

This Privacy Policy sets out the data processing practices of Propack Direct Mail Limited. Please note that all data thus captured will be used and held in accordance with the requirements of the Data Protection Act 2018.

Propack is a privately owned business established in 1996 and currently employs over 60 people. It supplies direct mail and other related services to clients in a number of business sectors, such as charity, automotive, government and financial services. Propack is registered with the Information Commissioner's Office as a data controller and is ISO 27001 accredited.

Propack Direct Mail Limited is the Data Processor. If you have any requests concerning your personal data or any queries with regard to how we handle your data you can contact the Compliance Manager by phone on 01484 550085, email [lyndsay.beaumont@wearepropack.co.uk](mailto:lyndsay.beaumont@wearepropack.co.uk)

or write to us at

Compliance Manager, Propack Direct Mail Limited, Units 4 & 5, Old Field House Park, Old Field House Lane, Huddersfield, HD2 1FA

## Purpose of processing your personal data

We may collect and process the following Personal Information about you:

- Information that you provide to us in your dealings with us. This includes information provided at the time of registering to use our site, or when you request further information from us
- We may also ask you for information when you enter a promotion conducted by us, or when you report a problem with our site.
- If you contact us, we may keep a record of that correspondence.
- Details of transactions you carry out through our site and of the fulfilment of your orders.
- Details we receive from credit reference and fraud detection agencies
- Details of your visits to our site including, but not limited to, traffic data, location data and the resources that you access.

We may hold Personal Information that you provide to us (such as on an application or registration form) or that we may obtain from another source (such as our suppliers, marketing organisations or credit reference agencies). This information may include your name, address, date of birth, gender, telephone numbers, email address, bank and credit/debit card information, occupation and employment data and details of how you use our products together with general information about the way you pay and manage your account. In the event that we undergo re-organisation or are sold to a third party you agree that your Personal Information may be transferred to that re-organised entity or third party for the purposes and subject to these Terms of Use.

Activity	Purpose of processing	Lawful basis
Making an enquiry	Dealing with your enquiries or requests	Consent/Legitimate interests
Selection of one of our services	Processing data or information to complete a mailing on behalf of a Client (Data Controller)	Contract

## The legal basis on which we rely

Consent – where you are relying on consent for some of your processing, explain which processing you are using consent for and how you will collect valid consent. Provide information on what you will do with the personal data in a clear and transparent way and that you will gain opt-in consent for each purpose of processing, i.e. each marketing channel, automated profiling, cookies etc

Compliance with a legal obligation, for example collecting personal data for the purposes of gift aid

Legitimate interests – which include commercial interests, individual interests or broader societal benefits

### 1. Marketing

We will never use the personal data you have provided us with for marketing purposes, nor will it be passed to any third parties for marketing purposes.

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 Jason Clough at [jason.clough@wearepropack.co.uk](mailto:jason.clough@wearepropack.co.uk)

or write to Jason Clough, Propack Direct Mail, Units 4&5 Fieldhouse Park, Old Fieldhouse Lane, Huddersfield. HD2 1FA.

### 2. Recipients/categories of recipients

In carrying out our business including our obligations to you, we may use sub-contractors. We will ensure that they respect your privacy and abide by all data protection laws.

### 3. Transfers to third countries

We will not transfer your personal data to a third country.

### 4. Retention periods

We will keep your personal data in connection with the services/products you have bought for 6 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 keep your contact details only to ensure that we do not contact you again for marketing purposes.

## 5. 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 a form of identity, such as a passport, driving licence, utility bill etc.

**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. If you want to know more about this right, the ICO has more guidance on their website: <https://ico.org.uk>

**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 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>

**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>

**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 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>

**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 the DP 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>

**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 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>

Right to object – you have the right to object to our processing of your personal data based on (i) legitimate interests, or for the performance of a task in the public interests/exercise of official authority (including profiling); (ii) direct marketing (including profiling); and (iii) for purposes of scientific/historical research and statistics.

(i) 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.

(ii) 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.

(iii) Scientific/historical research and statistics - your objection should be based on your particular situation. If we are conducting research where the processing is necessary for the performance of a public task, we can refuse to comply with your objection.

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>

Rights relating to automated decision making including profiling – you have the right in respect of automated decision making, including profiling. Where we carry out solely automated decision making, including profiling, which has legal or similarly significant effects on you, we can only do this if it is in connection with a contract with you, we have a right under law or you have provided your explicit consent. We will tell you if this happens and tell you how you can request human intervention or challenge the decision. 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>

## **6. 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 our Compliance Manager at the contact details above.

## **7. 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>

## **8. Cookies**

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>

We use cookies to identify you when you visit this website and to keep track of your browsing patterns and build up a demographic profile.

Our use of cookies also allows registered users to be presented with a personalised version of the site, carry out transactions and have access to information about their account.

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.

## COOKIES WE USE

Cookie	What it does	How to disable and consequences
Google analytics	tracks user activity	Users cannot accept cookies with the message that pops up on the site when using for the first time. Or switch cookies for the site off in their browser.
Cookie consent	accepts cookie use on first visit	
default php session cookie	tracks a user session	

## 9. Third party websites

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.

## 10. Changes to the privacy policy

This privacy policy is regularly reviewed and will be updated when necessary. If we make any significant changes to the policy we will communicate these to you.

# Force24 Cookies & Tracking

Our organisation utilises Force24's marketing automation platform.

Force24 cookies are first party cookies and are enabled at the point of cookie acceptance on this website. The cookies are named below:

- F24\_autoID
- F24\_personID

They allow us to understand our audience engagement thus allowing better optimisation of marketing activity.

## **f24\_autoid**

This is a temporary identifier on a local machine or phone browser that helps us track anonymous information to be later married up with f24\_personid. If this is left anonymous it will be deleted after 6 months. Non-essential, first party, 10 years, persistent.

## **f24\_personid**

This is an ID generated per individual contact in the Force24 system to be able to track behaviour and form submissions into the Force24 system from outside sources per user. This is used for personalisation and ability to segment decisions for further communications. Non-essential, first party, 10 years, persistent.

The information stored by Force24 cookies remains anonymous until:

- Our website is visited via clicking from an email or SMS message, sent via the Force24 platform and cookies are accepted on the website.
- A user of the website completes a form containing email address from either our website or our Force24 landing pages.

The Force24 cookies will remain on a device for 10 years unless they are deleted.

## **Other Tracking**

We also use similar technologies including tracking pixels and link tracking to monitor your viewing activities

### **Device & browser type and open statistics**

All emails have a tracking pixel (a tiny invisible image) with a query string in the URL. Within the URL we have user details to identify who opened an email for statistical purposes.

### **Link Tracking**

All links within emails and SMS messages sent from the Force24 platform contain a unique tracking reference, this reference help us identify who clicked an email for statistical purposes.