labels UK Leeds Ltd. Print Group and accessing the Website in connection with the provision of such service; |
| Website                          | The website that you are currently using, and any sub domains of this site unless expressly excluded by their own terms and conditions.   |

### Data Controller

All4Labels UK Leeds Ltd. is the Data Controller for the data processing operations described below. **We have appointed a data protection officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy**

**policy, including any requests to exercise your rights, please contact** Ian Ashness by email at [ian.ashness@all4labels.com](mailto:ian.ashness@all4labels.com)

### **Changes to this Privacy Policy**

We keep our Privacy Policy under regular review and may update it from time to time.

### **The Personal Data we collect about you**

We may collect, use, store and transfer different kinds of Personal Data about you which we have grouped together as follows:

- **Identity Data:** this includes your first name and last name.
- **Contact Data:** this includes your billing address, delivery address, email address and telephone number.
- **Financial Data:** this includes your bank account and payment card details.
- **Transaction Data:** this includes details about payments to and from you and other details of products you have purchased from us.
- **Technical Data:** includes your 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 this Website.
- **Usage Data:** this includes information about how you use our Website, products and services.
- **Market and communications Data:** this includes your preferences in receiving marketing from us and our third parties and your communication preferences.

Where we need to collect Personal Data by law, or under the terms of a contract with you, and you fail to provide the Personal Data when requested, we may not be able to perform the contract we have or are trying to enter into with you to provide the products and/or services. In this case, we may have to cancel you the products or services but we will notify you of this at the time.

### **How is your Personal Data collected**

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

- **Direct interactions:** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you order products or services from us, subscribe to our services or publications, request marketing to be sent to you or give feedback or contact us.
- **Automated technologies or interactions:** As you interact with our website, we will automatically collect technical data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies, server logs and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies. Please see our [Cookies Policy](#) for further details.

### **How we will 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 perform the contract we are about to enter into or have entered into with you.
- 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 obligation.

Generally, we do not rely on consent as a legal basis for processing your Personal Data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting 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 (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your Personal Data with any third party for marketing purposes.

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 or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to Personal Data provided to us as a result of a product/service purchase.

### **Data Security**

We take technical and organizations measures to protect your Personal Data as comprehensively as possible from unwanted access. These measures include encryption procedures on our web pages. Your Personal Data is transferred from your computers to our server and vice versa via the internet using TLS encryption. 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.

You can usually recognize this by the fact that lock symbol in the status bar of your browser is closed and the address line begins with https//.

### **Contact form**

You may contact us third party via contact form. In order to use our contact form, we will require to provide the data marked as mandatory. The legal basis for this processing is Article 6 (1)(f) GDPR, being our legitimate interest to respond to your request. You can decide whether or not you would like to provide us with further information. This information is provided voluntarily and is not required to contact us. We process your

voluntary details on the basis of your consent in accordance with art. 6 (1) (a) GDPR. Your data will only be processed to process your request. We will delete your Personal Data if it is no longer required and there are no legal obligations to retain it.

Where the processing of your Personal Data which is transmitted via the contact form is based on legitimate interest in accordance with art. 6 (1) (f) GDPR, you have the right to object to the processing at any time. To do so, please use the e-mail address provided in the imprint.

In addition, you can withdraw your consent to the processing of your voluntarily provided information at any time. To do so, please use the e-mail address provided in the imprint.

### **Map service**

On our website, we embed map services which are not stored on our service. In order to prevent the automatic downloading of third party content when you visit our websites with embedded map services, we only show locally stored preview images of the maps as a first step. This does not provide the third party provider with any information.

Only after you click on the preview image, third party content will be downloaded. This provides the third party with information that you have accessed on our site and with the usage data technically required for this purpose. We have no influence on the further data processing by the third party provider.

By clicking on the preview image, you give us the consent to download contents of the third party provider.

The legal basis for the embedding processing is your consent if you have previously given your consent by clicking on the preview image.

Please note that the embedding of some map services means that your Personal Data may be processed outside the UK. In some countries, there is a risk that authorities may access the Personal Data for security and surveillance purposes without informing you or allowing you to take legal action. Where what is it we use providers in third countries without an adequate level of protection and you give your consent, the transfer to third party countries is based on art. 49 (1) (a) GDPR.

| <b>Provider</b>  | <b>Maximum Storage Period</b> | <b>Adequate level of data protection</b>  | <b>Withdrawal of consent</b>   |
|------------------|-------------------------------|---|--|
| Google LLC (USA) | 1 year                        | No adequate level of data protection. The data is transmitted on the basis of Art. 49 (1) (a) GDPR. | If you have clicked on a preview image, the content of the third-party provider is immediately downloaded. To avoid this downloading on other sites. Please do not click on the preview image. |

|               |        |  |  |
|---------------|--------|--|--|
| OpenStreetMap | 1 year | Processing outside the UK but within EU/EEA. | If you have clicked on a preview image, the content of the third-party provider is immediately downloaded. To avoid this downloading on other sites. Please do not click on the preview image. |
|---------------|--------|--|--|

### Storage Period

Unless otherwise specified, we will delete your Personal Data if it is no longer required for the relevant processing purposes and no longer attention obligations oppose deletion. We will only retain your Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

In some circumstances we will 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.

However, website log files are rotated when they reach 5MB. This varies based on website traffic so can be anywhere between a week or more.

### Disclosures of Data

We transfer your Personal data to service providers who support us in the operation of our websites related processes. The services providers are usually data processors within the meaning of Art. 28 GDPR. Our service providers are strictly bound by contract and our instructions.

We may share your Data with the parties listed below for the purposes set out. 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.

| Service Provider / Processor | Purpose             | Adequate level of date protection           |
|------------------------------|---------------------|---|
| My Team Ltd                  | Hosting and Support | Processing outside the UK but within EU/EEA |
| Linode LLC                   | Hosting             | Processing outside the UK but within EU/EEA |

### **International transfers of Personal Data**

If Personal Data is transferred outside the UK, we will also provide information on the adequate level of data protection.

Whenever we transfer your Personal Data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data.
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give Personal Data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data out of the UK.

### **Your rights as a data subject**

Under certain circumstances, you have rights under Data Protection Laws in relation to your Personal Data. These rights are explained in further detail, below.

#### **Right to Access to Your Personal Data (Article 15 GDPR)**

You have the right to obtain confirmation as to whether Personal Data concerning you is being processed; if this is the case, you have the right to be informed of this Personal Data and to receive the information specified in Art.15 GDPR.

#### **Right to Rectification of your Personal Data (Article 16 GDPR)**

You have the right to obtain from the controller without undue delay the rectification of inaccurate Personal Data concerning you. Considering the purposes of the processing, you have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement. We may need to verify the accuracy of the new Personal Data you provide to us.

#### **Right to portability (Article 20 GDPR)**

In certain cases, which are listed in detail in Article 20 GDPR, you have the right to receive the Personal Data concerning you in a structured, commonly used, and machine-readable format, or to request that thus data be transferred to a third party.

#### **Right to withdraw consent (Article 7 GDPR)**

If the processing of Personal Data is based on your consent, you are entitled to withdraw your consent to the use of your Personal Data at any time in accordance with Article 7 GDPR. Please note that the withdrawal is only effective for the future. Processing that took place before the withdrawal is not affected.

#### **Right to object (Article 21 GDPR)**

If Personal Data is collected on the basis of Article 6 GDPR (data processing for the purpose of our legitimate interests) or on the basis of Article 6(1) 1 e GDPR (data processing for the purpose of protecting public interest or in the exercise of official authority), you have the

right to object to the processing at any time for reasons arising from your particular situation 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. We will then no longer process the Personal Data unless there are compelling legitimate grounds for the processing which override your interest rights and freedoms or if Personal Data is still needed for the establishment, exercise, or defense of legal claims.

### **Right to erasure**

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.

### **Right to restriction of processing**

This enables you to ask us to suspend the processing of your Personal Data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- 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.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

### **Right to transfer**

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.

### **Right to lodge a complaint with a supervisory authority (Articles 57(1)(f) and (2) and 77 of the GDPR)**

We work to high standards when it comes to processing your personal information. If you have queries or concerns, please contact us at [info.ukleeds@all4labels.com](mailto:info.ukleeds@all4labels.com) and we'll respond.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to Information Commissioner's Office (ICO) as the UK supervisory authority.

### **Asserting your rights**

Unless otherwise described above, please contact us to assert your rights.

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 could refuse to comply with your request in these circumstances.

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.

We try to respond to all legitimate requests within one month. Occasionally it could 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.