

## **GDPR: DATA PRIVACY NOTICE FOR CLIENTS AND SUPPLIERS**

### **Introduction**

TRANSFER 2000 LTD ("We") are committed to protecting and respecting your privacy. This policy (together with our terms of use available from our webpage [www.transfer2000.co.uk](http://www.transfer2000.co.uk) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

The rules on processing of personal data are set out in the General Data Protection Regulation (the "GDPR").

### **1. Definitions**

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person

#### **Categories of data: Personal data and special categories of personal data**

**Personal data** - The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier (as explained in Article 6 of GDPR). For example name, passport number, home address or private email address. Online identifiers include IP addresses and cookies.

**Special categories personal data** - The GDPR refers to sensitive personal data as 'special categories of personal data' (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

### **2. Who are we?**

Transfer 2000 Ltd is the data controller. This means we decide how your personal data is processed and for what purposes. Our contact details are: T: 0345 060 2000 / 01732 771000. Head Office: 191 Vale Road, Tonbridge, Kent, TN9 1ST. For all data matters contact Laura Hayes / Anthony Whittaker on 01732 771000.

### 3. The purpose(s) of processing your personal data

We use your personal data for the following purposes\*:

- For the provision of services that you may request from us
- To maintain our own accounts and records.
- To keep you up to date with important business changes
- To answer queries

\* Please note this list is not exhaustive – if we are processing your personal data for other purpose we will notify you accordingly.

### 4. The categories of personal data concerned

With reference to the categories of personal data described in the definitions section, we process the following categories of your personal data:

- your name, address, email address, telephone number(s) and other contact details
- information required to provide you with a service, and details of our services that you have used
- your company's name, your position in the company; the company's address, company's email address and telephone number
- your payment information such as credit or debit card details
- information collected through your use of the Transfer 2000 Ltd websites. Please see the Cookies Policy on each of websites for more information.
- details of any enquiry or complaint you make to Transfer 2000 Ltd
- information about the shipments sent to you via our services
- your information when signing for receipt of a shipment.

### 5. What is our legal basis for processing your personal data?

#### a) Personal data (article 6 of GDPR)

#### Our lawful basis for processing your general personal data:

Processing necessary for the performance of a contract with the data subject or to take steps to enter into a contract

### 6. Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with:

Transfer 2000 Group Companies including Franchisees

Selected trusted Third Parties where services are provided together with a business partner and it is necessary to disclose the information to them in order to provide the services or for the purpose of identity verification

Regulatory and law enforcement agencies. As noted above, if we receive a request from a regulatory body or law enforcement agency, and if permitted under GDPR and other laws, we may disclose certain personal information to such bodies or agencies

### 7. How long do we keep your personal data?

We will keep your personal data for no longer than reasonably necessary to comply with statutory and contractual service provisions. Currently we retain data for a period of 6 years from the end of the last company financial year to which they relate (ie a maximum of 7 years) for legal, accounting and tax purposes.

## 8. Providing us with your personal data

We require your personal data as it is a requirement necessary to enter into a contract for services.

## 9. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable i.e. where the processing is based on consent or is necessary for the performance of a contract with the data subject and where the data controller processes the data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable i.e. where processing is based on legitimate interests (or the performance of a task in the public interest/exercise of official authority); direct marketing and processing for the purposes of scientific/historical research and statistics).

## 10. Transfer of Data Abroad

We may need to transfer personal information about customers to third parties located outside the UK in order to fulfil our contractual obligations.

## 11. Automated Decision Making

We do not use any form of automated decision making in our business.

## 12. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions.

## 13. Changes to our privacy policy

Any material changes or updates we may make to our privacy policy in the future will be notified to you by e-mail where appropriate.

## 14. How to make a complaint

To exercise all relevant rights, queries or complaints please in the first instance contact our Data Representative on 01732 771000.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioner's Office](https://ico.org.uk/global/contact-us/email/) on 03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK.