



## **John C. Brow Ltd T/A Brow Packaging**

### **General Data Protection Regulations (GDPR)**

#### **Company Data Policy**

Including **https:**       **www.browpack.com**  
                              **www.statpakliners.com**

#### **Customers & Suppliers**

##### **Privacy Policy**

At John C Brow Limited t/a Brow Packaging, we're committed to protecting, ensuring and respecting your privacy.

This policy explains when, where and why we collect personal information from you as a customer, or user of our website, or supplier, how we use it, the reasons under which we may disclose it to others and how we keep it secure.

For the purpose of the Data Protection Act 1998 (Act)/EU General Data Protection Regulation 2016 (GDPR), the data controller is John C Brow Limited t/a Brow Packaging, 1 Prince Regent Road, Belfast BT5 6SA.

Any questions regarding this policy and our privacy practices should be sent by email to [secretarial@browpack.com](mailto:secretarial@browpack.com) or by telephone 02890 798171. Alternatively by writing to John C Brow Limited t/a Brow Packaging, FAO Data Protection, 1 Prince Regent Road, Belfast BT5 6SA.

##### **Who are we?**

John C Brow Limited t/a Brow Packaging is a packaging manufacturer and distributor.

John C Brow Limited t/a Brow Packaging is a company incorporated in Northern Ireland with the registered name John C Brow Limited t/a Brow Packaging whose registered address is 1 Prince Regent Road, Belfast BT5 6SA. The registered number of the company is NI001729 and it is a member of the VAT group GB 777 9519 58.

##### **How do we obtain information from you?**

We obtain information about you, as a customer, when you enquire about our products or services or place an order for them. We may also obtain further data from you, as part of your quality or audit review process. We obtain information from you as a supplier when we seek to open an account or obtain product data or place orders with you for products and raw materials.

We also collect information from you when you voluntarily complete customer or supplier surveys or provide feedback. This information can be collected via our website, email and telephone or other written communications. Website usage information is collected using Cookies.



## **What type of information is collected from you?**

The personal information that we collect might include your company name, address, your name and job title as well as contact information such as email address, telephone number and fax number.

Your IP address, web browser type and information regarding what pages are accessed and when may be collected automatically.

## **How is your information used?**

We may process personal information if you have previously consented or for certain legitimate business purposes, which include some or all of the following:-

- process a quote/order you have requested
- where the processing enables us to enhance, modify, personalize or otherwise improve our services/communications for the benefit of our customers and suppliers
- to enhance our provision of goods or services to you in line with your requirements
- to enhance security of our networks and information systems
- to better understand how people interact with websites
- to provide postal communications which we think will be of interest to you
- to determine the effectiveness of promotional campaigns and advertising

## **Retention and Deletion**

John C Brow Limited t/a Brow Packaging retains your information while you/your company remain an active client or supplier, unless you ask us to delete your information.

If you stop being an active client / supplier, we will retain your information for 6 years unless you request that your details be deleted before this date or have made specific requests as to the holding of your data for a set period; however we will only contact you if you have provided us with consent or we believe the information we intend to send to you could be of 'legitimate interest' to you or your company.

If you have signed up to receive our product offer newsletters/ or requested information from us, we will retain your information until you request to be removed/deleted. Subject to the exceptions described below, John C Brow Limited t/a Brow Packaging deletes or anonymizes your information upon request.

Subject to applicable law, John C Brow Limited t/a Brow Packaging may retain information after account deletion:

- if there is an unresolved issue relating to your account, such as an outstanding invoice on your account
- John C Brow Limited t/a Brow Packaging may also retain certain information if necessary for its legitimate business interests, such as fraud prevention or to provide an audit trail, whether that be to trace goods or to verify our financial accounts
- if we are required to by applicable law; and/or in aggregated and/or anonymized form
- for meeting financial reporting legislation which state that documents should be retained for 6 complete, financial years



### **Who has access to your information?**

Designated employees in our company will control and use your data, depending on whether you are a customer or supplier to manage your account.

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

### **Third Party Service Providers we work in association with:**

We work closely with various third-party service providers to bring you as a customer, a range of quality and reliable products/services. When you enquire about one or more of these products, we will advise you of the third party that we feel will be able to accommodate your request better and ask you for permission to pass your details onto them. With your permission the relevant third party product provider will use your details to provide you with information and to carry out their obligations arising from any contracts you have entered with them. In some cases, they will be acting as a data controller of your information and therefore we advise you to read their Privacy Policy. These third party product providers will share your information with us which we will use in accordance with this Privacy Policy.

**Links to other Websites:** Our website may from time to time provide links to other websites. Our privacy policy does not extend to your use of such websites as we have no control over such websites and are not responsible for their content. Therefore we advise that you refer to their privacy policy or statement prior to using them.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganization, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

### **What are my choices?**

You have a choice about whether or not you wish to receive information from us. If you do not want to receive marketing information from us about our products and services, then you can select your choices by ticking the relevant boxes situated on the contact forms which we collect information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

You can change your marketing preferences at any time as well as request to be forgotten by contacting us by email: [secretarial@browpack.com](mailto:secretarial@browpack.com) or telephone 02890 798171.



## How can I access and update my information?

We're working on better ways for you to access and update your information as the accuracy of your data is important to us. In the meantime, if you chance any of your personal information, or any of the information is inaccurate or out of date, please email us at [secretarial@browpack.com](mailto:secretarial@browpack.com) or write to us at: 1 Prince Regent Road, Belfast BT5 6SA.

You can find out if we hold any personal information about you by making a "data subject access request" under GDPR 2016. If we hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy

Any formal subject access request should be made in writing to the address, The Secretary, 1 Prince Regent Road, Belfast BT5 6SA. This will be provided Free of Charge. However we may charge a reasonable fee for repetitive, unfounded or excessive requests or additional copies.

## Your Rights as a Data Subject

- **Right to Rectification** – the right to request the controller rectify inaccurate personal data.
- **Right to Object** – the right to object to processing based on either public interests or legitimate interests. Processing must stop, unless the controller demonstrates compelling grounds for continuing the processing or that the processing is necessary in connection with the controller's legal rights.
- **Rights to object** – to Direct Marketing.
- **Right to be Forgotten** – the right to have the controller erase personal data without undue delay. Contingent on the occurrence of one of the following:
  - The data is no longer necessary;
  - The data subject withdraws consent (and consent is the legal basis for processing);
  - Controller has no overriding grounds for continuing processing against the objectification;
  - Processing with unlawful;
  - Erasure is necessary with EU or national law.
- **Right to Restrict Processing**- the right to have the controller restrict processing if:
  - The accuracy of the data is contested;
  - Processing is unlawful;
  - The controller no longer needs the data for its original purpose, but needs it for legal purposes;
  - Erasure is pending.
- **Right of Data Portability** – the right to receive a copy of your data in a commonly used machine-readable format for transfer to another controller. This will either be in .xls or .csv format.

## Security Precautions in place at John C Brow Limited t/a Brow Packaging

Data Security is of great importance to John C Brow Limited t/a Brow Packaging and to protect your data we have put in place suitable physical, electronic and managerial procedures to ensure that it is treated securely.



We strive to protect your personal information but we cannot guarantee the security of any information you transmit to us over the internet, and you do so at your own risk. Where you have chosen a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and we ask you not to share your password with anyone.

**Profiling** – we may analyze your personal information to create a profile of your interests and preferences so that we can contact you with information that is relevant to you.

### **Use of ‘Cookies’**

Like many other websites, John C Brow Limited t/a Brow Packaging website may use cookies. ‘Cookies’ are small pieces of information sent by an organization to your computer and stored on your hard drive to allow that website to recognize when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual i.e. we use cookies to store your country preference. ‘Cookies’ helps us to improve our website and deliver a better, more personalized service.

It is possible to turn off Cookies by setting your browser preferences.

### **Transferring your information outside of Europe**

As part of the services offered to you through our website, or when we process data through our accounting, manufacturing and distribution software, the information which you provide to us may be transferred to countries outside the European Union (“EU”). For example, this may happen if any of our servers are located in a country outside of the EU, in conjunction with our data storage or backup providers.

These countries may not have similar data protection laws to the UK. By submitting your personal data, you are agreeing to this transfer, storing or processing. In the case that we do transfer your information outside of the EU, we will take steps to ensure that the appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in the policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

### **Review of this Policy**

We keep this policy under regular review. This policy was last updated on 16 May 2018.

JWB