

Privacy Notice

This is the privacy notice of the Paperhat Group. Our registered office is at 5 Fleet Place, London, EC4M 7RD. We are company number 03126476, registered in England and Wales.

In this document, "we", "our", or "us" refer to Paperhat Group Limited and all subsidiaries, including: Paperhat Communications Limited, Paperhat FTP Limited, CTi Digital Limited, Grebot Donnelly Associates Limited, Paperhat Poland Sp., Despark Bulgaria, Despark UK Limited, Nirvana CPH Limited, Paperhat Germany GmbH, Paperhat USA Inc, Paperhat Hong Kong.

Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We take seriously the protection of your privacy and confidentiality. We understand that you are entitled to know that your personal data will not be used for any purpose unintended by you, and will not accidentally fall into the hands of a third party.
3. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
4. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
5. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org

6. Except as set out below, we do not share, or sell, or disclose to a third party, any information about you.

Data we process

We aim to process data, whether personal data or not, only to the extent necessary for us to provide our clients with our services and for other agreed purposes.

Often we may aggregate information in a general way and use it to provide class information. If we use it for this purpose, you as an individual will not be personally identifiable.

Suppliers

If you supply our business with goods or services, including subcontracted services that we supply to our clients, then we may process your personal information. However, we do so only to the extent necessary to contract with you.

In most cases, your personal data will have been provided to us by you. However, sometimes we use third parties such as credit rating agencies to make decisions regarding our relationship.

Third parties connected to clients and suppliers

We may process your personal data if you have a personal or business connection with any of our clients or suppliers. For example, you may be an employee, business partner, other adviser, or supplier.

The data we process may include contact information, information about your relationship to our client or supplier.

We may be given your personal data by our clients or suppliers, or by third parties acting on the instructions of a client or a supplier.

We ask our clients and suppliers to bring this privacy notice to your attention as soon as they become aware that we process your personal data.

The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant then we shall immediately stop processing your data.

If the basis changes then, if required by law, we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

7. Information we process because we have a contractual obligation with you

We may process personal information when a contract has been formed with our business and processing is necessary to carry out our obligations under that contract, or when processing personal data is necessary in order to form a contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

8. Information we process with your consent

Only when you have given us explicit permission to do so, do we process your personal information under the basis of consent.

For example, you might have agreed that we may pass your name and contact information to selected associates whom we consider may provide services or products you would find useful.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us at privacy@paperhatgroup.com. However, if you do so, you may not be able to use our website or our services further.

9. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- record-keeping for the proper and necessary administration of our business.
- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- insuring against or obtaining professional advice that is required to manage business risk
- protecting your interests where we believe we have a duty to do so

10. Information we process because we have a legal obligation

Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal or tax authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

Specific uses of information

11. Job application and employment

If you send us information in connection with a job application, we may keep it for up to one year in case we decide to contact you at a later date.

If we employ you, we collect information about you and your work from time to time throughout the period of your employment. This information will be used only for purposes directly relevant to your employment and will be retained for six years after the end of your employment. Thereafter, we will retain only minimal information to satisfy reference requests where we believe that there is a legitimate interest to provide these.

12. Office visitors

If you visit our office you will be required to sign in at reception. We keep a record of your visit in order to maintain the security of our premises, your safety and the safety of other visitors.

We keep the record of your visit only for as long as necessary, and in any case, for less than one year.

Closed circuit television (CCTV) may be used at our premises and surrounding area in order to deter and to help investigate crime.

We may process personal information captured from CCTV, including images and behaviours, on the basis of legitimate interests.

This information may be shared with the data subject, our employees and agents and the police.

Our landlords and their agents may also use CCTV.

13. Contact management system

We use information systems to process personal data.

Data subjects include existing, former and prospective clients, suppliers, agents and representatives.

Personal data that we process includes the name of the person, information about his or her relationship with us or with other data subjects, and contact information.

We process this data on the basis of legitimate interests for purposes that include:

- managing and developing our business or services
- informing clients and prospective clients about our services
- determining relationships between clients and our partners and employees
- analysing whether we provide clients with a high level of service

We do not sell or share any personal data with third parties unless we have explicit consent to do so from the data subject.

14. Communicating with you

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business

We keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high- quality service.

15. Dealing with complaints

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do share this information, and if we do, what that information is.

We may also compile statistics showing information obtained from complaints to assess the level of service we provide, but not in a way that could identify you or any other person.

Use of information we collect through automated systems when you visit our website

16. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit any website. They allow information gathered on one web page to be stored until it is needed for use on another, allowing a website to provide you with a personalised experience and the website owner with statistics about how you use the website so that it can be improved.

Some cookies may last for a defined period of time, such as one day or until you close your browser. Others last indefinitely.

Your web browser should allow you to delete any you choose. It also should allow you to prevent or limit their use.

Our website uses cookies. They are placed by software that operates on our servers, and by software operated by third parties whose services we use.

We use cookies in the following ways:

16.1 to track how you use our website

16.2 to record whether you have seen specific messages we display on our website

16.3 to record your answers to surveys and questionnaires on our site while you complete them

17. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record reported information such as your geographical location and your IP address. We also record reported information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

This data cannot be used to identify you personally.

18. Our use of re-marketing

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website.

We may use a third party to provide us with re-marketing services from time to time. If so, then if you have consented to our use of cookies, you may see advertisements for our products and services on other websites.

Disclosure and sharing of your information

19. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we sometimes receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

20. Data may be processed outside the European Union

Our websites are hosted in the United Kingdom.

We may also use outsourced services in countries outside the European Union from time to time in other aspects of our business.

Accordingly data obtained within the UK or any other country could be processed outside the European Union.

Where personal data is transferred outside the European Union, we have in place appropriate safeguards to protect that data.

20.1 All our subsidiaries, including those outside the European Union, abide by the same Group level policy regarding data protection.

20.2 Data protection clauses in our contracts with third parties include appropriate transfer clauses to protect personal information.

Access to your own information

21. Obtaining a copy of your personal information

21.1 At any time you may review or obtain a copy of any information that we hold about you, by sending a request to privacy@paperhatgroup.com.

21.2 After receiving the request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

22. Removal of your information

If you wish us to remove personally identifiable information from our website, you may contact us at privacy@paperhatgroup.com.

This may limit the service we can provide to you.

23. Verification of your information

When we receive any request to access, edit or delete personal identifiable information we shall first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Other matters

24. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check SSL is used by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

25. How you can complain

25.1 If you are not happy with our privacy policy or if have any complaint, then you should inform us by email. Our address is privacy@paperhatgroup.com.

25.2 If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

25.3 If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

26. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

26.1 to provide you with the services you have requested;

26.2 to comply with other law, including for the period demanded by our tax authorities;

26.3 to support a claim or defence in court.

27. **Compliance with the law**

Our privacy policy has been compiled so as to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

However, ultimately it is your choice as to whether you wish to use our website.

28. **Review of our privacy policy**

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please email privacy@paperhatgroup.com.