

GDPR009 Privacy Policy

How Paragon Graphic Services handles your personal data

Paragon Group UK Ltd (PGS) takes the privacy of your information very seriously. To ensure you are fully informed and to adhere to current legislation, this policy is designed to inform you about:

- **how** we collect and process your information,
- **why** we collect your information and
- **what** rights you have.

We may vary this policy from time to time and the current version will be published on this site. Through the policy, the words 'we' and 'us' refers to PGS [and its subsidiaries], unless otherwise indicated.

How we collect your information

You may submit personal information about yourself (for example, name and email address etc.) in order to receive or use services. When we collect this information, we will only do so over a secure connection. Any additional future use by PGUK of your personal data will be determined by your responses to the questions you are asked at the time your data is captured. These future communications may include marketing materials and sales promotional items.

You can rest assured that we will never pass your data to a third party for their own use.

Your rights

Under current legislation, you have many rights in respect of how we hold and use your data.

You have the right

- to know why we collect your data
- to ask for a copy of the information we hold on you
- to correct any inaccuracies
- to restrict how we process your data
- to ask us to stop processing your data
- to know if we use any profiling or automated decision making with your data.

Opting out of marketing communications

As a business contact, we will be holding, processing your data and contacting you under the legitimate interests provision of the General Data Protection Regulation (GDPR) and in line with Privacy and Electronic Communications Regulations (PECR), having undertaken an appropriate balancing assessment. However if you no longer wish to hear from us you can always easily opt out in the following ways:

- Contact us using DPO@servicegraphics.co.uk to opt out of any channels
- Unsubscribe from specific communications, for example email or SMS
 - Write to us at Data Protection Office, Paragon Group UK Ltd, 1 Onslow Street, London, EC1N 8AS.
- Inform your contact at Paragon who will pass your wishes on

If you want to complain

You have the right to complain about the way we have used your data. If this is the case, please contact our Data Protection Officer using the address below. If you are not satisfied with our response, you can also contact the Information Commissioner's Office on their website - www.ico.org.uk.

How we collect information about your visits to our website

When you visit our web pages, we will download a small file called a “cookie” to be stored on your computer’s web browser. This helps us personalise your web experience and remember you when you return and want to continue a task. Please view our cookies page to see full details of what cookies we use on the site, what these are used for and for how to disable them.

Our cookies provide us with non-personal statistical information about what you do on the website, for example: the duration of time a page was viewed, common paths taken through the site, data on screen settings and other general information. We may also collect information about what other websites you visit after ours. We use this data to improve the services on our site and to improve your experience of using our website.

First Party Cookies

These are cookies that are set by this website directly and include Google Analytics & other analysis tools

Google Analytics: We use Google Analytics to collect information about visitor behaviour on our website. Google Analytics stores information about what pages you visit, how long you are on the site, how you got here and what you click on. This Analytics data is collected via a JavaScript tag in the pages of our site and is not tied to personally identifiable information. We therefore do not collect or store your personal information (e.g. your name or address) so this information cannot be used to identify who you are. Additionally, we use Google Optimize to utilise our Google Analytics cookies to target content variants to a user and a content experiment cookie to determine a user's participation in an experiment.

You can find out more about Google’s position on privacy as regards its analytics service at http://www.google.com/intl/en_uk/analytics/privacyoverview.html

Drupal: Our websites run the popular Drupal CMS. Cookies are used to store basic data on your interactions with Drupal, and whether you have logged into Drupal. We use a session cookie to remember your log-in for you if you are a registered user and we deem these as being strictly necessary to the working of the website. If disabled, then various website functionality on the site will be broken. More information on session cookies and what they are used for at <http://www.allaboutcookies.org/cookies/session-cookies-used-for.html>

Hotjar: our websites use Hotjar, which is a tool that records and aggregates data on how visitors to our site use are using it. Hotjar uses cookies to collect non-personal information, so users cannot be personally identified. Examples of the type of information collected include, but are not limited to: pages visited, how pages are used and interacted with, type of device and browser used, and the country you are in.

For more information on Hotjar, how it collects data, what data it collects please and how to opt out of it collecting your information please read Hotjar's own privacy policy

Leadfeeder: We are currently trailing Leadfeeder on our website. This is a tool to track our website visitors. To know more, please view the privacy policy for leadfeeder here

Third Party Cookies

These are cookies set on your machine by external websites whose services are used on this site. Cookies of this type are the sharing buttons across the site allow visitors to share content onto social networks. Cookies are currently set by some or all of the following services: ShareThis, LinkedIn, Twitter, Facebook,



Google+ and Pinterest. In order to implement these buttons and connect them to the relevant social networks and external sites, there are scripts from domains outside of our website.

You should be aware that these sites are likely to be collecting information about what you are doing all around the internet, including on this website.

LinkedIn: The LinkedIn Insight Tag enables the collection of data regarding LinkedIn members' visits to our website, including the URL, referrer, IP address, device and browser characteristics (User Agent), and timestamp. This data is encrypted, the IP addresses are truncated, and members' direct identifiers are removed within seven days in order to make the data pseudonymous. This remaining, pseudonymized data is then deleted within 90 days.

LinkedIn does not share the personal data with PGS, it only provides aggregated reports about the website audience and ad performance. LinkedIn also provides retargeting for website visitors, enabling PGS to show personalised ads off its website by using this data, but without identifying the member. LinkedIn members can control the use of their personal data for advertising purposes through their account settings.

You should check the respective policies of each of these sites to see how exactly they use your information and to find out how to opt out, or delete, such information.

Users aged 16 and under

If you are 16 or under you must have permission from a parent or guardian before you give us personal information. If we find that we have received information from you without the appropriate consent, we reserve the right to remove all personal data that you have supplied. You will be able to re-submit the information when you have the required permission.

Processing purposes and legal basis

Your data will be processed under various legal bases based on the specific activity interests for the following purposes:

- Sales of product and services to customers – contractual obligation
- Maintaining our accounts and records – contractual obligation
- To send out service messages – legitimate interests
- Customer analytics and suppression – legitimate interests
- Legal or Enforcement – legal obligation
- for the purposes of security and prevention and detection of crime
- Outward Marketing communications – legitimate interests
- Requests for information, brochures etc. – your consent to allow us to fulfil your request
- Research activity we might undertake is covered by our legitimate interest

Request access

You may gain access to the PII (Personally Identifiable Information) data we hold on you by contacting us.



Correcting your data

If you believe any of the data we hold about you is incorrect or being misused, or want further information you may contact us.

Please address requests to:

Data Protection Officer
Paragon Graphic Services,
Unit 1 Potter Place,
Skelmersdale,
WN8

Or email to dpo@paragonuk.com

Restriction of processing

You can contact us and ask us to restrict the processing we perform with your data.

Automated decisions and profiling

Automated decision-making will not be used on any data supplied to us. Profiling we undertake on business contacts is based on the size of the company and the industry sector and the job titles of individuals. This may then be used within the marketing communication to make sure anything we send is relevant to you.

Erasing your data

You have the right to ask us to remove your data from all of our systems. If this is the case, where there is no reason not to (such as an outstanding contractual obligation) we will implement your request.

In all cases, please address requests to your contact at the respective Paragon business.

Recipients

The following types of people may have access to your data depending on their role within our business and the type of data being stored.

- Paragon Employees
- Central Government

Transfers

We will store your information on secure systems within PGUK offices or secure data centres in Europe.

Retention



We keep the data you give us for differing lengths of time depending on what data it is and the reason for its collection.

- Specific enquiry data – to fulfil the enquiry and for one year afterwards
- Customer data – for the length of the contract plus two years

Legitimate interest

We process your personal data for our legitimate business interests. Examples of this include fraud prevention, data analytics, marketing communications, research and improving our services.

When we process your data for our legitimate interests, we will always balance the benefits to you against those of our business to make sure we are compliant with data protection legislation.

Links to other websites

Our websites may contain links to other sites outside the group. Neither PGUK, nor its group companies, is responsible for the privacy and security of these sites. This privacy policy applies only to PGS and its group companies.

Details about PGS

Paragon businesses will appoint their own Data Protection Officer and they can be contacted by email or postal address as stated in the respective policy document.

The company number is 00551336 and the various businesses are registered with ICO under Z9590394, Z6227312, Z6941941, Z8482467, and Z9471827.

The Company number in Luxembourg is B226065.

Review History

06/07/2019 – Paragon Graphic Services rebranding

29/01/2021 – annual review, minor changes to reflect UK GDPR (DPA 2018).