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J W Suckling Transport Limited are committed to protecting and respecting your data privacy.

Head Office Address: 12 Argent Court, Sylvan Way, Southfield Business Park, Laindon Essex SS15 6TH.

This notice explains how we, the Company are going to use and protect the personal information that we hold on our customers, suppliers and third parties.

This policy applies to customers, suppliers and third parties who engage with us and share personal information and the management of that personal information in any form – whether oral, electronic or written.

As a company we take the protection and privacy of the information we hold extremely seriously. We understand that all customers, suppliers and third parties have the right to be concerned that their data will be held securely and will not be used for any purpose unintended by them and that it will not accidentally fall into the hands of an unauthorised parties. We are constantly reviewing our privacy policy and the way we store and process data in order to comply with the EU General Data Protection Regulation (GDPR). We have included information in this policy that is specific and informative. We are happy to review our policy if you inform us of any area you feel it falls short of your expectations.

We do not share, sell or disclose to another party, any identifiable information collected through the course of our business with our customers, suppliers and third parties.

Please see below under each heading a list of information we collect from you through various ways and the reasons why we collect it and how we use it:

(a) Contact and Identification Information

This information is collected (in various ways by telephone calls, emails, meetings and general correspondence) to provide the services you have requested or deliver to us. We use the information to verify your identity for credit checks and security purposes. We use this information to contact you in relation to managing our services.

- Full name of relevant contacts
- Company address
- Contact details, email, mobile and landline telephone numbers
- The terms and conditions of your contract
- Copies of email correspondence and hardcopy correspondence
- Bank account details

We process personal data where the organisation has a legitimate interest or reason to process this data. We do not collect or process special categories of personal data i.e. sensitive information such as; ethnic origin, sexual orientation or religious or political beliefs.

You have some obligation to provide J W Suckling Limited with relevant data so that both parties can fulfil our contractual obligations pertaining to the services offered.

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(b) Your e-mail address

- We shall not under any circumstances divulge your e-mail address to any person, company or service provider who does not need to know, either generally or specifically.
- We use your email to correspond with you or deal with you as you should expect.
- We use your email to send you news about our services and to tell you about other services.

(c) Business and personal information

This includes all information given to us in the course of your business and ours, such information you give us in your capacity as our client or customer. We undertake to preserve the confidentiality of the information and the terms of this relationship. It is not used for any other purpose. We expect you to reciprocate this policy. We keep information which forms part of our business record for a minimum of seven years.

(d) Who can access the personal data and data may be "processed" outside of the UK

We disclose the data for the purposes of operational use to J W Suckling Limited and SBG Group employees, including the Directors and Managers.

If necessary, the Company will share your data with third parties such as solicitors and Courts in relation to disputes, or with third parties that process data on our behalf, such as for the purposes of end of year accounting.

J W Suckling Transport Limited is a subsidiary of SBG Group, Italy. Data held within our systems may be processed and reviewed by the SBG Group outside of the UK.

We will never sell your details to a third party or transfer your data to countries outside the European Economic Area.

(e) How do we protect personal data?

J W Suckling Transport Limited takes the security of your data very seriously. The Company has internal policies and controls in place to ensure as is reasonably practicable that your data is not lost, accidently destroyed, misused or disclosed to irrelevant third parties, and that your data is only accessed and used by J W Suckling Transport Limited or SBG Group employees in the performance of their duties. Electronic data received is held securely via a secure server and password protected systems. Financial information is stored within J W Suckling Limited chosen online banking systems. Hardcopy information is locked away when not in operational use. Data is subject to restricted access as appropriate.

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Where the Company engages third parties to process personal data on its behalf in the course of its business operations, such parties do so on the basis of written instructions and are under a duty of confidentiality and are obliged to implement appropriate measures to ensure the security of data held.

(f) How long does J W Suckling Limited / SBG Group keep personal data

The Company will hold data in line with HMRC and other legislative requirements. The majority of data is retained for a period of seven years.

The keeping of data relating to customers, suppliers and third parties is reviewed annually.

Any information the Company deem irrelevant to retain will be shredded and destroyed in a controlled manner.

(g) Your Rights

As a data subject, you have rights over your personal data collected by us;

You can;

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interest as the legal ground for processing;
- ask the Company to stop processing the data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data; and/ or
- ask the Company not to share your personal data with third parties other than our employees.

We can provide details of personal data we hold about you on receipt of a written request, verification of your identity and payment of a fee of £10.00 (by cheque or BACS transfer only).

If you would like to exercise any of the above rights or wish to contact us regarding any comments or queries, please put your request in writing via email to Caroline Gammon, <u>caroline.gammon@sucklingtransport.co.uk</u>. Or write to us at;

J W Suckling Transport Limited, 12 Argent Court, Sylvan Way, Southfields Business Park, Laindon, Essex SS15 6TH.

If you believe that the Company has failed to produce a satisfactory response and has not compiled with your data protection rights, you have the right to complain to the Information Commissioner. For advice and information, you can visit <u>https://ico.org.uk/concerns</u>.

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(h) Changes to our Data Privacy Policy

We may modify our Data Privacy Policy from time to time at our sole discretion. The most up to date version will be posted on our webpage. Modifications will be effective as soon as they are posted on the website.

www.sucklingtransport.co.uk