

# Privacy Policy

Elephant respects your privacy and is committed to protecting your personal data.

## 1. INTRODUCTION

This privacy policy tells you how Elephant Graphics Limited uses your personal data when you visit our website, interact with us, and buy our goods and services.

It also tells you about your privacy rights and how the law protects you.

It is important that you read this privacy policy, together with any other privacy policies we may provide, so that you are fully aware of how and why we are using your data.

If you have any questions, or would like to exercise your privacy rights, please follow the instructions in this privacy policy

## 2. OUR WEBSITE

Our websites at [elephantprint.co.uk](http://elephantprint.co.uk), [elephantgraphics.co.uk](http://elephantgraphics.co.uk) and [thecardpress.co.uk](http://thecardpress.co.uk) sell printed goods and services which are aimed at business users – from start-ups and independent designers to larger organisations. This website is not intended for children and we do not knowingly collect data relating to children.

Elephant Graphics Limited is the registered company.

Elephant Print and Display is a trading name of Elephant Graphics Limited. The Card Press is also a trading name of Elephant Graphics Limited.

When we mention "Elephant", "we", "us" or "our" in this privacy policy, we are referring to all 3 of these names.

## 3. PERSONAL DATA WHICH WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect a variety of information about our customers and visitors to the elephant websites. This personal data falls into these categories:

Identity Data includes title, first name, last name, username or similar identifier and an encrypted version of your login/password. If you interact with us through social media, this may include your social media user name.

Contact Data includes billing address, delivery address, email address and telephone numbers.

Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.

Profile Data includes your username and password, purchases or orders made by you, preferences, feedback and survey responses, as well as any profile data which we have added (for example, using analytics and profiling).

Technical Data includes internet protocol (IP) address, your login data, 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.

Usage Data includes information about how you use our website, products and services

Tracking Data includes information we or others collect about you from cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers.

Marketing and Communications Data includes your preferences in receiving direct marketing from us and our third parties and your communication preferences.

We also collect and may use Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from

your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this 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). Nor do we collect any information about criminal convictions and offences.

If you use any of these types of personal data on products you design or create on The Card Press, we will not be able to tell. We will treat all the personal data included in designs or products as ordinary personal data.

Remember, if you choose not to share personal data with us, or refuse certain contact permissions, we might not be able to provide the products and services you've asked for.

## 4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

**Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or social media.

This includes personal data you provide when you:

- make enquiries or request information be sent to you;
- create an account on our website The Card Press
- request a quotation from us
- place a job with us
- ask for marketing to be sent to you
- engage with us on social media
- enter a competition, promotion or survey
- contact customer services; or
- leave comments or reviews on our products or services

**Automated technologies or interactions.** As you interact with us we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may also collect Tracking Data when you use our website, or when you click on one of our adverts (including those shown on third party websites).

**Third parties or publicly available sources.** We may receive personal data about you from various types of third parties, including:

- Technical Data and/or Tracking Data from analytics providers, advertising networks and search information providers;
- Contact, Financial and Transaction Data from providers of payment and fraud prevention services;
- Identity and Contact Data from data partners; and
- Data from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media or review sites. We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

## 5. HOW WE USE YOUR PERSONAL DATA

Where we need to perform the contract we are about to enter into or have entered into with you. For example, when you purchase our products, that's a contract.

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. For example, when we carry out fraud screening as part of the check-out process.

Where we need to comply with a legal or regulatory obligation. For example, keeping records of our sales for tax compliance.

Communications. Where our legal basis is consent, you have the right to withdraw consent any time.

See Explaining the legal bases we rely on to process personal data to find out more about the types of lawful basis that we will rely on to process your personal data.

## 6. EXPLAINING THE LEGAL BASES WE RELY ON TO PROCESS PERSONAL DATA

The table here shows you a description of all the ways we plan to use personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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

We do not carry out any automated decision making.

If you ever have any questions about this, all you have to do is ask. See How to contact MOO about privacy below.

## 7. ADVERTISING, MARKETING AND YOUR COMMUNICATIONS PREFERENCES

We may use your Identity, Contact, Technical, Tracking, Usage and Profile Data to form a picture of what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you and tell you about them. This is what we call direct marketing.

We may carry out direct marketing by email, phone, text or post. Advertising space in the real world and websites and social media

But here's some things we may do that may be specifically directed at you:

- emails
- text messages, for example with discount codes;
- promotions by post
- phone calls, to tell you something that might be relevant to you and your business.

We may also work with partners to try and promote the reach of our adverts and use analytics including via websites and social media.

Tracking Data, and in particular cookies, help us to deliver website and social advertising that we believe is most relevant to you and to potential new customers. The cookies used for this purpose are often placed on our website by specialist organisations.

Cookies can also tell us if you have seen a specific advert, and how long it has been since you have seen it. This is helpful, because it means we can control the effectiveness of our adverts and control the number of times people might be shown our adverts.

If you want more information about Tracking Data, in particular cookies, see Cookies below.

Almost all the cookies that relate to advertising are part of third party online advertising networks. If you'd like to read about how you can control which adverts you see online, see opt-out programs established by the Digital Advertising Alliance (United States), the Digital Advertising Alliance of Canada and the European Interactive Digital Advertising Alliance. We do not control cookies which are set by advertising networks.

You can see from Advertising, marketing and your communications preferences above, that cookies are a tool which we (and everyone else who operates online) uses for advertising. That is just part of why cookies are used.

Other cookies collect information about how visitors use elephant, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and used to improve how elephant works.

There are also cookies that allow elephant to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features.

These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog.

There are cookies that collect information about your browsing habits in order to make advertising delivered to you more relevant to you and your interests (see Advertising, marketing and your communications preferences above). They are usually placed by advertising networks with our permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

When you use elephant, your device or browser may be sent cookies from third parties, for example when using embedded content and social network links. It's important for you to know that we have no access to or control over cookies used by these companies or third-party websites. We suggest you check the third-party websites for more information about their cookies and how to manage them.

You can see more information about the cookies we use here, including who they belong to, their ID and why they are used. We've also included links to the third-party websites where you can go to find out more.

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.

## 9. DISCLOSURES OF YOUR PERSONAL DATA

We may share your personal data with the parties set out below for the purposes set out in this privacy policy. We may also share your personal data if the law otherwise allows it.

We may share personal data with the following categories third parties:

- Suppliers and service providers (such as technology service providers, payment processing and fraud prevention providers, manufacturers and post and courier services);
- auditors and professional advisers like bankers, lawyers, accountants and insurers;
- and government, regulators and law enforcement.

We may also share data with third parties connected to advertising, retargeting and analytics. Please see Cookies above, including the cookie list, for more information about who those third parties are.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Elephant uses third party payment processors Elevation and PayPal to process payments made for products and services via the Website. All online payments will be conducted in accordance with Payment Card Industry (PCI) data security standards (which are high!) and your billing information (which is only used by these payment processors for the purpose of performing fraud protection) is encrypted before being communicated to them.

Subject to the below exceptions, your credit card details are communicated directly from your browser to these payment processors.

Your payment details are not retained by us.

For PayPal we only store the tokens required to identify the transaction with PayPal, issue refunds and identify transactions made using PayPal.

## 10. INTERNATIONAL TRANSFERS

Whenever we transfer your personal data out of the EEA, we will comply with applicable data protection law. Some of the mechanisms we may choose to use when undertaking an international transfer are:

The transfer of your personal data is to a country that has officially been deemed to provide an adequate level of protection for personal data by the European Commission.

We may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe (called the "EU Model Clauses").

Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. If the provider is not EU-US Privacy Shield certified, we may use the EU Model Clauses.

## 11. 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. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

## 12. 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 policy of every website you visit

## 13. DATA RETENTION

We will only keep 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 stop being customers for tax purposes.

In some circumstances you can ask us to delete your data; see Your legal rights below for further information.

## 14. YOUR LEGAL RIGHTS

If the General Data Protection Regulation applies to you because you are in the European Union, you have rights under data protection laws in relation to your personal data:

**The right to be informed** – that's an obligation on us to inform you how we use your personal data (and that's what we're doing that in this privacy policy);

**The right of access** – that's a right to make what's known as a 'data subject access request' for copy of the personal data we hold about you;

**The right to rectification** – that's a right to make us correct personal data about you that may be incomplete or inaccurate;

**The right to erasure** – that's also known as the 'right to be forgotten' where in certain circumstances you can ask us to delete the personal data we have about you (unless there's an overriding legal reason we need to keep it);

**The right to restrict processing** – that's a right for you in certain circumstances to ask us to suspend processing personal data;

**The right to data portability** – that's a right for you to ask us for a copy of your personal data in a common format (for example, a .csv file);

**The right to object** – that's a right for you to object to us processing your personal data (for example, if you object to us processing your data for direct marketing); and

**Rights in relation to automated decision making and profiling** – that's a right you have for us to be transparent about any profiling we do, or any automated decision making.

These rights are subject to certain rules around when you can exercise them. You can see a lot more information on them, if you are interested, on the UK Information Commissioner's Office website.

If you wish to exercise any of the rights set out above, please contact us (see How to contact).

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.

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)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## 15. HOW TO CONTACT ELEPHANT ABOUT PRIVACY

If you have any questions about this privacy policy, or would like to exercise any of your rights, please email us at [jason@elephantgraphics.co.uk](mailto:jason@elephantgraphics.co.uk) or write to us with your letter addressed to: The Managing Director – Elephant Graphics Ltd. Units 1 & 6 Sewells Farm, Barcombe, East Sussex BN8 5FH

If you need help about our products and services, or this website generally, please contact us here.

## 16. A REQUEST FROM ELEPHANT

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us. You can do this by updating your account. Thank you.

## 17. CHANGES TO THIS PRIVACY POLICY

The General Data Protection Regulation is new and the ICO is still issuing new bits of guidance about how businesses should follow it. So, you may see little updates to our privacy policy over the coming months. Be sure to check in and have read every now and then. Thank you.