

# **Keenpac Privacy Policy**

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## 1. Introduction

We appreciate the trust you place in us when sharing your personal data. The security of that data is very important to us.

This policy explains how we collect and use your personal information and who we share it with and will also explain what rights you have with regards to your personal data and how you can exercise those rights.

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## 2. Who we are

Keenpac,

For the purposes of the General Data Protection Regulation Keenpac is the data controller. This means that Keenpac determines what data is collected, how this data is going to be used and how this data is protected.

Our registered office address is:

Bunzl Retail & Healthcare Supplies Ltd trading as Keenpac,  
York House, 45 Seymour Street, London, W1H 7JT

If you have questions about how we process personal data, or would like to exercise your data subject rights, please email us at [privacy-brhs@bunzl.co.uk](mailto:privacy-brhs@bunzl.co.uk) or write to us at the address above.

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## 3. Companies and websites within scope

The following is within scope for this privacy policy:

Keenpac

It also includes personal data that is collected through our websites, by telephone, through LiveChat and through any related social media applications.

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## 4. Collection of personal data

We collect personal data from you for one or more of the following purposes:

- To fulfil a contract that we have entered into with you or with the entity (or organisation) that you represent. In these circumstances it may be your entity (or organisation), rather than yourself, that has provided us with your personal data
- To initiate and complete commercial transactions with you, or the entity (or organisation) that you represent, for the purchase of products and/or services
- To deliver product you have purchased directly or indirectly from us
- To communicate with suppliers of goods and services
- Keeping accounts and other business records
- To carry out marketing, electronic or otherwise
- Complying with legal or regulatory requirements
- To manage existing and past employees
- To manage job applicants
- Dealing with queries from our current employees, past employees, and job applicants
- Dealing with complaints or queries from our customers and our suppliers
- Dealing with queries from our shareholders and other stakeholders
- Generating data analytics to monitor and improve the performance of our website
- To ensure the security and safe operation of our websites and underlying business infrastructure.

### Technical information

In addition, to ensure that each visitor to any of our websites can use and navigate the site effectively, we collect the following:

- Technical information, including the IP (Internet Protocol) address used to connect your device to the Internet
- Your login information, browser type and version, time zone setting, browser plug-in types and versions
- Operating system and platform
- Information about your visit, including the URL (Uniform Resource Locators) clickstream to, through and from our site.

In section 10 below, we identify your rights in respect of the personal data that we collect and describe how you can exercise those rights.

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## 5. Lawful basis for the processing of personal data

We believe that it is in our legitimate interests, or is necessary for the performance of a contract, to collect and use personal information to operate our business and to provide a service that you have requested. In some cases, we may be under a legal duty to use or disclose personal information, for example to comply with a request from an official body.

When we process on the lawful basis of legitimate interest, we apply the following test to determine whether it is appropriate:

**The purpose test** – is there a legitimate interest behind the processing?

**Necessity test** – is the processing necessary for that purpose?

**Balancing test** – is the legitimate interest overridden, or not, by the individual's interests, rights, or freedoms?

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## 6. Sharing your personal information

We may share your personal information, but this will be done on a 'need to know' basis and only where it is necessary to do so or where we are required to share information. Such as our professional advisors and service providers including:

- Accountants
- Legal counsel
- Consultants
- Payment providers
- Payroll providers
- Pension providers
- Insurers
- Information technology and communications service providers
- Suppliers
- Logistics and transport services.

We may also share personal information:

- With any competent law enforcement or regulator as require by law
- When we buy or sell any businesses or assets.

We aim to put the necessary safeguards in place to ensure that personal information that the company is legally responsible for remains properly protected and is used appropriately when in the hands of a third party.

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## 7. International transfer

We are a global organisation and use third parties located in other countries to help us run our business. This includes countries outside the European Union ("EU") and to countries that do not have laws that provide specific protection for personal data. We have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data outside the EU are done lawfully. Where we transfer personal data outside of the EU to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU.

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## 8. How long do we keep your personal information?

We will take steps to keep your information for only as long as is necessary for our business needs and in compliance with any legal or regulatory duties to retain personal information for a particular period. However long we retain personal information for, we will make sure it is subject to appropriate security.

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## 9. Security measures

We have what we believe are appropriate security controls in place to protect personal data. Risk assessment, including assessing risks to the rights and freedoms of data subjects, is at the heart of our Information Security Management System. We do not, however, have any control over what happens between your device and the boundary of our information infrastructure. You should be aware of the many information security risks that exist and take appropriate steps to safeguard your own information. We accept no liability in respect of breaches that occur beyond our sphere of control.

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## 10. Your rights as a data subject

As a data subject whose personal information we hold, you have certain rights. If you wish to exercise any of these rights, please email [privacy-brhs@bunzl.co.uk](mailto:privacy-brhs@bunzl.co.uk) or use the information supplied in the Contact Us section below. To process your request, we will ask you to provide a valid form of identification for verification purposes. Your rights are as follows:

- **The right to be informed**  
As a data controller, we are obliged to provide clear and transparent information about our data processing activities. This is provided by this privacy policy and any related communications we may send you.
- **The right of access**  
You may request a copy of the personal data we hold about you free of charge. Once

we have verified your identity and, if relevant, the authority of any third-party requestor, we will provide access to the personal data we hold about you as well as the following information:

- a) Know whether as a data controller we hold any personal data about you
  - b) Receive a description of the personal data held and, if permissible and practical, a copy of the personal data
  - c) Be informed of the purpose(s) for which that personal data is being processed, and from where it was received
  - d) Be informed whether the personal data is being disclosed to anyone apart from the original recipient of the personal data and, if so, the identity of those recipients
  - e) Ask that your personal data be transferred to you or a third party in machine readable format (Word, PDF, etc.) (although such requests can only be fulfilled if the personal data in question is
    1. provided by the data subject to the company,
    2. is processed automatically
  - f) If the personal data is being used to make automated decisions about you as the data subject (e.g. profiling), to be told what logic the system uses to make those decisions and to be able to request human intervention to override any such automated decisions.
  - g) Where your personal data is transferred to a third country or to an international organisation, you have the right to be informed of the appropriate safeguards pursuant to Article 46 of the GDPR relating to the transfer
- If there are exceptional circumstances that mean we can refuse to provide the information, we will explain them. If requests are frivolous or vexatious, we reserve the right to refuse them. If answering requests is likely to require additional time or occasions unreasonable expense (which you may have to meet), we will inform you.
  - **The right to rectification**  
When you believe we hold inaccurate or incomplete personal information about you, you may exercise your right to correct or complete this data. This may be used with the right to restrict processing to make sure that incorrect/incomplete information is not processed until it is corrected.
  - **The right to erasure (the 'right to be forgotten')**  
Where no overriding legal basis or legitimate reason continues to exist for processing personal data, you may request that we delete the personal data. This includes personal data that may have been unlawfully processed. We will take all reasonable steps to ensure erasure.
  - **The right to restrict processing**  
You may ask us to stop processing your personal data. We will still hold the data but will not process it any further. This right is an alternative to the right to erasure. If

one of the following conditions applies you may exercise the right to restrict processing:

- a) The accuracy of the personal data is contested
- b) Processing of the personal data is unlawful
- c) We no longer need the personal data for processing but the personal data is required for part of a legal process
- d) The right to object has been exercised and processing is restricted pending a decision on the status of the processing.

- **The right to data portability**

You may request your set of personal data be transferred to another controller or processor, provided in a commonly used and machine-readable format. This right is only available if the original processing was on the basis of consent, the processing is by automated means and if the processing is based on the fulfilment of a contractual obligation.

- **The right to object**

You have the right to object to our processing of your data where

- a) Processing is based on legitimate interest
- b) Processing is for the purpose of direct marketing
- c) Processing is for the purposes of scientific or historic research; or
- d) Processing involves automated decision-making and profiling.

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## **11. Do you have to provide your personal information to us?**

You are never required to provide personal information to us, but you may need to do so when you enter into a contract for the provision of our services or products. We will not be able to provide our services or products unless you provide us with the personal information, we need to do so.

In addition, you will be required to provide certain personal information if you contact us to exercise your rights under GDPR as set out in section 10.

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## **12. Automated decision-making**

We carry out automated decision-making when you use our website. This involves providing content to you based on your online behaviour. This allows us to display content that is relevant to you.

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## **13. Do we use your personal information for marketing?**

Yes, we may use your personal information to carry out marketing, but we aim to only contact people who want to receive marketing. If you object to marketing – whether electronic or otherwise – please let us know and we will stop contacting you.

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## 14. Cookies

We use cookies, which are small text files placed on your computer by websites that you visit, to make our website work properly, to monitor its usage and to display content that we believe will be relevant to you. If you register with us or if you continue to use our site, then you will be asked to agree to our use of cookies. Further details regarding cookies used and your rights are available in our Cookie Policy here – <https://keenpac.com/cookie-policy>.

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## 15. Contact us

Any comments, questions or suggestions about this privacy policy or our handling of your personal data should be emailed to [privacy-brhs@bunzl.co.uk](mailto:privacy-brhs@bunzl.co.uk).

Alternatively, you can contact us at the following postal address:

GDPR Privacy Champion  
c/o Daniel Roberts  
Keenpac, 29 Centurion Way, Meridian Business Park, Leicester, LE19 1WH

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## 16. Complaints

Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.

Should you feel unsatisfied with our handling of your data, or about any complaint that you have made to us about our handling of your data, you are entitled to escalate your complaint to a supervisory authority within the European Union. For the UK, this is the ICO (Information Commissioner's Office), which is also our lead supervisory authority. Its contact information can be found at <https://ico.org.uk/global/contact-us/>.

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## 17. Changes to this policy

This policy was last updated 28 September 2020.