



Customer Privacy Notice

Reference: Personal information held by us

Impro are committed to complying with the General Data Protection Regulation and the Data Protection Act 2018. Looking after the personal information you share with us is very important, and we want you to be confident that your personal data is kept safely and securely and to understand how we use it to offer you a better and more personalised service.

This privacy notice tells you what to expect when Impro collects personal information. It applies to information we collect about people who use our services and visitors to our website.

The company collects and processes personal data relating its customers and suppliers to manage the business relationship. The company is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

We review our privacy notice regularly and will place any updates on this page. This privacy policy applies only to Impro and its website.

This Privacy Notice outlines:

- how and why we collect information from you;
- who we share your information with, why and on what basis; and
- what your rights are.

What information does the company collect?

Customers and Suppliers of Impro

We hold details of people who have requested our services in order to provide them with quotations or printed orders. We also hold details of people who provide us a service. The data that we keep on record may include your name, company name, contact details (including email address, telephone information) and details of your bank information. In some cases, the company may collect data about you from third parties, such as references supplied by other suppliers. Please do not provide us with information if you do not want it stored.

Visitors to our website

When someone visits our website we collect standard internet log information and details of visitor behaviour patterns. We do this to find out things like the number of visitors to the



various parts of Impro's website. We collect this information in a way which does not identify anyone.

The tool we use to analyse visitor patterns uses 'cookies', which are text files placed on your computer to collect information. You can decide if you want to accept or reject cookies by changing the settings on your browser.

We will not associate any data gathered from our site with any personally identifying information from any source.

Data will be stored in a range of different places, including on our MIS system, our accounts system and IT systems (phone and email).

Why does the company process personal data?

The company needs to process data to enter into a customer contract and to meet its obligations under an order. For example, it needs to process your data to provide you with a quotation, a purchase order, an order and/ or an invoice and to pay you in accordance with your terms.

In other cases, the company has a legitimate interest in processing personal data before, during and after the end of the relationship. Processing data allows the company to:

- maintain accurate and up-to-date records and contact details (including details of who to contact);
- ensure effective business administration;
- provide references on request for current customers and suppliers
- respond to and defend against legal claims; and
- aid promotional activities - Impro may send you marketing information by email.

Opt-out to disclosure of personal information

If you do not want your details to be used in any of the ways described above, please tell us. Please note that it may not be possible to provide some Impro services if you do not allow us to disclose information provided to us.

You can opt out at any time from receiving marketing material by emailing sales@impro.co.uk and stating 'Opt Out' in the subject line.



Who has access to data?

Your information may be shared internally, with managers within the business if access to the data is necessary for performance of their roles.

The company also shares your data with third parties that process data on its behalf, in connection with delivery (e.g. courier and mailing companies), with financial information (e.g. accountants, banking) and with the provision of other services (e.g.IT).

The company may share your data with third parties with regards to references from/ for other companies. The company may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

The company will not transfer your data to countries outside the European Economic Area.

As required by law, we may disclose information to government bodies and law enforcement agencies for their enforcement purposes.

We will never pass on information other than for the purpose for which it was provided to us and we will not sell your personal information.

How does the company protect data?

The company takes the security of your data seriously. The company has internal controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. The data security policy outlines these controls including password protected systems and documents with system restrictions.

Where the company engages third parties to process personal data on its behalf, they do so on the basis of instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Information will be destroyed in line with the data retention schedule.

For how long does the company keep data?

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws.



We may need your personal information to establish, bring or defend legal claims. For this purpose, we will always retain your personal information for 7 years after the date it is no longer needed by us for any of the purposes listed.

- the law requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law;

The periods for which your data is held are set out in the Data Retention spreadsheet.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the company to change incorrect or incomplete data;
- require the company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where the company is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact caroline@impro.co.uk

Complaints or queries

If you believe that the company has not complied with your data protection rights, or if you think that our collection or use of information is unfair, misleading or inappropriate, please contact us in writing at Data Complaints & Feedback, Impro Printing Limited, 41 Dargan Road, Belfast, BT3 9JU or send an email to caroline@impro.co.uk. We'll provide a response within 30 days if not sooner. There's normally no charge for exercising any of your rights.

If you're not satisfied with our response you can complain directly to the Information Commissioner.