



# Privacy Notice

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<b>Department</b>	Altodigital	
<b>Product or Process</b>	Privacy Notice	
<b>Document Author</b>	Dean Scales	
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<b>Version</b>	0.2	
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## 1 Document Control

### 1.1 Change Control Record

Date	Author	Version	Change reference
May 18	Dean Scales	0.1	Initial draft
June 18	Dean Scales	0.2	Approved and published

**Table 1** – Document change control record

### 1.2 Document Control Statement

The following outlines the access, handling, communication and disposal guidelines that are followed by The Information Assurance Programme for this document based on the assigned classification. For this document, which has a classification of T4 Unclassified, the following is recommended:

#### 1.2.1 Access Guidelines

- There are no restrictions on internal staff access to this document.

#### 1.2.2 Handling Guidelines

- This document will be stored in the ISMS, accessible via Shared Drive (Q Drive).
- Hardcopies of documents will be stored under lock and key.

#### 1.2.3 Communications Guidelines

- Altodigital documents which are to be communicated external to Altodigital must be produced in protected PDF format and sent with encryption where appropriate.

#### 1.2.4 Disposal Guidelines

- All hardcopies of this document will be securely shredded.

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## 2 Introduction

Altodigital is an independent provider of office technology and supplies with over 35 years' experience offering a range of products and services spanning across print, IT, communications, document management and office supplies. To complement these services, Altodigital offers a UK based call centre and 24/7 web portal. To support the service capability, Altodigital also operates a network of nationwide technical expertise.

Altodigital own many business assets, including physical items, IT services, communication systems, information and personnel, all of which have a high value to Altodigital and therefore need to be suitably protected.

To ensure the adequate protection of these business assets from a wide range of threats, Altodigital employs an Information Risk Management approach to the implementation of physical, procedural, technical and personnel security measures throughout the organisation. This ensures that all risks pertinent to Altodigital's business assets are identified, prioritised, managed and treated in an effective and consistent manner, thereby maintaining their Confidentiality, Integrity and Availability.

## 3 Executive Summary

We appreciate the trust you place in us when sharing your personal data. The security of that data is very important to us. In this document, we will explain how we collect, use and protect your personal data.

We will also explain what rights you have with regards to your personal data and how you can exercise those rights.

## 4 Office

### **Altodigital Networks Limited**

Summit House

Cherrycourt Way

Leighton Buzzard

LU7 4UH

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at [ISM-DPO@ALTODIGITAL.COM](mailto:ISM-DPO@ALTODIGITAL.COM)

## 5 Company areas

The following companies and websites are within scope for this privacy policy:

Company Title	Website
Altodigital Networks Ltd	<a href="http://www.altodigital.com">www.altodigital.com</a>
Altooffice	<a href="http://www.altooffice.com">www.altooffice.com</a>
Midlands Copiers Direct	<a href="http://www.midlandscopiersdirect.co.uk">www.midlandscopiersdirect.co.uk</a>
East Midland Copiers Direct	<a href="http://www.eastmidlandscopiersdirect.co.uk">www.eastmidlandscopiersdirect.co.uk</a>
Bristol Copiers Direct	<a href="http://www.bristolcopiersdirect.co.uk">www.bristolcopiersdirect.co.uk</a>
North West Copiers Direct	<a href="http://www.northwestcopiersdirect.co.uk">www.northwestcopiersdirect.co.uk</a>
Yorkshire Copiers Direct	<a href="http://www.yorkshirecopiersdirect.co.uk">www.yorkshirecopiersdirect.co.uk</a>
Scotland Copiers Direct	<a href="http://www.scotlandcopiersdirect.co.uk">www.scotlandcopiersdirect.co.uk</a>

Unless specifically stated, we consider these websites to be UK based websites; see section 6 below for more information on non-EU data processing.

## 6 Collection of personal data

We collect personal data from you for one or more of the following purposes:

- 1. To provide you with information that you have requested or which we think may be relevant to a subject in which you have demonstrated an interest;
- 2. To initiate and complete commercial transactions with you, or the entity that you represent, for the purchase of products and/or services;
- 3. To fulfil a contract that we have entered into with you or with the entity that you represent;
- 4. To ensure the security and safe operation of our websites and underlying business infrastructure, and
- 5. To manage any communication between you and us.

The table in Section 5 below provides more detail about the data that we collect for each of these purposes, the lawful basis for doing so, and the period for which we will retain each type of data.

### Technical information

In addition, and in order to ensure that each visitor to any of our websites can use and navigate the site effectively, we collect the following:

- Technical information, including the Internet Protocol (IP) address used to connect your device to the Internet;
- Your login information, browser type and version, time zone setting, browser plug-in types and versions;
- Operating system and platform;
- Information about your visit, including the Uniform Resource Locators (URL) clickstream to, through, and from our site

### Cookies

Our website uses various cookies. A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and also allows us to improve our site. The cookies we use are “analytical” cookies. They collect data which allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to improve the way our website works, for example

by ensuring that users are finding what they are looking for easily. This privacy policy explains how we control and process the data we gather from cookies. Please note that if you disable or refuse cookies some parts of our website may become inaccessible or may not function properly.

In Section 8 below, we identify your rights in respect of the personal data that we collect and describe how you can exercise those rights.

## 7 Lawful basis for collection of data

The table below describes the various forms of personal data we collect and the lawful basis for processing this data. Our business architecture, accounting and systems infrastructure and compliance organisation means that all personal data is processed on common, Group-wide platforms. We have processes in place to make sure that only those people in our organisation who need to access your data can do so. A number of data elements are collected for multiple purposes, as the table below shows. Some data may be shared with third parties and, where this happens, this is also identified below.

When we process on the lawful basis of legitimate interest, we apply the following test to determine whether it is appropriate:

**The purpose test** – is there a legitimate interest behind the processing?

**Necessity test** – is the processing necessary for that purpose?

**Balancing test** – is the legitimate interest overridden, or not, by the individual's interests, rights or freedoms?

Purpose of collection	Information category	Data collected	Purpose for collection	Lawful basis for processing	Data shared with?	Retention period
1. To provide you with information	Subject matter information	Name, company name, geographic location, email address, business sector.	To provide appropriate online or email information about products and services that you have requested	<b>Contractual fulfilment</b>	Internally only	Maximum 8 years from the data the information is collected. 6 months if a marketing email is left unopened
			To provide further, related, online or email information and ongoing news updates in relation to the identified area of interest.	<b>Legitimate interest</b>	Internally only	
		Telephone number	Follow-up to ensure requested	<b>Legitimate interest</b>	Internally only	

			information meets needs and identify further requirements			
		Personal contact information as provided through website forms or at trade shows or any other means.	General mailing list subscription	<b>Consent</b>	Internally only	
2. Transactional information	Transaction details	Name, physical address, email address, telephone number, bank account details (for credit accounts), other medium of content delivery	To process purchase transactions for products and services with customers, and to ensure any transaction issues can be dealt with.	<b>Contractual performance</b>	Internally only	Maximum 8 years from the date of the performance of the contract. 6 months from the data the data subject has input personal information but has not proceeded with a transaction. 8 years for VAT records from the performance of the contract
			For accounting and taxation purposes	<b>Statutory obligation</b>	Internally and professional advisers	
			Documentation should any contractual legal claim arise	<b>Legitimate Interest</b>	Internally and professional advisers	
	Payment card data	Primary account number (PAN), cardholder name,	To fulfil purchase requests using payment cards	<b>Contractual performance</b>	Payment card companies, all in line with PCI DSS	Only retained whilst authorisation is pending.

		service code, expiration date				
3. Fulfilment information	Fulfilment data	Name, dietary requirements	Appropriate catering arrangements for training courses	<b>Contractual performance</b>	Internally and training venues	Maximum 6 years from the date of the performance of the contract.
		Name, contact and identification details	Access to training courses, attendance registers	<b>Contractual performance</b>	Internally and training venues	
		Name, contact and identification details	Exam attendance, exam results and certifications	<b>Contractual performance</b>	Internally and external examiners, proctors and certification bodies	
		Name, contact details	Licensing details necessary for allocation and maintenance of a licence purchased for use of software and related products, distance and e- learning.	<b>Contractual performance</b>	Internally and any third parties whose products or services you may have purchased from us.	
		Name, address(es), email address, contact details	Actual delivery of products or services, in physical or digital form, that you may have purchased from us.	<b>Contractual performance</b>	Internally and any third party logistics or supplier companies with whom we contract in order to fulfil these requirements.	

4. Security	Security information	Technical information, as described above, plus any other information that may be required for this purpose	To protect our websites and infrastructure from cyber attacks or other threats and to report and deal with any illegal acts.	<b>Legitimate interest</b>	Internally, forensic and other organisations with whom we might contract for this purpose.	Relevant statutes of limitation
5. Communications	Contact information	Names, contact details, identification details	To communicate with you about any issue that you raise with us or which follows from an interaction between us.	<b>Legitimate interest</b>	Internally and, as necessary, with professional advisers.	Relevant statutes of limitation.

## 8 Storage of personal data

Altodigital is a UK-domiciled organisation whose primary offices are in the UK.

- The majority of our websites and web applications are hosted in the EU and are accessed only by our EU-based staff. In these instances, we have appropriate contractual and security measures in place to ensure that personal data is protected at all times.
- Our customer relationship management, marketing and accounting systems for all our businesses are either EU-based or hosted by companies participating in the EU - [U.S. Privacy Shield Framework](#).
- We use a wide range of Cloud Service Providers (CSPs) as part of our processing environment. Unless we specifically state otherwise, we are, in respect of all these CSPs, the data controller.
- Unless we specifically state otherwise all of the CSPs that we use utilise EU-located processing facilities.
- Our payment processors and banking arrangements are based in the EU.
- We ship and deliver physical products around the world; we therefore use logistics companies that are based outside the EU and operate in other countries. We have appropriate legal and security relationships with those partners.
- We resell products supplied by organisations outside the EU. This may mean that our resale partner will have access to information about data subjects who purchase their products.
- We operate a data retention policy in respect of all data, whether paper-based or digital and those aspects of it which relate to personal data are contained in the table at 5, above.

## 9 Security measures

Our information security management system (ISMS) is aligned to ISO/IEC 27001 and all our payment card processing is in compliance with PCI DSS.

We have what we believe are appropriate security controls in place to protect personal data. Risk assessment, including assessing risks to the rights and freedoms of data subjects, is at the heart of our ISMS. We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

## 10 Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email [ISM-DPO@ALTODIGITAL.COM](mailto:ISM-DPO@ALTODIGITAL.COM) or use the information supplied in the Contact us section below. In order to process your request, we will ask you to provide two valid forms of identification for verification purposes. Your rights are as follows:

- **The right to be informed**

As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.
- **The right of access**

You may request a copy of the personal data we hold about you free of charge. Once we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

  - a) The purposes of the processing
  - b) The categories of personal data concerned
  - c) The recipients to whom the personal data has been disclosed
  - d) The retention period or envisioned retention period for that personal data
  - e) When personal data has been collected from a third party, the source of the personal data
- If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.
- **The right to rectification**

When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.
- **The right to erasure (the 'right to be forgotten')**

Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.
- **The right to restrict processing**

You may ask us to stop processing your personal data. We will still hold the data, but will not process it any further. This right is an alternative to the right to erasure. If one of the following conditions applies you may exercise the right to restrict processing:

  - a) The accuracy of the personal data is contested
  - b) Processing of the personal data is unlawful
  - c) We no longer need the personal data for processing but the personal data is required for part of a legal process
  - d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing

- **The right to data portability**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- **The right to object**

You have the right to object to our processing of your data where

- Processing is based on legitimate interest;
- Processing is for the purpose of direct marketing;
- Processing is for the purposes of scientific or historic research;
- Processing involves automated decision-making and profiling.

## 11 Contact us

Any comments, questions or suggestions about this privacy policy or our handling of your personal data should be emailed to [ISM-DPO@ALTODIGITAL.COM](mailto:ISM-DPO@ALTODIGITAL.COM)

Alternatively, you can contact us at our main office using the following postal address or telephone numbers:

**Data Protection Officer  
Altodigital Networks Limited**

93 Vantage Point,  
Kingswinford,  
West Midlands,  
DY6 7FR

**Telephone:** 01384 405 370

Our office is open 9:00 am – 5:00 pm GMT, Monday to Friday. Our team will take a message and ensure the appropriate person responds as soon as possible.

## 12 Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union. For the United Kingdom, this is the Information Commissioner's Office (ICO), who is also our lead supervisory authority. Its contact information can be found at <https://ico.org.uk/global/contact-us/>.