

## Privacy Standard Introduction

### GDPR (General Data Protection Regulation) & DPA (Data Protection Act) (UK)

A Privacy Standard is an internally facing standard surrounding data privacy for use by KARTELL, our standard sets out the principles, conditions and controls that KARTELL will adhere to when obtaining, handling, processing, transporting or storing personal data in the course everyday business operations and activities, this includes and is not limited to customer data, supplier data and also employee data.

This standard will not only demonstrate how the organisation processes personal data but also make employees aware of their data protection obligations.

### For your information

### What is GDPR?

GDPR went live in May 2018, the purpose of the regulation is to strengthen the rights and controls available to a data subject and their personal data. The regulation is centric to individuals, their data and identity. GDPR comprises of articles and principles that clearly outline how personal data and the data subject should be handled and appreciated. Processing data belonging to a data subject, which could be an email address (personal or work), name, address or even financial must be processed inline with 6 key principles.

**Articles 5-11 of GDPR form the basis of the GDPR requirement:**

### Lawfulness of processing

Companies that process personal data are expected to do so in a lawful manner. What does this mean?

*Lawful* means that all processing should be based on a legitimate purpose. GDPR lists six legitimate purposes, and processing of personal data must be linked to one of these.

#### 1) Purpose Limitation

Processing of personal data must be limited to the legitimate purpose for which that personal data was originally collected from the data subject. This effectively forbids the processing of personal data outside of the legitimate purpose for which the personal data was collected.

*Reusing data collected for an alternative purpose is also commonly known as 're-purposing' data.*

#### 2) Data minimisation

When collecting data, only the personal data absolutely required for that purpose may be requested. This means that no data other than what is necessary can be requested, or stored. This is of significance when your company is analysing data. It will be important to limit the analysis of data to a set of anonymised data, or to a set of data for which consent has been obtained or there is a clear legitimate processing purpose.

#### 3) Accuracy

Personal data of data subjects must always be accurate and kept up to date. This is simple and straightforward, meaning that controllers are asked to ensure that data is kept accurate, and data subjects can update their data when required.

#### 4) Integrity and confidentiality

Personal data must be processed in a way that ensures appropriate security, including protection against unauthorised or unlawful processing. Also, controllers must ensure that data cannot be modified by unauthorised persons.

#### 5) Storage limitation

Personal data should be retained only while necessary. That is, personal data should be deleted once the legitimate purpose for which it was collected has been fulfilled. This is not simple, and needs to be determined in line with applicable laws that may sometimes require personal data to be retained for a longer period than the originally envisaged processing purpose.

#### 6) Fair and transparent

GDPR asks that all personal data processing should be fair; that is, companies do not perform processing that is not legitimate. Also, companies should be transparent regarding the processing of personal data, and inform the data subject in an open and transparent manner. This means that personal data should be processed if, and only if, there is a legitimate purpose for the processing of that personal data. EU GDPR requires companies to practice transparency so that data subjects will be sufficiently informed regarding the processing of their personal data.

## Accountability

The expectation that companies are fair, transparent and processing personal data lawfully eventually leads to accountability, which is a framework of self-discipline among companies. And, the responsibility to demonstrate compliance with this principle shall always rest with the controller. This means that the companies should be responsible in their actions relating to the processing of personal data, take ownership of what they do, and demonstrate evidence of all decisions made in the context of personal data processing.

### The three main principles of accountability

#### 1. Responsibility:

- The appropriate technical and organisational measures have been implemented and are maintained proactively, systematically, and on an ongoing basis.

#### 2. Ownership:

- The technical and organisational measures are embedded at each level in the organisation, within each department or function that processes the personal data.

#### 3. Evidence:

- The relevant documentation can be produced and used as evidence to demonstrate compliance at any time. Compliance should be demonstrated to the data protection authority, and to interested parties (clients, employees, etc.).

**These principles should lie at the heart of your approach to processing personal data.**

To this effect, KARTELL currently outlines how it reviews and states how it will use data in its Privacy Standard.

# KARTELL PRIVACY STANDARD

Here at KARTELL UK LTD (KARTELL), we're committed to protecting your personal information when you use our services, obtain our products or otherwise interact with us.

KARTELL deploy a high level of security to shield the data we have gathered. However, on the events of a data breach we will remain compliant and alert supervisory authorities within 72 hours of becoming aware

*What this standard applies to:* This standard applies to personal information we collect about you when you interact with us. For example, when you use our website such as [www.kartelluk.com](http://www.kartelluk.com) (or when you purchase our goods, products and services), as described in this privacy standard.

It sets out:

- i. what information we collect, and from whom;
- ii. how we use that information;
- iii. who we share your information with;
- iv. how your information is protected;
- v. your rights in relation to the information we hold about you; and
- vi. when will we delete your data

## i: What information we collect from you

You may give us your personal information when you:

- **Open a trading account with KARTELL;**

When you apply to open a trading account with KARTELL, you provide KARTELL with details below to help assist the creation of a trading account and for KARTELL to approve any credit facilities;

• Registered Business or Company Name and Address	• Trading Name
• Address Details	• Registration Number
• Account Contact: Contact Name, Address, Mobile & Email	• Invoice/Statement: Contact Name, Address, Mobile & Email Address
• Delivery Contacts: Contact Name, Address, Mobile & Email Address	• Pricing Contact: Contact Name, Mobile & Email Address
• E-Mail Marketing: Name & Email Address	• Newsletters Publication: Name & Email Address
• Bank Details	• Details of two business referees

- **Order products or services via your KARTELL trading account;**

When you order products or services from KARTELL, you provide us with your:

- Your Company Name and Address
- A Purchase Order Reference
- Some customer may need to provide electronic payment details
- KARTELL Reference for your account
- Delivery Contact: Contact Name, Address, Mobile & Email Address (Yours or your customers)

**Note:** KARTELL may share the above delivery details with third party delivery partners or suppliers in order to delivery products and services to your address or your customer addresses. Before we provide services, goods or financing to you, we undertake checks for the purposes of preventing fraud and money laundering, and to verify your identity. These checks require us to process personal data about you

- **Correspond with or contact us**

You may correspond with KARTELL by email or by telephone.

When you send an email to a department or individual at KARTELL your email address will be stored in our email system.

If you call any KARTELL main telephone numbers or land-lines then your telephone number and phone call will be recorded for training and monitoring purposes.

If you call a mobile number of any KARTELL employee, your number may be stored on that mobile.

- **Interact with us on social medias platforms or APPs**

If you interact with any KARTELL social media accounts, your social media identify, name and email may be publicly viewable on any walls or groups that you publish too, any direct messages will be private and stored on the social media platform or APPs. This information will not be shared with any third parties.

- **Sign up to one of our Newsletters or marketing communications**

If you sign up to receive our newsletters or marketing communications (special offers), your name and email address will be stored in our ERP system and our email marketing platform. This information will not be shared with any third parties.

If you have any queries or wish to change your marketing preferences you can email: [GDPR@kartelluk.com](mailto:GDPR@kartelluk.com)

On each of our mailshot campaigns, a link is provided for you to unsubscribe and /or opt out if you wish.

- **Website contact form or browsing our website(s)**

If you request contact via our website contact form, this information is sent to KARTELL via an email and is not stored with any third parties.

Our website does not place any cookies in your browser for commercial benefit and we do not use any demographics to target potential customers or prospects.

- **Electronic Data interchange or Submission**

Where possible KARTELL supports and encourages the use of EDI systems in order to prevent personal data being transferred or transported on typical communication systems such as email or telephone systems. This data is then handled by systems and not users or people when submitted.

The data contained in EDI transmission is then used by our systems to provide services to you such as supply and delivery.

## **ii. How we use that information;**

Your data is received by KARTELL and used to process and deliver your order(s) including:

- a) Manage payments, fees and charges
- b) Collect and recover money owed to us
- c) To provide and maintain service
- d) To notify you of changes to services that may affect our customer/supplier relationship
- e) To notify you of any changes or progress to your order and/or deliveries.
- f) To provide customer care and product support undertaken by warranty or guarantee of product
- g) To detect, prevent and address technical issues
- h) Provide you with marketing emails if you have opted in for newsletters and special offer mailshots

KARTELL process the above on a lawful basis and with a legitimate interest.

## **iii. Who we share your information with;**

### **a) Transfer of data**

- i) In order to satisfy our promise to service your order we may use a third party or external partner(s) to perform deliveries of goods to you. Deliveries outside of the UK will need to be handled via an agent to navigate and abide by international customs requirements and law.  
This means we will need to disclose your information (name, address, contact telephone number and/or email address) to our third parties. Your data may be transferred to and maintained on computer systems outside of your county, city or other governmental jurisdiction where the data protection laws may differ from your jurisdiction.  
For deliveries in the UK, our third party/network partners are UK based. However their business systems may be hosted abroad.
- ii) KARTELL's email systems are cloud hosted and processed in the UK.
- iii) KARTELL's ERP system where your order data is processed are hosted in the UK.
- iv) KARTELL's Transport Management System that is used to plan your deliveries and data on our own vehicles is cloud hosted in the UK.

### **b) Legal Requirements**

KARTELL may disclose your Personal Data in the good faith that such action is necessary to:

- To comply with a legal obligation and/or regulations such as HMRC, Banking, Insurers and Auditors
- To protect and defend the rights or property of Kartell UK Ltd, such as with our Lawyers
- To prevent or investigate possible wrongdoing in connection with the Service with any authorities such as the Police Force.
- To protect the personal safety of users of the Service or the public
- To protect against legal liability, as such with our Lawyers

**Note:** When your data is shared with the external bodies listed above, they assume responsibility as joint data controllers as such is their liability.

#### **iv. how your information is protected;**

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 an operational need to know. We also advocate the prevention of data-escape via system controls and measures.

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.

Please remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

#### **v. your rights in relation to the information we hold about you; and**

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

##### **You have the right to:**

- 1) 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.
- 2) 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.
- 3) 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. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 4) 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. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 5) Request restriction of processing of your personal data. This enables you to 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.
- 6) 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. 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.
- 7) Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us. We will 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.

You will not have to pay a fee to access your personal data (or to exercise any other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

KARTELL will need specific information from you to confirm your identity (or to exercise any 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. Any data requested will be made available in a common format and in portable state to support your rights further.

#### **vi. when will we delete your data**

You have a right to ask for your personal data to be erased. However, we are not required to erase your data where we need your personal data to comply with a legal obligation or for the establishment, exercise or defence of legal claims.

Therefore we cannot comply with an erasure request where you owe money on a credit facility or have otherwise bought products and services for which we must keep records.

In addition, if you opt out of marketing communications or have previously opted out of marketing communications, we have to keep a record or such opt out to ensure that we don't contact you in the future.