

---

## PRIVACY NOTICE

---

### BACKGROUND:

Swan Mill Paper Company Limited understands that your privacy is important to you and that you care about how your personal data is used. We respect and value data privacy and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

#### 1. Information About Us

Swan Mill Paper Company Limited.

A company limited by shares incorporated and registered in England under company number 01752881.

Registered address: Swan Mill, Goldsel Road, Swanley, Kent, BR8 8EU.

Main trading address: As above

VAT number: 203463304.

Head of Data Compliance: Graham Rogers, Group Finance Director

Email address: [grogers@swantex.com](mailto:grogers@swantex.com)

#### 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

#### 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 6, below.

#### 4. **What Are My Rights?**

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 13 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 13.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

**5. Where Do You Collect My Data?**

We may collect your personal information directly from you, from a variety of sources, including:

- an application form for a product or service
- phone conversations with us
- emails or letters you send to us
- our online services such as websites and social media

We may also collect personal information on you from places such as:

- business directories and other commercially or publically available sources
- third parties such as recruitment agencies

**6. What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name;
- Date of birth;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Payment information;
- Information about your preferences and interests;

## 7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products to you. Your personal details are required for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract.
- Communicating with you. This may include responding to emails or calls from you.
- Where you have given your consent to the processing of your data for one or more specific purposes;
- The processing is necessary for compliance with a legal obligation to which we are subject to;
- Other applicable legal basis for data processing, especially provisions set out by member state law

With your permission and/or where there is a legitimate business interest and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and/or telephone and/or text message and/or post with information, news, and offers on our products. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

## 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Once our relationship has come to an end, we will either delete your personal data or anonymize your personal data, unless statutory retention requirements apply (such as for taxation purposes). We may retain your contact details and interests in our products or services for a long period of time if you have opted in to receive marketing materials. Also, we may be required by applicable law to retain certain of your personal data for a period of 10 years after the relevant taxation year. We may also retain your personal data after the termination of the contractual relationship if your personal data is necessary to comply with other applicable laws or if we need your personal data to establish, exercise or defend a legal claim, on a need to know basis only. To the extent possible, we will restrict the processing of your personal data for such limited purposes after the termination of the contractual relationship.

**9. Where Is My Information Processed?**

The majority of your information is processed in the UK and European Economic Area (EEA).

However, some of your information may be processed by us or the third parties we work with outside of the EEA.

Where your information is being processed outside of the EEA, we take additional steps to ensure that your information is protected to at least an equivalent level as would be applied by UK/EEA privacy laws.

**10. Do You Share My Personal Data?**

We may share your personal data with other companies in our group for the purposes of fulfilling a contract. This includes our holding company and its subsidiaries.

We may sometimes contract with third parties to supply products to you on our behalf. These may include freight agents/ hauliers and payment processors. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 9.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 9.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

**11. How do you protect my information?**

We take information and system security very seriously and we strive to comply with our obligations at all times. Any personal information which is collected, recorded or used in any way, whether on paper, online or any other media, will have appropriate safeguards applied in line with our data protection obligations.

Your information is protected by controls designed to minimise loss or damage through accident, negligence or deliberate actions. Our employees also protect sensitive or confidential information when storing or transmitting information electronically.

Our security controls are aligned to good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your information.

## 12. **How Can I Access My Personal Data?**

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 13. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 21 days and, in any case, not more than one month from the date of receiving the request. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 13. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details for the attention of Graham Rogers, Group Finance Director. Email address: [grogers@swantex.com](mailto:grogers@swantex.com).

## 14. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our [website](#).