

# GDPR COMPLIANCE AND PRIVACY NOTICE FOR CLIENTS EFFECTIVE 25th MAY 2018

### How and Why we use your Personal Data

Worldwide Express (UK) Ltd provides the following types of service:

- UK Courier Services
- International Courier Services
  International Freight Services
  Storage & Warehousing
- Complete Logistic Solutions

In order that we are able to provide these services to you, we must be able to identify you in some manner, to be able to deliver your service to you specifically.

Although unlikely, were there to be a reason to capture Personal Data of Individuals employed by clients/suppliers to provide such a service, we will always seek your Consent in order to do so, and give the reasons that we would require such information.

Where we are provided with Personal Data of to legally fulfil a service to you that you have requested, we will endeavour to make you aware that we have processed and handled your Personal Data.

We do Not share information about our Clients or Suppliers to anyone without consent unless the laws and our policies allow us to do so.

This Privacy Notice sets out how we will fulfil our obligations to you in the safe and legal treatment of your Personal Data. Should you have any questions or queries, please contact us at any time using the contact details provided above.

# Your Consent

Worldwide Express (UK) Ltd, will never use your Personal Data for a business purpose without your explicit consent. If we require your Personal Data for any other Purpose we will seek your consent prior to undertaking any processing activity. For reference our business will only provide services to individuals aged 18 years and over.

### Your Personal Data

It is your responsibility to ensure that the Personal Data we hold about you is accurate and up-to-date. Please contact us if you have any queries regarding your Personal Data.

### Where you directly contact us to Provide a Service

Worldwide Express (UK) Ltd will only ever retain Personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK Tax Law to keep your basic Personal Data for a minimum of 6 years after which point the information will be Destroyed or Erased.

# Where we are provided with your Personal Data to fulfil a service on behalf of a Partner

We will only accept the minimum Personal Data to enable us to deliver the required service. Your Personal Data will be retained for no longer than 12 months following the delivery of the service. The originating service provider may retain your Personal Data for longer, and you should speak with that party if you have any queries. All accounting information will again be retained for the minimum UK Tax Law Period of minimum 6 years.

# Your Rights as a Data Subject

- You have the right to know what Personal Data we hold about you.
- You have the right to request we cease processing your Personal Data.
- You have the right to revoke your consent to your personal Data being Processed (except where necessary to legally deliver a Contracted Service).
- You have the right to request we not make decisions about you automatically and can prefer human intervention (where possible).
- You have the right to request we delete all Personal Data we hold about you (where legally we are able to do so).
- You have the right to request a copy of any Personal Data we hold about you, which must be provided to you in a commonly used electronic format.
- You have the right for your Personal Data to be stored and Processed securely and have confidence that it will not be disclosed to an unauthorised party.
- You have a right to make a complaint if you are dissatisfied with how we have honoured your rights.

- It must be noted that there is no charge to request such information from us. We are only permitted to charge if:
  - Your request is unfounded

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- Your request is excessive
- Your requests are repetitive in nature

# Interacting with us regarding your rights

#### Making a Subject Acting Request

You have the right to request a copy of the Personal Data we hold about you. This request must be made in writing, by email or post, to the contact details provided above.

We will acknowledge receipt of your request and will respond to the request at the latest within 30 working days from said receipt. When making your request, you must provide all necessary information to support your query including:

- Your Name and Contact Details 
  The Reason for your request
- How we can contact you

There are exemptions to Subject Access Requests that may prevent us from honouring your request. This may include the request being overly broad, or your request may infringe the rights of another individual. We will always attempt to honour your request and will fully explain, if we are unable to do so, why, and what can be done to progress the request further.

# Your right to receive Data in a commonly used electronic format

Due to the very nature of the services we provide, it may be that we are unable to honour all requests. We will always seek to provide you with Data that you or your service provider can easily reuse.

### Your right to request we restrict Processing

You have the right to request that we restrict processing any Personal Data we hold about you. This request should be made in writing to the contact identified above, stating the reason for your request, and the timeframe required for processing to be restricted. We will acknowledge your request and respond within 5 working days.

### Your right to request the deletion of Personal Data

You have the right to request that we delete or destroy any Personal Data that behold on you. This request should be made in writing, by post or email, to the contact identified above. We will acknowledge your request and respond within 5 working days. We may be unable to honour such requests that infringe on our other legal obligations, or in relation to a dispute, or where the deletion affects the rights of another party.

# Your rights in relation to automated decision making and profiling

We do not make use of Personal Data for automated decision making or profiling in the delivery of our services to you. If you believe this not to be the case, please contact us.

# Making a Complaint

You have the right to make a complaint if we fail to honour your rights. We hope that you never have the need to complain about our service, however if you do, our business operates a three-stage complaints process, as follows:

- 1. In the first instance please send in writing, by post or email, your complaint to the contact named above. We will acknowledge receipt of your complaint. You will receive a response within two working days of receipt.
- 2. If we fail to resolve your issue with our response, you may escalate your complaint to our Managing Director. Please indicate in writing, again either by post or email, for your desire for the complaint to be escalated. We will acknowledge receipt of your complaint and will respond to you within five working days.
- 3. If you remain dissatisfied with how we have handled your complaint, you have the right to seek redress through the Data Protection Supervisory Authority. Please assemble all necessary information and submit your complaint here:

http://www.ico.org.uk

# **Securing your Personal Data**

We undertake comprehensive technical measures to reduce the likelihood of your Personal Data will be accessed by an unauthorised party. For security we cannot disclose all measures undertaken, however we are able to comment that our organisation seeks at all times to comply with (at the very least) the requirements of the following specifications.

- Sophos Anti Virus Firewalls
- Encryption
- Authentication

Worldwide Express (UK) Ltd will always endeavour to store and process your Personal Data within the Geographic confines of the European Economic Area ('EEA"). If we are unable to do so, we will always ensure that our Data Processors comply with the same or greater level of assurance over use of your Personal Data than ourselves.

#### In the event of a Personal Data Breach

As a responsible Data Controller and Data Processor, in the event that Personal Data is disclosed to unauthorised individuals, we will notify you in writing as soon as possible. We take a great number of precautions to prevent this from happening, however should an incident arise we will detail what Personal Data was affected and the steps we are taking to manage the issue going forwards.

### **Our use of Data Processors**

It is possible that we may entrust your Personal Data to other businesses to help us deliver our service to you. Our business will only operate with partners that adhere to a similar or greater level of assurance and compliance than ourselves. When you request a service from us, to legally disclose the contract entered into, we must always assume your Consent for Personal Data to be shared with partners where only strictly necessary to do so.

### Your Feedback

Your feedback is of extreme importance to us. Should you have any queries, or desire any clarification regarding this Privacy Notice, please contact us and we will be happy to discuss any such concerns with you and put your mind at rest.