



Privacy Policy

OVERVIEW of this Policy and Commitments to Privacy at European Transport Solutions Ltd

At ETS ("we", "us", "our"), we collect and store personal data from our customers. Personal data is any information that can be used to identify you as an individual. The protection of your personal data is very important to us, and we understand our responsibilities to handle your personal data with care, to keep it secure and to comply with legal requirements. The purpose of this privacy policy ("**Policy**") is to provide a clear explanation of when, why and how we collect and use personal data. It provides important information about how we use personal data and explains your legal rights. This Policy is not intended to override the terms of any contract that you, or any rights you might have available under applicable data protection laws. We will make changes to this Policy from time to time for example, to keep it up to date or to comply with legal requirements or changes in the way we operate our business. We will make sure that you are aware of any significant changes by sending an email message to the email address you most recently provided to us.

WHO is responsible for looking after your personal data?

ETS Ltd, The Manor, Howbery Park, Benson Lane, Wallingford, Oxfordshire. OX10 8BA is responsible for looking after your data. We take this very responsibility very seriously.

WHAT personal data do we collect?

In relation to potential customers, historic customers and current customers we collect the following data:

- Your name, address, telephone number and email address in order to contact you with details of sales offers, sales enquiries and purchase orders and enquiries. We also record marketing preferences including brands you are interested in receiving offers from.

WHEN do we collect your personal data?

Customers and Suppliers

We will collect information from you when you contact us regarding sales or purchases.

What PURPOSES do we USE your personal data for and what is the LEGAL BASIS?

We will use your personal data to:

- provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- carry out our obligations arising from any contracts entered into between you and us.
- notify you about changes to our service.

We may also send you marketing offers (where we have appropriate permissions as explained in more detail below). We will also need to use your personal data for purposes associated with our legal and regulatory obligations. We have to establish a legal ground to use your personal data, so we will make sure that we only use your personal data for the purposes set out here and we are satisfied that:

- our use of your personal data is necessary to perform a contract or take steps to enter into a contract with you eg to create a sales order.
- our use of your personal data is necessary to comply with a relevant legal or regulatory obligation that we are subject to (e.g. to comply with ICO requirements).

Who do we SHARE your personal data with?

- service providers, who help manage our IT and back office systems, and assist with our Customer Relationship Management database.
- our regulators, which include the ICO, as well as other regulators and law enforcement agencies in the E.U. and around the world,
- solicitors and other professional services firms (including our auditors).

Direct Marketing

We may use your personal data to send you direct marketing communications about our products. This will be in the form of email or telephone. Where we require explicit opt-in consent for direct marketing in accordance with the Privacy and Electronic Communications Regulations we will ask for your consent. Otherwise, for non-electronic marketing or where we can rely on the soft opt-in exemption under the Privacy and Electronic Communications Regulations, we will be relying on our Legitimate Interests for the purposes of GDPR as further detailed in this document. You have a right to stop receiving direct marketing at any time - you can do this by contacting us directly.

How long do we keep your personal data?

We will retain your personal data for as long as is reasonably necessary for the purposes listed in this Policy. Where we are required to do so to meet legal, regulatory, tax or accounting requirements, we will retain your personal data for longer periods of time, but only where permitted to do so, including so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a possibility of legal action relating to your personal data or dealings.

What are your rights?

You have a number of rights in relation to your personal data. In summary, you have the right to request: access to your data; rectification of any mistakes in our files; erasure of records where no longer required; restriction on the processing of your data; objection to the processing of your data; data portability. You also have the right to complain to your supervisory authority.

Access

You can ask us to: confirm whether we are processing your personal data; give you a copy of that data; provide you with other information about your personal data .

Rectification

You can ask us to rectify inaccurate personal data. We may seek to verify the accuracy of the data before rectifying it.

Erasure / Right to be Forgotten

You can ask us to erase your personal data, but only where: it is no longer needed for the purposes for which it was collected; or you have withdrawn your consent (where the data processing was based on consent); or it follows a successful right to object (see 'Objection' below); or it has been processed unlawfully; or it is necessary to comply with a legal obligation which ETS Ltd is subject to. We are not required to comply with your request to erase your

personal data if the processing of your personal data is necessary: for compliance with a legal obligation; or for the establishment, exercise or defense of legal claims.. In the context of marketing, please note that we will maintain a suppression list if you have opted out from receiving marketing content to ensure that you do not receive any further communications.

Restriction

You can ask us to restrict (i.e. keep but not use) your personal data, but only where: its accuracy is contested (see 'Rectification' below), to allow us to verify its accuracy; or the processing is unlawful, but you do not want it erased; or it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or you have exercised the right to object, and verification of overriding grounds is pending. We can continue to use your personal data following a request for restriction, where: we have your consent; or to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.

Objection

You can object to any processing of your personal data which has our 'Legitimate Interests' as its legal basis (see below for further details), if you believe your fundamental rights and freedoms outweigh our Legitimate Interests. Once you have objected, we have an opportunity to demonstrate that we have compelling Legitimate Interests which override your rights, however this does not apply as far as the objections refers to the use of personal data for direct marketing purposes. To exercise your rights you can contact us as set out below. Please note the following if you do wish to exercise these rights:

- Identity. We take the confidentiality of all records containing personal data seriously, and reserve the right to ask you for proof of your identity if you make a request.
- Fees. We will not ask for a fee to exercise any of your rights in relation to your personal data, unless your request for access to information is unfounded, repetitive or excessive, in which case we will charge a reasonable amount in the circumstances.
- Timescales. We aim to respond to any valid requests within one month unless it is particularly complicated or you have made several requests, in which case we aim to respond within three months. We will let you know if we are going to take longer than one month. We might ask you if you can help by telling us what exactly you want to receive or are concerned about. This will help us to action your request more quickly.
- Exemptions. Local laws, including in the UK, provide for additional exemptions, in particular to the right of access, whereby personal data can be withheld from you in certain circumstances, for example where it is subject to legal privilege.

Contact and complaints

The primary point of contact for all issues arising from this Policy, including requests to exercise data subject rights, is our Data Protection Officer. The Data Protection Officer can be contacted Purchases@ets-eu.net If you have a complaint or concern about how we use your personal data, please contact us in the first instance and we will attempt to resolve the issue as soon as possible. You also have a right to lodge a complaint with your national data protection supervisory authority at any time. In the UK, the supervisory authority for data protection is the ICO (<https://ico.org.uk/>). We do ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time. **May 25th 2018**