

# PRIVACY POLICY AND USE OF COOKIES

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#### 1. Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how Langstane Press Ltd uses your data; for example we will explain things such as our credit checking procedure, and how we combine data to build a picture of you.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever your wish.

# 2. About Langstane

Langstane is a Limited company registered in Scotland, Registration Number SC062202. Our postal address and registered office is 1 Links Place, Aberdeen AB11 5DY. For simplicity throughout this notice, 'we' and 'us' means Langstane Press Limited.

#### 3. Explaining the legislation

The law on data protection sets out a number of different reasons for which a company may collect and process your personal data, including:

#### Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email communications

#### **Contractual obligations**

In certain circumstances, we need your personal data to comply with our contractual obligations.

For example, if you order an item from us for direct shipment, we'll collect your address details to deliver your purchase, and pass them to our courier (where applicable).

#### Legal compliance

If the law requires us to, we may need to collect and process your data.

For example, we can pass on details of people involved in fraud or other criminal activity affecting Langstane Press Limited to law enforcement.

#### Legitimate interest

In specific situations, we require your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests.

For example, we will use your purchase history to send you or make available personalised offers.

We also combine the shopping history of many customers to identify trends and ensure we can keep up with demand, or supply new products/services.

We will also use your address details to send you direct marketing information by email and post, telling you about products and services that we think might interest you.

#### 4. When do we collect your personal data?

- When you visit any of our websites, as a guest or use your account to buy products and services
- When you create an account with us.
- When you purchase a product or service in store or by phone but don't have (or don't use) an account.
- When you engage with us on social media.
- When you engage with us using our LiveChat facility
- When you contact us by any means with queries, complaints etc.
- When you ask one of our staff to email you information about a product or service.
- When you enter prize draws or competitions.
- When you book to attend an event, for example our Bi-annual Product Show.
- When you choose to complete any surveys we send you.
- When you comment on or review our products and services.
- Any individual may access personal data related to them, including opinions. So
  if your comment or review includes information about the member of staff who
  provided that service, it may be passed on to them if requested.
- When you fill in any forms. For example, if an accident happens which relates to Langstane Press Limited, a member of staff may collect your personal data.

# 5. What sort of personal data do we collect?

- If you have a web account with us: your name, billing/delivery address, orders and receipts, email and telephone number. For your security, our web provider will keep an encrypted record of your login password.
- Details of your interactions with us For example, we collect notes from our conversations with you, details of any complaints or comments you make, details of purchases you made, items viewed or added to your basket, brands you show interest in, web pages you visit and how and when you contact us.
- Details of your shopping preferences.
- Details of your visits to our websites or apps, and which site you came from to ours.
- Information gathered by the use of cookies in your web browser. Learn more about how we use cookies.

We'll only ask for and use your personal data collected for recommending items of interest and to tailor your shopping experience with us. Of course, it's always your choice whether you share such details with us.

- Payment card information.
- Your comments and product reviews.
- To deliver the best possible web experience, we collect technical information about your internet connection and browser as well as the country where your server is located, the web pages viewed during your visit, the advertisements you clicked on, and any search terms you entered.

• Your social media username, if you interact with us through those channels, to help us respond to your comments, questions or feedback.

# 6. How and why do we use your personal data?

We want to give you the best possible customer experience. One way to achieve that is to get the richest picture we can of who you are by combining the data we have about you.

We then use this to offer you promotions, products and services that are most likely to interest you.

The data privacy law allows this as part of our legitimate interest in understanding our customers and providing the highest levels of service.

Of course, if you wish to change how we use your data, you'll find details in the 'What are my rights?' section below.

Remember, if you choose not to share your personal data with us, or refuse certain contact permissions, we might not be able to provide some services you've asked for.

Here's how we'll use your personal data and why:

• To process any orders that you make by using our websites, sales team or in our shop facility. If we don't collect your personal data during checkout, we won't be able to process your order and comply with our legal obligations.

For example, your details may need to be passed to a third party to supply or deliver the product or service that you ordered, and we may keep your details for a reasonable period afterwards in order to fulfil any contractual obligations such as refunds, guarantees and so on.

- To respond to your queries, return requests and complaints. Handling the information you sent enables us to respond. We may also keep a record of these to inform any future communication with us and to demonstrate how we communicated with you throughout. We do this on the basis of our contractual obligations to you, our legal obligations and our legitimate interests in providing you with the best service and understanding how we can improve our service based on your experience.
- To protect our business and your account from fraud and other illegal activities.
   This includes using your personal data to maintain, update and safeguard your account. We'll also monitor your browsing activity with us to quickly identify and resolve any problems and protect the integrity of our websites. We'll do all of this as part of our legitimate interest.

For example, by clicking your password when you login and using automated monitoring of IP addresses to identify possible fraudulent log-ins from unexpected locations.

- To process payments and to prevent fraudulent transactions. We do this on the basis of our legitimate business interests. This also helps to protect our customers from fraud.
- With your consent, we will use your personal data, preferences and details of your transactions to keep you informed by email, web, text, telephone about relevant products and services including tailored special offers, discounts, promotions, events, competitions and so on.
- To send you communications required by law or which are necessary to inform you about our changes to the services we provide you. For example, updates to this Privacy Notice, product recall notices, and legally required information relating to your orders. These service messages will not include any promotional content and do not require prior consent when sent by email or text message.

If we do not use your personal data for these purposes, we would be unable to comply with our legal obligations.

- To administer any of our prize draws or competitions which you enter, based on your consent given at the time of entering.
- To comply with our contractual or legal obligations to share data with law enforcement.

For example, when a court order is submitted to share data with law enforcement agencies or a court of law

- To send you survey and feedback requests to help improve our services. These messages will not include any promotional content and do not require prior consent when sent by email or text message. We have a legitimate interest to do so as this helps make our products or services more relevant to you.
- To collect and recover money that is owed to us

# 7. How we protect your personal data

We know how much data security matters to all our customers. With this in mind we will treat your data with the utmost care and take all appropriate steps to protect it.

We secure access to all transactional areas of our websites using 'https' technology.

Access to your personal data is password-protected, and sensitive data (such as payment card information) is secured by SSL encryption.

We regularly monitor our system for possible vulnerabilities and attacks, and we carry out penetration testing to identify ways to further strengthen security.

# 8. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a nonidentifiable way for statistical analysis.

Some examples of customer data retention periods:

#### **Orders**

When you place an order, we'll keep the personal data you give us for seven years so we can comply with our legal and contractual obligations.

# 9. Who do we share your personal data with?

We sometimes share your personal data with trusted third parties.

For example, delivery couriers, technicians visiting your workplace. All outsourced rubber stamps, printed promotional products and printed matter and to help us share our offers to you and so on

Here's the policy we apply to those organisations to keep your data safe and protect your privacy:

- We provide only the information they need to perform their specific services.
- They may only use your data for the exact purposes we specify in our contract with them.
- We work closely with them to ensure that your privacy is respected and protected at all times.

• If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

Examples of the kind of third parties we work with are:

- IT companies who support our website and other business systems
- Operational companies such as delivery couriers
- Our email Provider who help us manage our electronic communication with you
- Google/Facebook/Linkedin to show your products that might interest you while you're browsing the internet. This is based on either your marketing consent or your acceptance of cookies on our website. See our Cookies Notice for details.

Examples of the kind of third parties we work with. (We will only do this in very specific circumstances), for example:

- For fraud management, we may share information about fraudulent or potentially fraudulent activity in our premises or systems. This may include sharing data about individuals with law enforcement bodies.
- We may also be required to disclose your personal data to the police or other enforcement, regulatory or Government body, in your country of origin or elsewhere, upon a valid request to do so. These requests are assessed on a case-by-case basis and take the privacy of our customers into consideration.

To help personalise your journey through Langstane we currently use the following companies/software, who will process your personal data as part of their contracts with us:

- Pinpointe
- PrintSmith
- Quoteworx
- Creditsafe
- Q-Pulse
- Sage Pay
- Google
- Facebook
- Twitter
- Linkedin
- You Tube

# 10. Use of cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Cookie	Purpose
ASP.NET_Session-Id	This cookie is used to determine who you are so when you add to your basket the items go into your basket and no-one elses.
_utmc	This cookies is used for the purpose of Google Tracking
_utma _utmb _utmc _utmz	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and pages they visited

# 11. What are your rights over your personal data?

An overview of your different rights

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- For example, when you withdraw consent, or object and we have no legitimate overriding interest, or once the purpose for which we hold the data has come to an end
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.

You have the right to request a copy of any information about you that we hold at any time, and also to have that information corrected if it is inaccurate. To ask for your information, please contact Marketing Manager, Langstane Press Limited, 1 Links Place, Aberdeen, AB11 5DY or email marketing@langstane.co.uk. To ask for your information to be amended, please update your online account, or contact our Marketing team.

If we choose not to action your request we will explain to you the reasons for our refusal.

#### Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

#### Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

#### **Direct marketing**

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

#### Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

# 12. How can you stop the use of your personal data for direct marketing?

There are several ways you can stop direct marketing communications from us:

- Click the 'unsubscribe' link in any email communication that we send you. We will then stop any further emails being sent.
- Write to the Marketing Manager, Langstane Press Limited, 1 Links Place, Aberdeen, AB11 5DY.

Please note that you may continue to receive communications for a short period after changing your preferences while our systems are fully updated.

### 13. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to <a href="www.ico.org.uk/concerns">www.ico.org.uk/concerns</a> (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

#### 14. Customers outside the UK

For all non-UK customers

By using our services or providing your personal data to us, you expressly consent to the processing of your personal data by us or on our behalf. Of course, you still have the right to ask us not to process your data in certain ways, and if you do so, we will respect your wishes.

Sometimes we'll need to transfer your personal data between countries to enable us to supply the goods or services you've requested. In the ordinary course of business, we may transfer your personal data from your country of residence to ourselves and to third parties located in the UK.

By dealing with us, you are giving your consent to this overseas use, transfer and disclosure of your personal data outside your country of residence for our ordinary business purposes.

This may occur because our information technology storage facilities and servers are located outside your country of residence, and could include storage of your personal data on servers in the UK.

We'll ensure that reasonable steps are taken to prevent third parties outside your country of residence using your personal data in any way that's not set out in this Privacy Notice. We'll also make sure we adequately protect the confidentiality and privacy of your personal data.

#### 15. Any questions?

We hope this Privacy Notice has been helpful in setting out the way we handle your personal data and your rights to control it.

If you have any questions that haven't been covered, please contact our Data Protection Officer who will be pleased to help you:

- Email us at marketing@langstane.co.uk
- Or write to the Marketing Manager, Langstane Press Limited, 1 Links Place, Aberdeen, AB11 5DY.
- This notice was last updated on 25/05/2018