

PRIVACY POLICY

Direct Imaging Limited

Introduction

We have updated our Privacy Policy (the “**Notice**”) to meet the General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**”).

This Notice explains how we collect and use the data when you interact with us through our website/s and other forms of communication, the retention and protection of your personal data and how to contact us if you are not happy.

Direct Imaging Limited is pre-press and pre-media services registered company located at “Direct Imaging Limited, Triq Notabile, Birkirkara, BKR 3000, Malta” (herein the “Company”, “we”, “us” or “our”). The company is committed to ensure that your privacy is respected and that your personal data is treated appropriately.

1. **What do we class per “Personal Information”**
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1. What do we class per “Personal Information”

This is information relating to an identifiable natural person. A person who can be identified directly or indirectly, by a name, email, location data or more specific factors relating to, including to but not limited to the physical, genetic, or social identity of a natural person.

We do not and will not use any personal information that has been changed or amended so that it can no longer be used to identify a specific person.

2. Important Information and Who We Are

2.1 General Information and the Purpose of this Notice

We have structured our Website so that you can visit us on the Internet without identifying yourself or revealing any personal information. Once you choose to provide us with personal information, we will protect such information and use it only in the ways described in this Notice.

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when browsing, when you use our Contact Us, visit us at our premises or communicate with us in any other way.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

2.2 Controller

Direct Imaging Limited, having its registered address located at “Triq Notabile, Birkirkara, BKR 3000, Malta”, is the data controller in relation to your personal data. We have appointed a Data Protection Contact Point who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *Your Legal Rights*, please contact the Data Protection Contact Point using the details set out below.

2.3 Data Protection Contact Point

Our full details are **Mr Pierre Borg and Mr Edward Borg**

Full name of legal entity: **Direct Imaging Limited** having its registered office at “**Triq Notabile, Birkirkara, BKR 3000, Malta**”

Email address: pierre@sado.com.mt and edward@sado.com.mt

Postal address: **Direct Imaging Limited, Triq Notabile, Birkirkara, BKR 3000, Malta**

You have the right to make a complaint at any time to the Information and Data Protection Commissioner (“**IDPC**”) as the supervisory authority for data protection issues (<https://idpc.org.mt/en/Pages/Home.aspx>). We would, however, appreciate the chance to deal with your concerns before you approach the IDPC so please contact us in the first instance.

2.4 Changes to the privacy notice and your duty to inform us of changes

This version was last updated on **25.03.2019**

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

This Privacy Policy was last updated **25.03.2019**

2.5 Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

3 The data we collect about you

3.1 How we collect your personal data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together in the following instances:

3.1.1 When visiting our website

It is possible to visit our website without submitting any personal data. In order to provide you with the best experience when browsing our website, we may need to process certain data which can identify you and can therefore be considered to be personal data. In this regard we may collect the following information about you whenever you visit our website.

- a) **Technical information: including the IP address used to connect your computer to the Internet, your login information, browser type and version, the full Uniform Resource Locators (URL), clickstream to, through and from our Site (including date and time) as well as other information regarding your experience on our Website such as page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.**
- b) **Location Information: We may receive information about your location. We may determine your location through your IP address and, when accessing the Website through a mobile device, by using the data that we collect from this device. This includes precise location**

information from GPS or information about the wireless networks or cell towers near your mobile device at the time of access.

Please refer to our [Cookie Policy](#) for further information as to how this website may collect certain information about your visit to our website.

3.1.2 When using the Contact Us or Get-Quote Form

Our website allows you to submit an enquiry and get in touch with us in order to be able to provide assistance according to your needs. In order to be able to reply to your query accurately and be of the most assistance to you, we shall require certain basic contact information (your name, surname and email address) as well as information relating to your query.

Based upon the information which you provide, one of our representatives will contact you in order to be able to provide assistance as per your request.

3.1.3 When contacting us via other communication methods

Generally, we shall collect your personal data in order to be able to send you a quote and deliver the products you have ordered to have purchased at your request. In order to be able to do so we shall require your name, surname and a contact number, generally your mobile phone number. In some instances we would require other details to take steps to enter into a contract with you or perform the contract which we enter into with you. We shall only use this personal data in order to be able to provide with the products and services requested by you and to fulfil and safeguard our contractual obligations with you.

You may also contact us using our [Facebook Page](#) in order to ask us for a quote or for further information about a particular product or service. Please refer to Facebook's Privacy Policy to familiarise yourself with their data privacy practices.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3.1.4 When visiting our offices or make contact with us through other channels

Should you wish to do so, we shall provide [a Feedback Questionnaire](#) by means of which you shall be requested to rate your service experience and provide feedback as to any improvements which we may make. Filling in this Feedback Questionnaire is entirely at your discretion and you may decide not to fill in any of your personal data such as your name and surname.

Should you decide to provide your personal data, we shall only process your personal data in order to receive your feedback and take it into account to improve the dining experience we provide to our guests.

You may also decide to opt-in to marketing communications through our Feedback Questionnaire. You may unsubscribe to receiving such marketing communications at any time by contacting us at: unsubscribe@directimaging.com.mt

3.2 If you fail to provide personal data

If you fail to provide the personal data which we require in order to provide with the product/s and/or service/s you requested, we may be unable to assist you.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to provide the services which you request, in particular, delivery and installation of the products you purchased or other related services.
- On the basis of your consent when you opt-in to receiving marketing communications until such time as you withdraw your consent or unsubscribe to receiving such communications.

5. Purposes for which we will use your personal data

The table below depicts the ways we plan to use your personal data, and which of the legal basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To be able to provide the services which you request	(a) Identity (b) Contact (c) Financial information	To take steps to enter into a contract with you or perform the contract which we enter into with you.

To respond to your queries	(a) Identity (b) Contact (c) Information relating to your query	(a) Performance of a contract with you
To manage our relationship with you which will include: (a) Updating you with any developments relating to the product/s and/or service/s you requested (b) Asking you to leave a review by completing our customer satisfaction questionnaire	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services and how we can improve our services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Marketing data	Necessary for our legitimate interests (to develop our products/services and grow our business)

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [Contact Us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

5.1 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

5.2 Promotional offers from us

We may use your Identity, Contact, and marketing data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have **subscribed to our newsletter** or when you provide your consent to receiving such marketing communications. You may unsubscribe to receiving such communications at any time by contacting us at: **@.com.mt**

5.3 Third-party marketing

We will get your express opt-in consent before we share your personal data with any company which is not legally related to Direct Imaging Limited for marketing purposes.

5.4 Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by **Contacting Us** at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of the Services which we provide to you or any personal data which we are obliged to retain as a result of our legal obligations.

5.5 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please read our cookies policy - <https://????????????????/>.

5.6 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please **Contact Us**.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 5 above.

We may disclose, transfer or otherwise give access to your personal data to our affiliated entities for any of the reasons indicated in Section 5 of this Policy.

We may also transfer your personal data to external third parties, namely our service providers which are necessary for us to be able to provide the Services we offer. In particular, we may transfer your personal data to our IT and software support service providers, our insurers and external legal counsel. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions

Whenever we enter into a contract with you we shall inform you of the identity of the service providers which may be necessary for us to be able to provide the Services you engage us to carry out.

We may also disclose your personal data to regulatory or governmental agencies as well as executive and judicial authorities which may have jurisdiction over our operations. We shall only make such disclosures in accordance with the appropriate authority and to comply with our legal obligations.

7. International transfers

We do not transfer your personal data outside the European Economic Area (**EEA**).

However, we may transfer your personal data outside the EEA in any of the following circumstances:

- a) the transfer is necessary for the performance of a contract between you and Direct Imaging Limited or for the implementation of pre-contractual measures taken at your request;
- b) the transfer is necessary for the conclusion or performance of a contract concluded in your interest between us and another natural or legal person;
- c) the transfer is necessary for important reasons of public interest; or
- d) the transfer is necessary for the establishment, exercise or defence of legal claims.

In certain cases, we may transfer your personal data to our third-party suppliers, such as IT and system support providers which may be located outside of the EEA. In such cases we have agreements in place to regulate the processing of personal data and ensure that your personal data is handled responsibly and in line with applicable data protection laws.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers, including contact details and details regarding any contracts which you may have entered into as a result of our Services for six years after the conclusion of the contract, taking into account the applicable prescriptive period at law. We may also retain certain personal data to ensure compliance with our legal obligations. In particular, we shall retain certain transactional and financial information for a period not exceeding ten years, in compliance with tax and accounting reporting legal obligations.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Under applicable data protection laws, you are entitled to exercise the following rights:

10.1 You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please [Contact Us](#) at [@.com.mt](#)

10.2 No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

10.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

10.4 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated