

Data Privacy Policy

Data Protection Act 1998 (DPA) EU General Data Protection Regulation 2018 (GDPR).

Comco Plastics (Belfast) Ltd is a registered company with the Information Commissioners Office.

Notice Objective

To collect and use personal information fairly and transparently by providing access to personal data retained and provide greater choice and control over how it's used.

Who is responsible for what personal data is collected, how it's retained and how it's processed:

Comco Plastics (Belfast) Ltd have assigned a Data Controller, responsible for data collection, manual processing and the protection of personal information. The Data Controller will make information available to its data subjects on request (the individuals whom the data relates to), so far as practicable or when legally obliged to do so.

• The name of Comco Plastics (Belfast) Ltd Data Controller and Data Protection Officer is Mrs Jackie Barrow, Financial Controller Tel: 02890668358

Responsibilities of the Data Controller:

- What information is being collected
- Who collects it
- How it's collected
- Why it's being collected
- How it will be used
- Who it will be shared with
- How it is protected
- What will be the effect of this on the individuals concerned
- If the intended use is likely to cause individuals to object or complain

What personal information is being collected:

Comco Plastics (Belfast) Ltd collect and retain the following information:

- Company name
- address
- Contact names
- Telephone number
- Fax number
- Mobile number
- Contact Email address
- Purchasing history with Comco Plastics (Belfast) Ltd only

- Your industry sector

Request For Consent:

The European Union General Data Protection Regulation (GDPR), regulated by the Information Commissioners Office sets a high standard for consent. Consent means offering people genuine choice and control over how organisations use data. Consent requires a positive opt-in and not any pre-ticked boxes or any other method of consent by default.

Comco Plastics (Belfast) Ltd wants to keep its customers informed of promotions on products and services which offer cost effective production solutions to help save money and increase profitability. To do that we need to ask for your consent to process specifically your contact information with your purchasing trends (what you buy from us and how often) to identify who would best benefit from any particular promotion. This very basic marketing supports us both by offering you savings and benefits on material available and technical support which helps secure your purchasing loyalty with us while at the same time keeping you informed and up to date of the latest in what we have to offer.

If following consent Comco Plastics (Belfast) Ltd do not contact you promoting its products and services for a period greater than eighteen months your consent will need to be reiterated.

You have the right to request the Data Controller at Comco Plastics (Belfast) Ltd, to stop processing your personal data by withdrawing consent. You can withdraw consent in part or in full, for example you may wish to be contacted by Email only and by no other means when promoting our products and services

Who collects the personal information:

On the permission of the subject all employees of Comco Plastics (Belfast) Ltd collect information detailed above as and when required under the instruction and supervision of The Data Controller.

How is the personal information collected:

- On permission of the subject in person
- On permission of the subject by telephone
- On permission of the subject through Comco Plastics (Belfast) Ltd website
- On permission of the subject through Email
- On permission of the subject through the process of opening an account
- On permission of the subject when placing an order
- On permission of the subject when requesting technical support
- On permission of the subject when enquiring about products and services

Most contact information is obtained directly from the data subject through methods listed above. Contact information is also obtained from publicly accessible sources like advertisements, database listings and internet websites and not always directly from the data subject. In such a case the subject will be contacted and consent sought before being included in any further promotional processing. The personal information retained is not collected through observation, by tracking people online or by smart devices. It's not derived from combining other data sets and it's not inferred by automated processing using algorithms to analyse a variety of data, such as social media, location data and records of purchases elsewhere to profile business's or people. Why do we collect your personal information: For the sole action or business of marketing, informing and promoting products and services supplied by Comco Plastics (Belfast) Ltd.

How do we use your personal information:

Your personal information, contact details and purchasing trends (what you buy from us and how often) are used for accounting purposes and the sole action or business of informing and promoting our products and services through the following methods -

- Postal Mail marketing
- Email marketing
- Telephone marketing

Your contact information and purchasing history (what you buy from us and how often) are manually processed by Comco Plastics (Belfast) Ltd only. Comco Plastics (Belfast) Ltd do not carry out any automated processing, decision making or profiling of personal data.

Who will your personal information be shared with:

Comco Plastics (Belfast) Ltd will not share or impart any personal information to any third party for processing or profiling or for any other use unless legally obliged to do so.

By completing and signing the credit account application form the customer acknowledges and agrees that the Comco Plastics (Belfast) Ltd will be using data as per standard terms and conditions of sale, eg for the purpose of fraud prevention, audit and debt collection.

How is my personal information protected:

Personal information is stored locally at Comco Plastics (Belfast) Ltd electronically and has secured access by authorised personnel only. Information is not stored, duplicated or backed up to any on line storage facility.

How long will my personal information be retained for:

Information is held for the duration of a business's solvency until it ceases to trade or a request is made to withdraw consent in part or in full.

Your right to view, change or amend personal information retained or to withdraw consent in part or in full:

To view your personal information retained by Comco Plastics (Belfast) Ltd, contact The Data Controller and ask for an 'Information Subject Access Request' form to complete. Information will be provided without delay and at the latest within one month of its receipt.

You are entitled to request any personal contact information be rectified if it is inaccurate or incomplete. Any request must be written and addressed to The Data Controller which will be responded to within one month of receipt.

The right to erase does not provide an absolute 'right to be forgotten'. You have a right to have personal data erased to prevent it being processed when you withdraw consent. You can withdraw consent in part or in full, for example you may wish to be contacted by Email only when marketing our products and services. To make a request to withdraw consent please contact Comco Plastics (Belfast) Ltd Data Controller.

Comco Plastics (Belfast) Ltd reserves the right to terminate any agreement to sell to or support if any request of change or amendment to information limits, impairs or prevents its ability to provide an

appropriate and adequate standard of service using our existing systems and procedures going forward.

CCTV at Comco Plastics (Belfast) Ltd, 24 Stockmans Way, Musgrave Park Ind Estate, Belfast BT9 7ET

CCTV footage is recorded for building security. It's taken by CCTV cameras, positioned outside covering the exterior perimeter, doors and car park, one at reception and others covering all areas in the warehouse where they don't unnecessarily intrude on anyone's privacy but where they best support their purpose.

The Data Controller at Comco Plastics (Belfast) Ltd and the Directors have access to the CCTV Footage detailed above. No other person will be granted access to any footage except lawful representation in the case of a breach of security to assist in identifying a perpetrator.

The Information Commissioners Office regulates the use of CCTV footage because it involves the processing of personal information capturing and/or recording images of identifiable individuals. Because CCTV is covered by the Data Protection Act, you have the right to see information held about you, including CCTV images which give away information about you (such as your car number plate). A Subject Access Request will be required for consideration to view any footage and if authorised will be supplied on a DVD unencrypted and will therefore be required to be signed for and collected in person.

The Data Protection Controller at Comco Plastics (Belfast) Ltd is responsible for CCTV footage, deciding what is recorded, how images should be used and who they should be disclosed to.

Statement of transparency and fairness

Comco Plastics (Belfast) Ltd regard the personal information collected when manually processed with a business's purchasing history to be fair to retain and necessary for the specific action or business of marketing and promoting its products and services. The information is protected, it's not shared with any third parties except for credit searches, the purpose of fraud prevention, audit and debt collection. It's not used for any form of automated processing or decision making and is used in a way that people would reasonably expect.

It's assumed that collecting and retaining this basic information in conjunction with any purchasing history (what you buy from us and how often) will cause no justified adverse effect on businesses or individuals concerned and is therefore not likely to cause objection or complaint. In the event it does, please contact The Data Controller who will exercise your right to withdraw consent. In circumstances you deem appropriate, you can exercise your right to lodge a complaint with the appropriate supervisory authority and or seek a judicial remedy without undue delay, at the latest within one month.