



Privacy Policy

Compliance

The EU General Data Protection Regulation (GDPR) has the aim of harmonising data protection and processing laws across the European Union and giving individuals stronger rights of access and control of their personal data.

Bell Plastics Ltd (the Company) will continue to ensure the security and protection of personal data which is held within the Company. Accordingly it will comply with the provisions of GDPR where it applies to the Company in a manner, which is appropriate and proportionate to the size, type and geography of its business, and in particular it will process and protect personal data in accordance with the responsibilities and principles set out in GDPR.

Principles

GDPR will apply to the Company, as in the course of its business the Company will process data relating to individuals, which is personal to those individuals. GDPR describes such data as Personal Data and such individuals as Data Subjects.

In compliance with the provisions of GDPR, the Company will accordingly adhere to the following data protection principles:

- Process Personal Data lawfully, fairly and in a transparent manner;
- Collect Personal Data for specified, explicit and legitimate purposes and will not process it in a manner that is incompatible with those purposes;
- Only process Personal Data that is adequate, relevant and limited to what is necessary in relation to the purposes for which the Data has been processed;
- Ensure that Personal Data is accurate and, where necessary, kept up to date;
- Keep Personal Data in a form which permits identification of the Data Subject for no longer than is necessary for the purposes for which the Data has been processed; and
- Retain Personal Data in an appropriately secure manner which will include its protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

The Company is also committed to ensuring that the rights of the Data Subject about whom Personal Data is held will be fully upheld,

including in particular the rights to:

- Know that Data is being processed;
- Access the Data;
- Object to or restrict processing of the Data; and
- Correct, rectify, block or erase any Data, which is wrong.

Processing

The Company recognises that Personal Data can only be processed on a lawful basis and accordingly its policy will be to determine such lawful basis before it does so and will document this.

GDPR sets out examples of lawful bases for processing Personal Data and these include in particular where processing:

- Has been consented to by the Data Subject;
- Is necessary for the performance of a contract with the Data Subject or for taking steps to enter into a contract;
- Is necessary for compliance with a legal obligation;
- Is necessary for the purposes of legitimate interests pursued by the controller or a relevant third party, except where the law requires such interests to be overridden by the interests, rights or freedoms of the Data Subject.

Storage

The Company will consider how long it intends to store information containing Personal Data and determine the criteria for doing so. After expiry of the retention period, unless there is a sound business reason to retain them beyond this period, the records containing Personal Data will be disposed of securely and destroyed effectively.

Protection

The Company's employees are required to adhere to this policy and other policies of confidentiality of the Company, together with any instructions which may be given from time to time by Peter Martin, the Company's Data Protection Compliance Manager, so that the integrity, confidentiality and security of the Personal Data which the Company processes and to which its employees may have access is protected.

Employees are also required to take particular care with regard to protecting special categories of Personal Data and criminal records data.

The Company and its employees must:

- Only access Personal Data that they are permitted to access and only for authorised purposes;
- Not allow any other person (including other Company staff) to access Personal Data unless the employee knows that they have the appropriate permissions;
- Keep Personal Data secure (for example by complying with rules on access to premises), computer access, password protection, encryption and secure file storage and destruction)
- Not remove Personal Data (including Personal Data in files), or devices containing Personal Data (or which can be used to access it), from the Company's premises unless appropriate security measures are in place (such as encryption or password protection) to secure the information and the device;
- Not store Personal Data on local drives or on personal devices that are used for work purposes.

Disclosure

The Company may be legally required to share Personal Data with other bodies or agencies, such as government or other official bodies, in some of the circumstances set out above and where prior consent may not have been given beforehand by the Data Subject.

Subject to such exceptions and any other relevant provisions of GDPR, the Company will not disclose Personal Data to any unauthorised persons or third parties.

Additional information

Policy Operational Date: 25 May 2018

Preparation of Policy: prepared by Nick Ball, Group Finance Director and Data Protection Compliance Leader for the Plastics Capital Group, and Peter Martin, Finance Manager and Data Protection Compliance Manager of the Company.

Approval of Policy: approved respectively by the board of Plastics Capital plc, the ultimate parent company of the Company, and the board of the Company following consultation with the senior management of the Company.

Policy Review Date: 25 May 2021

Privacy Policy - Suppliers

Notice

Purpose of notice

We, Bell Plastics Ltd, company number: 02095777 whose registered office is at Room 1.1, London Heliport, Bridges Court Road, London SW11 3BE, is the controller and accordingly responsible for the personal information about you which we may hold (**personal data**).

We are required under data protection legislation (and in particular the General Data Protection Regulation, which came into force on 25th May 2018) to notify you of the information contained in this privacy notice. This notice explains to you how we collect and process your personal data during and after the delivery and or provision of services provided by you to Bell Plastics Ltd and your rights in relation to that personal data. This privacy notice supplements any other notices we may have previously provided to you and should be read in conjunction with them.

Data we collect

Personal data

"Personal data" 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).

Relevance of Data

The personal data we collect about you will depend on the products and services you supply. We will however only collect personal data, which is relevant in the context of our business relationship with you.

Categories of data

We will collect and process the following categories of personal data:

- **Identity Data** including personal contact details such as name and title.
- **Contact Data** including addresses, telephone numbers, and personal email addresses.
- **Financial Data** including bank account details, your debit or credit card information, your credit rating information (which we acquire from credit reference agencies) and other banking information.
- **Transaction Data** including trading history and anything else relating to our account.
- **Technical data**, including information on how to use your products and services.
- **Profile Data** including information you provide to us in your communications with us.

Special Categories of Personal Data

We do not collect any data about you within these categories (which includes in particular details about your race or ethnicity, religious or

philosophical beliefs, political opinions, trade union membership), nor do we collect any information about criminal convictions or offences.

Failure to provide data

Where we need to collect personal data by law or under the terms of our contract, or proposed contract, with you and you fail to provide that data when requested, we may not be able to be able to perform the contract we have, or are trying to enter into, with you. In such event we may have to terminate the contract (or any negotiations relating to a proposed contract) but we will notify you if this is the case at the time.

Change of data

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

How we collect your data

Direct Interaction

You may give us your Identity, Contact, Financial and Transaction Data when you supply your products or services to us, or during the negotiation process, or during the course of you providing products and services to us throughout the period of your contract with us.

Third Party or Publically Available Sources

We may receive personal data and additional information from third parties including credit reference agencies or other background agencies and business directories.

How we use your data

Legal basis

We will only use your personal data for a particular reason and where there is a legal basis to do so. We will use your personal data in the following circumstances in particular:

- Where we need to perform a contract we have entered into with you, or are taking steps to enter into with you.
- Where we need to comply with a legal obligation or are required to do so by law.
- Where you have consented to such use.
- Where it is necessary for the purposes of our own legitimate interests (or those of a relevant third party) except where the law requires such interests to be overridden by your interests, rights or freedoms.

Data sharing

Sharing personal data with third parties

We may share your personal data with third parties where required by law, or where it is necessary to perform our contract with you or where we have a legitimate business interest in doing so.

“Third parties” may include third party service providers, being parties for example which provide software, technical or professional services to us, and may also include other members of the Synnovia Group, where it is required for example as part of the sales or project process or fulfilling our contract with you.

Any third-party service provider with whom your personal data has been shared will be required to take appropriate security measures to protect such data in line with our policies and the law and to process your personal data only for specified lawful purposes and not for their own purposes.

Transfer outside the EU

We will not transfer your personal data outside the EU without your consent and then only on terms approved by us.

Data security

Security Breach

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed and to deal with any suspected data security breach.

We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Limiting access

We limit access to personal data to only those of our employees or agents on a strictly need to know basis. They will only process your personal data on our instructions and will be subject to a duty of confidentiality.

Data retention

Length of retention

We will only retain your personal data for as long as is necessary to fulfil the purposes it was collected for, including the purposes of satisfying any legal, accounting, or reporting requirements.

By law, for example, we are required for tax purposes to keep certain information about our suppliers (including Contact, Identity, Financial and Transaction Data) for a period of time after they cease being suppliers.

Determination of retention period

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 any applicable legal requirements.

Your rights in connection with data

Access, Correction, Erasure and other rights

By law you have the right in certain circumstances to:

- **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 information we hold about you corrected, if it is wrong.
- **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 exercised your right to object to the data being processed (see below).
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and your particular circumstances justify your objecting to processing on this ground.
- **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

Procedure

If you want to verify, correct or request erasure of your personal data, or object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact our Data Protection Compliance Manager in writing.

No fee usually required

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 unfounded or excessive.

Refusal of request

We may also refuse your request for access in certain circumstances where your request is unfounded or excessive.

Withdrawal of consent

Right to withdraw

In those circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a particular purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please notify our Data Protection Compliance Manager in writing.

Processing following withdrawal

Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless there remains another lawful basis for doing so.

Data protection compliance manager and questions

Details and contact information

If you have any questions about this privacy notice or how we handle your personal information, please contact Peter Martin, our Data Protection Compliance Manager, at Bell Plastics Ltd, 450 Blandford Road, Poole, Dorset. BH16 5BN or email: pmartin@bellplastics.co.uk

Complaints

Right to complain

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). However, as we take our obligations in relation to your personal information seriously, we would ask and encourage you to contact us first if you have any issues or concerns so that we may address and try to resolve these before you approach the ICO.

Effective date and update

Effective date

This version is effective 25th May 2018.

Update

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

Privacy Policy - Customers

Notice

Purpose of notice

We, Bell Plastics Ltd, company number: 02095777 whose registered office is at, Room 1.1 London Heliport. Bridges Court Road. London. SW11 3BE, is the controller and accordingly responsible for the personal information about you which we may hold (personal data).

We are required under data protection legislation (and in particular the General Data Protection Regulation, which came into force on 25th May 2018) to notify you of the information contained in this privacy notice.

This notice explains to you how we collect and process your personal data through your use of our website and prior to, during and after the supply of products or the provision of services by us and your rights in relation to that personal data.

This privacy notice supplements any other notices we may have previously provided to you and should be read in conjunction with them

Website and Third Party Links

Our website uses cookies and may include links to third party websites and applications, which may also use cookies. 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 or applications and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every third party website you visit.

Data we collect

Personal data

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Relevance of Data

The personal data we collect about you will depend on the products and services you supply. We will however only collect personal data, which is relevant in the context of our business relationship with you.

Categories of data

We will collect and process the following categories of personal data:

- **Identity Data** including personal contact details

such as name and title.

- **Contact Data** including addresses, telephone numbers, and personal email addresses.
- **Financial Data** including bank account details, your debit or credit card information, your credit rating information (which we acquire from credit reference agencies) and other banking information.
- **Transaction Data** including your billing history and products and services you use and anything else relating to your account.
- **Technical data** including information on how you use our products and services.
- **Profile Data** including information you provide to us in your communications with us, including for example information you provide to us when participating in market or product surveys.
- **Marketing and communications data** including your preferences in receiving marketing information from us and our third parties and your communication preferences.

Special Categories of Personal Data

We do not collect any of this data about you (which includes in particular details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership), nor do we collect any information about criminal convictions or offences.

Failure to provide data

Where we need to collect personal data by law or under the terms of our contract (or proposed contract) to provide products or services to you and you fail to provide that data when requested, we may not be able to perform the contract we have, or are trying to enter into, with you. In such event, we may have to terminate the contract (or any negotiations in relation to a proposed contract) but we will notify you if this is the case at the time.

Change of data

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

How we collect your data

Direct Interaction

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Third Party or Publically Available Sources

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How we use your data

Legal basis

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- We will use your personal data in the following circumstances in particular:
- Where we need to perform a contract we have entered into with you or are taking steps to enter into with you.
- Where we need to comply with a legal obligation or are required to do so by law.
- Where you have consented to such use.
- Where it is necessary for the purposes of our own legitimate business interests (or those of a relevant third party) except where the law requires such interests to be overridden by your interests, rights or freedoms.

Marketing and advertising

We will only use your Identity, Contact, Technical and Profile Data to determine which products, services or offers we think you may want or need or be of interest to you.

You will only receive marketing messages from us if you have requested information, or purchased products or services, from us and you have not opted out of receiving such messages.

Opting out

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data already provided to us as a result of a product/service purchase, warranty registration, product/service experience or other commercial transaction.

Cookies

As previously indicated, our website uses cookies, which allows us to distinguish you from other users of the website. This helps us to improve the website and provide you with as worthwhile and relevant an experience as we can when you browse the website.

For information on the cookies we use and the purposes for which we use them, please refer to our Cookie policy, details of which may be found on our website or through our Data Protection Compliance Manager, whose details are set out below.

Data Sharing

Sharing personal data with third parties

We may share your personal data with third parties where required by law, or where it is necessary to perform our contract with you or where we have a legitimate business interest in doing so.

“Third parties” may include third party service providers, being parties for example which provide software, technical or professional services to us, and may also include other members of the Synnovia Group, where it is required for example as part of the sales or project process or fulfilling our contract with you.

Any third-party service provider with whom your personal data has been shared will be required to take appropriate security measures to protect such data in line with our policies and the law and to process your personal data only for specified lawful purposes and not for their own purposes.

Transfer outside the EU

We will not transfer your personal data outside the EU without your consent and then only on terms approved by us.

Data security

Security Breach

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed and to deal with any suspected data security breach.

We will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Limiting access

We limit access to personal data to only those of our employees or agents on a strictly need to know basis. They will only process your personal data on our instructions and will be subject to a duty of confidentiality.

Data retention

Length of retention

We will only retain your personal data for as long as is necessary to fulfil the purposes it was collected for, including the purposes of satisfying any legal, accounting, or reporting requirements.

By law, for example, we are required for tax purposes to keep certain information about our suppliers (including Contact, Identity, Financial and Transaction Data) for a period of time after they cease being suppliers.

Determination of retention period

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 any applicable legal requirements.

Your rights in connection with data

Access, Correction, Erasure and other rights

By law you have the right in certain circumstances to:

- **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.
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Procedure

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No fee usually required

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 unfounded or excessive.

Refusal of request

We may also refuse your request for access in certain circumstances where your request is unfounded or excessive.

Withdrawal of consent

Right to withdraw

In those circumstances where you have provided your consent to the collection, processing and transfer of your personal data for a particular purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please notify our Data Protection Compliance Manager in writing.

Processing following withdrawal

Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless there remains another lawful basis for doing so.

Data protection compliance manager and questions

Details and contact information

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Effective date and update

Effective date

This version is effective 25th May 2018.

Update

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.