

GPDR: Privacy Statement

Last updated April 2018

How your personal information is used by Allander Print Limited.

Your information will be held by Allander Print Limited.

More information on the Group can be found at www.allander.com.

How we use your personal information

This privacy notice is to let you know how we promise to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a client, and the choices you give us about what marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Our Privacy Promise

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at any time.

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Data Protection law will change on 25 May 2018

This notice sets out most of your rights under the new laws. We'll update it again, if necessary, between now and 25 May 2018 when changes come into effect.

Who we are

We are Allander Print Limited. You can find out more about us at www.allander.com.

If you have any questions, or want more details about how we use your personal information, you can contact by email enquiries@allander.com or telephone 0131 270 6000.

How the law protects you

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Allander Print Limited. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

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A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for:	Our reasons	Our legitimate interests
<ul style="list-style-type: none">• To manage our relationship with you or your business.• To develop new ways to meet our customers' needs and to grow our business.• To develop and carry out marketing activities.• To study how our customers use products and services from us and other organisations.• To provide advice or guidance about our products and services.	<ul style="list-style-type: none">• Your consent.• Fulfilling contracts.• Our legitimate interests.• Our legal duty.	<ul style="list-style-type: none">• Keeping our records up to date, working out which of our products and services may interest you and telling you about them.• Developing products and services, and what we charge for them.• Defining types of customers for new products or services.• Seeking your consent when we need it to contact you.• Being efficient about how we fulfil our legal duties.

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What we use your personal information for:	Our reasons	Our legitimate interests
<ul style="list-style-type: none">• To develop and manage our brands, products and services.• To test new products.• To manage how we work with other companies that provide services to us and our customers.	<ul style="list-style-type: none">• Fulfilling contracts.• Our legitimate interests.• Our legal duty.	<ul style="list-style-type: none">• Developing products and services, and what we charge for them.• Defining types of clients for new products or services.• Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none">• To deliver of our products and services.• To make and manage client payments.• To manage fees, charges due on client accounts.• To collect and recover money that is owed to us.	<ul style="list-style-type: none">• Fulfilling contracts.• Our legitimate interests.• Our legal duty.	<ul style="list-style-type: none">• Being efficient about how we fulfil our legal and contractual duties.• Complying with regulations that apply to us.

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What we use your personal information for:	Our reasons	Our legitimate interests
<ul style="list-style-type: none">• To manage risk for us and our clients.• To obey laws and regulations that apply to us.• To respond to complaints and seek to resolve them.	<ul style="list-style-type: none">• Fulfilling contracts.• Our legitimate interests.• Our legal duty.	<ul style="list-style-type: none">• Complying with regulations that apply to us.• Being efficient about how we fulfil our legal and contractual duties.

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What we use your personal information for:	Our reasons	Our legitimate interests
<ul style="list-style-type: none">• To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, governance, and audit. • To exercise our rights set out in agreements or contracts.	<ul style="list-style-type: none">• Our legitimate interests.• Our legal duty. • Fulfilling contracts.	<ul style="list-style-type: none">• Complying with regulations that apply to us.• Being efficient about how we fulfil our legal and contractual duties.

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Groups of Personal Information

We use many different kinds of personal information, and group them together like this.

Types of personal information	Description
Financial	Your financial position, status and history.

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Types of personal information	Description
Contact	Where you live and how to contact you.
Socio-Demographic	This includes details about your work or profession, nationality and education

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Types of personal information	Description
Transactional	Details about payments to and from your accounts with us
Contractual	Details about the products or services we provide to you.

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Types of personal information	Description
Locational	Data we get about where you are, such as may come from your mobile phone, the address where you connect a computer to the internet.
Behavioural	Details about how you use our products and services.

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Types of personal information	Description
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters, emails, and conversations between us.

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Types of personal information	Description
Open Data and Public Records	Details about you that are in public records such as the Electoral Register, and information about you that is openly available on the internet.
Usage Data	Other data about how you use our products and services.

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Types of personal information	Description
Documentary Data	<p>Details about you that are stored in documents in different formats, or copies of them. This could include things like your passport, drivers licence, or birth certificate.</p>
Special types of data	<p>The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law allows us to do so:</p> <ul style="list-style-type: none">• Racial or ethnic origin• Religious or philosophical beliefs• Trade union membership• Genetic and bio-metric data• Health data including gender• Criminal convictions and offences

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Types of personal information	Description
Consents	Any permissions, consents, or preferences that you give us. This includes things like how you want us to contact you and whether you get our newsletters.
National Identifier	A number or code given to you by a government to identify who you are, such as a National Insurance number.

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Where we collect personal information from

We may collect personal information about you (or your business) from these sources:

Data you give to us:

- When you apply for our products and services
- When you talk to us on the phone or in our office
- When you use our websites, mobile device apps, web chat or other online services
- In emails and letters
- other documents
- interviews
- In customer surveys

Data we collect when you use our services. This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data.
- Profile and usage data. This includes the profile you create to identify yourself when you connect to our internet, mobile and telephone services. It also includes other data about how you use those services. We gather this data from devices you use to connect to those services, such as computers and mobile phones, using cookies and other internet tracking software.

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Data from third parties we work with:

- Companies that introduce you to us
- HR Support teams
- Financial advisers
- Social networks
- Payroll service providers
- Public information sources such as Companies House
- Agents working on our behalf
- Market researchers
- Medical practitioners*
- Government and law enforcement agencies.

* we may ask your GP or other medical professional to send us a report. We will only do this if we get your consent first.

Who we share your personal information with

- Agents and advisers who we use to help run your accounts and services, collect what you owe, and explore new ways of doing business
- regulators and other authorities
- Any party linked with you or your business's product or service
- Companies we have a joint venture or agreement to co-operate with
- Organisations that introduce you to us
- Companies that we introduce you to
- Market researchers
- Companies you ask us to share your data with.

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If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies. It could mean that we cancel a product or service you have with us.

Any data collection that is optional would be made clear at the point of collection.

Marketing

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us, and data we collect when you use our services, or from third parties we work with.

We study this 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 can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business or commercial reason to use your information. It must not unfairly go against what is right and best for you.

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You can ask us to stop sending you marketing messages by contacting us at any time.

We may ask you to confirm or update your choices, if you take out any new products or services with us in future. We will also ask you to do this if there are changes in the law, regulation, or the structure of our business.

If you change your mind you can update your choices at any time by contacting us.

How long we keep your personal information

We will keep your personal information for as long as you are a client of Allander Print Limited.

After you stop being a client, we may keep your data for up to 1 year for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that apply to us.

We may keep your data for longer than 1 year if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

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How to get a copy of your personal information

You can access your personal information we hold by writing to us at this address:

Allander Print Limited, 4 East Telferton, Edinburgh, EH7 6XD.

Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

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We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it or, please contact us.

How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so.

How to complain

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you. Please let us know if you are unhappy with how we have used your personal information. You can contact us by email at enquiries@allander.com or telephone 0131 270 6000.

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to report a concern.

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Future formats for sharing data

The Data Privacy laws will change on 25 May 2018 when the GDPR comes into force. From that date you will have the right to get your personal information from us in a format that is portable can be easily re-used. You can also ask us to pass on your personal information in this format to other organisations.