

## Privacy Policy

For the purposes of The General Data protection Regulation (“GDPR”) and UK data protection laws, the controller is Colourgen Limited (“we, “us”, or “our”).

### About this document

This privacy policy, together with our terms of website use (and any other documents referred to in it) sets out the basis on which we use and protect any information that you provide to us. This information may be collected via various methods of communication, including our website, post, email, telephone, fax, or in person.

The categories of persons from whom we may collect and use personal information include customers, suppliers, and employees. It may also include individuals from businesses who visit our website or who request information from us.

### The types of information we collect

We may collect the following types of personal information:

- Contact information, including email addresses, telephone and mobile numbers and postal addresses including post codes
- Financial information, including bank account details, debit and credit card details (identifiable personal information is not stored)
- Other information relevant to customer surveys, show visits or offers
- Information relevant to our provision of technical support to our service customers, including details regarding your printing equipment, hardware and software

### What we do with the information

Under the GDPR, we have a legal basis on which to collect personal information, process it, and control and store it as follows, including:

- Legitimate interest based on previous business transactions
- Performance of the contract
- Compliance of a legal obligation to which we are subject (HMRC)
- Occasionally when you have provided contact information and given consent

### Customers

- The personal data that you supply to us, which may include your own personal data (“Your Personal Data”), and the personal data of third parties to whom our products may be delivered (“Third Party Data”), is held by us and is kept confidential on our secure database.

- We will use Your Personal Data to provide you with our products and services (including enabling you to purchase our products and services and to arrange for delivery of our products to you or to a third party, and allowing you to access our website), for administration and accounting, for marketing, for our engineers to carry out service calls at your customers' premises, to respond to complaints and to ensure that the content of our website and the products and services that we offer are tailored to your needs and interests.
- We will use Third Party Data only for the purposes of delivering our products and services, to enable our engineers to carry out service calls, and to respond to any queries or complaints from the relevant third party.
- We only hold such personal data as you have provided to us, and we try to ensure that the personal data we hold about you is as accurate as possible.
- In the event that you place an order through our website you will be required to submit Your Personal Data and your account number with us. In placing the order you warrant to Colourgen that you have obtained (and you will continue to obtain) your customer personal data (our Third Part Data – delivery addresses, contact names and mobile numbers for delivery contact) in accordance with all relevant provisions of the Data Protection Legislation in such a way as to permit it to be lawfully used by Colourgen.

## Suppliers

- We will use your personal data to continue to communicate with you via the various methods noted previously under our legitimate interest or performance of the contract
- We will hold this personal data in digital form on our computer systems and back up devices (including the cloud), and printed form, such as purchase orders, emails, delivery notes, invoices etc.
- We will keep your personal data (as defined previously) secure

## Employees

- We will collect, use and store your personal data in line with our employee GDPR privacy policy which will be given to all current and new employees and is available to former employees on request.

## Other individuals or businesses

- We may collect and use your personal data if you supply it to us
- We may periodically send promotional or other information about new products and services if we have previously done so and if you have not 'opted out'
- We may send promotional or other information if you expressly consent to us doing so

## Sharing your information with others

We would not sell your personal data. We may share your personal data with another party including:

- A software vendor who is providing you with the software or technical support
- A supplier for registering warranties
- A delivery service for delivery of the product
- A supplier for information for their relationship directly with you as a reseller
- Service providers who may provide IT and system administration services
- Professional advisors including auditors, accountants, bankers, lawyers and insurers
- Government bodies including Her Majesties Revenue and Customs (HMRC)

## How we use cookies when you visit our website

Information about you may be stored in a cookie (a small text file that is placed on your computer when you visit our website).

Sending cookies is usual practice for any website that needs to remember what its users' preferences are and cookies are used to keep track of your choices and of any orders you place through our website.

Cookies are also used to gather analytical information such as counting the number of website visitors and the pages of our website most frequently visited in order to make your visits to our website more efficient.

If you want to delete any cookies that are already on your computer, please refer to the instructions for your file management software to locate the file or directory that cookies are stored in.

If you want to stop cookies being stored on your computer in the future, please refer to your browser manufacturer's instructions, but please note that you may not be able to access some parts of our website if you do. Further information about deleting or controlling cookies is available at [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

Please note that when you visit our website, we may also log your IP address or other information, which is used to gather location information and to indicate which businesses visited a given website. This is for analytical purposes only and does not include any information about the individual, unless our website is accessed from a home computer, We will keep these records for up to 2 years.

If your personal details change, please email us at [sales@colourgen.com](mailto:sales@colourgen.com) If you have any queries about how we use personal data, please contact us by writing to Colourgen Limited, The Amber Centre, Oldfield Road, Maidenhead, Berkshire SL6 1TH or by email on [gdpr@colourgen.com](mailto:gdpr@colourgen.com).

## **Links to other websites**

Our website may contain links to the websites of our suppliers. However, once you have used these links to leave our site, we do not have any control over that other website. Therefore we cannot be responsible for the protection and privacy of any information which you provide whilst visiting those websites.

## **International Transfers**

None of your personal information, shared or otherwise, is transferred out of the European Economic Area (EEA).

## **Data security**

We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation. We also allow access to your personal data only to those who have a business need to know such data. They will only process your personal data on our instructions and they must keep it confidential.

We have procedures in place to deal with any suspected data breach and will notify you and any applicable regulator of a breach if we are legally required to.

## **Data retention**

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

When deciding what the correct time is to keep the data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

For tax purposes the law requires us to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers.

In some circumstances we may anonymise your personal data for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## Your legal rights

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at [gdpr@colourgen.com](mailto:gdpr@colourgen.com).

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 or 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 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.

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.