



STM PACKAGING GROUP

PRIVACY POLICY

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| Prepared by; | Frances Plant, Group HR Manager |
| Approved by Board on date; | 27 th April 2018 |
| Effective from; | 01 st May 2018 |
| Review date; | 01 st May 2019 |

This policy is written for STM Packaging Group Ltd and all its subsidiary companies (Sefton Transmail, The Polythene Company, Shirlpass, Packaging Products Online).

1. INTRODUCTION

STM Packaging Group Ltd may gather and use certain personal information about individuals during the course of its business operations. Personal information may be used from customers, suppliers, business contacts, employees and other people the organisation has a relationship with or may need to contact.

Our Privacy Policy details the practices we use in connection with the information that we collect through our website www.stmpackaging.com, and any other websites managed by us. It also covers how we will use and store any personal information collected through emails, verbal communication and by post.

This policy is in line with the Data Protection Act 1998, and the General Data Protection Regulations (GDPR) effective 25th May 2018.

We may change and update our policies from time to time to ensure we remain compliant and up to date.

2. INFORMATION ABOUT OUR CUSTOMERS

At STM Packaging Group Ltd we handle information relating to our customers or their end users as a service provider. Our use of such information is governed by our agreements with our customers. In addition, such information may be subject to our customers' own privacy policies. Our Privacy Policy does not apply to such information.

3. PERSONAL INFORMATION

"Personal Information" is information that identifies you as a living individual, including but not exclusive to; name, postal address, email address, telephone number, website URL(s), payment details, IP address, identification number or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

For us to provide the requested services to you we may need to collect and process Personal Information. We may also need to do so for legal reasons. If you do not provide the information that we request, we may not be able to provide you with the requested services.

4. OUR PRINCIPLES

- We will only collect and use your information where we have legitimate and lawful reasons for doing so.
- We will be transparent in our dealings with you and tell you how we will use your information.
- If we collect your information for a particular purpose we will only use it for that purpose.
- We won't ask for more information than we need for the purposes for which we're collecting it.
- We will update our records when you tell us that your details have changed.
- We will periodically review your personal information to ensure we don't keep it for longer than is necessary.
- We will ensure that your information is securely disposed of at the end of the appropriate retention period.
- We will observe your rights under applicable privacy and data protection laws and will ensure that queries relating to privacy issues are dealt with promptly and transparently.
- We will train our staff on their privacy obligations.
- We will ensure we have appropriate physical and technological security measures to protect your information regardless of where it is held.

5. HOW WE COLLECT PERSONAL INFORMATION

We may collect personal information about you in the following ways:

- When you apply to us about our products
- When you talk to us on the phone or in any face to face communications
- When you use our websites or social media apps
- In emails and letters
- In customer surveys

We will ensure that you are aware of any information that we collect on you and the purpose of which we are doing so.

6. USE OF PERSONAL INFORMATION

We use Personal Information for our legitimate business interests, including the following:

- To respond to your enquiries, fulfil your requests and provide you with related customer services
- To manage your account and provide invoices for work carried out
- To contact you about relevant product offers, business updates and information
- To develop and carry out marketing activities
- We may disclose your personal data to any member of our group of companies insofar as is reasonably necessary for the purpose of legitimate business interest.
- To make and manage customer payments
- We may share financial transactions with our payment services providers. Any information shared will only be for the extent as necessary for dealing with payments and refunds.

7. OTHER INFORMATION WE COLLECT

"Other Information" is any information that does not reveal your specific identity or does not directly relate to an identifiable individual, such as:

- Browser and device information
- Information collected through cookies, pixel tags and other technologies

- Demographic information and other information provided by you that does not reveal your specific identity
- Information that has been aggregated in a manner such that it no longer reveals your specific identity are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Policy.

8. RETAINING AND DELETING PERSONAL DATA

Personal data that we process for any purpose shall not be kept for longer than is necessary.

We will keep your personal data for the duration that you are a customer with us, keeping this data secure and accurate throughout this time.

Payment details will not be retained. Credit card details are taken for the purpose of the single transaction and are destroyed immediately afterwards.

After you stop being a customer with us we may keep your data for the purpose of responding to any questions or complaints and to demonstrate that we treated you fairly during this time. During this time we will store your data securely, and when we will delete your data we will do this in a secure way.

9. COOKIES

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. STM Packaging Group Ltd uses cookies to help us identify and track visitors, regarding their usage on our website (www.stmpackaging.com), and their website access preferences. STM Packaging Group Ltd website visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using our websites, with the drawback that certain features of our websites may not function properly without the aid of cookies.

10. PROTECTING INFORMATION

STM Packaging Group Ltd do not rent or sell potentially personally-identifying information to anyone and will only disclose this information for legal reasons and if required by law.

11. MARKETING & COMMUNICATION

STM Packaging Group Ltd keep customers up to date with company news, offers, updates or invites. We will ask you first before sending you marketing emails and require you to confirm through opting in if you would like to receive these before we send them. If you do confirm that you would like to receive company news, offers, updates or invites from us you can still change your mind at any time by unsubscribing via the link included within all of our communications.

We are committed to only contacting you where we feel we have a legitimate reason to do so. We will not bombard you with emails or phone calls.

STM Packaging Group Ltd may still send you important administrative messages (these include accounting emails) which you cannot opt out of. We may also send direct emails via third parties, regarding legitimate business interests in order to respond to your enquiries, fulfil your requests and provide you with related customer services whilst managing your account (customers we are working with).

12. THIRD-PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the services link. The inclusion of a link on the services does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organisations, such as Facebook, Twitter, Instagram, Pinterest, LinkedIn, Apple, Google, Microsoft, RIM or any other developer or social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organisations through or in connection with our Social Media Pages.

13. SECURITY

We seek to use reasonable organisational, technical and administrative measures designed to protect Personal Information within our organisation. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, then you must contact us immediately.

The transmission of information via the internet or email is not completely secure. Although we will endeavour to protect your information we cannot guarantee security and therefore please note anything transmitted via the internet is at your own risk.

14. HOW YOU CAN ACCESS, CHANGE OR WITHDRAW CONSENT

If you would like to request to review, correct, update, suppress or delete Personal Information that you have previously provided to us, you may make this request by email to HR or the Managing Director. You may request to make any changes or delete your data at any time.

Should you send a request, you must ensure that you make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we will only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. As mentioned should you wish to opt out of our emails at any time please click the unsubscribe link at the footer of the email and your email address will be removed. Please note this may take up to 48 hours to process.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed unless asked to do so.

If you have any specific concerns about the way we handle your personal data, you can contact the [ICO](#) or raise a complaint.

15. SERVICES BY MINORS

The services that we provide are not directed to individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from individuals under sixteen (16). We do

not offer work experience, placement in our offices or employment to anyone under the age of sixteen, thereby no longer having a need to keep data of minors.

16. SENSITIVE INFORMATION DISCLOSURE

STM Packaging Group Ltd ask that you not send us, and you not disclose, any sensitive Personal Information (e.g. information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the services or otherwise to us.

17. UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy at any time. The last updated version of this document as to when it was last revised is included at the top of the document.

18. HOW TO CONTACT US

If you have any questions or queries about this policy or data protection you can email us at STMSales@stmpackaging.com or contact us via a link from our website www.stmpackaging.com