

## GDPR Privacy Notice – Miniclipper Logistics – May 2018

Mini Clipper Ltd trading as Miniclipper Logistics

### GDPR Statement and Privacy Notice

Issue Date: 18th May 2018

In May 2018, the EU General Data Protection Regulation (GDPR) replaces the existing 1995 EU Data Protection Directive (European Directive 95/46/EC). Miniclipper Logistics (collectively referred to as “we”, “us” or “our”) aims to comply with the GDPR as a controller and data processor where applicable. Working alongside its employees, customers and their employees and suppliers, we will comply with the GDPR when it takes effect on 25th May 2018.

You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

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

**Collecting your Personal Information** We will collect and process personal data about you, including but not limited to: your name, email, job title, postal address, telephone number(s) i.e. your contact details, whenever you complete an online form or make a telephone enquiry.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel service you have with us but we will notify you if this is the case at the time. We collect and store technical information when you visit our website and this may include using cookies and similar technologies to monitor site performance and build a profile of our users. When you interact with our services we may identify, for example:

- How many times you visit
- What pages you go to within our website(s)
- Your IP address
- The originating domain name of your internet provider
- Identify your browser or device

[We may also collect, store and transfer different kinds of personal data as follows:

- **Financial data** includes bank account and payment card details
- **Transaction data** includes details about payments to and from you and other details of services which you have purchased from us.
- **Profile data** includes your username and password, purchases or orders made by you and, where appropriate, your preferences or requirements.

- **Marketing and communications data** includes your preferences in receiving marketing from us and your communication preferences]

## Cookies

Cookies do lots of different jobs, like helping us understand how our website is being used, letting you navigate between pages efficiently, remembering your preferences, and generally improving your browsing experience. Cookies can also help ensure marketing you see online is more relevant to you and your interests. You can set your browser to block or disable cookies (see the 'Help' menu of your browser to see how), but doing this will mean certain personalised features of our websites can't be provided to you and other parts may also not work properly.

## Use of your Personal Information

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 perform the contract we are about to enter into or have entered into with you [\*]
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests [\*\*]
- Where we need to comply with a legal or regulatory obligation [\*\*\*]

## Purposes for using your Personal Information

We use your personal information for the following purposes and indicate the lawful basis referred above for processing by asterisks

- To facilitate the provision of products and services you or your employer have requested[\*]
- To help us identify you and any accounts you or your employer hold with us [\*] [\*\*] [\*\*\*]
- Undertaking credit checks[\*\*]
- Administration [\*] [\*\*]
- Research and statistical analysis [\*\*]
- Marketing [\*\*]
- Fraud prevention and detection [\*\*] [\*\*\*]
- Billing and order fulfilment [\*] [\*\*]
- Improving our services[\*\*]

## Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We may use your personal, technical and profile 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 to you (we call this marketing). You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing.

You can ask us to stop sending you marketing messages at any time by contacting us.

## 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.

## Disclosure of your Personal Information

We do not and will not sell, rent or trade your personal information. We only forward your personal data to third parties; (i) in cases specified in this privacy notice, (ii) in accordance with the agreement concluded with you or your employer, and (iii) in the cases specified below:

- To third parties that process your personal data on our behalf (e.g., hosting partners)
- To third parties that supply products or services to you on our behalf within the context of your use of agreement with us
- To third parties that perform creditworthiness checks or record payment behaviour on our behalf
- To public authorities, courts, police authorities and judicial services that request the data from us or when we are required to do so by law
- To your employer – as the lessee of the vehicle that you are using
- To any third party to which we assign our rights and obligations

[If you require more detailed information regarding the third party to whom we disclose your personal data, please contact us.]

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.

## Access to your Personal Information

You have the right to request access to any personal data we may hold about you. To apply for a 'Subject Access Request', an individual must:

- Make the request in writing to: **Sales Director, Miniclipper Logistics, Clipper House, Billington Road, Leighton Buzzard, Bedfordshire, LU7 0AG**
- Supply information to prove who they are to eliminate the risk of unauthorised disclosure
- Supply appropriate information to help us locate the required information

In addition, you have the right to:

- **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 your fundamental 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.
- **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, **request the transfer** of personal data in a portable format (note that this right only applies to automated information which you initially provided your consent for us to use or where we used the information to perform a contract with you).

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.

All data subject requests must be made in writing. We try to respond to all legitimate requests within one calendar month either by email or letter (whichever is most appropriate). If data has been deleted, erased or is otherwise irretrievable, you will also be informed of this. Occasionally it may take us longer than a calendar month if your request is particularly complex or you have many a number of requests. In this case, we will notify you and keep you updated.

### **Security of your Personal Information**

We strictly protect the security of your personal information and honour choices for its intended use. We carefully protect your data from loss, misuse, unauthorised access or disclosure, alteration, or destruction. Your personal information is never shared outside the company

without your permission, except under conditions explained above. Inside the company, data is stored on secure servers that are housed in controlled environments to protect against loss, misuse or alteration of your information.

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.

### **International Transfers**

All countries in the European Economic Area (EEA), which includes the UK, have similar standards of legal protection for your personal information.

We do not transfer your personal data outside the EEA.

### **Data Retention**

We will only store your personal data for as long as is necessary for fulfilling the purpose for which the data was collected and for meeting legal, regulatory and/or internal 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.

### **Data Deletion**

After the retention period, personal data will be hard erased unless (i) the data is subject to a data subject requestor (ii) the data must be retained in order for us to comply with a legal or regulatory obligation.

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Miniclipper Logistics aims to deliver great service. We want to gain the trust of data subjects and aspire to treat data collected on them with integrity and respect. We will continue to improve and change operations where necessary to comply with new legislation. Internally Miniclipper Logistics review the systems in place and aim to improve this continuously. This statement aims to outline our GDPR strategy and policies surrounding data control and processing.

This document is provided as of May 2018, for informational purposes to explain Miniclipper Logistics' stance on GDPR compliance. It is subject to change or removal without notice.