

Data Protection Policy

What information do we collect about you?

We collect information about you when you register with us or place an order for products or services. We also collect information when you voluntarily complete customer surveys, provide feedback and participate in competitions. Website usage information is also collected.

The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you as follows:

- Identity data including name, username or similar identifier, marital status, title, date of birth and gender.
- Contact data including billing address, delivery address, email address and telephone numbers.
- Financial data including bank and payment details.
- Transaction data including details about payments to and from you and other details of products and services you have purchased from us.
- Technical data including internet protocol (IP) address, 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 our websites.
- Profile data including purchases or orders made by you, your interests, preferences, feedback and any survey responses.
- Usage data including information about how you use our website, products and services.
- Marketing and communications data including your preferences in receiving marketing from us and our third parties and your communication preferences.

How is your personal data collected?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - request information to be sent to you;
 - interact with us about business activities; or
 - provide us with feedback.

- Automated technologies or interactions. As you interact with our website, we may 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.
- Third parties or publicly available sources. We may receive personal data about you from various third parties as set out below:
 - Technical data from search engines and analytics providers.
 - Contact, financial and transaction data from providers of technical, payment and delivery services.
 - Identity and contact data from publicly available sources.
 - Information from our customers.

How will we use the information about you?

We collect information about you to process your order, manage your account and, if you agree, email, telephone or contact you by post about other products and services we think may be of interest to you. If you do become a customer it may be necessary to share your data with other organisations for the purposes of satisfying your order, e.g. logistic companies.

The bases for processing any personal data we hold about you are as follows:

- 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), by which we mean in the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience.
- Where we need to comply with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you electronically (see 'Marketing' below).

We may share your information with credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors. Beyond this, we will not disclose any information to any company outside James Cropper Plc except to prevent fraud or if required to do so by law.

Companies belonging to the Plc. include:

James Cropper Speciality Paper Ltd

Technical Fibre Products Ltd

James Cropper 3D Products Ltd

James Cropper Converting Ltd

Marketing

We would like to send you information about products and services which may be of interest to you. If you have consented to receive marketing, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes.

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.

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 requirements.

In some circumstances we may 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.

Access to your information and correction

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please email or write to us at the following address.

James Cropper Plc

Burnside Mills

Burnside

Kendal

LA9 6PZ

privacy@cropper.com

You will not have to pay a fee to access your personal data. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may 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 and keep you updated but comply in any event within 3 months of receiving your request (or any further information requested from you).

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

You have the following additional rights in relation to any personal data we hold:

- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. 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.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you or to a third party. 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.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

Changes to our privacy policy

We keep our privacy policy under regular review and we will place any updates on this web page. This privacy policy was last updated on 25/04/2018.