

## **Macfarlane Group UK Limited**

### **Privacy Policy for website users**

**August 2024**

This policy sets out the basis on which Macfarlane collects and processes your personal data through your use of our website and/or other marketing activities.

Any changes we make to this policy in the future will be posted on this page and, if appropriate, notified to you by email so please check this page regularly.

For the purposes of this policy, Macfarlane refers to Macfarlane Group UK Limited.

### **Macfarlane Group UK Limited**

Macfarlane Group UK Limited is the controller responsible for your personal data (referred to as "we", "us" or "our" in this privacy policy). Our registered office is Siskin Parkway East, Middlemarch Business Park, Coventry, CV3 4PE.

We will always do our best to ensure that our processing and handling of personal data is done in accordance with all applicable data protection laws, including but not limited to (1) in respect of data subjects in the UK, the Data Protection Act 2018 and the UK's retained version of the General Data Protection Regulation ((EU) 2016/679), and (2) in respect of data subjects in Ireland, the Irish Data Protection Act 2018 and the General Data Protection Regulation ((EU) 2016/679). If you have any questions about this privacy policy, the use of your personal information, or your dealings with our website, you can contact us at [customercare@macfarlanepackaging.com](mailto:customercare@macfarlanepackaging.com) or on [0800 288 8822](tel:08002888822) (if you are based in the UK) or at [irsales@macfarlanepackaging.com](mailto:irsales@macfarlanepackaging.com) or on IE [+353 404 37370](tel:+35340437370) (if you are based in Ireland).

Alternatively, you can contact our Data Protection Officer by emailing [dpo@macfarlanepackaging.com](mailto:dpo@macfarlanepackaging.com).

### **Your Personal Data**

#### **Information You Provide to Us**

You will provide some or all the following information to us when you purchase goods from our website, register a customer account with us, contact us, or sign up for marketing activities:

- *Your Identity and Contact Details* - includes your name, email address, postal address/billing address, delivery address (if different), and your contact telephone number;
- *Your Payment Details* - your bank details and payment card details, however we will not retain any payment card details submitted by you;
- *Your Profile Data* - if you register a customer account, this includes the profile you create to identify yourself when connecting to our website (including username and password) and other data about purchases and your personal preferences; and
- *Additional Personal Details* - At your option, you can also provide additional personal information to us such as product preferences and interests. This additional information would only be collected and stored by us for analysing sales to help us understand and improve our business and for the purpose of any direct marketing which you may have expressly given your consent to.

Please Note: It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us.

We do not collect any categories of sensitive personal data and our website is not intended for children so we do not knowingly collect data relating to children.

### **Information We Collect When You Use Our Website or Our Apps**

As you interact with our website, we also automatically collect usage and technical data (described below) about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.

*Usage Data* – includes details of products and services you have purchased from us, and information about how you use our website;

*Technical Data* – includes:

- your Internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page, mobile applications traffic data, weblogs and other communication data;

- if you use a mobile device to access our website, the type of mobile device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone settings);

*Other* – We may also receive information from third parties we work closely with such as delivery services, credit reference agencies and fraud prevention agencies.

### **What we Use Your Personal Data For**

Data protection law in the UK allows us to collect, use, store and transfer personal information if we have one or more of the lawful bases for doing so. We will normally have one or more of the following lawful bases for our processing:

- processing needed to fulfil a contract with you; or
- processing necessary to comply with a legal or regulatory obligation; or
- processing necessary for our legitimate interests (or those of a third party) provided your interests and fundamental rights do not override these interests);  
or
- processing in accordance with your consent.

Below are the ways we will use your personal data to fulfil your contract and/or for our legitimate interests:

- *Processing your order, including taking payment, supplying products and any after sales services such as cancellations and returns;*
- *identify verification and credit checking;*
- *keeping you updated on the progress of your order, we will usually communicate with you about your order by email, but we or our couriers may also contact you by phone;*
- *where you have registered with us, processing and administering your account;*
- *processing information required for competition, promotion or survey entries by you;*
- *analysing sales to help us understand and improve our business;*
- *administration, analysis and assessment of our website and its performance, to understand and develop our business and for the improvement and optimisation of our website; and*
- *as part of our efforts to keep our website safe and secure.*

## **Direct Marketing**

We need your consent for direct marketing communications. If you have expressly given your consent to receive direct marketing from us, whether via our website or by other means, we may use the information you have given us for:

- *delivering direct marketing, advertising and updates from us to you, such as telling you about forthcoming events, products, services and offers and updates and information about us;*
- *measuring and understanding the effectiveness of advertising we serve to you and others; and*
- *making suggestions and recommendations to you and other users of our website about goods or services that may interest you or them.*

At any time, you can opt out of direct marketing or change your preferences by following the link on the emails we send to you or by contacting us using the details set out above.

Cookies: We need your consent for our use of cookies. You have the right to withdraw your consent.

## **Sharing your Personal Data**

We may share your information within Macfarlane Group PLC and with our selected third parties for the purposes referred to above. For example:

- Payment Acquiring Services to process your payment;
- Delivery and Courier Companies to supply your order;
- Credit Reference & Fraud Prevention Agencies for credit checking and identity verification;
- Analytics and search engine providers that assist us in the improvement and optimisation of our website;
- Build and hosting service providers that help us to maintain the software that runs our website. They provide us with reporting statistics, and serve cookies on our behalf to enable any website personalisation and sign-in functionality.
- Where you opted in to direct marketing, third party advertisers, affiliate marketing agencies and advertising networks engaged by us to select and serve relevant communications to you on our behalf.

We require all third parties engaged by us to respect the security of your personal data and to treat it in accordance with the law. Such third parties are only allowed to process your personal data in accordance with our instructions, and **not** for their own purposes.

From time to time, we may ask you if you would like to be contacted by other selected third parties, such as part of a joint promotion or a collaboration. If we do this, we will also provide you with a link to that third party's privacy policy to help you decide if you wish to be contacted by them. If you do consent to this (by an express opt in), that third party would be the data controller in respect of any activity by them that you have consented to.

### **Links to Other Organisations**

If you follow links to any other websites from our own website, these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Opting Out of Marketing and Preference Updates**

If you no longer wish to receive direct marketing and updates from Macfarlane, you can unsubscribe at any time by clicking on the link in the footer of Macfarlane Packaging marketing emails or using the 'unsubscribe from all' link within the email preference centre, which is accessible through the emails. You can also amend your other marketing preferences within our preference centre.

Alternatively, you can contact us using the details set out above. If you are a customer registered online at [macfarlanepackaging.com](http://macfarlanepackaging.com), you can also opt out and amend your preference settings within your login profile under "My Account".

### **Security of Your Personal Data**

We have appropriate security measures in place to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. All information you provide to us is stored on secure servers. We have also put in place procedures to deal with any suspected personal data breach.

Where you have chosen a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you to choose an effective, secure password and not to share your password with anyone.

We recommend only connecting to secure wireless networks that you trust to reduce the risk of unauthorised people intercepting your online activity. Beware of the risks of using public wifi.

If you receive an email purporting to be from Macfarlane Group asking for personal data, please do not respond to the email but please let us know that this has happened so we can check whether the email is genuine.

## **Data Storage and Transfer**

The data that we collect from you may be transferred to, and stored at, a destination outside of the UK.

Whenever we transfer your personal data out of the UK, we will endeavour to make sure that all such activity is carried out in compliance with all relevant data protection laws.

## **How Long We Keep Your Personal Data**

We will keep your data for as long as you are a customer and thereafter we may keep it for longer in order to respond to any questions or complaints and to maintain necessary records to satisfy legal, accounting or reporting requirements. We may also keep your data for research or statistical purposes.

## **Your Rights**

You have the right to object to our use of your personal information, or to ask us to delete, remove or stop using it if there is no need for us to keep it. Please let us know if you think we should not be using it, but please be aware that there may be legal or other official reasons why we need to keep or use your information.

Your rights under data protection laws in relation to your personal data are briefly summarised below, and where applicable you can exercise these rights by contacting us using the contact details outlined above. :

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which we will tell you about, if applicable, after receiving your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing** of your personal data. You can ask us to suspend the processing of your personal data in the following scenarios: (a) if

you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** if we are relying on your consent to process your personal data (such as direct marketing and cookies). This won't affect any processing already carried out before you withdraw your consent or processing under other grounds. If you withdraw your consent, we may not be able to provide certain products or services to 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.

You will not have to pay a fee to access your personal data and we try to respond to all requests within one month.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). However, we would appreciate the chance to deal with any concerns you may have before you approach the ICO so please contact us in the first instance.

If you have any questions or require any more information, please contact us at [customercare@macfarlanepackaging.com](mailto:customercare@macfarlanepackaging.com) or on [0800 288 8822](tel:08002888822) (if you are based in the UK) or at [irsales@macfarlanepackaging.com](mailto:irsales@macfarlanepackaging.com) or on IE [+353 404 37370](tel:+35340437370) (if you are based in Ireland).

### **Cookies used by this website**

There are two cookie types that you may encounter on Macfarlane Group Websites. These are known as; 'First party cookies' and 'Third party cookies'.

**First party cookies:** these are cookies that are necessary for our website to function and ensure a positive user experience.

**Third party cookies:** these are cookies delivered by other companies and determine ways in which we can improve or enhance our website.

Please see below for a further description of these cookies and the time they remain resident on your computer...

**First party cookies:**

**Name:** Frontend

**Purpose:** Authentication session to prevent having to login multiple times in one browser session.

**Expires:** 8 hours.

**Third party cookies:**

Used by Google Analytics and Yahoo.

**Provider:** Google Analytics

**Name:** \_\_utma

**Purpose:** Provides a unique ID for each web browser that visits this site.

**Expires:** 15 seconds.

**Provider:** Google Analytics

**Name:** \_\_utmb

**Purpose:** Used to establish and continue a user session with this website.

**Expires:** 30 minutes.

**Provider:** Google Analytics

**Name:** \_utm

**Purpose:** Used to establish and continue a user session with this website.

**Expires:** When you close your browser.

**Provider:** Google Analytics

**Name:** \_utmz

**Purpose:** Used to calculate search engine traffic, ad campaigns and page navigation within this site.

**Expires:** 30 days.

**Provider:** Yahoo

**Name:** ysm

**Purpose:** Provides a unique ID for each web browser that visits this site.

**Expires:** When you close your browser.