

## Privacy Policy Emballator UK

Emballator (UK) Limited (company number 03648265) (we/us) are committed to protecting your privacy, including your personal data. We will be the data controller of any personal data which we collect from or about you. This Policy sets out the terms on which we will hold and process your personal data. If you have any queries about this Policy or how we use your data, you can contact us using the contact details below.

Please read this Policy carefully. By contracting with us, you acknowledge that your personal data will be used in accordance with this Policy.

### When Do We Collect Information?

We will collect information from you when you become our customer or supplier, or contact us in person, by telephone, by e-mail, by post, by fax, site visit or by social media. We may record images of you on CCTV when you visit our premises. We also collect information from you when you voluntarily complete customer surveys, enter a competition or promotion, provide feedback or complete a contact form on our website.

We may collect information about you from credit reference agencies when we undertake checks such as credit and identity checks. Information may also be collected about you when you visit our website (for example via cookies), such as your IP address and other browser-generated information.

[We may record all calls for training and equality purposes, to enable us to deal effectively with queries or complaints].

### What Information Will We Collect?

We may collect the following information:-

- Your contact details or those of your employees, such as name, address, telephone number and email address
- Your date of birth, nationality, country of birth, country of residence, employment status and tax identification number (i.e. National Insurance Number)
- Passport details, driving licence and utility bills
- Details of any goods or services you sell to us, or ask us to supply
- Details of your credit history and any records held by financial crime prevention agencies, on the Electoral Register and by providers of utility service
- Details of your employment status, income and source of wealth
- Your physical appearance and your activities when you visit our premises.

Before we can contract with you for the purchase or sale of goods or services, we may need to obtain certain information about you to verify your identity so that we can meet our obligations under the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 (the “Money Laundering Regulations 2017”) and any other applicable legislation and for the purposes of assessing our credit risk. You are obliged to provide this information and if you do not provide it, we will be unable to contract with you.

Emballator (UK) Limited,  
Unit 1, City Link Industrial Park, Phoenix Way, Bradford, BD4 8JP, United Kingdom  
Phone: + 44 12 74 66 88 55

## How We Will Use Your Information

We use information held about you in the following ways:-

- to undertake checks such as credit and identity checks to enable us to comply with our anti-money laundering obligations and for the purposes of assessing our credit risk;
  - to comply with our contractual obligations to you;
  - to help protect your information and prevent unauthorised access to it;
  - to deal with any queries, complaints or problems reported by you;
  - for payment verification, debt tracing and debt recovery;
  - to enable you to participate in our promotions or competitions;
  - to enable you to participate in the interactive features of our website and to ensure that content from our website is presented in the most effective manner for you and your computer/device;
  - to generate statistics relating to use of our website;
  - to provide you with information about other goods or services we offer that are similar to those that you have already contracted with us to provide, or enquired about. You may opt out of receiving this information when we collect your details or at any time by contacting us using the contact details below;
  - if required to do so by law and to the extent necessary for the proper operation of our systems, to protect us/our customers, or to enforce the terms of any contract that we have entered into with you;
  - to notify you of changes to our terms of business;
  - to ensure that our premises are secure and remain a safe working environment.

Our use of your personal data will be for one or more of the legitimate interests described above.

## Disclosure of Your Information

We may disclose your information:-

- to businesses that are part of the same group of companies as us, or that become part of that group;
  - to our IT providers and others who provide us with support services (such as shipping and delivery contractors) so that we can comply with our contractual obligations to you;
  - to our appointed accountants, lawyers and other professional advisers (including our bankers), to the extent that they require access to the information in order to advise us;
  - to credit reference agencies and other organisations to allow us to undertake the checks set out below;
  - to debt collection agencies or to the Court;
  - if required to do so by any legal requirement;
  - to law enforcement agencies and others in order to investigate or prevent fraud or activities believed to be illegal or otherwise in breach of applicable laws;
  - to HMRC if obliged to do so by law, who may pass this on to tax authorities in other jurisdictions;
- or

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- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers and suppliers may be one of the transferred assets.

We will not disclose your information to third parties other than as outlined above.

## **Credit and Identity Checks**

As part of our contracting process we may carry out automated checks using your personal data, such as your name, postal address, date of birth, telephone numbers and employment status. These checks include credit checks and identity checks and involve us obtaining information (such as your credit history) from credit reference agencies, the Electoral Register and providers of utility services.

We need to carry out these checks in order to meet our obligations under the Money Laundering Regulations 2017 (and any other applicable legislation) and for the purposes of assessing our credit risk. The information obtained from these checks is used by us to determine if an account can be opened or whether further information is required, based on factors such as whether we have been able to verify your identity or your credit history.

Credit reference agencies will record the details of our search and may record whether or not your application to contract with us is accepted. We may make periodic searches with credit agencies to manage your account.

We may provide information to financial and other organisations involved in fraud prevention to protect ourselves and our customers from theft and/or fraud. If false or inaccurate information is provided and fraud is identified or reasonably suspected, details may be passed to fraud prevention agencies who will record this. This information may also be accessed by law enforcement agencies. This information may be used by us to prevent fraud and money laundering, for example, when processing applications for credit, managing credit or for debt recovery.

## **Storage of Your Personal Data**

We will only keep your personal data for as long as we need to in order to fulfil the purpose(s) for which it was collected, as set out above in this Policy, and for as long as we are required to keep it by law.

We retain personal data collected in connection with the performance of our contractual obligations to you and the information provided to us for identity checks and anti-money laundering checks for [7] years after performance of our contract with you. You may require us to delete personal data once that period has expired unless we are required to retain that personal data for a longer period by law.

We take appropriate security measures (including physical, electronic and procedural measures) to help safeguard your personal information from unauthorised access and disclosure.

We may transfer, or allow access to, your information internationally including to countries outside the European Economic Area (EEA) when performing our contractual obligations to you. We will ensure that your personal data is adequately protected when it is transferred outside the EEA in accordance with applicable data protection laws.

You can update your personal data by contacting us.

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## **Changes to Our Privacy Policy**

We reserve the right to amend this Policy at any time. Any substantive changes we make to our Policy in the future will be notified to you in writing, but we would advise you to check our website regularly to ensure that you are familiar with the most up-to-date version.

## **Contacting Us**

If you have any queries, comments or requests regarding this Policy or would like to exercise any of your rights set out above, you can contact us at:-

Email: [gdpr.admin@emballator.co.uk](mailto:gdpr.admin@emballator.co.uk)

Post: Emballator (UK) Limited, Unit 1, City Link Industrial Park, Phoenix Way, Tyersal, Bradford, BD4 8JP

If we cannot resolve your concerns, you may report a concern to the Information Commissioner at [ico.org.uk/concerns](http://ico.org.uk/concerns) or telephone +44 (0)303 123 1113 for further information about your rights.