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## PRIVACY POLICY

Hello. We are Afford A Print Limited. Here's how we protect your data and respect your privacy.

### OUR ROLE IN YOUR PRIVACY

If you are an Afford A Print customer, subscriber, or just visiting our website, this policy applies to you.

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#### OUR RESPONSIBILITIES

If you are a visitor to our website we act as the '[data controller](#)' of personal data. If you are a customer of Afford A Print we act as the '[data processor](#)' of personal data. This means we determine how and why your data are processed. We are registered as a data controller at the UK Information Commissioner's Office under number ZA347526.

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#### YOUR RESPONSIBILITIES

- Read this Privacy Policy
- If you are our customer, please also check our Terms of Business or other contracts between us: they may contain further details on how we collect and process your data.
- If you provide us with personal information about other people (for instance, if you provide personal details for printing on business cards), or if others give us your information (such as your employer), we will only use that information for the specific reason for which it was provided to us (i.e. printing those business cards). By submitting the information, you confirm that you have the right to authorise us to process it on your behalf in accordance with this Privacy Policy.

### DATA COLLECTION

From the first moment you interact with Afford A Print, we are collecting data. Sometimes you provide us with data, sometimes data about you is collected automatically.

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#### WHEN AND HOW WE COLLECT DATA

Here's when and how we do this:

- You browse any page of our website
- You request a quote from us or make an enquiry
- We contact you
- You use our services



- We provide services to your employer or your service provider
- You opt-in to marketing messages

The data we collect is different depending on our relationship with you, for instance, whether you are a customer of Afford A Print, a member of the Afford A Print team, a supplier, or visitor to our website.

#### CONTACT DETAILS

We collect your name, address, telephone number, email address. If your information is provided as part of our services to you or your employer, those details will only ever be processed in accordance with the contract between you or your employer and us.

#### FINANCIAL INFORMATION

We will retain records of any financial transaction with us.

#### DATA THAT IDENTIFIES YOU

Your IP address, browser type and version, time zone setting, browser plug-in types, geolocation information about where you might be, operating system and version, etc.

#### DATA ON HOW YOU USE AFFORD A PRINT

Your URL clickstreams (the path you take through our site), products/services viewed, page response times, download errors, how long you stay on our pages, what you do on those pages, how often, and other actions.

#### SENSITIVE DATA

We don't collect any "sensitive data" about you (like racial or ethnic origin, political opinions, religious/philosophical beliefs, trade union membership, genetic data, biometric data, health data, data about your sexual life or orientation, and offences or alleged offences) except when we have your [specific consent](#), or when we have to in order to comply with the law.

#### WHAT ABOUT REALLY SENSITIVE DATA?

Afford A Print is a business-to-business service directed to and intended for use only by those who are 18 years of age or over. We do not target our services at children, and we do not knowingly collect any personal data from any person under 16 years of age.

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### WHY WE COLLECT YOUR INFORMATION

Afford A Print is committed to ensuring that your privacy is protected. The information which you provide to us, along with other information relating to you, will be held by Afford A Print and used for particular purposes, and under specific lawful basis.

Data protection law means that we can only use your data for certain reasons and where we have a legal basis to do so. Here are the reasons for which we process your data:

PURPOSE	DATA PROCESSED	LEGAL BASIS
<b>Business Governance</b>	Delivery of our services	Contract
	Statutory and financial reporting and other regulatory compliance purposes	Legal Obligation
		Legitimate Interests

	Transfers of data to those required to be involved in order to carry out those purposes	
<b>Administration &amp; Operational Management</b>	Responding to solicited enquiries Providing information and services Research Data Analytics Employment and recruitment administration	Contract Legitimate Interests
<b>Internal Record Keeping</b>	Records (including contact details) of those who we have provided services to. Records of those we have received enquiries and communicated with.	Legitimate Interests Legal Obligation
<b>Marketing Communications</b>	Sending marketing information about our services, promotions and relevant promotional materials.	Consent
<b>Contracted Services</b>	Fulfilling contractual obligations entered into with customers	Contract

## PEOPLE WHO USE OUR ONLINE SERVICES

We hold the details of the people who have requested our services so we can provide them. However, we only use these details to provide the service the person has requested. When people consent to subscribe to our marketing communications, they can cancel their subscription at any time and are given an easy way of doing this.

### ELECTRONIC COMMUNICATIONS

To those who subscribe to our mailing list, we send out regular e-newsletters, promotional offers, and other useful updates and information.

We use a third-party service, MailChimp, to manage this. We may gather statistics around email opening and clicks using industry standard technologies including clear gifs to help us monitor and improve our e-newsletters. For more information, visit [www.mailchimp.com/legal/privacy/](http://www.mailchimp.com/legal/privacy/)

### PEOPLE WHO CONTACT US VIA SOCIAL MEDIA

We manage our social media interactions via Facebook, LinkedIn, and Twitter. If you send us a private or direct message via social media, the message may be stored by the social media website as per their privacy policy. It will not be shared with any other third party by us. To view their privacy policies, visit:

- Facebook - [www.en-gb.facebook.com/full\\_data\\_use\\_policy](http://www.en-gb.facebook.com/full_data_use_policy)
- LinkedIn - <https://www.linkedin.com/legal/privacy-policy>
- Twitter - <https://twitter.com/en/privacy>

### PEOPLE WHO EMAIL US



Any email sent to us, including any attachments, may be monitored, and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software is also used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

#### PEOPLE WHO MESSAGE US VIA OUR WEBSITES CONTACT FORM

We use a third-party provider, JotForm, to manage our form traffic from our website. JotForm have servers in the USA and Germany and is deemed GDPR Compliant. We have a Data Protection Agreement in place with JotForm to ensure the necessary compliance measures and security required by data protection law is in place.

If you submit a form via the website, the information will be stored by JotForm temporarily. It will not be shared with any other organisations or third parties. For more information about how JotForm processes data, please see their Privacy Policy here: <https://www.jotform.com/privacy-for-ios-app/>

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#### LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## SECURITY AND PERFORMANCE

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online and in completing our services to you.

We process any personal data identified in this Policy where it is deemed necessary for the purposes of maintaining insurance coverage, managing risks, obtaining professional advice, or establishing, exercising, or defending legal claims, we do this for the proper protection of our business. We also process such data where processing is required to comply with a legal obligation to protect yours or another person's vital interests.

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#### HOW WE LOOK AFTER YOUR DATA

We ensure that there are appropriate technical controls in place to protect your personal details in accordance with current data protection legislation; this includes secure cloud servers, firewalls, and SSL encryption.

The data stored in our system is only kept in line with our retention policy. We retain some information and data (anonymised) for statistical research and our own archival records. No identifying data is used for this purpose.

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#### HOW LONG WE KEEP YOUR DATA

We keep your data for no longer than necessary for the purposes for which it was collected, considering guidance issued by the Information Commissioner's Office.

The length of time that data will be kept depends on the reasons for which we are processing the data as well as any applicable or regulations that the information falls under, such as financial regulations, Health and Safety regulation etc., or any contractual obligation we might have – such as local government contracts.

For example, we will keep a record of financial transactions for six years to comply with HMRC rules.

Below is a summary of our data retention schedule.

DATA TYPE	RETENTION PERIOD
<b>Payment Transaction Records / Financial and account records / Donations</b>	6 years
<b>Website analytics</b>	7 years
<b>Customer Contact Details and communications</b>	10 years from the last contact
<b>Personal Information contained in print items</b>	2 years from print completion
<b>Employee application forms, CV's</b>	Successful – 7 years after engagement (employees), 1 year after engagement (volunteers) Unsuccessful – 6 months
<b>Employee – non-essential elements</b>	7 years after engagement (employees) 1 year after engagement (Volunteers) Indefinitely (limited record of employees)
<b>Contract</b>	Indefinitely
<b>Emails/communication records</b>	Will be minimised as soon as possible (stored for a maximum 10 years)

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### HOW SECURE IS THE DATA WE COLLECT?

We have physical, electronic, and managerial procedures to safeguard and secure the information we collect.

And please remember:

- You provide personal data at your own risk: unfortunately, no data transmission is guaranteed to be 100% secure
- You are responsible of your username and password: keep them secret and safe!
- If you believe your privacy has been breached, please contact us immediately on 02382 358 168 or [support@AffordAPrint.co.uk](mailto:support@AffordAPrint.co.uk)

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### WHERE DO WE STORE THE DATA?

The personal data we collect is processed at our offices in Hampshire and in any data processing facilities operated by the third parties identified above or notified to you.

By submitting your personal data, you agree to the transfer, storing, and processing by us. If we transfer or store your information outside the EEA in any way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this Privacy Policy.

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## HOW WE MONITOR OUR DATA SECURITY

Afford A Print is committed to ensuring the security of your Personal Data. Your information is stored using appropriate technical and organisational measures to ensure its security, we monitor this by:

- regular review of security measures of all data storage systems and emerging security risks
- regular training of staff that access the information. We keep your personal information in accordance with our Retention Policy, which considers:
  - the purpose(s) for which the information was collected and how long we need to keep the information to achieve the purpose
  - any applicable legal, accounting, reporting or regulatory requirements to keep the information.

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## TRANSFERRING YOUR INFORMATION OUT OF THE UK

We may transfer your Personal Data out of the UK where our service providers referred to above are based outside the UK. Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring one of the following safeguards is implemented:

- We ensure that the country we are transferring the data to has been deemed under UK data protection laws to provide an adequate level of protection for Personal Data.
- If the country has not been deemed to provide an adequate level of protection, we use specific contracts approved for use under UK data protection laws which give Personal Data an equivalent level of protection as it has in the UK.

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## VISITORS TO OUR WEBSITE OR SOCIAL MEDIA

If you browse, read pages, or download information from our website, we will gather and store certain limited information about your visit. This information collected or stored is used by us only for the purpose of improving the content of our web services and to help us understand how people are using our services.

## THIRD PARTIES

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### USE OF THIRD PARTIES

As part of our services to you, and in the day to day running of our business, we use some third-party support or software. Before contracting with any supplier, we review their data protection policies and processes to ensure that your (and our) data will be suitably protected when processed by them and assess where their data is stored.

Please note that not all our suppliers are listed below as these may change regularly due to them carrying out specific tasks on specific projects.

The legal basis for processing this data is both our legitimate business interests, namely the proper administration of our business, consent, or the performance of a contract between us and/or taking steps, at your request, to enter such a contract.

Our online based suppliers are listed below:



#### MICROSOFT 365 / GOGGLE MAIL

We use Microsoft 365 to manage all our email communications and we use SharePoint to store our electronic files and data. You can review their privacy policy here: <https://www.microsoft.com/online/legal/v2/?docid=43>



#### XERO ACCOUNTING

We use Xero for our own accounting software. Xero take their responsibilities under GDPR seriously. That's why they've embarked on a programme to identify which measures they need to implement to be compliant with GDPR. You can read more about their privacy processes here: <https://www.xero.com/uk/about/terms/privacy/> and <https://www.xero.com/uk/gdpr/>



#### JOTFORM

JotForm is used to create our forms and questionnaires on our website. We have a Data Protection Agreement in place with them. You can view their privacy policy here:

<https://www.jotform.com/privacy-for-ios-app/>



#### MAILCHIMP

We use MailChimp to manage our email marketing, consent to receive marketing and our unsubscribe process.

<https://www.intuit.com/privacy/statement/>



#### WETRANSFER

WeTransfer is sometimes used to transfer large files between us and a customer or third-party provider. Read more here:

<https://help.wetransfer.com/hc/en-us/categories/201270873-Security-Privacy>



Google Docs

#### GOOGLEDOCS

GoogleDocs is used to store our business and customer information in a secure cloud environment.

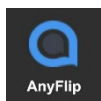
<https://safety.google/privacy/privacy-controls/>



#### DROPBOX

We use DropBox as our secure cloud storage for all our business and customer information. They have servers around the world but have adequate security mechanisms and controls in place.

[https://www.dropbox.com/en\\_GB/privacy](https://www.dropbox.com/en_GB/privacy)



#### ANYFLIP

AnyFlip allows us to provide online proves of your requirements. These servers are UK based.

<https://anyflip.com/privacy/>



#### PAYPAL

We use PayPal to manage online payments and our online donations.

<https://www.paypal.com/myaccount/privacy/privacyhub>

## COOKIES & ANALYTICS

### GOOGLE ANALYTICS

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ('Google'). Google Analytics uses cookies (text files placed on your computer) to help the website operators analyse how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.



Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. If you do not wish for your data to be processed this way, please do not enter our website.

Google Analytics automatically collects and stores the following information about your visit:

- The Internet Protocol (IP) address and domain name used. The IP address is a numerical identifier assigned either to your internet service or directly to your computer. We use the IP address to direct internet traffic to you. This address can be translated to determine the domain name of your service provider (e.g., abccompany.com, xyz-school.edu, and so on)
- The type of browser and operating system you used
- The date and time you visited this site
- The web pages or services you accessed at this site; and
- The website you visited prior to coming to this site.

The legal basis for processing this data is both our legitimate business interests, namely monitoring and improving our website and services.

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## USE OF COOKIES

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

## COMPLAINTS AND QUERIES

Afford A Print tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading, or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide in exhaustive detail of all aspects of Afford A Print's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.

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## PEOPLE WHO MAKE A COMPLAINT TO US

When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.



We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We do compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually need disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us, we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

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## ACCESS TO PERSONAL INFORMATION

Afford A Print tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection legislation. If we do hold information about you, we will:

- ✓ give you a description of it;
- ✓ tell you why we are holding it;
- ✓ tell you who it could be disclosed to; and
- ✓ let you have a copy of the information in an intelligible form.

To make a request to Afford A Print for any personal information we may hold you need to put the request in writing addressing it to our Data Protection Officer at our registered office or emailing it to the address provided below.

Nigel Williams

- Telephone: 02382 358 168
- Email: support@affordaprint.co.uk
- Address:  
Data Protection Officer, Nigel Williams, 1st Floor, 132 Winchester Road, Chandlers Ford, Hampshire,  
SO53 2DS

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need. You will be asked for proof of your identity before we are able to provide you with the information requested.

We will provide you with the information within one month of your request, unless doing so would adversely affect the rights and freedoms of another (e.g., another person's confidentiality). We'll tell you if we can't meet your request for that reason.

## CONTROLLING YOUR PERSONAL INFORMATION










- We will not sell, distribute, or lease your personal information to third parties unless we have your permission or are required by law to do so.

- You may request details of personal information which we hold about you under the Data Protection Act 2018 and UK GDPR.
- If you believe that any information, we are holding on you is incorrect or incomplete, please write to or email us as soon as possible, at the above address. We will promptly correct any information found to be incorrect.

## YOUR RIGHTS

You have specific rights under data protection legislation. You can exercise these rights by emailing us. Please visit the Information Commissioners Office website to learn all about the rights you have:

<https://ico.org.uk/for-the-public/>

<ul style="list-style-type: none"> <li>• Transparency over how we use your personal information</li> <li>• This privacy notice, as well as any additional information that is provided to you either at the time you provided your details, or later, is intended to provide you with this information.</li> </ul> <p>Right to be Informed </p>	<ul style="list-style-type: none"> <li>• Request a copy of the information we hold about you – this is sometimes called a data subject access or data subject request We will supply requested information that we hold about you as soon as possible, but this may take up to 30 days. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity for us to do this.</li> </ul> <p>Right of Access </p>	<ul style="list-style-type: none"> <li>• Update or amend the information we hold about you if it is wrong</li> </ul> <p>Right of Rectification </p>
<ul style="list-style-type: none"> <li>• Ask us to stop using your information</li> <li>• In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.</li> </ul> <p>Right to Restrict Processing </p>	<ul style="list-style-type: none"> <li>• Ask us to remove your personal information from our records</li> <li>• Note: where you have requested that we do not send you marketing materials, we will need to keep some limited information to ensure that you are not contacted in the future</li> </ul> <p>Right to be "Forgotten" </p>	<ul style="list-style-type: none"> <li>• Where we process your data based on your consent (for example, to send you marketing texts or emails), you can withdraw that consent at any time.</li> </ul> <p>Withdraw Consent </p>
<ul style="list-style-type: none"> <li>• Object to the processing of your information for marketing purposes</li> <li>★ You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so (for example, to send you direct marketing by post).</li> </ul> <p>Right to Object </p>	<ul style="list-style-type: none"> <li>• Obtain and reuse your personal data for your own purposes</li> </ul> <p>Right to Data Portability </p>	<ul style="list-style-type: none"> <li>• Not be subject to a decision when it is based on automated processing</li> </ul> <p>Rights relating to Automated Decisions &amp; Profiling </p>