

# **PINNACLE DOCUMENT SOLUTIONS LTD**

## **Privacy Policy**

Pinnacle understands that its use of your information requires your trust. Pinnacle are committed to the highest standards of data privacy and will only use your information for clearly described purposes and in accordance with your data protection rights.

### **What Pinnacle do**

We provide managed services related to document management including but not limited to the provision of printing, scanning and faxing equipment, IT hardware and a range of services related to the maintenance of such equipment.

### **Pinnacle as Data Controllers and our responsibilities**

Pinnacle and its subsidiaries are responsible for, and is the Data Controller of your personal information that it receives through the company websites and additional sources.

### **Changes to this Privacy Policy**

We may modify or update this privacy policy from time to time.

If we change this privacy policy, we will notify you of the changes. Where changes to this privacy policy will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise any rights you may have under local law (e.g. to object to the processing).

### **How do we collect your personal information**

These are the main ways in which we collect your information:

- If you contact us directly via our websites or via our customer hotlines to request information about our services.
- If you reply to our direct marketing campaigns (e.g. filling out a response card).
- If with your permission, your contact details are transferred from authorised centres or other third parties.
- If with your permission, other business partners transfer your personal data to us.
- If we acquired your personal data from other sources with your permission.

If you give information on behalf of someone else you must ensure that they have been provided with this Privacy Policy before doing so.

If you are under 16 please do not provide us with any of your information unless you have the permission of your parent or guardian to do so.

Please help us to keep your information up to date by informing us of any changes to your contact details or preferences. You may change or review your preferences by emailing [datacontrol@pinnacle-group.co.uk](mailto:datacontrol@pinnacle-group.co.uk)

## What information may be collected about you

The following types of personal information about you may be collected:

### **Contact Details**

- Name
- Company name
- Address
- Phone numbers
- Email address

### **Interests**

- Information you provide us about your interests.

### **Website and Communication Usage**

- How you use our website and whether you open or forward our communications, including information collected through cookies and other tracking technologies. You can view our Cookie Policy at <https://pinnaclecos.co.uk/terms-and-conditions>

### **Sales and Services Information**

- Relating to services, including complaints and claims.

### **Credit and Anti-Fraud Information**

- Which establishes your identity, such as driving licences, passports and utility bills
- Information about transactions, requests for credit and non-payment of debts with us and third parties and credit ratings from credit reference agencies
- Fraud, offences, suspicious transactions, politically exposed person and sanctions lists where your details are included.

### **Device and Service Usage**

- How you use your device and services offered on the device.

## How your personal information may be used

Use of personal information under EU data protection laws (also known as GDPR) must be justified under one of a number of legal grounds and we are required to set out the grounds in respect of each use in this policy.

The main uses of your information are:

**Customer Support & Marketing** - to respond to enquiries and to bring you news and offers.

Pinnacle use your personal data for customer care and for personalised communication concerning our products and service information, where necessary with your consent. For these purposes, Pinnacle may transmit this data to authorised Companies.

In order to ensure that you receive relevant and personalised communications, we will use your data to create an individual customer profile and we may share your personal data between Pinnacle where relevant. This may include data you have provided, or which is generated by your use of Pinnacle products and services, for example contact details, preferences, customer history, and online behaviour.

**Sales** – to process your sale.

Pinnacle will obtain Contact Details, when you purchase from us .

## Quality Assurance, Research and Development – to improve our products and services

Pinnacle may use any of the information that it receives through the provision of services for product and service quality assurance and development purposes. Before any such use is undertaken your information will be de-personalised so it cannot be directly linked back to you.

## Compliance with legal requests for your information – to comply with our legal obligations to law enforcement, regulators and the court service

We may be legally required to provide your information to law enforcement agencies, regulators and courts and third party litigants in connection with proceedings or investigations anywhere in the world. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

## Legal grounds for processing of your personal information

The use of your information set out above is permitted under EU data protection law on the basis of these principal legal grounds:

- where you have consented to the use (you will have been presented with a consent form in relation to any such use) but may withdraw your consent at any time by emailing [datacontrol@pinnacle-group.co.uk](mailto:datacontrol@pinnacle-group.co.uk)
- or by writing to us at:

Pinnacle Document Solutions Ltd  
Fairway House,  
Links Business Park,  
St Mellons,  
Cardiff,  
CF3 0LT

- where necessary to enter into or perform our contract with you
- where we need to use it to comply with our legal obligations
- where we use it to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights (our legitimate interests include promoting our business and tailoring news and offers to your profile, research and development of related products and services, assessing your credit-worthiness, detecting fraud and criminal activities)
- where necessary for us to defend, prosecute or make a claim against you, us or a third party

There may be uses that are permitted on the basis of other grounds; where this is the case we will use reasonable endeavours to identify the ground and communicate it to you as soon as possible after becoming aware of the new basis.

## Transfer to third parties

Personal information which we collected may be transferred to third parties on your behalf, only with your consent.

This is only shared in a secure manner, using a consistent security protocol. When we share with other parties we ensure that they only use your personal data for the purpose it was collected and do not allow them to abuse this agreement.

The types of third parties apart from Pinnacle and its subsidiaries are:

- Marketing agencies who run and manage marketing campaigns on our behalf
- Event companies who run and manage sponsored events on our behalf

## How do we keep your personal information safe

We use a variety of security measures, including encryption and authentication tools, to help protect and maintain security, integrity and availability of your information.

Although data transmission over the Internet or website cannot be guaranteed to be secure, we and our business partners work hard to maintain physical, electronic and procedural safeguards to protect your information in accordance with applicable data protection requirements. Our main security measures are:

- tightly restricted personal access to your data on a 'need to know' basis and for the communicated purpose only
- transferred collected data only in encrypted form
- highly confidential data stored only in encrypted form - e.g. credit card information
- firewalled IT systems to prohibit unauthorised access e.g. from hackers
- permanently monitored access to IT systems to detect and stop misuse of personal data.

If you have a personal password which enables you to access certain parts of our websites or any other portal, app or service we operate, do not forget your responsibility for keeping this password confidential. We ask you not to share your password with anyone.

## How long we keep your personal information for

We retain your information only as long as is necessary for the purpose for which we obtained them and any other permitted linked purposes. If information is used for two purposes we will retain it until the purpose with the latest period expires; but we will stop using it for the purpose with a shorter period once that period expires.

We restrict access to your information to only those persons who need to use it for the relevant purpose.

Our retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymised or destroyed securely.

### **Use for marketing:**

We retain your personal information for as long as is necessary, but only for the relevant purpose that we collected it for. You retain the right to remove this consent at any point.

### **Use to perform a contract:**

In relation to your information used to perform any contractual obligation with you we may retain that data whilst the contract remains in force plus three years to deal with any queries or claims thereafter.

**Where claims are contemplated:**

In relation to any information where we reasonably believe it will be necessary to defend or prosecute or make a claim against you, us or a third party, we may retain that data for as long as that claim could be pursued.

## How to change your privacy preferences

You can change your preferences, or withdraw your consent in relation to how Pinnacle use your personal information in one of the following ways:

- You are able to request information about your data stored at Pinnacle as well as request the correction, deletion or restriction of your personal data for analytics and/or marketing use.
- By contacting the Pinnacle Data Controller on 02920 365222
- Or by sending an email to [datacontrol@pinnacle-group.co.uk](mailto:datacontrol@pinnacle-group.co.uk)

Or by writing to us at:

Pinnacle Document Solutions Ltd  
Fairway House,  
Links Business Park,  
St Mellons,  
Cardiff,  
CF3 0LT

## Contacting Pinnacle about this privacy policy

If you have any questions in relation to our use of your information you should first contact the Pinnacle Data Controller in one of the following ways:

- Call our Head Office on 02920 365222
- Or by sending an email to [datacontrol@pinnacle-group.co.uk](mailto:datacontrol@pinnacle-group.co.uk)

Or by writing to us at:

Pinnacle Document Solutions Ltd  
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Under certain conditions you have the right to require us to:

- Provide you with further detail on the use we make of your information
- Provide you with a copy of your information
- Update any inaccuracies in the information we hold about you
- Delete any information about you that we no longer have a lawful ground to use
- Remove you from any direct marketing lists when you object or withdraw your consent
- Provide you with your personal information in a usable electronic format and transmit it to a third party (right to data portability)
- Restrict our use of your personal information
- Cease carrying out certain processing activities based on the legitimate interests ground unless our reasons for undertaking that processing outweigh any prejudice to your data protection rights

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime), our interests (e.g. the maintenance of legal privilege) and the rights of third parties.

If you are dissatisfied with our use of your information or our response to any exercise of these rights you have the right to complain to your data protection authority, this in the UK is the Information Commissioner's Office (click [ICO](#) for more information).

## Data Controller Contact Details

If you have questions in relation to our use of your personal information you should contact the Data Controller:

[datacontrol@pinnacle-group.co.uk](mailto:datacontrol@pinnacle-group.co.uk)

Tel: 02920 365222

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