

**We appreciate your interest in our products and services and your visit to this website.**

Your privacy is important to us and we want you to feel comfortable with how we use and share your personal information. This privacy policy provides you with details of how we collect and process your personal data through your use of our site <http://www.firstpointprintec1.london> including any information you may provide through our site when you purchase / enquire about a product or service or sign up to a newsletter.

By providing us with your data, you warrant to us that you are over 13 years of age.

Vanadu Ltd. are the data controller and we are responsible for your personal data.

We have appointed a Data Protection Officer who is responsible for all privacy related matters.

If you have any questions, please contact the Data Protection Officer using the details set out below.

### Contact Details

**Full name of legal entity:**

Vanadu Ltd. trading as the Firstpointprint Clerkenwell.

Name of Data Protection Officer: Dominic Morrissey

**Email:** [dominic@firstpointec1.co.uk](mailto:dominic@firstpointec1.co.uk)

**Postal address:**

8-11 St. John's Lane, London, EC1M 4BF

**Telephone Number:** 020 7490 7588

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

We will always endeavour to resolve any complaint directly, to resolve any issue should you contact us in the first instance.

It is very important that the information we hold about you is accurate and up to date. Please email us if at any time your personal information changes and send to: [dominic@firstpointec1.co.uk](mailto:dominic@firstpointec1.co.uk)

### 1. WHAT DATA DO WE COLLECT ABOUT YOU?

Personal data means any information capable of identifying an individual. It does not include anonymised data. We may process certain types of personal data about you as follows:

- > **Identity Data** may include your first name, maiden name, last name, username and title.
- > **Contact Data** may include your billing address, delivery address, email address and telephone numbers.
- > **Financial Data** may include your bank account and payment card details although this is only used for transactions and not retained.

- > **Transaction Data** may include details about payments between us and other details of purchases made by you.
- > **Usage Data** may include information about how you use our website, products and services.
- > **Marketing & Communications Data** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

### Sensitive Data

We do not collect any Sensitive Data about you.

Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We do not collect any information about criminal convictions and offences.

### 2. HOW WE COLLECT YOUR PERSONAL DATA

We collect data about you through a variety of different methods including:

- > **Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:
  - > order our products or services;
  - > subscribe to our service or publications;
  - > request resources or marketing be sent to you;
  - > Give us feedback.
- > **Automated technologies or interactions:** As you use our site, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies.

We may also receive Technical Data about you if you visit other websites that use our cookies.

- > **Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:
  - > analytics providers such as Google based outside the EU;
  - > advertising networks which we may utilise from time-to-time
  - > Contact, Financial and Transaction Data from providers of technical, payment and delivery services
  - > Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

### 3. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- > Where we need to perform the contract between us.
- > Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- > Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending marketing communications to you via email or text message.

You have the right to withdraw your consent to receiving marketing at any time by emailing us at: [dominic@firstpointec1.co.uk](mailto:dominic@firstpointec1.co.uk)

#### Purposes for processing your personal data

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Purpose / Activity	Type of data	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transactional (e) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
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) Profile (d) Marketing & 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 customers use our products/services
To administer and protect our business and our site (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, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation
To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) Technical	Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site 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 (e) Profile	Necessary for our legitimate interests to develop our products/services and grow our business

## Marketing Communications

You will receive marketing communications from us if you have:

- i. requested information from us or purchased goods or services from us; or
- ii. if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- iii. in each case, you have not opted out of receiving that marketing.

We will not share your personal data with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time OR by following the opt-out links on any marketing message sent to you OR by emailing us at: [dominic@firstpointec1.co.uk](mailto:dominic@firstpointec1.co.uk)

Where you opt out of receiving our marketing communications, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

## 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 find out more about how the processing for the new purpose is compatible with the original purpose, please email us at: [dominic@firstpointec1.co.uk](mailto:dominic@firstpointec1.co.uk)

If we need to use your personal data for a purpose unrelated to the purpose for which we collected the data, we will notify you and we will explain the legal ground of processing.

We may process your personal data without your knowledge or consent where this is required or permitted by law.

## 4. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table on the previous page:

- > Service providers who provide IT and system administration services.
- > Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- > HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

- > Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law.

We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

## 5. INTERNATIONAL TRANSFERS

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

## 6. 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 such data. 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.

## 7. 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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information. In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## 8. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

These include the right to:

- > Request access to your personal data.
- > Request correction of your personal data.
- > Request erasure of your personal data.
- > Object to processing of your personal data.
- > Request restriction of processing your personal data.
- > Request transfer of your personal data.
- > Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at: [dominic@firstpointec1.co.uk](mailto:dominic@firstpointec1.co.uk)

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 fee if your request is clearly unfounded, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances.

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.

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.

## 9. THIRD-PARTY LINKS

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.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 10. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies.

If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

For more information about the cookies we use, please see **GDPR Cookie Policy** which follows.

### GDPR Cookie Policy

At Firstpointprint Clerkenwell, we believe in being fully transparent offering details on how we collect and use any data related to you personally.

We may use cookies as explained in our Privacy Policy and by your continued visit to our website you are agreeing to the use of cookies as described in this policy.

Explaining a "cookie"

A cookie is a small file placed onto your device that enables us to identify your device and secure your access.

There are two main types of cookie:

**persistent cookies and session cookies.**

A persistent cookie will recognise you as an existing user: **e.g. can remove the need to sign in each time you visit the site.**

Session cookies will only apply for as long as your current website visit or browser session.

The privacy use of a Cookie is compliant with the General Data protection Regulations (GDPR).

### The use of Cookies

Categories of Use & Descriptions:

**Authenticate** — Cookies can deliver the most appropriate information and personal experience.

**Security** — Cookies can be tailored to support security features and to identify malicious activity.

**Preferences, Features & Services** — Cookies can identify language and communications preferences, aid easier form completion and customise content.

**Advertising** — Cookies can deliver relevant advertising and provide retargeting to visitors who saw an ad, took action, purchase or download.

**Performance, Analytics & Research** — Cookies aid research and analytics to understand, improve, products, features and services.

## **Cookies & Advertising**

Cookies, pixels, and tags help to serve relevant ads to visitors by identifying your device, your usage, your browsing behaviour, log data (your IP address).

The General Data Protection Regulations (GDPR) governs the use of personal information and information collected cannot be shared with any 3rd party advertisers without your consent.

### **The use of third-party cookies**

Firstpointprint Clerkenwell can provide details of the 3rd party cookies that may be used on our site.

### **Controlling cookies**

You can control cookies through your browser settings preferences.

### **How do you decline or remove cookies?**

To decline to receive cookies, simply change your browser settings on your computer or other device. Most browsers also provide functionality that lets you review and erase cookies.

To learn more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [wikipedia.org](http://wikipedia.org), [www.allaboutcookies.org](http://www.allaboutcookies.org), or [www.aboutcookies.org](http://www.aboutcookies.org).

### **Resources**

- > [European Interactive Digital Advertising Alliance \(EU\)](#)
- > [Internet Advertising Bureau \(EU\)](#)

Browser manufacturers provide help pages relating to cookie management in their products.

Please see below for more information. For other browsers, please consult the documentation that your browser manufacturer provides.

- > [Google Chrome](#)
- > [Internet Explorer](#)
- > [Mozilla Firefox](#)
- > [Safari \(Desktop\)](#)
- > [Safari \(Mobile\)](#)
- > [Android Browser](#)
- > [Opera](#)
- > [Opera Mobile](#)