Privacy Policy/Privacy Notice External

AIMS & OBJECTIVES

This privacy notice tells you what to expect us to do with your personal information.

- Contact details
- What information we collect, use, and why
- Lawful bases and data protection rights
- Where we get personal information from
- How long we keep information
- How to complain

This Privacy notices relates to Communisis PS Ltd which is trading as Paragon Global Brands. While this is a UK company, this privacy policy covers the use of personal data for all countries in which we operate.

CONTACT DETAILS

Email: communisis.risk@paragonglobalbrands.com

WHAT INFORMATION WE COLLECT, USE, AND WHY

We collect or use the following information to **provide services and goods, including delivery**:

- Names and contact details
- Addresses
- Information relating to compliments or complaints

We collect or use the following information for **service updates or marketing purposes**:

- Names and contact details

We collect or use the following information to **comply with legal requirements**:

- Name
- Contact information

We collect or use the following information for **recruitment purposes.** Please note that information collected and used during the recruitment process will be held by Paragon London Ltd as Data Controller and Communisis PS Ltd is the data processor for this data. The paragon London Ltd data retention policy and standards can be obtained by contacting us at Risk@paragonglobalbrands.com :

- Contact details (e.g. name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (e.g. job application, employment references or secondary employment)
- Education history (e.g. qualifications)
- Right to work information
- Details of any criminal convictions (e.g. Disclosure Barring Service (DBS) or equivalent for non-UK applicants, Access NI or Disclosure Scotland checks)

We also collect or use, on an optional basis, the following special category information for **recruitment purposes.** This information is subject to additional protection due to its sensitive nature. Paragon London Ltd is also the data controller for this data:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Sexual orientation information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details

LAWFUL BASES AND DATA PROTECTION RIGHTS

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website. Within the EU the EU GDPR applies.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. You can read more about this right here.
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. You can read more about this right here.
- **Your right to erasure** - You have the right to ask us to delete your personal information. You can read more about this right here.
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. You can read more about this right here.
- **Your right to object to processing** - You have the right to object to the processing of your personal data. You can read more about this right here.
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. You can read more about this right here.
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. You can read more about this right here.

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

OUR LAWFUL BASES FOR THE COLLECTION AND USE OF YOUR DATA

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We collect information to be able to market our goods and services to large companies to support their brand, we collect only business contact details. The benefits to the individuals who are employees of the brands served is that they will be able to better serve their customers by displaying products and providing offers which will be more appropriate to their needs.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

The lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - We collect the information to ensure that recruitment is fair and that skills match the role requirements, by capturing the right information we can also ensure that individuals have access to roles suited to their skills and ambitions.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

WHERE WE GET PERSONAL INFORMATION FROM

- Directly from you
- Previous employers
- Credit reference agencies
- Suppliers and service providers
- Clients

HOW LONG WE KEEP INFORMATION

The following tables detail how long we keep information for. Where the personal data relates to recruitment or to you in respect of your employment with us the retention period is determined by Paragon London Ltd as Data Controller. More information about retention of data in this respect, and our relationship with Paragon London Ltd, is available either from the contact details set out above or directly from dpo@paragon-cc.co.uk

RETENTION STANDARDS:

FINANCE/ACCOUTNING

Type of Record	**Retention Period**
Accounting Records	10 years
Tax Returns and Records	Indefinitely

LEGAL

Type of Record	**Retention Period**
Legal Advice	6 Years

CONTRACTS

Type of Record	**Retention Period**
Major Agreements of historical Significance	Indefinitely
Contracts with clients and suppliers	Six years after expiry
Licensing Agreements	Six years after expiry

INTELLECTUAL PROPERTY

Type of Record	Retention Period
Patent and Trade Mark records	Six years after cessation of registration
Certificates of registration of trade / service marks	Six years after cessation of registration

DATA PROTECTION

Type of Record	Retention Period
ROPAs and DPIAs	Six years after the data processing activity has ceased
Data Subject Access Requests (DSARs) – raw data	One year following completion of the request.
Data Processed in responding to DSARs – case history and administrative documents	Three years following completion of the request

INTERNAL INVESTIGATIONS

Type of Record	Retention Period
Case histories and other finding where there has been no case to answer	One month
All data retaining to investigations in which action has been taken or deemed necessary	In line with HR Policy
Appropriately redacted reports and anonymised investigation history 'stubs' providing limited summary information	7 years following closure of the investigation

COMMUNICATION ACTIVITIES

Type of Record	Retention Period
Archived copies of emails in mailboxes	7 years
Other documents which form part of the corporate record, held in 3rd party apps such as SharePoint, Teams, Mtivity etc.	7 years
Instant messages	6 months
Contact Information for Marketing	3-years (from last response or from first contact if no reply)

CLIENT INFORMATION

Type of Record	Retention Period
Complaints	6 years after contract expiry
Requests such as change requests or requests for information	As agreed contractually or 6 years after contract expiry
Proof of delivery, PO and invoices	6 years (6 years after contract expiry)

OTHER ORGANISATION WIDE DOCUMENTS

Type of Record	Retention Period
HR Data	In line with Paragon HR Retention Standard
Detail of Injuries or Accident Reports/Records	10 years from the date of the accident
Records relating to Working Time	3 years, after the end of the pay reference period following the one that the records cover
First Aid and/or Fire Marshal training	6 years after expiry of certification or end of employment
Current and previous versions of policy, procedures, processes and guides	Current and two previous versions where superseded. 3 years where retired
Internal Audits	3 years
Whistleblowing Documents	6 Months, following the outcome (if substantiated). If unsubstantiated, personal data should be removed within one week
Team information, team meetings	3 years
Internal Management Information e.g. client satisfaction, GRC data, process monitoring, corporate risk registers	6 years
Client Management Information	As required in the contract or 6 years
Project files (including abandoned or deferred projects)	< £100k 2 years from termination > £100k 6 years from termination
Visitor information (where captured)	1 year

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

HOW TO COMPLAIN

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO. The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: https://www.ico.org.uk/make-a-complaint

LAST UPDATED:

23rd July 2025