

This Privacy Policy sets out how **Kite Environmental Solutions Limited** will process your personal data that you may provide to us or that we may collect from you when you visit our website **packagingregs.co.uk**.

Kite Environmental Solutions is committed to ensuring that your privacy is protected and will only process personal data in accordance with this Privacy Policy.

### Contact details

If you have any questions our contact details are:

Kite Environmental Solutions Limited  
186 Torrington Avenue  
Tile Hill  
Coventry  
CV4 9AJ

Telephone: 024 7642 0080  
E-mail: [gdpr@packagingregs.co.uk](mailto:gdpr@packagingregs.co.uk)

### The information we collect

We process personal data including and not limited to:

- Name and job title
- Contact information including e-mail address and telephone number
- Financial information including credit card and/or debit card information
- Invoice and delivery addresses
- Demographic information such as postcode and preferences

### Legal grounds for processing your information

We will rely on the following legal bases under GDPR to process your personal data:

1. Consent
2. Performance of a contract
3. Legal obligation
4. Vital interest
5. Public interest or exercise of official authority
6. Legitimate interest pursued by Kite Packaging, as a data controller, or a 3<sup>rd</sup> party

### How we collect your information

#### Voluntary Information

You may provide us this information when completing forms and contracts, corresponding via the telephone, e-mail or live chat, or we may meet you at an event or exhibition.

#### Involuntary information when you visit our website

We may gain information that we gather through our monitoring of visits to our website. We use Google Analytics and cookies in order to improve our service, user experience and to analyse how the

website is used. Aside from the approximate location (IP address), the information collected is mostly anonymous traffic data including browser information, device information and language. We do not collect any additional information which could be classified as personal via these means.

#### Cookie Policy

For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy:

[http://packagingregs.co.uk/KES\\_Cookie\\_Policy\\_2018.pdf](http://packagingregs.co.uk/KES_Cookie_Policy_2018.pdf)

#### **How we process your information**

We collect and process data for the following reasons:

- to ensure we can fulfil our service levels to a high standard
- internal record keeping
- to improve our products and services
- to ensure that our website is presented in the most effective manner
- to meet our legal requirements as a UK registered business
- to communicate with our partners
- to market our products and services (see Marketing below)

We will also provide information to 3<sup>rd</sup> parties, when it is necessary for us to fulfil your service requirements. These include, but are not limited to, 3<sup>rd</sup> party carriers for the delivery of goods and secure payment gateway services.

We will only process your data in the UK. In all circumstances the information obtained will be retained and utilised in accordance with all relevant laws, in particular the Data Protection Act 2018 and GDPR.

#### **Marketing**

We may from time to time contact you to make you aware of new products and services, unless you explicitly request us not to do so.

If you no longer wish to receive such communications, you can opt out by clicking the unsubscribe link at the bottom of any Kite Environmental Solutions marketing e-mail.

If you are a new customer, you can opt out of email communications at the new customer billing stage of the basket. This will ensure we do not send you promotional material via email.

We will never share your name and contact details with 3<sup>rd</sup> parties for marketing purposes. We do use 3<sup>rd</sup> party service providers to send out marketing material but only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and to comply with data protection legislation.

#### **Data security**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your information.

How do we protect your personal data?

- We treat your data with care and take all steps to protect it
- Access to our websites is password protected
- Sensitive data is secured by SSL encryption
- Our systems have a very high level of security
- We carry out regular penetration testing to identify ways to further strengthen our security
- We monitor our systems for any intrusions
- We will notify you and any applicable regulator of a suspected breach as required by law

### **Data retention**

We collect and store data for the purposes of all our business operations and to provide service to our customers.

How long will we keep personal data?

- For active customers we will retain data for as long as you remain active
- For inactive customers we will retain data for marketing purposes; however we will anonymise your personal data so that it can no longer be associated with you, and in such case we may use such information without further notice to you
- On request of an 'unsubscribe' or a specific request not to be contacted, personal data will be transferred to a suppression list
- We will keep personal data in our database for our own internal records

### **Your rights**

You have the right to:

- Receive disclosure of any of your personal data that we store and process
- Update/amend inaccuracies or changes to your data
- Opt out of e-mail marketing by clicking the unsubscribe link at the bottom of any Kite Packaging email communication
- Request for processing of your personal data to be restricted
- Be informed of what lawful basis we are relying on for the processing of your personal data
- Be forgotten (have your personal data deleted); however we would recommend that we suppress you from future communications, rather than delete your data from our database

If you wish to review, verify, correct or request the erasure of your personal data, object to the processing of your personal data, withdraw the consent to the processing of your personal data or request that we transfer a copy of your personal data to a 3<sup>rd</sup> party, please contact our Data Protection Representative Andy Fay on [gdpr@packagingregs.co.uk](mailto:gdpr@packagingregs.co.uk). We will respond to the request as soon as we can. Generally this will be within one calendar month from when we receive your request but on occasions it may take longer to deal with your request and in such circumstances we will let you know.

### **Links to other websites**

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that

other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

**Automated Decision Making**

We do not use any form of automated decision making in our business.

**Changes to this Privacy Policy**

Any changes we make to our Privacy Policy in future will be posted on our website and where appropriate notified to you by e-mail or otherwise.