

## MINTING LIMITED

Privacy Notice - 16<sup>th</sup> May 2018

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the Data Protection Law protects you.

### What is the purpose of this Privacy Notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you complete any online form.

This website is not intended for use by children and we do not knowingly collect data relating to children.

You must read this website data privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements other notices and is not intended to override them.

### Data Controller

Minting Limited is the data controller and is responsible for your personal data (collectively referred to as "Minting", "we", "us" or "our" in this privacy notice). Minting Limited also trade as 'Minting Digital' or 'Minting Design'. Our contact details are:

**Registered address:** Minting Limited  
167 Park Street  
Cleethorpes  
North East Lincolnshire  
DN35 7LX

**Postal/trading address:** Minting Limited  
Fairfield Enterprise Centre  
Lincoln Way  
Louth  
Lincolnshire  
LN11 0LS

**Telephone:** +44 (0)1507 605511

**Email:** [datacontroller@mintingdigital.co.uk](mailto:datacontroller@mintingdigital.co.uk)

**ICO registration number:** ZA377482

Minting Limited is the data controller and is responsible for this website. For all data related matters contact Colin Rood.

## Third party links outside of our control

This website may include links to third party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements.

## The Personal Data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioners Office.

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data** includes your full name and title.
- **Contact Data** includes your address(es), email address(es) and telephone numbers.
- **Technical Data** includes your IP address, login data, browser type and version, operating system and platform.
- **Transaction Data** includes details about payments from you to us and details of the services you have purchased from us.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (e.g. to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## How we collect your personal data

We use different methods to collect data from and about you:

- when you provide us with your identity and contact details by filling in forms or by corresponding with us by post, telephone, email or otherwise. This includes personal data you provide to us when you apply for our products or services, use our online website forms and request marketing to be sent to you.

- when you interact with our website, we may automatically collect technical data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy for further details.

We may also receive personal data about you from various third parties and public sources, based inside or outside the EU as set out below:

- analytics providers such as Google.
- search information providers such as Google.
- contact and transactional data from providers of payment services such as PayPal.
- identity and contact data from publicly available sources such as Companies House and the Electoral Register.

### How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of Contract:** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Legitimate Interest:** this means the interest of our business in conducting and managing our business to enable us to give you the best service or product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting the data controller.
- **Complying with a legal or regulatory obligation:** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### Promotional offers from us

We may use your identity, contact, technical and usage data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased services from us, and in each case, you have not opted out of receiving that marketing.

## Opting out

You can ask us to stop sending you marketing messages at any time by following the opt out links on any marketing message or by contacting us.

## Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. For more information about the cookies we use please see our cookie policy.

## Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact the data controller.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## Who we share your personal data with

We may have to share your personal data with the parties set out below for the purposes set out in the table below.

- professional advisers including lawyers and accountants based in the United Kingdom who provide us with legal and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom.
- third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## International Transfers

We do not transfer your personal data outside the European Economic Area (EEA).

## Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a

business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements.

Your personal data may be kept for a period of three years after you cease to be a client, or unless otherwise agreed with you, however, by law we must keep basic information about our clients including contact, identity and transaction data for six years after they cease being clients.

In some circumstances you can ask us to delete your data, please see 'Your legal rights' below for further information.

### Your legal rights

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- the right to request a copy of the personal data which we hold about you.
- the right to request that we correct any personal data if it is found to be inaccurate or out of date.
- the right to request your personal data is erased where it is no longer necessary to retain such data.
- the right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data.
- the right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable (i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means).
- the right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- the right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests, or in performance of a task in the public interest and or exercise of official authority, direct marketing or processing for the purposes of scientific and or historical research and statistics.

If you wish to exercise any of the rights set out above, please contact our data controller.

## No fee required - with some exceptions

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable administration fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## Your duty to inform us of changes

Please keep us informed if your personal data changes during your relationship with us by using the 'Update your Details' form in our client area on our website at [www.mintingdigital.co.uk](http://www.mintingdigital.co.uk). It is important that the personal data we hold about you is accurate and current.

## Queries, requests or concerns

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our data controller.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Information Commissioner's Office by calling 0303 123 1113 or from the Information Commissioner's Office website or by post to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF England UK.

## Location of our servers

All of our servers are located in London in a secure data centre. Our data backups are stored both in London and Dublin, R.O.I.

## Purposes for which we will use your personal data

We have set out in the table below a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

## Changes to this notice

This version, Rev:180516, was created on 16th May 2018, there are no previous versions.

<u>Purpose and or Activity</u>	<u>Type of data</u>	<u>Lawful basis for processing</u>
To register you as a new client	(a) Identity (b) Contact	(a) Performance of a contract with you
To process and deliver your order including: (a) invoicing - fees and charges (b) collect and recover money owed to us	(a) Identity (b) Contact (c) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To process and deliver your order including: (a) exchange of information	(a) Identity (b) Contact (c) Technical	(a) Performance of a contract with you
To manage our relationship with you which will include: (a) notifying you about changes to our terms or privacy policy (b) asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Marketing and communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products or services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security and to prevent fraud) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products or services, marketing, client relationships and experiences	(a) Technical (b) Usage	(a) Necessary for our legitimate interests (to define types of clients for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage	(a) Necessary for our legitimate interests (to develop our products or services and grow our business)