



# CPI Privacy Policy

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## WHAT IS IT ABOUT?

At CPI Group, privacy is an important issue and we are committed to protecting it.

In accordance with the General Data Protection Regulation ("GDPR"), this policy sets out when, why and how our Group entities:

- Collect personal data relating to a physical person;
- Use such information;
- Disclose such data to a third party, where necessary and under certain conditions;
- Maintain the confidentiality of such personal data.

## HOW THIS POLICY MAY CHANGE

This policy may change from time to time, so please check our internet site [www.cpi-print.com](http://www.cpi-print.com) for the most recent version.

This policy was last updated on 05 July 2022.

## WHO WE ARE

The CPI Group (hereinafter the "Group") is made up of many autonomous entities. In your dealings with any of our Group companies, the "controller" of your personal data will be the company that decides the "why" and "how" of the processing of that data (hereinafter the "Company").

In this statement, unless otherwise stated, the use of the words "we", "us" or "our" refers to that particular Company, which is identified as the data controller of your personal data.

Each entity of the group remains responsible for respecting the protection of personal data in accordance with its local legislation. Consequently, in the event of conflict between the policies of the "Company" and this "Group" privacy policy, the local national "Company" privacy texts will prevail.

This Privacy Statement supplements and is not intended to replace any of the Company standard Sales Terms and Conditions.

CPI is the data controller and responsible for your personal data. It may also be a processor of your data.

Each Group entity complies with local rules regarding the obligation to appoint a Data Protection Officer ("DPO"). Each manager within each CPI company is responsible for ensuring compliance with privacy laws in the department they control. The implementation of the European Data Protection Directive in the respective member states in which the CPI Group operates, ensures the application of the national legislation on data protection (for example in Germany the Data Protection Regulation – DSGVO). The implementation in the UK ensures the application of the Data Protection Act.

A CPI Group Data Protection Watchdog Committee is in place to oversee that each CPI entity/division that processes the personal data of its staff, customers, suppliers or any other person, does so in compliance with the applicable data protection/GDPR rules. The Committee's role is to provide recommendations and support.

## HOW AND WHAT PERSONAL DATA IS COLLECTED

We may collect and process the following personal data:

**Personal data that you provide to us:** this is information that you voluntarily provide to us by entering information via:

- ✓ One of our websites;
- ✓ Our company applications including all order platforms, customer platforms, supplier platforms
- ✓ Social networking platforms;
- ✓ Electronic Data Interchange ( e.g. csv, xml, API) including a request for information or a request for a quote or order, whether for yourself or your employer or client.
- ✓ Our cloud service platforms provided by 3rd parties
- ✓ Correspondence with us by telephone, email, fax or any other means including a request for information or a request for a quote or order, whether for yourself or your employer or client.

Example: This includes, but is not limited to: information provided when you place an order or request for quotation or RFP (Request For Proposal) response; information provided in connection with creating a user account on our websites, subscribing to services we make available to you via our websites, posting documents or requesting additional services; or in connection with managing your online account (including accessing documentation and corresponding with us by telephone, e-mail or otherwise). We may also ask you for information if you report a problem with our websites, or if you participate in our surveys and polls conducted for research purposes.

We may collect, use, store and transfer various types of personal data about you, which we group as follows:

- ✓ Identity data including first name, last name, user name or similar identifier;
- ✓ Contact data including postal addresses, email addresses and telephone numbers;
- ✓ Financial data including credit reference reports, payment history and bank details;
- ✓ Transaction data including details of enquiries and orders for goods and services relating to those enquiries and orders, billing enquiries;
- ✓ Dispute resolution data;
- ✓ Information about an enquiry you have made to us, which may also include records of our correspondence and your responses to various surveys.

### **Personal data about you that we may collect automatically:**

- Information relating to your transactions on the websites and your visits to our websites, including but not limited to: traffic data, location data, weblogs and other communication data, and the resources you access;
- Technical information, automatically collected, including anonymous data collected by the hosting server for statistical purposes, the Internet Protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. See the section on cookies for more information;
- Any personal data, which you allow to be shared, that is part of your public profile or a third party social network.

**Personal data we may receive from other sources:** we obtain certain personal data about you from sources outside our Company, including from other entities in our Group or from other third party companies.

The other provisions of this policy also apply to all personal data we obtain from these sources.

## WHY AND HOW WE USE YOUR PERSONAL DATA

**We process your personal data lawfully** in order

- To ensure communication and/or exchange of information with the users of our websites;
- To manage our relationship with our customers and prospects, in particular in the context of processing your orders, responding to your requests or sending you regular news and information about our products, brands or initiatives that may be of interest to you;
- Or for any other purpose specified at the time of collection of your data;
- In general, to manage the working relationship with the employees of the Group's companies and to respond to their requests.

**We use and process your personal data mainly under the following conditions:**

- ✓ When you have expressed your free and explicit **CONSENT**, for specific, explicit and legitimate purposes.  
You can withdraw your consent at any time by contacting us.
- ✓ Where the processing is necessary for the pursuit of our **LEGITIMATE INTERESTS** as a business, provided that your interests or fundamental rights and freedoms are not overridden by the reasonable expectations you have of us.

For example, for the following purposes:

- Carrying out direct marketing activities (other than those based on your consent) such as analysis to refine our marketing strategy and to improve and personalise your user experience;
- Detecting, preventing and reducing fraud or other illegal activities;
- Network and information security enabling us to take steps to protect your data from loss or alteration, theft or unauthorised access;
- **Where we are required to COMPLY with a LEGAL REQUIREMENT**, including:
  - To assist a public authority or body with an investigation;
  - To identify you in the event that you contact us, in accordance with certain legal requirements;
  - To check the accuracy of the data we hold about you;
  - To deal with any unlawful situation reported by the Group's alert system.
- **Where the processing is necessary for the PERFORMANCE OF A CONTRACT** between us or where you request us to take specific action prior to the conclusion of a contract, including processing the information necessary to enable you to use our websites and the services we offer through them;



## WHO MAY RECEIVE OR ACCESS YOUR PERSONAL DATA

### Group entities

We may share information about you with other companies within the CPI Group for internal administrative or marketing purposes in relation to products and/or services which complement their own range of products and/or services which may be of interest to you.

We may also pass on your personal data if we need to redirect your enquiry to our contacts within the Group who can deal with it (for example, to resolve a problem you have reported to us).

### Our suppliers and service providers

We may disclose information about you to external providers, agents, contractors and other organisations to enable them to provide services to us or to provide services directly to you from us. These third parties may include cloud providers (including hosting and email management) or advertising agencies, administrative services, credit providers, credit and debit card payment processing services, customer satisfaction surveys or other third parties who provide services to us and assist us in carrying out our business and operating our website.

Where we use external service providers, we will only disclose the personal data necessary for their services and we will have a contract in place that requires them to keep your information secure and confidential and not to use it for any other purpose that does not comply with our specific guidelines.

Other ways we may share information about you

### We may transfer your personal data:

- In connection with a transfer of some or all of our business and assets to a third party or as part of a corporate reorganisation or restructuring;
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, subpoena, court order or government regulation, to detect or report a crime, to enforce or apply the terms of our contracts, or to protect the rights, property or safety of our visitors and customers;
- To enforce applicable terms of use, to preserve the rights, including privacy, property or safety, of our companies;
- If you have consented to such disclosure.

However, in all of these cases, we will always take appropriate steps to ensure that your privacy rights are protected.

## WHERE YOUR PERSONAL DATA IS STORED

Your information is stored either in our databases or in the databases of our service providers. Mainly due to the international dimension of the CPI Group and in order to optimise the quality of the services, the information you make available to us may, if necessary, be transmitted to countries outside the UK and the European Economic Area (UK + EEA).

In this case, we will ensure that appropriate security and confidentiality measures are taken to ensure that your privacy rights are maintained as set out in this policy. These measures may include imposing contractual obligations on the recipient of your personal data or ensuring that recipients have signed up to "international frameworks" aimed at ensuring sufficient protection of your data.



## HOW LONG WE KEEP YOUR PERSONAL DATA

We only keep your personal information for as long as it is necessary for the purposes for which it was collected and to meet our various legal and regulatory obligations. Except in special cases, this period is indicated at the time of collection of your personal data.

We do not keep personal data in a format that makes it possible to identify the holder for longer than is necessary for the purposes for which it was collected.

## WHAT ARE YOUR RIGHTS

Subject to applicable laws and certain exemptions, restrictions and circumstances, you may be entitled to:

- Access your personal data;
- To correct, amend and update your personal data;
- To delete your personal data or restrict its processing;
- To withdraw your consent;
- To object to our use of your personal data to make automated decisions about you;
- To ask us to transfer your personal data to you in a structured file or to a service provider that you indicate to us if this is technically possible (data portability);
- To lodge a complaint with the competent supervisory authority and to have recourse to the courts.

These rights can be exercised by sending a written request to the contact persons whose details will be indicated at the time of collection of your data. You will receive a reply within a reasonable time, in accordance with the applicable laws.

## HOW WE ENSURE THE SECURITY AND CONFIDENTIALITY OF YOUR DATA

We aim to keep your data secure at all times during processing. Upon receipt of your personal data, we put in place appropriate technical and organisational measures and controls to prevent, as far as possible, any accidental or unlawful destruction, loss, alteration, disclosure or unauthorised access.

## HOW COOKIES WORK

Like many other websites, our websites use cookies (including Google Analytics cookies) to gain an overall picture of our visitors' volumes and preferences as they browse our websites.

"Cookies" are small pieces of information sent to your device and stored on its hard drive to enable our websites to recognise you when you visit.

You can block these cookies by adjusting your browser preferences. For more information on our use of cookies and how to block them on your device, please refer to the applicable cookie policy for the website concerned.

## CONTACT US

Please direct any enquiries about this policy to the email address [privacy@cpi-print.com](mailto:privacy@cpi-print.com).

If you wish to write to us, please contact the address given in the Legal Notice on our website [cpi-print.com](http://cpi-print.com).