

Wednesday, July 25, 2018

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Privacy Policy

Effective and last updated: 25th July, 2018

This App is owned and operated by Hartley & Marks Publishers Inc. (hereinafter referred to as the brand “Paperblanks®”), a company that has its offices at 400-948 Homer Street, Vancouver, BC, V6B 2W7, Canada. We are committed to protecting the privacy of our visitors while they interact with the content, products and services on this app (the “App”). This Privacy Policy applies to the App only. It does not apply to other Apps or websites to which we link. Because we gather certain types of information about our users, we want you to understand what information we collect about you, how we collect it and how that information is used. You agree that your use of the App signifies your assent to this Privacy Policy. If you do not agree with this Privacy Policy, please do not use the App.

This App is designed to comply with the following international legislation with regards to data protection and user privacy:

- *EU General Data Protection Regulation 2018 (GDPR) – (<https://www.eugdpr.org/>)*

1) The Data Controller

Any personal information processed by this App in connection with this Privacy Policy is controlled by Hartley & Marks Publishers Inc., Homer Street, Vancouver, BC, V6B 2W7, Canada which is considered the “data controller” of your personal information under European Union data protection law. This App is designed to comply with the EU General Data Protection Regulation 2018 (GDPR) – (<https://www.eugdpr.org/>).

2) The Data Processor

Data processing is carried out by employees of Hartley & Marks Publishers Inc.

3) Information Collected

We collect the following information from you:

- **NAVIGATION DATA**

The computer systems and software procedures put in place for the functioning of this App shall obtain certain personal data, the transmission of which is implicit in the use of Internet protocols and communication. This involves information that is not

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collected for the purposes of association with designated interested parties, but which due to its very nature may, following procession and the cross-referencing with data held by third parties, make it possible to identify the users. Internet Protocol (IP) addresses or similar identifiers are considered personal information by European Union data protection law, we also treat these identifiers as personal information. In parallel, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

- **COOKIES**

This app does not collect cookies, but it does use your device's internal storage and cache.

4) How We Use Your Information

The App uses your personal information only for the original purposes it was given.

We will use this information:

- for marketing research purposes relating to Paperblanks® business and satisfaction surveys;
- to customise, analyse and improve our products, services, technologies, communications and relationship with you;
- to enforce our Terms of Use or Privacy Notice with you; and
- to protect the security or integrity of our App, our business or our products or services.

Your personal information will not be sold or otherwise transferred to unaffiliated third parties without your approval at the time of collection, unless required by law.

Further, the App reserves the right to contact you regarding matters relevant to the underlying service provided and/or the information collected.

The App may disclose contact information in special cases where we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury or interference with our rights, property, customers or anyone who could be harmed by such activities.

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You will receive notice when your personally identifiable information might be provided to any third party for any reason other than as set forth in this Privacy Policy, and you will have an opportunity to request that we not share such information.

5) Method of Processing – Retention

Processing is done using automated and manual methods, with procedures and tools aimed at guaranteeing maximum security and confidentiality, by parties specially appointed in compliance with art. 31 and foll. Leg. Dec. 196/03. The data will be stored for a period that shall not exceed the purposes for which the data has been collected and subsequently processed and based on applicable privacy regulations.

6) How We Store Your Personal Information

This App is not hosted by Microsoft Azure within a datacenter located in California, USA, but the webservice that it uses to get the prompts from is. However, no personal data is stored on Azure of the app. The data is stored only on the user's personal device. All Microsoft Azure Cloud services comply with the General Data Protection Regulation (GDPR). A full list of the key changes under GDPR operated by the hosting company can be found here (<https://www.microsoft.com/en-us/TrustCenter/Privacy/gdpr/default.aspx>).

Our third-party data processors

To manage some of our website activities, Hartley & Marks Publishers Inc. is able to use cloud platforms provided by third parties as sub-processors. In this regard, we inform you that some personal data acquired on the basis of this disclosure will be stored on servers located in the United States of America (Google Analytics). The United States of America does not benefit from an EU Commission's adequacy decision in accordance with Art. 25 of the EC Directive no. 46/95, therefore the transfer will take place on the basis of contractual clauses such as those approved by the Commission or by virtue of other suitable mechanisms for data transfer required by applicable regulations.

We permit certain trusted third parties to track usage and analyse data such as the source address that a page request is coming from, the date and time of the page request, the referring Website (if any) and other parameters in the URL. This is collected in order to better understand our website usage and enhance the performance of

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services to maintain and operate the App and certain features on the App.

- Google Analytics – ([Privacy Policy](#)).

8) How We Protect Your Information/Security

We are committed to protecting the information we receive from you. We take appropriate security measures to protect your information against unauthorised access to or unauthorised alteration, disclosure or destruction of data. To prevent unauthorised access, maintain data accuracy and ensure the correct use of information, we maintain appropriate physical, electronic and managerial procedures to safeguard and secure the information and data stored on our system.

While no computer system is completely secure, we believe the measures we have implemented reduce the likelihood of security problems to a level appropriate to the type of data involved. Our App is designed to comply with the EU General Data Protection Regulation (2018 -GDPR). However, these measures, standing alone, may not be sufficient to guarantee the security of your Personal Information.

It is your responsibility to safeguard your passwords and to guard against unauthorised access to your computer. In the absence of negligence on our part, we shall not be held liable for any loss you may suffer if a third party procures unauthorised access to any Personal Information you provide to us via the App or when ordering from Paperblanks® through Customer Service.

Paperblanks® welcomes your questions and comments about privacy. Please send your enquiries to dataprotection@hartleyandmarks.com.

9) Users Rights

Users are entitled to obtain confirmation of the existence of their data at any time and to be informed of their content and source, the processing purposes and methods, and - in the event of processing with electronic tools - the applied processing logic, checking the accuracy of their data or requesting corrections and updates. If you request disclosure, correction, deletion or that Paperblanks® stop using your Personal Information, Paperblanks® will deal with such requests in accordance with the General Data Protection Regulation (GDPR). Please send your enquiries to dataprotection@hartleyandmarks.com.

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The deletion of your Personal Information or a request for Paperblanks® to stop using it will result in the cancellation of your registration. There is no fee for this request.

10) Disclaimer to Security

By consenting to the Privacy Policy, you consent that no data transmission over the Internet is completely secure. We cannot guarantee or warrant the security of any information you provide to us and you transmit such information to us at your own risk.

We will report any unlawful data breach of this App'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.

11) Notification of Changes

The Data Controller reserves the right to change this Privacy Policy from time to time at its sole discretion. If at some point in the future there is a change to our Privacy Policy, unless we obtain your express consent, such change will apply only to information collected after the revised Privacy Policy took effect. Your continued use of the App indicates your assent to the Privacy Policy as posted.

12) Contact Information

If you have any questions or concerns regarding this Privacy Policy please contact dataprotection@hartleyandmarks.com.