

CFH DOCMAIL LIMITED PRIVACY POLICY

CFH Docmail Limited Privacy Policy

CFH Docmail Limited (“**we**”, “**our**”, “**us**”) respects the rights that individuals (“**you**”) have in relation to their personal data. This privacy policy (“**privacy policy**”) will inform you about how we look after personal data, provide details of your privacy rights and how the law protects you.

We care about your privacy and we will always endeavour to comply with the UK GDPR and the Data Protection Act 2018, as amended (“**data protection law**”) and we will keep personal data secure and will respect the rights you have in relation to your personal data.

If you have any questions regarding our processing of personal data, you can contact us via the following methods and locations:

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

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

Telephone number: 01761 416311

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

Telephone number: 01506 462468

By email:

DPO: Data.Protection@cfh.com

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

What is the purpose of this privacy policy and who does it cover?

This privacy policy provides information about how we collect and process personal data when:

- **you are our customer**, when you accept the terms and conditions upon which we will provide services to you or you enter into a contractual agreement with us; or

- **you are not our customer**, but we collect your contact details from you, you attend an event or you interact with us for information regarding our products, services and latest offers.

Our services and our website are not intended for use by children.

It is important that you read this privacy policy together with any other 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 personal data. This privacy policy supplements the other privacy policies and is not intended to override them.

This privacy policy deals with the questions below and you can go directly to a specific section by clicking on each heading.

- Who is the controller and who is the processor for personal data and how can I make a complaint?
- What happens if this privacy policy is updated or personal data changes?
- What are my rights under data protection law?
- What personal data do you collect about me?
- How do you collect personal data about me?
- What happens if I provide you with personal data about another individual?
- How do you use personal data?
- What do you use personal data for and why?
- How do you use personal data for marketing and how can I opt out?
- To whom do you disclose personal data?
- Transferring your personal data outside of the UK
- How do you safeguard personal data?
- For how long will you use personal data?
- Third-party links on this website
- What are cookies and how are these used?

Who is the controller and who is the processor for personal data and how can I make a complaint?

- You will be the data controller and we will be the data processor for the data which you provide to us to enable us to perform our services.

You have certain rights with regard to the processing of personal data (see below) and 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.

What happens if this privacy policy is updated or personal data changes?

We may change this policy from time to time. If we make changes, we will notify you by revising the date at the top of this policy, and if the changes are significant, we may provide you with additional notice such as adding a banner to the website. 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 by contacting your CFH Docmail Limited representative.

What are my rights under data protection law?

As a data subject, you have the following rights under the data protection law:

- **Right to be informed** – When we collect your data, we have to tell you what we are going to do with it, as set out in this Privacy Policy.
- **Right of access** – You have the right to contact us to request details of the information we hold about you.
- **Right of rectification** – You have the right to ask us to rectify information that we hold about you if this is inaccurate or incomplete.
- **Right to erasure** – This is also known as the right to be forgotten and gives you the right to request your information to be removed if there is no compelling reason for its continued processing. We keep a list of people who have asked not to be contacted which is used to ensure that you receive no further marketing information from CFH Docmail Limited. Without this list your data could enter our system again from another source and we would have no record of the fact that you asked us not to contact you.

- **Right to restrict processing** – This is the alternative to erasure and gives you the right to tell us to stop processing your data but allowing us to keep enough information about you to ensure that your wishes are respected in the future.
- **Right to data portability** – This gives you the right to ask the holder of your information to transfer that information to another business. This right would be most commonly used if you were switching banks, insurance companies, utility companies or mobile phone companies.
- **Right to object** – You have the right to object to the processing of your data for marketing purposes and profiling for marketing purposes. Your rights and freedoms override our interests.
- **Rights related to automated decision-making** including profiling – We do not use automated decision-making processes which would have a potentially damaging effect on the information we hold about you. But if we did you have the right to obtain human intervention, express your point of view and obtain an explanation of the decision and challenge it.
- **Rights to withdraw consent** at any time where relevant – you have the right to withdraw your consent to the processing of your information at any time and we must provide you with the information to do so at the time we collect your data and each time we contact you.

What personal data do you collect about me?

Personal data means any information about an individual from which that person can be identified. It does not include personal data where the identity has been removed (anonymous data).

Special categories of personal data mean any information about you which includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any special categories of personal data about you.

We collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows. The terms below are mainly used to explain why we use the personal data in the way we do:

- **Communication** this includes the channel and method by which we communicate with you.
- **Contact** this could include address, email address and telephone numbers.
- **Financial** this could include bank account details.
- **Identity** this could include your name and title.
- **Marketing** this could include your preferences in receiving marketing from us.
- **Transaction** this could include the personal data belonging to your customers, details about payments from you and other details of services we have provided to you.
- **Technical** this could include internet protocol (IP) address, browser type and version, time zone setting, browser plug-in types and versions and operating system and platform.
- **Usage** this could include information about how you use our website and services.

How do you collect personal data about me?

We use different methods to collect personal data from and about you including through the following interactions set out below:

Direct interactions. You give us your Identity, Communication, Contact, Transaction and Financial data by filling in forms or by corresponding with us by post, phone, email or online. This could include personal data you provide when you:

- request information about our services;
- enter into a contract for the provision of services with us;
- request marketing to be sent to you;
- subscribe to our social media accounts;
- enter a competition, promotion or survey;
- give us your contact details; or
- give us feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect technical data about your equipment, browsing actions and

patterns. We collect this personal data by using cookies, server logs and other similar technologies.

Third parties. We receive personal data about you from the third parties below:

- Technical and Usage data from analytics providers such as Google and Bing;
- Contact, Identity, Financial and Transaction data from providers of technical, payment and delivery services;
- Contact and Identity data from social media providers when you sign up to receive information about the products and services we provide;
- Analytical data such as likes, shares, impressions and audience views from social media providers;
- Marketing and Technical data from Cookie compliance provider;
- Contact data from affiliate partners who promote our services on their websites.

What happens if I provide you with personal data about another individual?

In order for us to provide our services to you, we may need to process personal 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 personal 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.

How do you use personal data?

We will only use personal data when the law allows us to. We may process personal data without your knowledge or consent where this is required or permitted by law. Most commonly, we will use personal data in the following circumstances and for the following purposes:

- **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 you (both positive and negative) and your rights before we process personal data for our legitimate interests. We do not use personal data for activities where our interests are overridden by the impact on you (unless we have your 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 you in respect of specific activities by contacting us at data.protection@cfh.com
- **Performance of contract** – where it is necessary for us to process personal data for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract; and
- **Consent** – we may rely on consent as a legal basis for processing personal data. If we do, you can withdraw your consent at any time by contacting us at marketing@cfh.com or by following the opt-out links on any marketing communication sent to you.

What do you use personal data for and why?

We have set out in the table below, a description of all the ways we use personal data, and which of the legal bases 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 personal data.

We will only use personal 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 personal 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
CFH Docmail Limited Customers	To register you as a new customer, open an account and provide services to you	<ul style="list-style-type: none"> ○ Identity ○ Contact ○ Communication ○ Financial 	<ul style="list-style-type: none"> ○ Performance of a contract ○ Legal and regulatory obligation
Your Customers or other individuals with whom you wish to communicate	<p>To deliver services to you including print, fulfilment and despatch of documents.</p> <p>To improve the delivery of our services to you.</p>	<ul style="list-style-type: none"> ○ Identity ○ Contact ○ Financial ○ Transaction ○ Communication 	<ul style="list-style-type: none"> ○ Performance of a contract ○ Legitimate interest – to improve and enhance our services
CFH Docmail Limited Customers	To deliver services to you including managing payments, fees and charges and collecting and recovering any money owed to us	<ul style="list-style-type: none"> ○ Identity ○ Contact ○ Financial ○ Transaction ○ Communication 	<ul style="list-style-type: none"> ○ Performance of a contract ○ Legitimate interests – to recover debts due to us

Individual	Purpose for processing	Data used	Legal basis relied on
CFH Docmail Limited Customers	To manage our relationship with you including notifying you about changes to our terms	<ul style="list-style-type: none"> ○ Identity ○ Contact ○ Communication 	<ul style="list-style-type: none"> ○ Performance of a contract ○ Legal and regulatory obligation
CFH Docmail Limited Customers	To manage and promote our relationship with you when you are a corporate subscriber.	<ul style="list-style-type: none"> ○ Identity ○ Contact ○ Communication 	<ul style="list-style-type: none"> ○ Legitimate Interest
CFH Docmail Limited Customers	To invite you to events and/or workshops and to manage your attendance at those events and/or workshops	<ul style="list-style-type: none"> ○ Identity ○ Contact ○ Communication 	<ul style="list-style-type: none"> ○ Legitimate interests – to grow and expand our business
Prospective CFH Docmail Limited Customers	To contact you to provide you with information about us and our services	<ul style="list-style-type: none"> ○ Identity ○ Contact ○ Communication 	<ul style="list-style-type: none"> ○ Legitimate interests – to respond to requests for information from you

Individual	Purpose for processing	Data used	Legal basis relied on
	which you have requested when you are not our customer		
All website visitors	To administer and protect our business and our website including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data which may include the use of cookies	<ul style="list-style-type: none"> ○ Identity ○ Contact ○ Technical ○ Usage 	<ul style="list-style-type: none"> ○ Legal and regulatory obligation ○ Legitimate interests – to run our business, provide administration and IT services, network security and to prevent fraud
All website visitors	To deliver relevant website content to you and measure or understand the effectiveness of our website	<ul style="list-style-type: none"> ○ Usage ○ Technical ○ Communication 	<ul style="list-style-type: none"> ○ Legitimate interests – to study how customers and prospective customers use our services, to develop them, to grow our business and to

Individual	Purpose for processing	Data used	Legal basis relied on
			inform our marketing strategy
All website visitors	To use data analytics to improve our website, services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> ○ Usage ○ Technical ○ Reporting 	<ul style="list-style-type: none"> ○ Legitimate interests – to identify individuals for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy
All website visitors	To use non-essential cookies and similar technologies in the ways described in our Cookie Policy and to collect personal information about you using them.	<ul style="list-style-type: none"> ○ Usage ○ Technical ○ Reporting 	<ul style="list-style-type: none"> ○ Consent

Individual	Purpose for processing	Data used	Legal basis relied on
All website visitors	To distinguish between human and automated access to websites	<ul style="list-style-type: none"> ○ Usage ○ Technical 	<ul style="list-style-type: none"> ○ Legitimate Interest
Existing and prospective customers	To market our product and services to you	<ul style="list-style-type: none"> ○ Marketing ○ Contact details 	<ul style="list-style-type: none"> ○ Consent – where you have signed up for marketing on our website or through a competition, promotion or survey relating to CFH Docmail Limited ○ Legitimate Interest – to contact you by e-mail with marketing about our products and services after we presented you with an option on our Site to opt-out which you declined to take. This marketing will relate only to products and services similar to those you are

Individual	Purpose for processing	Data used	Legal basis relied on
			<p>purchasing or enquiring after;</p> <ul style="list-style-type: none"> ○ to deliver tailored advertising (including via social media); ○ to tailor and personalise our marketing communications based on your attributes; and <p>to contact you by email with information on our products and services if you are a corporate body and visited our website.</p>
Existing and prospective customers	To maintain a suppression list ensuring we are not sending marketing information to individuals who have opted out	<ul style="list-style-type: none"> ○ Marketing 	<ul style="list-style-type: none"> ○ To comply with our legal and regulatory obligations

How do you use personal data for marketing and how can I opt out?

We use the information provided to us to contact you regarding our products, services and latest offers (we define this as marketing). You will receive marketing communications from us if you have provided your consent or where we have a legitimate interest in using your personal information to promote our business, brands and products and services.

You can ask us to stop sending you marketing communications at any time contacting us at marketing@cfh.com or by following the opt-out links on any marketing communications sent to you.

Customer Support

We use your information to resolve technical issues you encounter, to respond to your requests for assistance, and to repair and improve the Services. This includes where you may choose to submit information regarding a problem you are experiencing through our third-party customer support service. For more information please contact data.protection@cfh.com or visit our customer support portal.

This information will be hosted with our third-party provider within the UK.

Information obtained through our support channel will not be used for Marketing purposes.

To whom do you disclose personal data?

We may have to share personal data with the parties set out below for the purposes set out in the table above:

- Service providers who provide IT and system maintenance, testing, administration services and access to platforms we use for operational purposes to run our business;
- Professional advisers including lawyers, barristers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;

- Third parties who require access to the personal data we process for the purposes of the prevention or detection of crime or for the purposes of legal proceedings;
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances, for example to ensure we are complying with legal and regulatory obligations;
- External auditors who provide auditing and similar compliance services to us to ensure we are complying with our legal and regulatory obligations when we provide services to you, process personal data or where we are certified under any relevant schemes or certifications;
- Financial services providers who provide us with financial services and facilities;
- Marketing service providers, for example those used to help us generate online advertisements;
- External providers of event management services to us for the purpose of marketing; or
- Our group companies who provide administrative support or other services to us or to whom we may sub-contract certain obligations.

We require all third parties to respect the security of personal data and to treat it in accordance with the law and the terms of the contract we have in place with them where they are our third-party service providers. We do not allow our third-party service providers to use personal data for their own purposes and only permit them to process personal data for specified purposes and in accordance with our instructions.

Transferring your personal data outside of the UK

To deliver services to you, it is sometimes necessary for us to share your personal information outside the UK.

Whenever we transfer your personal data outside of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- a. We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the UK;

- b. Where we use third parties outside of the UK, we may use specific contracts approved under UK law, these are sometimes known as standard contractual clauses which give personal data the same protection it has in the UK.

If you would like more information about the methods used to transfer your personal data outside of the UK, please contact us at data.protection@cfh.com.

How do you safeguard personal data?

We have appropriate security measures in place to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We also have in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

For how long will you use personal data?

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it.

Third-party links on this website

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party websites and are not responsible for their privacy policies. When you leave our website, we encourage you to read the privacy policy of every website you visit.

What are cookies and how are these used?

Cookies are small files of letters and numbers stored on your browser or device that enable the cookie owner to recognise the device when it visits websites or uses online services. The website you visit may set cookies directly, known as first-party cookies, or may trigger cookies set by other domain names, known as third-party cookies. While we may automatically use some cookies that are strictly necessary to provide the services you request or enable

communications, we request your consent for all of our other cookie uses. We explain the cookies we use and why we use them within our cookie's settings on our website.

Authorisation

This version is authorised as current upon signing by the CFH Group Managing Director

Signed

Mr Bill McFedries
CFH Group Managing Director

Document History

Version	Change Details	Updated By	Date
1	First version	CFH Group DPO	01/05/2019
2	Update Livingston telephone number	Data Protection Officer	06/01/2020
3	Update use and disclosure of data sections	CFH Group Legal	07/05/2020
4	Update purpose of processing table	CFH Group Legal	08/06/2020
5	Update disclosure of data section	CFH Group Legal	10/07/2020
6	Amended to UK GDPR	CFH Group DPO	21/12/2020
7	Document classification added	Group Head of QHSE	19/08/2021
8	Personal data collected or sent to third party service providers Update to Cookies description and addition of Cookies table The transfer of data outside of the UK	CFH Group DPO	21/09/2021

	Marketing service providers to generate online advertisements Update purpose of processing table		
9	Update to the Cookies table to include the additional cookies set by a third party for Marketing purposes.	CFH Group DPO	22/03/2022
10	Cookies table now included within the cookie's settings held on website www.cfh.com .	CFH Group DPO	06/07/2022
11	To include Legitimate Interest as a lawful basis for contacting new prospects and corporate bodies when applicable. To identify between human and automated access to our website. Last amended date added to the policy.	CFH Group DPO	15/09/2022
12	Rebranding of document	Compliance Manager	07/2023
13	Customer Support statement added	CFH Group DPO	10/2024
14	Manage and promote relationship to corporate subscribers.	CFH Group DPO	12/2024

Document Review

Date Last Reviewed	Date Next Review	Reviewed By
12/2024	12/2025	Group Data Protection Officer