

# Data protection declaration of SAXOPRINT Limited

SAXOPRINT Limited takes the privacy of your information very seriously. This policy explains how and for what purposes we use the information collected about you via our website (referred to below as the "Site"). Please read this privacy policy carefully. By using the Site and any services we offer via the Site, you are agreeing to be bound by this policy in respect of the information collected about you via this Site. If you have any queries about the policy, please get in touch with us using the contact details set out below and we will do our best to answer your questions. SAXOPRINT may amend this policy from time to time. Every time you wish to order from our site, you should check this policy. You are not able to proceed with an order on our Site unless you confirm that you agree with this policy. This policy was most recently updated in July 2017.

# 1. COLLECTION, PROCESSING AND USE OF PERSONAL INFORMATION

You can visit our site without providing personal information. We will only store non-personal access information, such as the name of your Internet service provider, the page from which you are visiting, or the name of the requested file. This information is only analysed for the purpose of improving our offering and cannot be traced back to you. Personal information is only collected if you voluntarily provide this information as part of your order, when opening a new account or registering for our newsletter. We will use the information you supply without separate consent only to complete and process your order. When you register for the newsletter, with your consent your name and e-mail address will be used for our own advertising purposes until you unsubscribe from the newsletter, which can be done at any time. We reserve the right to store Customer print data electronically for one year. After that, we will move such data from electronic storage to tape storage; the print data will then be stored on such tape storage for 5 further years. The print data does not contain customer data or other personal data except for an order number (which is included in the name of the print file). On the basis that it is possible to identify the customer from the order number and therefore we treat the storage of such print data in accordance with the provisions of the Data Protection Act 1998. We store this print data for HMRC record keeping purposes, in particular in order to be able to demonstrate to the HMRC that we have correctly identified the applicable VAT rate to the service provided.

# 2. FORWARDING PERSONAL INFORMATION

Your information will be passed on to the shipping company commissioned with the delivery of your product. In order to arrange delivery dates, addresses, telephone numbers as well as e-mail address are shared with the parcel service. Your payment information will be forwarded to the bank commissioned with the payment with respect to payment settlement. Information will not be forwarded to any other third parties. The processing of partner offers which are found on our web pages will be done directly by these partners.

# **3. USE OF COOKIES**

To enable you to place orders in our Online Shop, a long-term cookie will be set when you access specific pages. These are small text files which remain on your computer. The file is only used to enable you to use certain applications, for example our shopping cart system. Most browsers will accept cookies by default. You can allow or prohibit temporary and stored cookies separately in your security settings. If you deactivate cookies you may lose access to some features on our site and some web pages may not be displayed correctly. The information stored in our cookies will never be linked to your personal information (name, address etc.) without your express consent.

# 4. USE OF ANALYSIS SERVICES

### a. Use of Google Analytics

This website uses Google Analytics, a web analytics service. It is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA. Google Analytics uses "cookies". These are text files that are stored on your computer and that enable analysis of your use of the website. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. For more information about how to deal with Google Analytics user data, see Google's data protection declaration: <a href="https://support.google.com/analytics/answer/6004245?hl=en">https://support.google.com/analytics/answer/6004245?hl=en</a>.

### Browser Plugin

You can prevent the storage of cookies by using the corresponding setting in your browser software; however, we would advise that in this case, you may not be able to make full use of all the functions of this website. You can also prevent the collection of data (including your IP address) generated by the cookie and relating to your use of the website to Google and the processing of this data by Google by downloading and installing the browser plug-in available via the following link: <a href="https://tools.google.com/dlpage/gaoptout?hl=en-GB">https://tools.google.com/dlpage/gaoptout?hl=en-GB</a>. The deactivation add-on for the Google Analytics browsers does not prevent the transfer of information to us or other web analytics services set up by us where necessary.

### Opposition to data collection

You can prevent the collection of your data by Google Analytics by clicking on the following link. This sets an opt-out cookie which prevents the collection of your data when you visit this website in the future: Deactivate Google Analytics.

### Anonymous collection of IP addresses

We use the "Activation of IP anonymisation" function on this website. Your IP address will be truncated by Google within the member states of the European Union or in other states that are party to the Agreement on the European Economic Area. The full IP address will only be transmitted to a Google server in the USA and truncated there in exceptional cases. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website activities, and to render other services related to website use and Internet use to the website operator. The IP address transmitted by your browser to Google Analytics will not be merged with other data by Google.

# b. Use of Hotjar

Our website uses Hotjar, which is essentially a tracking code-based web analytics tool of Hotjar Ltd, Level 2, St Julians Business Centre, 3, Elia Zammit Street, St Julians STJ 1000, Malta. Using Hotjar, interactions by randomly selected, individual visitors to our website are recorded anonymously. The result is a log of, for example, mouse movements and clicks, aimed at identifying opportunities for improving our website.

In addition, information relating to the operating system, browser, inbound and outbound links, geographical origin, as well as the resolution and the type of equipment used, is evaluated for statistical purposes using Hotjar. We also use Hotjar to offer the option of anonymous user feedback by means of 'feedback pools". The information collected is not personal and will not be transferred to third parties by Hotjar Ltd. For additional information about the functions and use of data by Hotjar, see: <a href="https://www.hotjar.com/privacy">https://www.hotjar.com/privacy</a>. If you don't want a website analysis using Hotjar, you can disable this on all websites that use Hotjar, by placing a DoNotTrack header in your browser: <a href="https://www.hotjar.com/opt-out">https://www.hotjar.com/opt-out</a>.

### c. The use of Visual Website Optimizer

Our website uses Visual Website Optimizer, a web analysis service of Wingify, 14th floor, KLJ Tower North, Netaji Subhash place, Pitam Pura, Delhi 110034, India. Visual Website Optimizer is used to test the usability of certain sites. This anonymously collects measurement data about user behaviour. We have no way of assigning this anonymous measurement data to your person - either through the assignment of your IP address or other means. Cookies are used, i.e. the programme uses the function provided by your browser to store information temporarily and access it later in order to obtain meaningful test results. If the cookies do not automatically expire at the end of the session, they are available for a maximum of 100 days (more details here: <a href="https://www.com/knowledae/cookies-used-by-vwo/">https://www.com/knowledae/cookies-used-by-vwo/</a>). You can delete the cookies in your browser at any time. The tracking (i.e. the acquisition of data generated by the cookie related to the use of the website) can be disabled at any time. Please, follow the instructions at: <a href="https://www.com/terms-conditions/">https://www.com/terms-conditions/</a>.

# **5. USING SOCIAL PLUGINS**

# a. Facebook

Our website uses social plugins of the social network Facebook, which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook"). The plugins are marked with a Facebook logo or the phrase "Facebook Social Plugin". You will find an overview of the Facebook plugins and their appearance here: <a href="https://developers.facebook.com/docs/">https://developers.facebook.com/docs/</a> plugins?locale=en. When you visit a page of our website that contains such a social plugin, your browser makes a direct connection with the Facebook servers. The content of the plugin is directly transmitted from Facebook to your browser and integrated by this into the website.

Through the integration of the plugin, Facebook receives the information that your browser has accessed the corresponding page of our website, even if you do not have a Facebook account or are not currently logged in to Facebook. This information (including your IP address) is directly transmitted from your browser to a Facebook server in the USA and stored there. If you are logged into Facebook, Facebook can link the visit to your Facebook account. If you interact with the plugins, for example by pressing the "Like" button or by entering a comment, the corresponding information is also transmitted directly to a Facebook server and stored there. The information is also published on Facebook and shown to your Facebook friends. Facebook can use this information for the purpose of advertising, market research and the appropriate design of the Facebook pages. For this purpose, Facebook creates usage, interests and relationship profiles, e.g. in order to evaluate your use of our website in terms of the advertisements displayed for you on Facebook, to inform other Facebook users about your activities on our website and to provide other services relating to the use of Facebook.

If you do not want Facebook to link the data collected on our website to your Facebook account, you must log out from Facebook before visiting our website. For the purpose, scope and extent of data collection and further processing and use of the data by Facebook as well as your rights in this respect and setting options for protecting your privacy, please see the privacy policies of Facebook: <a href="https://www.facebook.com/policy.php">https://www.facebook.com/policy.php</a>.

#### b. Google+

Our website uses the "+1" button of the social network Google Plus, which is operated by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States ("Google"). The button is identifiable by the "+1" on a white or coloured background. When users access the content of our website, which contains such a button, the browser establishes a direct connection to Google's servers. Google transmits the content of "+1" button directly to the user's browser, which then in turn embeds the content in the web page. We have therefore no influence on the data collected by Google using the button and according to Google, no personal data is collected if the button is not clicked. The IP address etc. will only be collected and processed in the case of registered Google users.

Users can find out more about the extent and the purpose of the data collection by Google, in whatever form the processing and use of data is carried out, and the rights in this respect and setting options to ensure the protection of privacy by viewing Google's privacy notice regarding the "+ 1" button: at: <u>https://developers.google.com/+/web/buttons-policy</u>. If you are a Google Plus member or are logged in to Google and you do not wish Google to collect data about you during your visit to our webpage, or to link this data to information about you saved by Google, you must log out of Google Plus or Google before visiting our website.

### c. Twitter

Functions of the Twitter service are embedded on the pages of our website. These functions are offered by Twitter Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, USA. Through the use of Twitter and the "Re-Tweet" function, Twitter links the Twitter account of users with the Internet sites frequented by them. This will be announced in particular to the followers of the Twitter user. When doing so, data will also be transferred to Twitter servers. We would advise that we, as the provider of the website, have no knowledge of the content of the data transmitted and use thereof by Twitter. Further information is available under the following link: <u>https://twitter.com/privacu?lang=en</u>.

Privacy settings on Twitter can be changed in the account settings at: http://twitter.com/account/settings.

### d. Pinterest

Our website uses the service pinterest.com. Pinterest.com is a service of Pinterest, Inc., 808 Brannan St, San Francisco, CA 94103, USA. By means of the integrated "Pin it" button on our page, Instagram receives the information that you have accessed the corresponding page of our website. If you are logged into Pinterest, Pinterest may assign the visit to our site to your Pinterest account and link the data by this means. The data transmitted by clicking the "Pin It" button is stored by Pinterest. You can find more information regarding the purpose and scope of the data collection, the processing and use of the data, as well as your related rights and settings options for protecting your privacy in the Pinterest data protection notice at <a href="https://policy.pinterest.com/en/privacy-policy">https://policy.pinterest.com/en/privacy-policy</a>. To prevent your visit to our site from being accessed by your Pinterest account, you must log out of your Pinterest account before visiting our site.

### e. Instagram

Our website uses the Instagram service. Instagram is a service of Instagram Inc. By means of the integrated "Insta" button on our page, Instagram receives the information that you have accessed the corresponding page of our website. If you are logged into Instagram, Instagram may assign the visit to our site to your Instagram account and link the data by this means. The data transmitted by clicking the "Insta" button is stored by Instagram. You can find more information regarding the purpose and scope of data collection, the processing and use of the data, as well as your related rights and settings options for protecting your privacy in the Instagram data protection notice at <a href="https://help.instagram.com/155833707900388">https://help.instagram.com/155833707900388</a>. To prevent your visit to our site from being accessed by your Instagram account, you must log out of your Instagram account before visiting our site.

#### f. LinkedIn

Our website uses the features of the LinkedIn network. The provider is the LinkedIn Corporation, 2029 Stierlin Court, Mountain View, CA 94043, USA. Each time you access one of our pages, which contain LinkedIn functions, a direct connection to the LinkedIn servers is established. LinkedIn is informed that the user has visited our Internet pages with their IP address. If the user clicks on the "Recommend" button from LinkedIn and they are logged in with LinkedIn, it is possible for LinkedIn to associate the visit on our website to the user and their LinkedIn user account. You can prevent this by logging out of your LinkedIn account. As the provider of this website, we expressly point out that we receive no information on the content of the transmitted data or its use by LinkedIn. More information can be found in the LinkedIn privacy policy below: <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>.

### g. YouTube

Our website uses plugins from YouTube, which is operated by Google. The operator of the pages is YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA. If a user visits one of our pages equipped with a YouTube plugin, a connection to the YouTube servers is established. The Youtube server is thereby informed about which of our pages the user has visited. When users are logged in to their YouTube account, this enables YouTube to map the surfing behaviour of the YouTube user profile. You can prevent this by logging out of your YouTube account. For more information, please see the YouTube privacy policy.

#### h. Tumblr

Our website uses the Tumblr service buttons. The operator is Tumblr, Inc., 35 East 21st St, 10th Floor, New York, NY 10010, USA. These buttons enable the user to share a post or a page of Tumblr, or to follow the provider of Tumblr. When you access one of our websites via the Tumblr button, your browser establishes a direct connection to the Tumblr servers. We have no influence on the amount of data that Tumblr gathers and transmits with the plugin. At present, the user's IP address as well as the URL of the respective website are transferred. For more information, please see the Tumblr privacy statement: <a href="https://www.tumblr.com/policy/en/privacy">https://www.tumblr.com/policy/en/privacy</a>.

# 6. COMMENTS, CONTACT, NEWSLETTER

# a. Comments and discussions in the blog

If you use the comment function in the SAXOPRINT blog section (www.saxoprint.co.uk/blog), your IP address will be stored. This is done for our safety, in case someone writes illegal content in comments and contributions (insults, prohibited political propaganda, etc.). We, as providers, can be prosecuted for any comments or posts and are therefore interested in the identity of the author. To post a comment, you must specify a valid email address, a (nick) name, and if necessary a valid website link. Your email address and personal information are not published or transferred to third parties. We reserve the right to delete comments with threats or insults, advertising or unlawful content, obvious backlink comments (in particular, SPAM), irrelevant context, or an invalid email address and, if necessary, to exclude the user from further use. The use of our comment function for commercial purposes is prohibited. By submitting the comment, you grant SAXOPRINT GmbH a temporally unlimited right of use for posting on our blog. There is the option of subscribing to follow-up comments. In this case, you receive a confirmation email, to verify whether you are the holder of the email address entered. Ongoing comment subscriptions can be cancelled at any time. Read the confirmation email for more information about this.

### b. Contacting us

We offer you the opportunity to contact us by email and/or via a contact form on our site. In this case, the information provided by the user is stored in order to enable contact to be established. There is no transfer to other third parties. We will not compare the data collected during newsletter registration with any other data that might be collected by other components of our site.

# 7. ONLINE ADVERTISING AND TARGETING

## a. Google Dynamic Remarketing

Our website uses the dynamic remarketing - function "Google AdWords", a service provided by Google Inc., 1600 Amphitheatre Parkway, mountain view, CA 94043, USA. The technology enables us to switch on automatically created, target group-oriented advertising after your visit to our site. The ads focus on the products and services that you clicked on during your last visit to our website. Google uses cookies to create interest-based ads. Google usually stores information such as your web query, IP address, browser type, browser language, the date and time of your request. This information is only used to assign the Web browser to a specific computer. It cannot be used to identify an individual. If users do not want to get user-based ads from Google, the advertisement setup can be disabled by using the <u>Google display setting</u>. For more information about how Google uses cookies, please see the <u>Google privacy policy</u>.

#### b. Double Click, Google ads and Google Conversion Tracking

To draw attention to our products, we place relevant ads for you and use "Google conversion tracking" in the course thereof, a service provided by Google, Inc., 1600 Amphitheatre Parkway, mountain view, Mountain View, CA 94043, USA. These ads are displayed following search queries on websites of the Google advertising network.

We are able to combine our ads with certain keywords. When you click on an ad, a cookie is set on the user's computer by Google. With the help of cookies, we can display ads based on the previous visits by a user. The use of DoubleClick cookies simply allows Google and its partner sites to display ads that are relevant to you based on your previous visits to our website or others on the Internet.

The cookie-generated information regarding your use of this website is transferred to a Google server in the USA and stored there. Google respects the provisions of the privacy policy of the "US Safe Harbor" agreement and is registered with the US Department of Commerce's "Safe Harbor" programme. The transfer of this data by Google to third parties only takes place on the basis of statutory provisions or in the context of processing order data. Google will not under any circumstances match its data with other data collected by Google. With the help of DoubleClick cookies, Google and we, as a customer, receive information about the fact that a user clicked on an advertisement and was redirected to our web pages.

The information thereby obtained is used exclusively for a statistical evaluation to optimise the advertisement. We do not obtain any information that can be used to identify users personally. The statistics provided to us by Google include the total number of users who clicked on one of our advertisements, and, where applicable, if they were redirected to a conversion tracking tagged page of our website. Based on these statistics, we can see which search terms were frequently clicked on our advertisement and which advertisements led to the user contacting us via the contact form. Further information on this can be found in the <u>Google privacy policy</u>. If you do not want this, you can prevent the storage of the cookies required for these technologies, for example, via your browser settings. In this case, your visit is not included in the user statistics. Users can do this via the <u>Display setting at Google</u> and deactivate interest-based advertising.

#### c. Use of Facebook retargeting

Our website uses the "Website Custom Audience" retargeting technology from the social network Facebook, which is operated by Facebook Inc., 1601 S. California Avenue, Palo Alto, CA 94394, USA ("Facebook"). This enables visitors to our website, who have already demonstrated an interest in our website and who are Facebook members, to also view relevant advertisements and offers on Facebook on the Facebook advertisement network.

In order to display such advertisements, we have incorporated a Facebook retargeting pixel into our website, which allows Facebook to capture our users as visitors to our website using a pseudonym and to use this data for our advertisement placement on Facebook.

Personal data is not collected or saved. Users cannot be identified on Facebook. Facebook does not link the data that is captured by the retargeting pixel with the user data stored on a Facebook user. Further information on data privacy and the settings options can be found at <a href="https://www.facebook.com/settings/?tab=ads">https://www.facebook.com/settings/?tab=ads</a> and <a href="https://www.facebook.com/settings/?tab=ads">https://www.facebook.com/settings/?tab=ads</a> and

#### d. Use of Facebook Custom Audiences

We use communication tools from the social network Facebook, which is operated by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA, in particular the product "Custom Audiences". In principle, an irreversible and non-personal checksum (hash value) is generated from usage data, which can be transmitted to Facebook for analysis and marketing purposes.

#### d. Deactivation help for third party providers of online advertising

With the help of the opt out tool from the <u>Network Advertising Initiative</u> (NAI) and <u>EDAA</u> (European Interactive Digital Advertising Alliance) the use of cookies may be disabled. However, we would like to point out that we have no influence on the completeness of the deactivation of the third-party cookies for these free services.

### 8. WITHDRAWAL OF CONSENT

You have provided the following consent, possibly as part of the ordering process. We would like to advise that you may withdraw your consent at any time, with immediate effect.

### 9. PAYMENT

When invoice is selected as the method of payment, in case of legitimate interest SAXOPRINT GmbH reserves the right to carry out a credit check and is entitled to share personal information with the credit reference agency specified below for the purpose of assessing the customer's credit and obtaining and processing information. Your legitimate interests are taken into account in accordance with legal provisions.

# Creditsafe Bryn House,

Caerphilly Business Park, Van Road, Caerphilly CF83 3GG United Kingdom

# Telephone 020 3608 0777 E-mail <u>ukinfo@creditsafeuk.com</u>

In order to be able to provide you with services prior to payment (payment by invoice, instalments, etc.), we first need to ensure that these payment methods will not be misused and that consumers will be protected against overspending. Our company is therefore linked to the credit risk warning system of the credit reference agency (Creditsafe, Bryn House, Caerphilly Business Park, Van Road, Caerphilly CF83 3GG, United Kingdom), ensuring protection against defaults in payment due to inability to pay, against misuse based on refusal to pay and against misuse by third parties. In order to be able to obtain a credit check from the credit reference agency, we provide it with your personal and address information. You can informally retract consent for your data to be shared with the credit reference agency at any time, in which case the payment options available to you will be restricted to advance payment and e-payment. In such a case, we are no longer able to provide you with services prior to payment and, if applicable, must discontinue them. We also provide the credit reference agency with personal contract information and information about payment behaviour that does not comply with contract stipulations, and obtain the same information regarding your contractual relationships with others that develop during our contractual dealings with you. This information is shared within the bounds of what is legally permissible and solely for the purpose of protecting the legitimate interests of our company or those of another contracting partner, all the while taking into account your legitimate interests and your concerns regarding the termination of reporting. The credit reference agency is only provided with information regarding behaviour that does not comply with contract stipulations if you have expressly provided consent in one of the forms stipulated by the requirements of Sec. 4a, Para. 1, of the German Federal Data Protection Act (Bundesdatenschutzgesetz – BDSG). Nevertheless, we reserve the right and are permitted by law to provide the aforementioned credit reference agency with your personal information regarding a claim for payment if you are late on a payment, if you have received two warnings in writing following the due date of the payment, if four weeks have passed between the first warning and the reporting, and if you have not challenged the legitimacy of the claim for payment. We will provide you with sufficient notice before providing the credit reference agency with your information. We would like to point out that, unlike in the past, regulations do not require an individual assessment in consideration of your interests to be carried out prior to reporting to the credit reference agency and the process is now automated to a much higher degree.

# **10. OPENING A CUSTOMER ACCOUNT**

Inventory data (name, address, e-mail, telephone number and bank details) as well as usage data (user name and password) will be stored in a customer database when a new customer account is opened. This will enable me to log in using my user name and password and make future purchases without having to re-enter my information.

# **11. CONSENT FOR E-MAIL ADVERTISING**

You may consent to receiving interesting offers by regular e-mail. Your e-mail address will not be forwarded to other companies. If you decide to discontinue receiving these services in the future, you can withdraw your consent at any time. To do this, please click "Unsubscribe" at the end of the newsletter, or send an e-mail to <u>service@saxoprint.co.uk</u>, with "Unsubscribe from newsletter" in the subject line.

# 12. DATA PROTECTION SUPERVISOR CONTACT

If you have any questions or suggestions regarding this privacy policy, please contact SAXOPRINT's appointed Data Protection Supervisor under privacy[at]saxoprint.com. This email address is also available to you if you are concerned about compliance with our Code of Conduct.

- Email: privacy[at]saxoprint.com c.o. Privacy Policy Supervisor Thomas Iberl
- Postal Address: SAXOPRINT GmbH c.o. Privacy Policy Supervisor Thomas Iberl Enderstraße 92c 01277 Dresden Germany

As at: January 2018