



BellaGiada

LUXURY PACKAGING DESIGN & MANUFACTURE

PRIVACY & COOKIES POLICY

EFFECTIVE DATE : 1 JAN 2022

Introduction

Bellagiada Luxury Packaging Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value your privacy and are committed to protecting your personal data.

This privacy notice informs you how we look after your personal data when you visit our website, www.bellagiada.com. We will only collect and use personal data in a way (and as legally permitted are accepting and consenting to) that is consistent with our obligations and your rights under the law.

Contact Details

This privacy statement applies to the processing of data by: -

Controller

Bellagiada Luxury Packaging Ltd

Triune Court, Monks Cross Drive, York, North Yorkshire, YO32 9GZ, United Kingdom

Tel: +44 (0)208 194 2185 (Mon-Fri 8:30am – 5:00pm)

Email: clientservices@bellagiada.com

What Does This Policy Cover?

This Privacy Policy applies only to your use of our website; which may contain links to other websites. We have no control, however, over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

Data We Collect From and About You

Personal data is any information relating to an identifiable person who can be directly or indirectly identified by reference to an identifier. It does not include data where the identity has been removed, i.e., anonymous data.

When visiting our website, data will be collected in log files, via search engines and in contact forms you submitted. We may collect the following information including your: -

- Name, title, address, organisation, email address and telephone number.
- The information you sent us in an inquiry and/or contact form and the topic you are interested in.
- IP address.
- Geographic location.
- Operating system.
- Time zone and language settings.
- Browser type and version.
- Browser plug-in types and versions.
- Search and page view information.
- The date, duration and time of access.
- Page response time and download errors.
- The name and URL of the file accessed, i.e. the websites which you visit Our website from.
- The website from which access was made (referrer URL).

We do not collect any Special Categories of Personal Data about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data. We also do not collect any information about criminal convictions and offences.

How We Collect Your Data and Its Purposes

We collect data from and about you through: -

- Direct communications. Through corresponding with us by post, email, phone and/or meeting us at each other's offices and events and exhibitions.
- Automated technologies. When you use our website and/or send inquiry forms to us, your personal data, browsing equipment, actions and patterns may be collected automatically. We use cookies, server logs and analytics service providers such as Google.
- Third parties. These may include business partners and service providers we work with, such as advertising and analytics providers. Social media platforms may also provide information about you to us.

We may use the information we collect to: -

- Improve our products and services.
- Improve our website through customising your experience with us.
- Technically administer our site and network infrastructure to optimise the search functions of our website.
- Ensure system security and stability.
- For marketing purposes if you have requested information from us, purchased from us or it is clear there is a legitimate interest in our services, from time to time, we may send you information which we think may interest you. These may include new product features, services and news about our partners (third parties), such as latest manufacturing technologies and development. For third-party marketing, we will get your express opt-in consent before we share your personal data with any company outside Bellagiada Luxury Packaging Ltd. You can ask us or third parties to stop sending you marketing messages at any time by contacting us at clientservices@bellagiada.com.

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: -

- for the performance of a contract we are about to enter or have entered into with you;
- where necessary for the compliance with a legal or regulatory obligation we are subject to; and
- for our legitimate interests (as described within this policy) where your interests and fundamental rights do not override these interests.

The legal basis for processing the data is Art. 6 (1) sentence 1 lit. f of the General Data Protection Regulation (GDPR). Our legitimate interest follows from the above-listed purposes of data collection. Under no circumstances will we use the data collected to draw conclusions about your person.

Under the Data Protection Legislation, we must always have a lawful basis for using personal data. The following table describes how we plan to use your personal data and our lawful bases for doing 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. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

What we Do	What Data we Use	Legal Basis including Legitimate Interests
Registering you on our website	(a) Identity (b) Contact	(a) Performance of a contract with you
Providing and managing your Account	(a) Identity (b) Contact (c) Financial (d) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (such as to recover debts due to us)
To manage our relationship with you which will include:	(a) Identity (b) Contact	(a) Performance of a contract with you

(a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(c) Profile (d) Marketing and Communications	(b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
Personalising and tailoring your experience on our website.	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing & Communications (f) Technical.	Necessary for our legitimate interests (to improve web contents and a better service for users of our website)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
Supplying you with information that may be of interest to you by email AND/OR post. You may opt-out at any time by emailing us at clientservices@bellagiada.com	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

If we need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, we will inform you and explain the legal basis which allows us to do so.

In some circumstances, where permitted or required by law, we may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

Data Retention

We will keep your personal data for no longer than is necessary considering the reason(s) for which it was first collected.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

We will only store your personal data in the UK. This means that it will be fully protected under the Data Protection Legislation.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;
- procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner's Office where we are legally required to do so.

Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions: -

- (a) If we sell, transfer, or merge parts of our business or assets, your personal data may be transferred to a third party. Any new owner of our business may choose to continue to use your personal data in the same way(s) that we have used it, as specified in this Privacy Policy.
- (a) In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.
- (b) If your inquiry leads to involvement with our business partners, such as our manufacturing partners, we may pass on your personal data to them to facilitate the inquiry

If any of your personal data is shared with a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law.

If any personal data is transferred outside of the UK, we will take suitable steps to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation.

How Can I Control and Access My Personal Data?

Under the UK GDPR and Data Protection Act 2018, you have rights in relations to your personal data:-

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

In addition to your rights under the law, you may:-

- When you are given options on our website to submit your personal data, you may choose to restrict our use of your data. We aim to give you strong controls on our use of your personal data for direct marketing purposes (including the ability to opt-out of receiving emails from us) which you may do so by unsubscribing using the links provided in our emails.
- Choose to access our website without providing any personal data at all. However, to use all the features and functions available on our website, you may be required to submit or allow the collection of certain data.
- Restrict our use of cookies. For more information, see details of our Cookie Policy below.

If you wish to know what personal data we have about you, you may raise a Subject Access Request in writing and send to the email or postal addresses shown in the Contact Details in this Policy.

There is normally no fee charge for a subject access request. If your request is, however, manifestly unfounded, excessive and/or repetitive, a fee may be charged to cover our administrative costs in responding.

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 aim respond to all legitimate requests within one month of receiving it. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

Cookies

Cookies are text files with small pieces of data (like a username and password) that are used to identify your computer as you use a computer network. Data stored in a cookie is created by the server upon your connection. This data is labelled with an ID unique to you and your computer. When the cookie is exchanged between your computer and the network server, the server reads the ID and knows what information to specifically serve to you.

We collect users' information over time to enable us to provide you with a good user experience when browsing our website and utilising our services. This also helps to improve our services by understanding your interests.

To collect information, we use common tracking tools, including HTTP cookies, web beacons, flash cookies, and similar technologies. You may also receive third-party cookies (such as Google) when you use our website. All cookies used by and on Our website are used in accordance with current Cookie Law.

By continuing to browse the site, you are agreeing to our use of cookies and other tracking technologies.

We may use the following cookies:

- Strictly necessary cookies, which are required for the operation of our website.
- Analytical/performance cookies, such as those from Google Analytics.
- Session (or transient) cookies to recognise that you have already visited certain pages of our website.
- Functionality cookies, to recognise you when you return to our website. This enables us to personalize content for you.
- Targeting cookies to make our website more relevant to your interests. We may share this information with third parties for this purpose.
- Social media buttons and/or plugins that allow you to connect with your social network in various ways. Social media sites such as Twitter, Facebook and LinkedIn will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

Note that third parties (such as advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

Disabling Cookies

By giving your consent to the placing of cookies you are enabling us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of cookies when prompted by our website. Be aware disabling cookies will affect the functionality and features of this website. Therefore, it is recommended that you do not disable cookies.

Certain features of our website depend on cookies to function. Cookie Law deems these cookies to be "strictly necessary". Your consent will not be sought to place these cookies, but it is still important that you are aware of them. You may still block these cookies by changing your browser's settings (see your browser Help for how to do this). Please be aware though that our website may not work properly if you do

so. We have taken great care to ensure that your privacy is not at risk by allowing them.

How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please see contact information at the beginning of this policy.

Changes to this Privacy Policy

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be immediately posted on our website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check this page regularly to keep up to date.