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## PRIVACY NOTICE

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### BACKGROUND:

Fenner 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 the privacy of all of our business contacts, enquirers and potential customers; customers and clients; suppliers and service providers; advisers, agents, consultants and other professional experts, 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

Fenner Paper Company Limited.

Limited Company registered in England under company number 01934207.

Registered address: 15 Orchard Business Centre, Sanderson Way, Tonbridge, Kent TN9 1QF.

Address: as above.

VAT number: GB 426 7552 38.

Data Protection Officer: Carol Wood, email: [dpo@fennerpaper.co.uk](mailto:dpo@fennerpaper.co.uk)

Telephone: 01732 771100.

Postal Address: as above.

We are registered with the Information Commissioner's Office.

#### 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 5, 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 11 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. Part 6 explains more about how we use your personal data, including profiling.

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 11.

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. **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, including Title;
- Gender;
- Registered Address, Trading Address and/or Delivery Address(es);
- Email, Social Media Information and Website;
- Telephone Number(s) including Mobile;
- Business Name and Type;
- Job Title;
- Payment Information and/or Banking Details;
- Purchase and/or Enquiry History and/or Dummy/Sample Requests.

Some personal data is obtained from third parties:

- Paper Merchant Credit References.

## 6. **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 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 the following purposes:

- Providing and managing your account.
- Supplying our products and/or services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and/or services for you.
- Communicating with you. This may include responding to your emails or calls.
- Supplying you with information by email and/or post (you may unsubscribe or opt-out at any time by using the details in Part 11).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by post, email and/or telephone with information, news, and offers on our products and/or services. 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.

We use the following automated system for carrying out basic profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact us to find out more using the details in Part 11.

- The following automated profiling may take place:  
filtration by type (e.g. printer, designer, greetings card publisher) or other appropriate business demographics, to identify and assist with accurately targeting marketing activity for relevant paper and related products to that which a data subject has expressed an interest and/or from purchase history, and what could reasonably be expected, with the aim of the data subject purchasing or negotiating to purchase products and/or services, and/or making recommendations to their customers and clients. The legal bases for this is consent and/or legitimate interests using a soft opt-in.

## 7. **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. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- If you make an enquiry; request samples or dummies; place an order with us; or supply paper, related products or services, we may keep your personal data for up to ten years to enable us to communicate with you and efficiently run our business and/or comply with the necessary periods for keeping financial records, or longer if we are legally obliged to do so;

- If you do not have a credit account with us and you pay by credit or debit card we will not keep your payment details after the payment has been approved by your card provider. You will, therefore, need to provide your payments details each time you make a purchase from us.
- If your account is inactive for ten years or more, we will contact you to ask whether you want to keep it open, and if you do not, we will delete or anonymise as much personal data associated with it as possible, unless we are legally required not to do so.

## 8. **How and Where Do You Store or Transfer My Personal Data?**

We will only securely store or transfer your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

## 9. **Do You Share My Personal Data?**

We may contract with third parties to supply products and/or services to you on our behalf, and these may include payment processing, marketing and delivery. In some cases, third parties may require access to some or all of your personal data that we hold. Only data specific to the task in hand will be provided.

- Suppliers of paper and paper related products and services, including personalised direct marketing and fulfilment;
- IT companies who offer maintenance services and system support;
- Logistics and transport companies;
- Trusted online card payment processors, such as Worldpay.
- Forest Stewardship Council (FSC) regarding chain of custody (CoC) certification to provide ‘proof from forest to end-user’.

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 8.

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, reporting and investigating fraudulent behaviour, a court order, or the instructions of a government authority.

## 10. **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 11. 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 as soon as possible and, in any case, not more than one month of receiving it. 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.

#### 11. **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 the Data Protection Officer):

Email: [dpo@fennerpaper.co.uk](mailto:dpo@fennerpaper.co.uk)

Telephone number: 01732 771100.

Postal Address: Fenner Paper Company Limited, 15 Orchard Business Centre, Sanderson Way, Tonbridge, Kent TN9 1QF.

#### 12. **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 request and on our website, [www.fennerpaper.co.uk](http://www.fennerpaper.co.uk)