## **Dryplast Privacy Policy**

# 1.0 OUR BELIEFS WHEN IT COMES TO USER PRIVACY AND DATA PROTECTION

- User privacy and data protection are human rights
- We have a duty of care to the people within our data
- Data is a liability, it should only be collected and processed when absolutely necessary
- We can't stand spam.
- We will never sell, rent or otherwise distribute or make public your personal information

#### 2.0 RELEVANT LEGISLATION

Along with our business and internal computer systems, this website is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1988 (DPA)
- EU Data Protection Directive 1995 (DPD)
- <u>EU General Data Protection Regulation 2018 (GDPR)</u>

This site's compliance with the above legislation, all of which are stringent in nature, means that this site is likely compliant with the data protection and user privacy legislation set out by many other countries and territories as well. If you are unsure about whether this site is compliant with your own country of residences' specific data protection and user privacy legislation you should contact our data protection officer (details of whom can be found in <u>section 9.0</u>) for clarification.

# 3.0 PERSONAL INFORMATION THAT THIS WEBSITE COLLECTS AND WHY WE COLLECT IT

This website collects and uses personal information for the following reasons:

#### 3.1 Site visitation tracking

Like most websites, this site uses Google Analytics (GA) to track user interaction. We use this data to determine the number of people using our site, to better understand how they find and use our web pages and to see their journey through the website.

Although GA records data such as your geographical location, device, internet browser and operating system, none of this information personally identifies you to us. GA also records your computer's IP address which could be used to personally identify you but Google do not grant us access to this. We consider Google to be a third party data processor (see section 6.0 below).

GA makes use of cookies, details of which can be found on <u>Google's developer guides</u>. FYI our website uses the gtag.js implementation of GA.

Disabling cookies on your internet browser will stop GA from tracking any part of your visit to pages within this website.

In addition to Google Analytics, this website may collect\* information (held in the public domain) attributed to the IP address of the computer or device that is being used to access it. The information is supplied to us from <a href="Whoisvisiting.com">Whoisvisiting.com</a>. Whoisvisiting.com is a service offered by Whoisdata Limited. The Whoisvisiting system does not use your IP address to identify you, the individual, in any way. No cookies are used by the Whoisvisiting system.

\* The Whoisvisiting system will only lookup information when a static IP address is being used. <u>Differences between a static and dynamic IP address</u>. More information about <u>how</u>
<u>Whoisvisiting uses IP addresses</u>.

In addition to the above services we use the Facebook Pixel service which similarly to Google Analytics does not allow us to identify individuals, but lets us monitor trends and the performance of the website. Facebook's Pixel also allows us to "remarket" to people who have visited our website through the use of cookies. Facebook users have the option to disable personalised ads from within the facebook platform, more information can be found here. In addition users have the ability to block the cookies either in their web browser, via Facebook settings or by using a third party cookie blocker to opt out of this type of marketing.

#### 3.2 Our blog

Currently, we don't allow for comments or contribution on our blog and as such no data is collected or processed. We are considering adding this functionality and when we do we will update this policy with details on how data is processed.

#### 3.3 Website forms

Should you choose to submit a form on our website, such as a contact us form, the data you've submitted, including your name, telephone number and email address where applicable will be collated into an email and sent to us over the <u>Simple Mail Transfer Protocol (SMTP)</u>. In addition a record of your submission will be stored on our website's database, which is only accessible by authorised members of the Dryplast team and is maintained by our 3rd party processor Webflow. For more information about Webflow please visit their <u>privacy policy here</u>.

#### 3.4 Email links

In various places of this website there is the option to click to email or click to call. In both of these cases upon clicking a link our website will not record or store any of the information you subsequently submit. These links will prompt your device to launch either the default call or email app in use.

Emails sent and received by us use <u>Simple Mail Transfer Protocol (SMTP)</u>, this service is provided to us by one of our third party processors Microsoft, on their Office 365 platform, for more information about Microsoft as a data processor see section 6.0.

Our SMTP servers are protected by <u>TLS</u> (sometimes known as SSL) meaning that the email content is encrypted using <u>SHA-2</u>, 256-bit cryptography before being sent across the internet. The email content is then decrypted by our local computers and devices.

#### 4.0 HOW WE STORE YOUR PERSONAL INFORMATION

As detailed in section 3.3, if you submit a form on the website, some personal information will be stored within this website's database. This is the only occasions where personal data will be stored on this website. This data is currently stored in an identifiable fashion; a limitation of the content management system that this website is built on (Webflow). However, whilst identifiable, the information is only accessible to those with the necessary system privileges.

In the near future we aim to change the storage of this data to a pseudonymous fashion meaning that the data would require additional processing using a separately stored 'key' before it could be used to identify an individual.

Pseudonymisation is a recent requirement of the GDPR which many web application developers are currently working to fully implement. We are committed to keeping it as a high priority and will implement it on this website as soon as we are able to.

#### 5.0 ABOUT THIS WEBSITE'S SERVER

This website is hosted by Webflow, one of our third party data processors. They in turn use both Amazon Cloudfront and the Fastly Content Delivery Network to distribute copies of the website around the world. The reason for the distributed nature is to ensure speed and reliability of the website globally.

Some of Webflow's & Amazon's Security benefits are:

- SSL Certificate for encryption between the visitor and the website
- Security guarded data centres
- Security fencing and feeds
- Intrusion detection technology
- Backup power systems
- Video surveillance systems
- Enterprise-grade website security
- ISO 27018 compliant

Full details of Webflow's hosting can be found <u>here</u>.

All traffic (transferral of files) between this website and your browser is encrypted and delivered over HTTPS.

#### 6.0 OUR THIRD PARTY DATA PROCESSORS

We use a number of third parties to process personal data on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in section 2.0.

- Webflow (Privacy policy) EU-US Privacy Shield Application Pending
- Google (Privacy policy) EU-US Privacy Shield Compliant
- Facebook (<u>Data policy</u>) EU-US Privacy Shield Compliant

#### 7.0 DATA BREACHES

We will report any unlawful data breach of this website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

#### 8.0 DATA CONTROLLER

The data controller of this website is: Dryplast, a UK Private limited Company with company number:2704266

Whose registered office is: Dryplast House, 2a St. Albans Road, Bournemouth, Dorset, BH8 9EP

### 9.0 DATA PROTECTION OFFICER

Stephanie Down Director

Telephone: 01202 777 070 Email: stephanie@dryplast.co.uk

#### 10.0 CHANGES TO OUR PRIVACY POLICY

This privacy policy may change from time to time in line with legislation or industry developments. We will not explicitly inform our clients or website users of these changes. Instead, we recommend that you check this page occasionally for any policy changes. Specific policy changes and updates are mentioned in the changelog below.

### 10.1 Change log

22/02/2018 - Privacy policy instigated