

# Privacy notice

Last updated: 23rd July 2018

www.indigo-promotions.co.uk ('Website') is provided by Promotional Items ('we'/'us'/'our'). In doing so, we may be in a position to receive and process personal information relating to you. As the controller of this information, we're providing this Privacy Notice ('Notice') to explain our approach to personal information. This Notice forms part of our Terms & Conditions, which governs the use of this Website.

We intend only to process personal information fairly and transparently as required by data protection law including the General Data Protection Regulation (GDPR). In particular, before obtaining information from you (including through use of cookies) we intend to alert you to this Notice, let you know how we intend to process the information (including through use of cookies) and (unless processing is necessary for at least one of the 5 reasons outlined in clause 2 below) we'll only process the information if you consent to that processing. The GDPR also defines certain 'special categories' of personal information that's considered more sensitive. These categories require a higher level of protection, as explained below.

Of course, you may browse parts of this Website without providing any information about yourself and without accepting cookies. In that case, it's unlikely we'll possess and process any information relating to you.

We'll start this Notice by setting out the conditions we must satisfy before processing your data. However, you may wish to start with this table at clause 4, which summarises what we intend to collect, or this table at clause 8.5, which summarises our use of cookies. The Notice also explains some of the security measures we take to protect your personal information, and tells you certain things we will or won't do. You should read this Notice in conjunction with the Terms & Conditions.

Sometimes, when you take a new service or product from us, or discuss taking a new service or product but decide against it, we might wish to provide you with further information about similar services or products by email or other written electronic communication. In that situation, we'll always give you the opportunity to refuse to receive that further information and you can change your mind at any point (opt-out) by contacting our Data Protection Officer (DPO) as set in clause 1.4. We'll endeavour to remind you of your right to opt-out on each occasion that we provide such information.

## 1. Identity and contact details

- 1.1. Registered number: 04992437
- 1.2. Registered office: Unit 21A Meridian House,, Road One, Winsford Industrial Estate, Winsford, Cheshire, CW7 2QG
- 1.3. sales@indigo-promotions.co.uk
- 1.4. Our Data Protection Officer (DPO), Mr Stephen Johnson, would welcome communication from you regarding any matter relating to data protection, and can be contacted by phone on 01606 871555, by post at the address shown above at 1.2 or by email at steve@indigo-promotions.co.uk.

## 2. When we're allowed to collect information from you

We will only collect personal information relating to you if one of the following conditions have been satisfied:

- 2.1. You have clearly told us that you are content for us to collect that information for the certain purpose or purposes that we will have specified.
- 2.2. The processing is necessary for the performance a contract that we have with you.
- 2.3. The processing is necessary so that we can comply with the law.
- 2.4. The processing is necessary to protect someone's life.
- 2.5. The processing is necessary for performance of a task that's in the public interest.
- 2.6. The processing is necessary for our or another's legitimate interest - but in this case, we'll balance those interests against your interests.

### 3. How to consent

- 3.1. At the point of collecting the information, we'll endeavour to explain how we intend to use the information and which of these purposes apply. If we rely on consent, we'll provide you with the opportunity to tell us that you're happy to provide the information.
- 3.2. If at any point in time you change your mind and decide that you don't consent, please let us know and we'll endeavour to stop processing your information in the specified manner, or we'll delete your data if there is no continuing reason for possessing it.
- 3.3. If you don't consent to a particular bit of processing, we'll endeavour to ensure that the Website and our service continue to operate without the need for that information.

### 4. Information we expect to collect from you

- 4.1. We envisage asking for the following types of information from you:

Information type	Purpose and related details	Justification
Contact Details (Name, Title, Phone Number (including mobile), website address, Notes, Invoice Address, Company Name, Previously used Contact Details, Tags, Pertinent Bespoke Dates)	<ul style="list-style-type: none"><li>• We ask for this to In order to be able to fulfil your order, verify your identity when you contact us, tell you about special offers, help analyse the demography of visitor to our website and help display appropriate advertising on our website.</li><li>• We intend to share this data with our suppliers and delivery companies in order to be able to fulfil your order and to be able to deliver your order to your chosen address.. They will be processing it for our purposes, under our directions and under a contract to ensure compliance with data protection law</li></ul>	<ul style="list-style-type: none"><li>• It's necessary for the performance of a contract with you</li></ul>
Credit Limit, Credit Check Date, Accounts Email and Contact Name, Financial Notes, Credit Card Tokens plus the last four digits on Card.	<ul style="list-style-type: none"><li>• We ask for this to generate invoices and to process your payment.</li><li>• We intend to share this data with payment processing companies, such as Paypal, banks and credit agencies. so that they can provide a credit limit and to process the payment for us.. They will be processing it for our purposes, under our directions and under a contract to ensure compliance with data protection law</li></ul>	<ul style="list-style-type: none"><li>• It's necessary for the performance of a contract with you</li></ul>
Order requirements (Enquiries, Quotes, Artwork, Proofs, Sales Orders, Invoices)	<ul style="list-style-type: none"><li>• We ask for this to fulfil your order</li><li>• We intend to share this data with our suppliers and delivery companies so that they can produce and ship your order.. They will be processing it for our purposes, under our directions and under a contract to ensure compliance with data protection law</li></ul>	<ul style="list-style-type: none"><li>• It's necessary for the performance of a contract with you</li></ul>

- 4.2. We may collect personal information about you from a number of sources, including the following:
  - 4.2.1. From you when you agree to take a service or product from us, in which case this may include your contact details, date of birth, how you will pay for the product or service and your bank details.
  - 4.2.2. From you when you contact us with an enquiry or in response to a communication from us, in which case, this may tell us something about how you use our services.
  - 4.2.3. From documents that are available to the public, such as the electoral register.
  - 4.2.4. From third parties to whom you have provided information with your consent to pass it on to other organisations or persons - when we receive such information we will let you know as soon as is reasonably practicable.

- 4.3. If you refuse to provide information requested, then if that information is necessary for a service we provide to you we may need to stop providing that service.
- 4.4. At the time of collecting information, by whichever method is used, we'll endeavour to alert you and inform you about our purposes and legal basis for processing that information, as well as whether we intend to share the information with anyone else or send it outside of the European Economic Area. If at any point you think we've invited you to provide information without explaining why, feel free to object and ask for our reasons.

## 5. Using your personal information

- 5.1. Data protection, privacy and security are important to us, and we shall only use your personal information for specified purposes and shall not keep such personal information longer than is necessary to fulfil these purposes. The following are examples of such purposes. We have also indicated below which GDPR justification applies, however it will depend on the circumstances of each case. At the time of collecting we will provide further information, and you may always ask for further information from us.
  - 5.1.1. To help us to identify you when you contact us. This will normally be necessary for the performance our contract.
  - 5.1.2. To help us to identify accounts, services and/or products which you could have from us or selected partners from time to time. We may do this by automatic means using a scoring system, which uses the personal information you've provided and/or any information we hold about you and personal information from third party agencies (including credit reference agencies). We will only use your information for this purpose if you agree to it.
  - 5.1.3. To help us to administer and to contact you about improved administration of any accounts, services and products we have provided before, do provide now or will or may provide in the future. This will often be necessary, but sometimes the improvements will not be necessary in which case we will ask whether you agree.
  - 5.1.4. To allow us to carry out marketing analysis and customer profiling (including with transactional information), conduct research, including creating statistical and testing information. This will sometimes require that you consent, but will sometimes be exempt as market research.
  - 5.1.5. To help to prevent and detect fraud or loss. This will only be done in certain circumstances when we consider it necessary or the law requires it.
  - 5.1.6. To allow us to contact you by written electronic means (such as email, text or multimedia messages) about products and services offered by us where:
    - 5.1.6.1. these products are similar to those you have already purchased from us,
    - 5.1.6.2. you were given the opportunity to opt out of being contacted by us at the time your personal information was originally collected by us and at the time of our subsequent communications with you, and
    - 5.1.6.3. you have not opted out of us contacting you.
  - 5.1.7. To allow us to contact you in any way (including mail, email, telephone, visit, text or multimedia messages) about products and services offered by us and selected partners where you have expressly consented to us doing so.
  - 5.1.8. We may monitor and record communications with you (including phone conversations and emails) for quality assurance and compliance.
    - 5.1.8.1. Before doing that, we will always tell you of our intentions and of the specific purpose in making the recording. Sometimes such recordings will be necessary to comply with the law. Alternatively, sometimes the recording will be necessary for our legitimate interest, but in that case we'll only record the call if our interest outweighs yours. This will depend on all the circumstances, in particular the importance of the information and whether we can obtain the information another way that's less intrusive.
    - 5.1.8.2. If we think the recording would be useful for us but that it's not necessary we'll ask whether you consent to the recording, and will provide an option for you to tell us that you consent. In those situations, if you don't consent, the call will either automatically end or will not be recorded.

- 5.1.9. When it's required by law, we'll check your details with fraud prevention agencies. If you provide false or inaccurate information and we suspect fraud, we intend to record this.
- 5.2. We will not disclose your personal information to any third party except in accordance with this Notice, and in particular in these circumstances:
  - 5.2.1. They will be processing the data on our behalf as a data processor (where we'll be the data controller). In that situation, we'll always have a contract with the data processor as set out in the GDPR. This contract provides significant restrictions as to how the data processor operates so that you can be confident your data is protected to the same degree as provided in this Notice.
  - 5.2.2. Sometimes it might be necessary to share data with another data controller. Before doing that we'll always tell you. Note that if we receive information about you from a third party, then as soon as reasonably practicable afterwards we'll let you know; that's required by the GDPR.
  - 5.2.3. Alternatively, sometimes we might consider it to be in your interest to send your information to a third party. If that's the case, we'll always ask whether you agree before sending.
- 5.3. Where you give us personal information on behalf of someone else, you confirm that you have provided them with the information set out in this Notice and that they have not objected to such use of their personal information.
- 5.4. In connection with any transaction which we enter into with you:
  - 5.4.1. We may carry out one or more credit checks where you have given us your express consent.
  - 5.4.2. We may carry out one or more fraud prevention checks with licensed fraud prevention agencies.
  - 5.4.3. We and they may keep a record of the search. Information held about you by these agencies may be linked to records relating to other people living at the same address with whom you are financially linked. These records may also be taken into account in credit and fraud prevention checks. Information from your application and payment details of your account will be recorded with one or more of these agencies and may be shared with other organisations to help make credit and insurance decisions about you and members of your household with whom you are financially linked and for debt collection and fraud prevention. This includes those who have moved house and who have missed payments.
  - 5.4.4. If you provide false or inaccurate information to us and we suspect fraud, we will record this and may share it with other people and organisations. We, and other credit and insurance organisations, may also use technology to detect and prevent fraud.
  - 5.4.5. If you need details of those credit agencies and fraud prevention agencies from which we obtain and with which we record information about you, please write to our Data Protection Officer as detailed in clause 1.4.
  - 5.4.6. We may need to transmit the payment and delivery information provided by you during the order process for the purpose of obtaining authorisation from your bank or from PayPal.
- 5.5. We may allow other people and organisations to use personal information we hold about you in the following circumstances:
  - 5.5.1. If we, or substantially all of our assets, are acquired or are in the process of being acquired by a third party, in which case personal information held by us, about our customers, will be one of the transferred assets.
  - 5.5.2. If we have been legitimately asked to provide information for legal or regulatory purposes or as part of legal proceedings or prospective legal proceedings.
  - 5.5.3. We may employ companies and individuals to perform functions on our behalf and we may disclose your personal information to these parties for the purposes set out above, for example, for fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customer lists, analysing data, providing marketing assistance, providing search results and links (including paid listings and links), processing credit and debit card payments and providing customer service. Those parties will be bound by strict contractual provisions with us and will only have access to personal information needed to perform their functions, and they may not use it for any

other purpose. Further, they must process the personal information in accordance with this Notice and as permitted by the GDPR. From time to time, these other people and organisations to whom we may pass your personal information may be outside the European Economic Area. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Notice and the GDPR.

## 6. Protecting information

- 6.1. We have strict security measures to protect personal information.
- 6.2. We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software to encrypt information you input.
- 6.3. We reveal only the last five digits of your credit card numbers when confirming an order. Of course, we transmit the entire credit card number to the appropriate credit card company during order processing.
- 6.4. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.
- 6.5. It is important for you to protect against unauthorised access to your password and to your computer. Be sure to sign off when you finish using a shared computer.

## 7. The internet

- 7.1. If you communicate with us using the internet, we may occasionally email you about our services and products. When you first give us personal information through the Website, we will normally give you the opportunity to say whether you would prefer that we don't contact you by email. You can also always send us an email (at the address set out below) at any time if you change your mind.
- 7.2. Please remember that communications over the internet, such as emails and webmails (messages sent through a website), are not secure unless they have been encrypted. Your communications may go through a number of countries before they are delivered - this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of personal information that is beyond our control.

## 8. Cookies and other internet tracking technology

- 8.1. When we provide services, we want to make them easy, useful and reliable. This sometimes involves placing small amounts of information on your computer, which is sent back to us at a later time. These are called 'cookies'. These cookies are listed in the table at clause 8.5. Some websites don't use cookies but use related technology for gaining information about website users such as JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. Multiple cookies may be found in a single file depending on which browser you use.
- 8.2. Where applicable, this section of the Notice also relates to that technology but the term 'cookie' is used throughout.
- 8.3. Some of these cookies are essential to services you've requested from us, whereas others are used to improve services for you, for example through:
  - 8.3.1. Letting you navigate between pages efficiently
  - 8.3.2. Enabling a service to recognise your computer so you don't have to give the same information during one task
  - 8.3.3. Recognising that you have already given a username and password so you don't need to enter it for every web page requested
  - 8.3.4. Measuring how many people are using services, so they can be made easier to use and that there is enough capacity to ensure they are fast
- 8.4. To learn more about cookies, you may wish to visit: [www.allaboutcookies.org](http://www.allaboutcookies.org), [www.youronlinechoices.eu](http://www.youronlinechoices.eu) or [www.google.com/policies/technologies/cookies/](http://www.google.com/policies/technologies/cookies/)
- 8.5. This Website uses, or allows use of, the following cookies:

Cookie name	Cookie qualities	Consent needed
Google Analytics	<ul style="list-style-type: none"> <li>• Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising. For the web analytics through Google Analytics the controller uses the application "_gat._anonymizelp". By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymised when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area. The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us. Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements. The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. Google may pass these personal data collected through the technical procedure to third parties.</li> <li>• Category 2 - performance</li> <li>• Third party: another website is placing the cookie</li> <li>• Persistent cookie, expiry: never</li> <li>• The information will be sent to Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States so that we can analyze the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us</li> <li>• The information from the cookie may be transferred to the US, and the receiving entity is registered with the EU-US Privacy Shield</li> </ul>	Yes

Twitter	<ul style="list-style-type: none"> <li>• On this website, the controller has integrated components of Twitter. Twitter is a multilingual, publicly-accessible microblogging service on which users may publish and spread so-called 'tweets,' e.g. short messages, which are limited to 140 characters. These short messages are available for everyone, including those who are not logged on to Twitter. The tweets are also displayed to so-called followers of the respective user. Followers are other Twitter users who follow a user's tweets. Furthermore, Twitter allows you to address a wide audience via hashtags, links or retweets. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a Twitter component (Twitter button) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Twitter component of Twitter. Further information about the Twitter buttons is available under <a href="https://about.twitter.com/de/resources/buttons">https://about.twitter.com/de/resources/buttons</a>. During the course of this technical procedure, Twitter gains knowledge of what specific sub-page of our website was visited by the data subject. The purpose of the integration of the Twitter component is a retransmission of the contents of this website to allow our users to introduce this web page to the digital world and increase our visitor numbers. If the data subject is logged in at the same time on Twitter, Twitter detects with every call-up to our website by the data subject and for the entire duration of their stay on our Internet site which specific sub-page of our Internet page was visited by the data subject. This information is collected through the Twitter component and associated with the respective Twitter account of the data subject. If the data subject clicks on one of the Twitter buttons integrated on our website, then Twitter assigns this information to the personal Twitter user account of the data subject and stores the personal data. Twitter receives information via the Twitter component that the data subject has visited our website, provided that the data subject is logged in on Twitter at the time of the call-up to our website. This occurs regardless of whether the person clicks on the Twitter component or not. If such a transmission of information to Twitter is not desirable for the data subject, then he or she may prevent this by logging off from their Twitter account before a call-up to our website is made. The applicable data protection provisions of Twitter may be accessed under <a href="https://twitter.com/privacy?lang=en">https://twitter.com/privacy?lang=en</a>.</li> <li>• Category 2 - performance</li> <li>• Third party: another website is placing the cookie</li> <li>• Persistent cookie, expiry: never</li> <li>• The information will be sent to Twitter, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, UNITED STATES. so that a retransmission of the contents of this website allows our users to introduce this web page to the digital world and increase our visitor numbers.</li> <li>• The information from the cookie may be transferred to the US, and the receiving entity is registered with the EU-US Privacy Shield</li> </ul>	Yes
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Paypal	<ul style="list-style-type: none"> <li>• On this website, the controller has integrated components of PayPal. PayPal is an online payment service provider. Payments are processed via so-called PayPal accounts, which represent virtual private or business accounts. PayPal is also able to process virtual payments through credit cards when a user does not have a PayPal account. A PayPal account is managed via an e-mail address, which is why there are no classic account numbers. PayPal makes it possible to trigger online payments to third parties or to receive payments. PayPal also accepts trustee functions and offers buyer protection services. If the data subject chooses "PayPal" as the payment option in the online shop during the ordering process, we automatically transmit the data of the data subject to PayPal. By selecting this payment option, the data subject agrees to the transfer of personal data required for payment processing. The personal data transmitted to PayPal is usually first name, last name, address, email address, IP address, telephone number, mobile phone number, or other data necessary for payment processing. The processing of the purchase contract also requires such personal data, which are in connection with the respective order. The transmission of the data is aimed at payment processing and fraud prevention. The controller will transfer personal data to PayPal, in particular, if a legitimate interest in the transmission is given. The personal data exchanged between PayPal and the controller for the processing of the data will be transmitted by PayPal to economic credit agencies. This transmission is intended for identity and creditworthiness checks. PayPal will, if necessary, pass on personal data to affiliates and service providers or subcontractors to the extent that this is necessary to fulfil contractual obligations or for data to be processed in the order. The data subject has the possibility to revoke consent for the handling of personal data at any time from PayPal. A revocation shall not have any effect on personal data which must be processed, used or transmitted in accordance with (contractual) payment processing. The applicable data protection provisions of PayPal may be retrieved under <a href="https://www.paypal.com/us/webapps/mpp/ua/privacy-full">https://www.paypal.com/us/webapps/mpp/ua/privacy-full</a>.</li> <li>• Category 2 - performance</li> <li>• Third party: another website is placing the cookie</li> <li>• Persistent cookie, expiry: never</li> <li>• The information will be sent to PayPal (Europe) S.à.r.l. &amp; Cie. S.C.A., 22-24 Boulevard Royal, 2449 Luxembourg, Luxembourg. so that we can process payments and fulfil your order.</li> </ul>	Yes
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Stripe UK

- On this website, the controller has integrated components of Stripe UK. Stripe UK is an online payment service provider. Payments are processed via Stripe accounts, which represent virtual private or business accounts. Stripe UK is also able to process virtual payments through credit cards when a user does not have a Stripe UK account. A Stripe UK account is managed via an e-mail address, which is why there are no classic account numbers. Stripe UK makes it possible to trigger online payments to third parties or to receive payments. Stripe UK also accepts trustee functions and offers buyer protection services. If the data subject chooses "Stripe UK" as the payment option in the online shop during the ordering process, we automatically transmit the data of the data subject to Stripe UK. By selecting this payment option, the data subject agrees to the transfer of personal data required for payment processing. The personal data transmitted to Stripe UK is usually first name, last name, address, email address, IP address, telephone number, mobile phone number, or other data necessary for payment processing. The processing of the purchase contract also requires such personal data, which are in connection with the respective order. The transmission of the data is aimed at payment processing and fraud prevention. The controller will transfer personal data to Stripe UK, in particular, if a legitimate interest in the transmission is given. The personal data exchanged between Stripe UK and the controller for the processing of the data will be transmitted by Stripe UK to economic credit agencies. This transmission is intended for identity and creditworthiness checks. Stripe UK will, if necessary, pass on personal data to affiliates and service providers or subcontractors to the extent that this is necessary to fulfil contractual obligations or for data to be processed in the order. The data subject has the possibility to revoke consent for the handling of personal data at any time from Stripe UK. A revocation shall not have any effect on personal data which must be processed, used or transmitted in accordance with (contractual) payment processing. The applicable data protection provisions of Stripe UK may be retrieved under <https://stripe.com/gb/privacy>.
- Category 2 - performance
- Third party: another website is placing the cookie
- Persistent cookie, expiry: never
- The information will be sent to 207 - 211 Old Street, London EC1V 9NR so that we can process payments and fulfil your order.

<p>Google Adwords</p>	<ul style="list-style-type: none"> <li>• On this website, the controller has integrated Google AdWords. Google AdWords is a service for Internet advertising that allows the advertiser to place ads in Google search engine results and the Google advertising network. Google AdWords allows an advertiser to pre-define specific keywords with the help of which an ad on Google's search results only then displayed, when the user utilizes the search engine to retrieve a keyword-relevant search result. In the Google Advertising Network, the ads are distributed on relevant web pages using an automatic algorithm, taking into account the previously defined keywords. The purpose of Google AdWords is the promotion of our website by the inclusion of relevant advertising on the websites of third parties and in the search engine results of the search engine Google and an insertion of third-party advertising on our website. If a data subject reaches our website via a Google ad, a conversion cookie is filed on the information technology system of the data subject through Google. The definition of cookies is explained above. A conversion cookie loses its validity after 30 days and is not used to identify the data subject. If the cookie has not expired, the conversion cookie is used to check whether certain sub-pages, e.g. the shopping cart from an online shop system, were called up on our website. Through the conversion cookie, both Google and the controller can understand whether a person who reached an AdWords ad on our website generated sales, that is, executed or cancelled a sale of goods. The data and information collected through the use of the conversion cookie is used by Google to create visit statistics for our website. These visit statistics are used in order to determine the total number of users who have been served through AdWords ads to ascertain the success or failure of each AdWords ad and to optimize our AdWords ads in the future. Neither our company nor other Google AdWords advertisers receive information from Google that could identify the data subject. The conversion cookie stores personal information, e.g. the Internet pages visited by the data subject. Each time we visit our Internet pages, personal data, including the IP address of the Internet access used by the data subject, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties. The data subject may, at any time, prevent the setting of cookies by our website, as stated above, by means of a corresponding setting of the Internet browser used and thus permanently deny the setting of cookies. Such a setting of the Internet browser used would also prevent Google from placing a conversion cookie on the information technology system of the data subject. In addition, a cookie set by Google AdWords may be deleted at any time via the Internet browser or other software programs. The data subject has a possibility of objecting to the interest based advertisement of Google. Therefore, the data subject must access from each of the browsers in use the link <a href="http://www.google.de/settings/ads">www.google.de/settings/ads</a> and set the desired settings. Further information and the applicable data protection provisions of Google may be retrieved under <a href="https://www.google.com/intl/en/policies/privacy/">https://www.google.com/intl/en/policies/privacy/</a>.</li> <li>• Category 4 - targeting and advertising</li> <li>• Third party: another website is placing the cookie</li> <li>• Persistent cookie, expiry: never</li> <li>• The information will be sent to Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES. so that to create visit statistics for our website. These visit statistics are used in order to determine the total number of users who have been served through AdWords ads to ascertain the success or failure of each AdWords ad and to optimize our AdWords ads in the future.</li> <li>• The information from the cookie may be transferred to the US, and the receiving entity is registered with the EU-US Privacy Shield</li> </ul>	<p>Yes</p>
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<p>Google Remarketing</p>	<ul style="list-style-type: none"> <li>• On this website, the controller has integrated Google Remarketing services. Google Remarketing is a feature of Google AdWords, which allows an enterprise to display advertising to Internet users who have previously resided on the enterprise's Internet site. The integration of Google Remarketing therefore allows an enterprise to create user-based advertising and thus shows relevant advertisements to interested Internet users. The purpose of Google Remarketing is the insertion of interest-relevant advertising. Google Remarketing allows us to display ads on the Google network or on other websites, which are based on individual needs and matched to the interests of Internet users. Google Remarketing sets a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google enables a recognition of the visitor of our website if he calls up consecutive web pages, which are also a member of the Google advertising network. With each call-up to an Internet site on which the service has been integrated by Google Remarketing, the web browser of the data subject identifies automatically with Google. During the course of this technical procedure, Google receives personal information, such as the IP address or the surfing behaviour of the user, which Google uses, inter alia, for the insertion of interest relevant advertising. The cookie is used to store personal information, e.g. the Internet pages visited by the data subject. Each time we visit our Internet pages, personal data, including the IP address of the Internet access used by the data subject, is transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties. The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google may be deleted at any time via a web browser or other software programs. In addition, the data subject has the possibility of objecting to the interest-based advertising by Google. For this purpose, the data subject must call up the link to <a href="http://www.google.de/settings/ads">www.google.de/settings/ads</a> and make the desired settings on each Internet browser used by the data subject. Further information and the actual data protection provisions of Google may be retrieved under <a href="https://www.google.com/intl/en/policies/privacy/">https://www.google.com/intl/en/policies/privacy/</a>.</li> <li>• Category 4 - targeting and advertising</li> <li>• Third party: another website is placing the cookie</li> <li>• Persistent cookie, expiry: never</li> <li>• The information will be sent to Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States. so that we can display ads on the Google network or on other websites, which are based on individual needs and matched to the interests of Internet users.</li> <li>• The information from the cookie may be transferred to the US, and the receiving entity is registered with the EU-US Privacy Shield</li> </ul>	<p>Yes</p>
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8.6. The distinctions referred to in the above table are as follows:

- 8.6.1. First party versus third party cookies - we set first party cookies ourselves; third party cookies are set by other entities via our Website.
- 8.6.2. Session versus persistent cookies - session cookies only persist for the duration of that visit; persistent cookies last for longer
- 8.6.3. Identifying information removed - just because we've done this, they will still be personal information if the relevant information can be reassembled

- 8.6.4. Categories 1-4 found in the ICC UK Cookie guide, as explained below. Category 1 cookies don't require the user's consent, though you must still tell them about the cookies. Categories 2-4 do require their specific and informed consent.

Category 1	Strictly necessary	<p>These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. Without these cookies services you have asked for, like shopping baskets or e-billing, cannot be provided.</p> <p>We include in this category cookies that are used only for electronic communication. (The ICC doesn't refer to these cookies, but the law is the same.)</p> <p>Note that cookies for which another person is the controller will never be necessary for a service requested of you. On the other hand, if you've asked another person to send a cookie on your behalf for an essential feature of your website, that would be category 1.</p>
Category 2	Performance	<p>These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. This information is only used to improve how a website works.</p>
Category 3	Functionality	<p>These cookies allow the website to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. For instance, a website may be able to provide you with local weather reports or traffic news by storing in a cookie the region in which you are currently located. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as a live chat session.</p>
Category 4	Targeting and advertising	<p>These cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.</p>

- 8.7. As with any other information we may collect from you, we'll work to protect the security of your information during transmission by using by using Secure Sockets Layer (SSL) software to encrypt information you input.
- 8.8. The Website may include third-party advertising and links to third-party websites. We do not provide any personally identifiable customer personal information to these third-party advertisers or third-party websites except where you've consented in accordance with this privacy notice, however as to cookies please see above clause Cookies and other internet tracking technology.
- 8.9. We exclude all liability for loss that you may incur when interacting with this third-party advertising or using these third-party websites unless you've consented in accordance with this privacy notice.

## 9. Subscription to our marketing emails

On the Indigo Promotions website, users are given the opportunity to subscribe to our marketing emails. The sign up form used for this purpose asks for your name and email address.

Indigo Promotions informs its customers and business partners regularly by means of a marketing email about offers and promotions. The marketing email may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers to receive marketing emails. A confirmation e-mail will be sent to the e-mail address registered by a data subject for the first time for email marketing, for legal reasons, in the double opt-in procedure. This confirmation e-mail is used to prove whether the owner of the e-mail address as the data subject is authorised to receive the newsletter.

During the registration for marketing emails, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller.

The personal data collected as part of a registration for marketing emails will only be used to send our marketing emails. In addition, subscribers to our marketing emails may be informed by e-mail, as long as this is necessary for the operation of the marketing emails service or a registration in question, as this could be the case in the event of modifications to the marketing emails offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the marketing emails service to third parties. The subscription to our marketing emails may be terminated by the data subject at any time. The consent to the storage of personal data, which the data subject has given for marketing emails, may be revoked at any time. For the purpose of revocation of consent, a corresponding link is found in each marketing email. It is also possible to unsubscribe from our marketing emails at any time by contacting us at [sales@indigo-promotions.co.uk](mailto:sales@indigo-promotions.co.uk)

### **9.1 Marketing emails-Tracking**

Indigo Promotions marketing emails may contain so-called tracking pixels. A tracking pixel is a miniature graphic embedded in e-mails, which are sent in HTML format to enable log file recording and analysis. This allows a statistical analysis of the success or failure of online marketing campaigns. Based on the embedded tracking pixel, Indigo Promotions may see if and when an e-mail was opened by a data subject, and which links in the e-mail were clicked on by data subjects.

Such personal data collected in the tracking pixels contained in marketing emails are stored and analysed by the controller in order to optimise the shipping of the newsletter, as well as to adapt the content of future newsletters even better to the interests of the data subject. This personal data will not be passed on to third parties. Data subjects are at any time entitled to revoke the respective separate declaration of consent issued by means of the double-opt-in procedure. After a revocation, this personal data will be deleted by the controller. Indigo Promotions automatically regards a withdrawal from the receipt of the newsletter as a revocation

## **10. Further information**

- 10.1. If you would like any more information or you have any comments about this Notice, please write to our Data Protection Officer as detailed in clause 1.4.
- 10.2. Please note that we may have to amend this Notice on occasion, for example if we change the cookies that we use. If we do that, we will publish the amended version on the Website. In that situation we will endeavour to alert you to the change, but it's also your responsibility to check regularly to determine whether this Notice has changed.
- 10.3. You can ask us for a copy of this Notice by writing to the above address or by emailing us at [sales@indigo-promotions.co.uk](mailto:sales@indigo-promotions.co.uk). This Notice applies to personal information we hold about individuals. It does not apply to information we hold about companies and other organisations.
- 10.4. If you would like access to the personal information that we hold about you, you can do this by emailing us at [sales@indigo-promotions.co.uk](mailto:sales@indigo-promotions.co.uk) or writing to us at the address noted above. There is not normally a fee for such a request, however if the request is unfounded, repetitive or excessive we may request a fee or refuse to comply with your request. You can also ask us to send the personal information we hold about you to another controller.
- 10.5. We aim to keep the personal information we hold about you accurate and up to date. If you tell us that we're holding any inaccurate or incomplete personal information about you, we will promptly amend, complete or delete it accordingly. Please email us at [sales@indigo-promotions.co.uk](mailto:sales@indigo-promotions.co.uk) or write to us at the address above to update your personal information. You have the right to complain to the Information Commissioner's Office if we don't do this.
- 10.6. You can ask us to delete the personal information that we hold about you if we relied on your consent in holding that information or if it's no longer necessary. You can also restrict or object to our processing of your personal information in certain circumstances. You can do this by emailing us at [sales@indigo-promotions.co.uk](mailto:sales@indigo-promotions.co.uk) or writing to us at the address noted above.
- 10.7. We will tell you if there is a breach, or a likely breach, of your data protection rights.