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Paragon Privacy Notice

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At Paragon Customer Communications Ltd (“Paragon”), we take your privacy seriously—whether we’re acting as a **Data Controller** or a **Data Processor**.

When we provide services like sending marketing messages on behalf of our clients, or where we provide inbound/outbound transactional print services, we act as a **Data Processor**. This means we handle personal data under the instructions of our clients and in line with the **UK Data Protection Act 2018** and the **General Data Protection Regulation (GDPR) (2016/679)**. In these cases, we don’t own or control the data.

If your personal information was shared with us by one of our clients and you want to exercise your data rights (like accessing or correcting your data), please contact that client directly as they are the **Data Controller**.

The rest of this notice explains how Paragon handles personal data when we act as a **Data Controller**, so you know exactly what we collect, why we collect it, and how we keep it safe.

What this notice covers

This notice explains:

- How and why we collect and use your personal information
- Who we share your information with
- Your rights under data protection laws

Whenever we say “we” or “us,” we’re referring to **all Paragon entities listed below, and all their subsidiaries**, unless we say otherwise.

We may update this notice from time to time. The latest version will always be available on our website.

Paragon business details

Paragon operates under several registered businesses in the UK, Ireland, Luxembourg, and India:

- **Paragon’s UK businesses:** Registered under company numbers 07262428, and 02788181 (Companies House).
- **Paragon’s Ireland business:** Registered under number 321694 (Companies Registration Office)
- **Paragon’s Luxembourg business:** Registered under number B226065 (Luxembourg Business Registers).
- **Paragon’s India business:** Registered under number U62099PN2025PTC237336 (Ministry of Corporate Affairs)

You can view these registrations on Companies House (UK), Companies Registration Office (Ireland), Luxembourg Business Registers (Luxembourg), Ministry of Corporate Affairs (India), and the RCS Portal.

Paragon is also registered as a **Data Controller** with the UK’s Information Commissioner’s Office (ICO) under the following registration numbers. We commit to maintaining registrations in applicable regions.

- **Z9590394**
- **Z6941941**
- **Z9471827**

Contacting our Data Protection Officer (DPO)

We've appointed a **Data Protection Officer (DPO)** to help ensure we meet our legal and contractual responsibilities.

You can contact the DPO by email at DPO@paragon-cc.co.uk, or by post using the address listed below:

Data Protection Office

Paragon
Park House, 16–18 Finsbury Circus
London, EC2M 7EB

How and why, we collect and process your information?

As a **Data Controller**, Paragon collects personal information that can identify you, like your name, email address, phone number, home address, or job details. This may be collected on its own or combined with other information.

We collect this information in different ways, such as when you:

- Contact us through our website
- Call us
- Send us an email or letter
- Reach out through other methods listed in this notice

Acquisition of products and services

If you buy products or services from Paragon, we'll collect and store your **business and payment details**.

We may also collect **non-personal information** (like your postcode or preferences) that doesn't identify you directly. This kind of information isn't linked to your personal details (for example, your IP address).

Cookies

Our website uses cookies and similar technologies to enhance user experience, analyse site traffic, and support certain functionalities. These may include essential cookies, performance cookies, and cookies used for marketing purposes. For detailed information about the types of cookies we use, their purpose, and how you can manage your preferences, please refer to our [Cookie Policy](#) available on our website.

Users aged 16 and under

If you're 16 or younger, please make sure you have permission from a parent or guardian before giving us any personal information.

If we find out that you've shared personal details without the right permission, we may delete that information. You'll be able to send it again once you have the proper consent.

Employment

When we handle personal data relating to our employees, workers, or other individuals, Paragon follows the rules set out in the UK GDPR and other relevant privacy laws in the countries where we operate. For more details, please see our **Data Protection Policy**.

Legal basis for processing of your information

We use your personal data for different reasons, depending on what we're doing. Here's a simple breakdown:

- **Selling products or services** – We need your data to meet our contract with you (contractual obligation).
- **Maintaining our accounts and records** – This is also a part of our contract with you (contractual obligation).
- **Sending service updates** – We do this because it's in our legitimate interest to keep you informed (legitimate interests).
- **Customer analytics/Understanding customer behaviour** – We analyse data to improve our services because it is in our legitimate interest (legitimate interests).
- **Legal or Enforcement** – Sometimes we must use your data to meet legal requirements or help with law enforcement (legal obligation).
- **Security and crime prevention** – We may need to use your data to follow the law or support official investigations (prevention and detection of crime).
- **Outward marketing communications** – Based on our legitimate interests, we may send you marketing messages (legitimate interest).
- **Requests for information** – If you ask for information or brochures, we'll use your data with your permission (consent) to allow us to fulfil your request.
- **Research** – Based on our legitimate interests, we may carry out research (legitimate interests).

Where legitimate interests are relied upon for processing, we will always balance the benefits to you against those of our business to make sure we are compliant with data protection legislation.

Retention

We retain personal data for no longer than is necessary for the purposes for which it was collected. The duration for which we keep data in the capacity of a data controller depends on several factors, including:

- **Legal and regulatory obligation:** Certain laws require us to retain data for defined periods (e.g. tax or employment law).
- **Contractual requirements:** We may retain data to fulfil contractual obligations or to support potential legal claims.
- **Business needs:** Data may be retained to maintain accurate records, improve services, sales purposes, or support operational continuity.

Once data is no longer needed for these purposes, it is securely deleted or anonymised in accordance with our data retention policy.

Who do we share your information with?

We store your personal data on secure systems and data centres located in the UK and the European Economic Area (EEA) when acting in the capacity of a data controller. These are either managed by Paragon or by trusted service providers we work with.

International Transfers

We store your personal data within the UK and the European Economic Area (EEA). However, some trusted suppliers based in other countries may need to access or view your data to help us deliver our services.

When this happens, Paragon makes sure your data is properly protected. We use safeguards such as:

- **Data Processing Agreements** – These include rules on how your data must be handled securely, including technical and organisational controls.
- **International Data Transfer Agreements (IDTAs)** – Legal agreements for transferring data safely across borders.
- **Binding Corporate Rules** – Internal rules for companies that handle data across different countries. Please note, we do not use Binding Corporate Rules (BCRs) for international transfers, however, our suppliers/partners may leverage BCRs where applicable.
- **Standard Contractual Clauses (SCCs)** – Approved legal terms that protect your data when it's accessed from outside the UK or EEA.

Your rights

Under current legislation and where Paragon is the Data Controller, you have many rights in respect of how we hold and use your data:

Right to be informed

We must tell you how we use your personal data. We do this through this privacy notice and whenever we collect your data.

Right to access

You can ask for a copy of the personal data we hold about you. Just contact our Data Protection Officer by post or email.

Right to rectification

If you think any of your information is wrong or being used incorrectly, you can ask us to fix it. Contact our Data Protection Officer to do this.

Restriction of processing

You can ask us to restrict how we use your data. Please send this request to your usual contact at Paragon.

Right to be forgotten

You can ask us to delete your personal data from our systems. If there's no legal reason to keep it (like an active contract), we'll remove it. Please send this request to your usual contact at Paragon.

Automated decisions and profiling

We don't use automated decision-making with your data. We may use basic profiling (like company size or job title) to make sure our marketing messages are relevant to you.

Right to data portability

You can ask us to send your data to another organisation, if it's technically possible. Please contact your Paragon representative to request this.

Right to object

You can ask us to stop using your personal data. Send this request to your contact at Paragon.

Opting out of marketing communications

As a business contact, we may use your data and get in touch with you based on our legitimate interests, following the rules in the UK General Data Protection Regulation (UK GDPR) and Privacy and Electronic Communications Regulations (PECR). We've carefully considered how this affects you and made sure it's fair.

If you no longer want to hear from us, it's easy to opt out:

- Click the **unsubscribe link** in any email or SMS we send.
- Let your Paragon contact know, and they'll update your preferences.
- Email us at DPD@Paragon-cc.co.uk to stop contact through any channel.
- Write to us at:

Data Protection Office
Paragon
Park House, 16–18 Finsbury Circus
London, EC2M 7EB

If you want to complain

You have the right to complain about the way we have used your data. If this is the case, please contact our Data Protection Officer using the address above. If you are not satisfied with our response, you can also contact the Information Commissioner's Office on their website - www.ico.org.uk.

Document history

Version	Date	Approved by	Comments
1.0	08/10/2025	Amit Arora (DPO)	Document creation.