

DOCMAIL PRIVACY POLICY

PRIVACY POLICY

Only read this if you are sending communications to recipients using our hybrid mail solution, Docmail[®]

WHAT IS THE PURPOSE OF THIS POLICY AND WHAT DOES IT COVER?

This privacy policy only provides information about how we process personal data relating to your communications recipients (“mailing data”) when you use our hybrid mailing solution. It does not cover our use of any personal data collected by us about you for other purposes, such as marketing. We process mailing data in our hybrid mail solution for our customers, and have no direct control or ownership of such mailing data.

It is important that you read this policy together with any other relevant privacy policies we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your personal data. Our general customer privacy policy can be found by following this link <https://www.cfh.com/policies/CFH-Privacy-Policy-2021.pdf>

This policy supplements any other policies and is not intended to override them.

Our hybrid mail solution is not intended for use by children.

This privacy policy deals with the following:

- Our contact details
- How and why do we process your mailing data?
- What happens if you provide CFH with mailing data about another individual?
- What we do with the mailing data
- How we store the mailing data
- To where might we transfer mailing data?
- Data protection rights
- How to complain?

OUR CONTACT DETAILS

CFH Docmail Limited (Reg. Co. No.: 01716891)

Main postal address: CFH Docmail Limited, St Peters Park, Wells Road, Westfield, Radstock, BA3 3UP

Main telephone number: 01761 416311

Alternative postal address: CFH Docmail Limited, Starlaw Business Park, Livingston, EH54 8SF

Alternative telephone number: 01506 462468

By email: data.protection@cfh.com

We are registered with the Information Commissioner’s Office (ICO) under registration number Z5722574.

HOW AND WHY DO WE PROCESS YOUR MAILING DATA?

We process mailing data when you submit an order through our hybrid mail solution (www.docmail.co.uk).

Under the UK General Data Protection Regulation and the Data Protection Act 2018, the lawful basis we rely on for processing mailing data is:

Performance of a Contract - we process the mailing data for the performance of a contract between you and us. Our Data Processing Agreement can be found using the following link:

<https://www.docmail.co.uk/tob.html>

Legal or regulatory obligation - to comply with a legal or regulatory obligation to which we are subject.

Legitimate interest - where it is in our legitimate interests or that of another third party. We will always make sure we consider and balance any potential impact on the mail recipient (both positive and negative) and their rights before we process mailing data for our legitimate interests. We do not use mailing data for activities where our interests are overridden by the impact on the mail recipient (unless we have their consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on the mail recipient in respect of specific activities by contacting us at data.protection@cfh.com.

WHAT HAPPENS IF YOU PROVIDE CFH WITH PERSONAL DATA ABOUT ANOTHER INDIVIDUAL?

In order for us to provide our services to you, we may need to process mailing data about other individuals, for example your customers or another individual. In this situation we will not have direct contact with those individuals and it will not be appropriate for us to provide them with a copy of this privacy policy.

You are required to ensure that you have satisfied all legal requirements before passing this mailing data to us, including providing them with a copy of this privacy policy and you must ensure that we can use any personal data that you pass to us in accordance with this privacy policy and data protection law.

You must also comply with any data protection provisions set out in the terms of business or contract we have entered into with you.

WHAT WE DO WITH THE MAILING DATA.

We use your mailing data for the purposes of providing printed and electronic document fulfilment and despatch services.

We have set out in the table below, a description of all the ways we use mailing data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate. We may process personal data for more than one legal basis depending on the specific purpose for which we are using the mailing data.

We will only use mailing data for the purposes for which we collected it, unless we consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use mailing data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Individual	Purpose for processing	Data used	Legal basis relied on
Your customers or other individuals with whom you wish to communicate	To deliver services to you including print, fulfilment and despatch of documents.	Identity Contact Financial Transaction Communication	Performance of a contract
Your customers or other individuals with whom you wish to communicate	Third party mail providers for document delivery.	Identity Contact	Legitimate Interest
Your customers or other individuals with whom you wish to communicate	Third party providers for SMS document delivery services.	Identity Contact Communication	Legitimate Interest
Your customers or other individuals with whom you wish to communicate	Service providers who provide IT and system maintenance, testing, administration services and access to platforms we use for operational purposes to run our business	Identity Contact Financial Transaction Communication	Legitimate Interest

Individual	Purpose for processing	Data used	Legal basis relied on
Your customers or other individuals with whom you wish to communicate	To comply with a legal or regulatory obligation to which we are subject.	Identity Contact Financial Transaction Communication	Legal or regulatory obligation

HOW WE STORE THE MAILING DATA.

We apply technical and organisational measures to keep your mailing data always secure. All mailing data is stored in a secure storage location within our own infrastructure. All mailing data is deleted once the retention period has been met. We will retain mailing data for 30 days from end of contract or processing whichever is the sooner. If “returns management services” are selected against an order, the name and address will be held for 60 days in order to process any returned mail items.

TO WHERE MIGHT WE TRANSFER MAILING DATA?

CFH does not transfer the mailing data to any third countries outside the UK and the EEA.

DATA PROTECTION RIGHTS.

Under data protection law, you or the communications recipient (as appropriate) have rights including:

Right of access – You have the right to ask us for copies of your personal information.

Right to rectification – You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Right to erasure – You have the right to ask us to erase your personal information in certain circumstances.

Right to restriction of processing – You have the right to ask us to restrict the processing of your information in certain circumstances.

Right to object to processing – You have the the right to object to the processing of your personal data in certain circumstances.

Right to data portability – You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

Unless you provide consent for us to do so, we do not alter the mailing data that you have provided to us. Where possible we will support you with your obligation to fulfil rights requests from individuals within your mailing data.

If you make a request, we have one month to respond to you.
Please contact us at data.protection@cfh.com if you wish to make a request.

HOW TO COMPLAIN

You have certain rights with regard to the processing of your mailing data as outlined above. You can make a complaint to the ICO, (www.ico.org.uk) if you feel we have infringed those rights. We would, however, appreciate the chance to deal with any concerns you may have before you approach the ICO.

The ICO's address:
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
Helpline number: 0303 123 1113

AUTHORISATION

This version is authorised as current upon signing by the CFH Group Managing Director.
Signed: Mr Bill McFederation, CFH Group Managing Director

Date	Version	Updated By	Change Details
01/05/2019	1	CFH Group DPO	First version
06/01/2020	2	CFH Group Legal	Update Livingston telephone number
10/07/2020	3	CFH Group DPO	Update disclosure of data section
29/12/2020	4	CFH Group DPO	Update to UK GDPR
13/01/2022	5	CFH Group DPO	Policy redraft so that this policy only covers the mailing data used within our hybrid mail solution, Docmail®.
10/05/2023	6	CFH Group DPO	Retention period wording aligned with wording within the contract.
17/05/2023	7	CFH Group DPO	SMS delivery separated within legal basis table.