

ALL4LABELS UK LIMITED PRIVACY POLICY

Thank you for visiting our website. This Privacy Policy applies between You, the User of this Website, and All4Labels UK Limited., the owner and provider of this Website. All4Labels UK 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 Ltd. via the Website.
Cookies	A small text file placed on your computes 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 our cookies policy All4Labels-UK-Leeds-Ltd-Cookies-Policy.pdf(Cookies) .
Data Protection Laws	All applicable data protection and privacy legislation in force from time to time in the UK including the UK GDPR; the Data Protection Act 2018 (DPA 2018) (and regulations made thereunder); and the Privacy and Electronic Communications Regulations 2003 (SI 2003 No. 2426) as amended.
GDPR	has the meaning given in section 3(10) (as supplemented by section 205(4)) of the Data Protection Act 2018.
User or you	Any individual that accesses the Website and is not either (i) employed by All4Labels UK Ltd. and acting in the course of their employment (ii) engaged as a consultant or otherwise providing services to All4Labels UK 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.

Controller, Processor, Information Commissioner, Data Subject and Personal Data, Processing and appropriate technical and organisational measures shall have the meanings given to them in the Data Protection Laws.

Data Controller

All4Labels UK Ltd. is the Data Controller and responsible for the data processing operations described below. We have appointed an external data protection officer who is responsible for overseeing questions in relation to this privacy policy.

First Privacy GmbH
Konsul-Smidt-Straße 88
28217 Bremen
Tel.: 0421 696632-0
Fax: 0421 696632-11
E-Mail: office@first-privacy.com
Web: <https://www.first-privacy.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 (if provided by yourself).
- **Contact Data:** this includes your email address and telephone number (if provided by yourself).
- **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.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our Website to help improve the website and our service offering.

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 and/ 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 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 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.

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 and your interests and fundamental rights do not override those interests. We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) 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).
- Where we need to comply with a legal obligation.

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.

If you provide your consent, 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).

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.

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 the various categories of 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.

Purpose/Use	Type of data	Legal basis
To register your business as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with your business which will include: (a) Notifying your business about changes to our terms or privacy policy (b) Dealing with your business' requests, complaints and queries	(a) Identity (b) Contact (c) 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 manage our relationship with you)
To administer and protect our business and this website (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 online advertisements to your business and measure or understand the effectiveness of the advertising we serve to your business	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) 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 website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To send your business relevant marketing communications and make personalised suggestions and recommendations to your business about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) or Consent, having obtained your prior consent to receiving direct marketing communications

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//.

Third party tracking technologies for advertising

We use cross device tracking technologies to help us show you targeted advertising on other websites based on your visit to our Websites and to help us determine how effective our advertising efforts have been.

The legal basis for this data processing is your consent if you have given your consent via our consent banner. Your consent is voluntary and can be withdrawn at any time by contacting us.

How does tracking work?

When you visit our Website, it is possible that the third-party providers listed below may retrieve identification characteristics of your browser or terminal device (e.g., browser fingerprint), evaluate your IP address, save or extract identification characteristics on your terminal device (e.g. cookies) or gain access to individual tracking pixels. The individual characteristics can be used by these third parties to identify your terminal device on other websites. We may commission these third-party providers to show you advertisements based on pages visited on our Website.

What does cross device tracking mean?

If you log on to the third-party provider with your user data, the respective identification characteristics of different browsers and each device can be linked with each other. For example, if the third party provider has created a unique identifier for each laptop, desktop personal computer, smartphone or tablet you use, these individual identifiers can be associated with each other as soon as you log into a third party service using your login credentials. This allows the third party to target our advertising campaigns across multiple devices.

Which third party providers do we use in this context?

The third-party providers with whom we work for advertising purposes are listed below. Your personal data might be transferred in some cases outside the UK. Please refer to section "International transfers of personal data" below to get further information on the transfer of your personal data to third parties located outside the UK as well as about the relevant safeguards in place.

Google Analytics

We use the web analysis tool "Google Analytics" to design our Websites according to your needs. Space Google Analytics creates user profiles based on pseudonyms. For this purpose, permanent cookies are stored on your end device and accessed by us. In this way we are able to recognise and measure returning visitors.

The Google Analytics tool is provided by Google Ireland limited and Google LLC. USA who support us and processes according to art. 28 GDPR. Since Google LLC is located in the USA data processing can therefore also take place outside the UK.

With regard to Google LLC, the company is certified under the Data Protection Framework which ensure an adequate level of data protection comparable to the UK. If you click on "Accept all cookies" in our cookie banner, you consent that your data will be processed outside the UK. You can withdraw your consent at any time by clicking on the dedicated widget on our Website and make the appropriate settings via our banner.

Google Tag Manager

Our Website uses the Google Tag Manager to manage website tags with this service from Google via a separate interface. It is used to manage and play out the tools integrated via it. The tool may trigger other tags that may collect data. The Google Tag Manager does not access this data.

However, Google Tag Manager collects your IP address, which may also be transferred to Google's parent company in the United States. Google LLC is certified under the Data Protection Framework which ensures an adequate level of data protection comparable to the UK.

The Google Tag Manager is used on the basis of Art. 6 para. 1 lit. f GDPR. As the website operator, we have a legitimate interest in the fast and uncomplicated integration and management of various tools on our website.

If disabling has been done at the cookie or domain level, this disabling will remain in place for all tracking tags when implemented with Google Tag Manager.

Storage Period

Unless otherwise specified, we will delete your Personal Data if it is no longer required for the relevant processing purposes. 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.

Storage of IP Addresses for Security Purposes

We store the complete IP address transmitted by your web browser as long as necessary in the interest of detecting, limiting, and eliminating attacks on our web pages. After this period, we delete or anonymize the IP address.

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 personal 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 data 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

We may share your personal data where necessary with 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 policy

International transfers of Personal Data

In certain circumstances, we may transfer your personal data to our affiliates or trusted third parties outside the UK. In such cases, to ensure that your personal data remains protected when it is transferred outside of the UK, we make sure that appropriate measures are implemented e.g. International Data Transfer Agreement or transferring your personal data to countries that have been deemed by the UK to provide an adequate level of protection for personal data.

In particular, the US has introduced new safeguards and mechanisms to ensure an adequate level of data protection that is essentially equivalent to the level of protection in the UK for companies certified under a framework called the Data Privacy Framework (DPF). Some of our business partners are certified under the DPF, e.g. Google LLC

In the absence of an adequacy decision pursuant to Article 45(3) UK GDPR, or of appropriate safeguards pursuant to Art. 46 UK GDPR like International Data Transfer Agreements, the personal data will be transferred based on one of the derogations of Art. 49 UK GDPR if applicable.

Please contact us if you want further information on the specific mechanism used by us when transferring your Personal Data outside 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)

This is commonly known as a "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

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 this 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 office@first-privacy.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.

Third- Party Links

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 policy of every website you visit.