JUST PADS

**Just Pads Ltd Privacy Notice and GDPR Policy**

*Last updated: 24th May 2018*

Just Pads Ltd (of Third Floor, Renaissance House, The Horizon Centre, 32 Upper High Street, Epsom, KT17 4QJ) takes the protection of your data and privacy seriously. This policy outlines the personally identifiable data that may be acquired and used in the routine operations of the business and how that data is used. Just Pads Ltd is not in the business of selling, renting or trading customer, or customer contact or other personally identifiable information with other companies and will only provide any such information to suitable external companies when required to fulfil customer orders or conduct other legitimate business activities. For example, address details might be provided to a courier company to allow delivery of an order.

This policy aims to meet the requirements of the (GDPR) across all locations, employees and affiliates of Just Pads Ltd whom act as processor on behalf of our data subjects. Significant changes to data privacy laws in the EU/UK have led to Just Pads Ltd reviewing its existing policies and procedures to ensure it meets the new criteria and to safeguard our business and its customers from the latest threats towards the overall rights and freedoms of individuals.

The General Data Protection Regulation replaces the EU Data Protection Directive of 1995 and supersedes the laws of individual Member States that were developed in compliance with the Data Protection Directive 95/46/EC. Its purpose is to protect the “rights and freedoms” of living individuals, and to ensure that personal data is not processed without their knowledge, and, wherever possible, that it is processed with their consent.
The Managing Director of Just Pads Ltd is responsible for the on-going maintenance, effectiveness and ultimate alignment of this policy to fulfil our legal/regulatory requirements; and remains accountable on its overall performance.

 **Types of Data We Hold and Process**

*All sensitive electronic data held by Just Pads Ltd is stored on secure servers with all reasonable measures to ensure security put in place.*

**Client Contact Data**

Just Pads Ltd maintains a set of client data, including contact information, within its customer relations database and accountancy system. This is used to facilitate the fulfilment of orders, provision of quotes, invoicing of orders and other such activities necessary to the provision of our goods and services. This data may also be used to communicate with you in order to maintain accuracy of details held and to pursue our goals of providing quality service to companies in the promotions industry.

**‘End Customer’ Data**

Data provided to us by our clients that relates to customers of that client, here referred to as the ‘end customer’, will be treated with the utmost confidentiality and will only be used as needed in the fulfilment of orders for the client company.  ‘End Customer’ data will not be passed onto any external company except where required for fulfilment of orders, for example provision of name and address details to a dispatch company.

**Marketing and Automated Emails**

Just Pads Ltd uses a third-party provider, Mailjet, for sending marketing emails to keep you up-to-date on our products, services and special offers, as permitted under the ‘legitimate interests’ basis for processing allowed under the GDPR. The Mailjet’s system allows you an easy means to opt out of the emails by clicking the ‘unsubscribe’ link at the bottom of each email. The Mailjet system provides us with statistics on email opening and opening of any links within the email. This data is generalised and cannot be used to monitor any one individual’s activity. Please see Mailjet’s Privacy policy for further information: <https://www.mailjet.com/privacy-policy/>

Just Pads Ltd may supply product/company information to industry publications such as Sourcing City and Sourcing Machine. These companies distribute market information/news to the Promotions industry using their own data and offer an easy means to opt out of the emails by clicking the ‘unsubscribe’ link at the bottom of each email.

Just Pads Ltd may also send automated emails directly for specific purposes such as order follow ups or email receipt acknowledgement.

 **Website Data**

The websites operated by Just Pads Ltd may store ‘cookie’ data to allow certain functionality, including access to restricted areas of a website that are available to users who have been provided with a log in. This data may include generalised statistics on page usage but, even where a user is logged in, the data gathered is not used to monitor or record the behaviour of any one individual.

Where log-ins are provided and the required data is stored, the data in question is restricted to the use of the site in question. Log-ins must be specifically requested and provision of these is limited to people verified as members of the promotions industry. The resulting data is not shared with any other company and is only used in the processes of authenticating users of the given website.

Visitors to the websites may prevent the use of cookies by adjusting settings in their browser software. This may have an adverse and unpredictable effect on some of the website’s functions.

The websites also make use of a third-party service, Google Analytics, to collect generalised information on page visits and how visitors use the site. This information does not identify any one user of our website. For more information on Google Analytics’ privacy policy, please follow the link: <https://support.google.com/analytics/answer/6004245?hl=en>

Websites and webhosting may also automatically record a visitor’s IP address, browser type and date and time of access to specific pages. This may on occasion be used to gain statistics of site visitors from various geographic locations but is not used to identify or monitor individual site visitors.

**Wi-Fi**

Visitors to Just Pads Ltd may, on request of the password, make use of the company Wi-Fi. While Just Pads Ltd does not purposefully gather information on the use of this, some information may be logged automatically by the operating software of the network routers. This data may include information about the device, volumes of data used, website and applications used and the time and location of access. Just Pads Ltd will not access this information or provide it to another party except if legally required to do so.

**Individual’s Rights**

Just Pads Ltd is fully committed to maintaining the rights of individuals to view, amend or delete their personal data, as defined under the current GDPR legislation. We reserve the right to levy a charge for this where appropriate and allowed by the Information Commissioner’s Office. If you wish to raise a request, please email personaldata@easygiftsuk.com

This document in no way restricts your individual rights as defined in current legislation and where any conflict occurs, current legislation takes precedence.