

This privacy policy sets out how **DRPG** business use and protects any information that you provide us when you visit and use [www.smithieslive.com](http://www.smithieslive.com)

**DRP UK Ltd** company number **03653794** is registered in England.

Our registered address is 212 Ikon Estate, Droitwich Road, Hartlebury, DY10 4EU. Tel: 01299 250531

## Introduction

This privacy policy aims to inform you about how **DRPG** collects and processes any information that we collect from you, or that you provide to us. It covers information that could identify you (“personal information”) and information that could not. In the context of the law and this notice, “process” means collect, store, transfer, use or otherwise act on information. It tells you about your privacy rights and how the law protects you.

**DRPG** are committed to protecting your privacy and the confidentiality of your personal information.

Our policy is not just an exercise in complying with the law, but a continuation of our respect for you and your personal information.

We undertake to preserve the confidentiality of all information you provide to us and our policy complies with the Data Protection Act 2018 (Act) accordingly incorporating the EU General Data Protection Regulation (GDPR).

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data.

Except as set out below, we do not share, sell, or disclose to a third party, any information collected through our website.

## Data Controller

DS Smith is the overall controller of the personal information we process, unless otherwise stated.

Please contact Andrew Wallace ([Andrew.Wallace@dssmith.com](mailto:Andrew.Wallace@dssmith.com)), should you have any questions regarding this policy.

## Data Processor

**DRPG** are acting on behalf of DS Smith and will be processing data on their behalf.

## Data Protection Officer

**DRPG** have appointed a data protection officer (DPO) who is responsible for ensuring this policy is followed. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact [dpo@drpgroup.com](mailto:dpo@drpgroup.com) or via our postal address and mark the envelope 'FAO Data Protection Officer'.

## Data we process / collection of personal information

We may collect, use, store and transfer different kinds of personal data about you. We have collated these into groups as follows:

Your identity includes information such as first name, last name, title, and other identifiers that you may have provided at some time.

Your contact information includes information such as email address, telephone numbers and any other information you have given to us for the purpose of communication or meeting.

We may aggregate anonymous data such as statistical or demographic data for any purpose.

Anonymous data is data that does not identify you as an individual. Aggregated data may be derived from your personal data but is not considered personal information in law because it does not reveal your identity.

## Collection of special personal information

Special personal information is data 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.

It also includes information about criminal convictions and offences.

We do not collect any special personal information about you.

It is our policy to collect only minimum information required to complete your request.

## Use of personal information

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

We may send you email communication which may be of interest to you from time to time for the duration of Smithies 2022

## The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal information, and to notify you of the basis for each category.

If a basis on which we process your personal information is no longer relevant, then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

We rely on one or more of the following processing conditions:

- rely on explicit consent;
- our legitimate interests in the effective delivery of information and services to you;
- to satisfy any legal and regulatory obligations to which we are subject or;
- to perform our obligations under the Terms and conditions of a contract.

## Cookies

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity including geographical information.

In addition to this, if you go on to a web page on our site that contains embedded content, for example a video from YouTube, you may be sent cookies from these websites. We don't control these cookies, so we suggest you check the third-party websites for more information about their cookies and how to manage them.

You can set your browser not to accept cookies and obtain up-to-date information about blocking and deleting cookies via the below website.

We use cookies in the following ways:

- to track how you use our website
- to record whether you have seen specific messages we display on our website
- to keep you signed in our site
- to record your answers to surveys and questionnaires on our site while you complete them
- to record the conversation thread during a live chat/video stream with our support team

For further information visit [www.aboutcookies.org](http://www.aboutcookies.org)

## Rights in relation to your information

Under data protection law, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

- Your right of access

You have the right to ask us for copies of your personal information. This right always applies. There are some exemptions, which means you may not always receive all the information we process.

- Your right to recertification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies

- Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances

- Your right to restrictions of processing

You have the right to ask us to restrict the processing of your information in certain circumstances

- Your right to object processing

You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests.

- Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you.

If you would like to exercise these rights or understand if these rights apply to you, please contact us by sending an email [dpo@drpgroup.com](mailto:dpo@drpgroup.com)

## Sharing of information

We will not share your information with any third parties other than the specified Data Controller as listed in this policy and will not use any information for the purposes of direct marketing.

We may use data processors who are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

## Children's Information

We do not provide services directly to children or proactively collect their personal information. However, as in this case we are sometimes given information about. The information in the relevant parts of this notice applies to children as well as adults.

## Retention of personal information & special personal information

Except as otherwise mentioned in this privacy notice, we keep your personal and special information only for as long as required by us and;

- to provide you with the services you have requested.
- to comply with other law

Retention of data has been stipulated by the Data Controller DS Smith

## Third Party Links

Our website may contain links to other websites provided by third parties not under our control.

When following a link and providing information on that link please be aware that we are not responsible for the data provided to that third party.

This privacy policy only applies to this website so when you link to other websites you should read their own privacy policies.

## Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

## Compliance with the law

Our privacy policy has been compiled to comply with the law of every country or legal jurisdiction in which we aim to do business. If you think it fails to satisfy the law of your jurisdiction, we should like to hear from you.

## How you can complain

If you are not happy with our privacy policy or if you have any complaint, then you should tell us.

If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office (ICO).

This can be done at <https://ico.org.uk/make-a-complaint/>. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

## Review of this privacy policy

**DRPG** may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us on the details above.