

## 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

## 2. Responsibilities

- 2.1 The Data Protection Officer/Information Security Officer is responsible for ensuring that this notice is made available to data subjects prior to The Watermill Press Limited collecting/processing their personal data.
- 2.2 All Employees/Staff of The Watermill Press Limited who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

## 3. Privacy notice

### 3.1 Who are we?

The Watermill Press are a privately owned limited company who manufactures plain labels in a dedicated production facility in West Yorkshire. We also sell bespoke labelling systems, consultancy and consumable products.

Our Data Protection Officer can be contacted directly here:

- [dpo@watermillpress.co.uk](mailto:dpo@watermillpress.co.uk)
- 01274 738833

## 3.2 The personal data we would like to collect and process about you is:

We collect information about you to process your order, manage your account and, if you agree, to email you about other products and services we think may be of interest to you. We store your name, company address, email address and telephone number. We will not share your information for marketing purposes. We may use your email address for informational mailings such as when you need to place orders before Christmas closures and to make you aware of any new or product changes.

In order to process your order we may give your address and order details to courier firms who will act on our behalf. In processing your order, we will send your details to, and use information from, credit reference agencies, banks and fraud prevention agencies.

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with The Watermill Press Limited's procedures. We will also share information with our auditors for both financial and ethical audits.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

The personal data we collect will be used for the following purposes:

- Sending invoices
- Keeping a record for VAT
- To process your order
- For traceability of order placement

Our legal basis for processing for the personal data:

- HMRC
- Audits both legal and ethical
- Delivering goods
- Communicating with you about your order and payments
- Fulfillment of our contract with you.

## 3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for The Watermill Press Limited to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

# PRIVACY NOTICE (TIER 4)

You may withdraw consent at any time by in line with Withdrawal of Consent Procedure [GDPR DOC 2.7A](#)].

### 3.3 Disclosure

The Watermill Press Limited will pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purposes as part of the processing activities:

Company	What is shared
Courier Firms	Contact Name address
	Delivery note
HMRC	Audits
Bank	Audits
ISO Auditors	
Third party suppliers	Technical onsite services eg printer repair

This list may be extended if required to service the account

### 3.4 Retention period

The Watermill Press Limited will process personal data for and will store the personal data for seven years the retention period has been established for HMRC purposes.

### 3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that The Watermill Press Limited refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

# PRIVACY NOTICE (TIER 4)

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All of the above requests will be forwarded on should there be a third party involved (as stated in 3.3 above) in the processing of your personal data.

## 3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by The Watermill Press Limited (or third parties as described in 3.3 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and The Watermill Press Limited's data protection officer. The details for each of these contacts are: See below.

Contact details of the Data Protection Officer / GDPR Owner:

	<b>Data Protection Officer / GDPR Owner contact details</b>
Contact Name:	<a href="mailto:dpo@watermillpress.co.uk">dpo@watermillpress.co.uk</a>
Address line 1:	33-35 Pitcliffe Way
Address line 2:	Bradford BD5 7SG

## **Document Owner and Approval**

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available on the corporate website – [www.watermillpress.co.uk](http://www.watermillpress.co.uk)

Signature:

Date:

## **Change History Record**

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	Ian Sharp	20/05/18

The Watermill Press  
Limited

Public

