

FLEET RETAIL PACKAGING PRIVACY POLICY

WHO WE ARE

We are Fleet Retail Packaging Ltd (registered in England and Wales under company registration number 05232673) and are the controller and responsible for your personal data (referred to as “Fleet Retail Packaging”, “Company”, “we”, “us” or “our” in this privacy policy).

Fleet Retail Packaging undertakes to meet its obligations under the Data Protection Act, the Privacy and Electronic Communications Regulations and the EU General Data Protection Regulation (GDPR).

Our contact details for Fleet Retail Packaging Ltd:

Fleet House,
Sunderland Quay, Culpeper Close,
Rochester,
Kent, ME2 4HN

Email address: privacy@fleetluxury.com

YOUR DUTY TO INFORM US OF CHANGES

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

PERSONAL DATA THAT WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. We collect different kinds of personal data about you which are detailed below:

- **Personal Data** includes first name, last name, company name, title.
- **Contact Data** includes postal addresses, email address and telephone numbers.
- **Company Data** includes company name, company address and company contact details.

HOW WILL WE USE YOUR PERSONAL DATA?

Most commonly, we will use your personal data in the following circumstances:

- 1) Where we need to perform the contract we are about to enter into or have entered into with you.
- 2) Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests;
- 3) Where we need to comply with a legal or regulatory obligation;
- 4) To respond to questions or complaints you have about our services
- 5) To assess your suitability for employment and process your application;
- 6) To evidence company practices;
- 7) To contact you to ensure that our records of your personal information are correct;
- 8) To respond to questions or complaints you have about our services;

LAWFUL BASIS FOR COLLECTION OF YOUR PERSONAL DATA

We shall ensure that we have a lawful basis for collection of personal data, namely either:

- 1) Where we need it to perform a contract we are about to enter into, or have entered into, with you;
- 2) For the purposes of the legitimate interest pursued by us.
- 3) Where you have given consent.

DISCLOSURES/SHARING OF YOUR PERSONAL DATA

We may need to disclose/share your personal data with the parties set out below for the purposes set out above.

Our customer relationship management software providers, HR system, IT providers, delivery companies, email platforms, and backup software;

professional advisers including solicitors, bankers, auditors and insurers based in the UK

We also reserve the right to use or disclose information provided if required by law or if we reasonably believe that use or disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud and/or to comply with a judicial proceeding, court order, legal process or other governmental authority; provided, however, that unless prohibited by law, Fleet Retail Packaging Limited will use its reasonable efforts to give you notice to enable you to seek a protective order or take other appropriate action.

DATA SECURITY

We will ensure that your data is only accessible to authorised people in our firm and will remain confidential at all times. Appropriate security measures will be in place to prevent unauthorised access, alteration, disclosure, loss, damage or destruction of your information. If we have a contract with another organisation to provide us with services or a service on our behalf to process your personal information, we'll make sure they give reassurances regarding appropriate security measures in place and only process your information in the way we've authorised them to. These organisations won't be entitled to use your personal information for their own purposes. If necessary, our security teams will check them to make sure they meet the security requirements we've set.

We have put in place procedures to deal with any suspected personal data breach.

HOW LONG WILL WE HOLD YOUR PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We keep information on unsuccessful employment applications for six (6) months in case another alternative role becomes available that we think you may be suitable for.

We keep basic personal data about our customers for the duration of your business relationship with us and thereafter as required for legal and audit purposes.

IMPORTANT RIGHTS

You have the right, on grounds relating to your situation, at any time to object to processing which is carried out as part of our legitimate interests or in the performance of a task carried out in the public interest. We will no longer process your data unless we can demonstrate there are compelling legitimate grounds which override your rights and freedoms or unless processing is necessary for the establishment, exercise or defence of legal claims.

You have the right to object at any time to processing your personal data for marketing activities. In such a case we must stop processing for this purpose.

WHAT ARE YOUR OTHER LEGAL RIGHTS?

In addition to the rights above the additional following rights:

Where you have given consent, you have the right to withdraw previous consent to processing your personal data at any time;

You have the right to request from us access to and rectification or erasure of personal data or restriction of processing concerning your data;

You have the right to receive data you have provided to us in a structured, commonly used and machine readable format;

You have the right to lodge a complaint with the regulator (see below).

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer on privacy@fleetluxury.com.

REQUESTING A COPY OF THE INFORMATION WE HOLD

You may at any time ask for a copy of the information we hold about you – it is your legal right. We will provide you with a copy of any non-exempt personal information within one month unless we ask you for an extension of time. To protect your personal data, we will ask you to verify your identity before we release any information. We may refuse your request if we are unable to confirm your identity.

COMPLAINTS

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO. Therefore, please contact our Data Protection Officer (privacy@fleetluxury.com) in the first instance.