

## Privacy and cookies policy

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors, service users, individual customers and customer personnel.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.
- 1.4 In this policy, "we", "us" and "our" refer to CurbCargo Limited. For more information about us, see Section 14.

### 2. The personal data that we collect

- 2.1 In this Section 2 we have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.
- 2.2 We may process data enabling us to get in touch with you ("**contact data**"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers. The source of the contact data is you and/or your employer. If you log into our website using a social media account, we will obtain elements of the contact data from the relevant social media account provider.
- 2.3 We may process information relating to our customer relationships ("**customer relationship data**"). The customer relationship data may include your name, the name of your business or employer, your job title or role, your contact details, your classification / categorisation within our customer relationship management system and information contained in or relating to communications between us and you, or between us and your employer. The source of the customer relationship data is you and/or your employer.
- 2.4 We may process your personal data that are provided in the course of the use of our services (under a separate license agreement to access the CurbCargo SaaS platform) and generated by our services in the course of such use ("**service data**"). The service data may include User names, role and employer. The source of the service data is you and/or your employer and/or our services.
- 2.5 We may process information contained in or relating to any communication that you send to us or that we send to you ("**communication data**"). The communication data may include the communication content and metadata associated with the communication.

2.6 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system.

2.7 Please do not supply any other person's personal data to us, unless we prompt you to do so.

### **3. Purposes of processing and legal bases**

3.1 In this Section 3, we have set out the purposes for which we may process personal data and the legal bases of the processing.

3.2 **Direct marketing** - We may process contact data, account data, profile data, customer relationship data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and service users.

3.3 **Security** - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.

3.4 **Legal claims** - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

3.5 **Legal compliance and vital interests** - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

### **4. Providing your personal data to others**

4.1 Your personal data held in our website database will be stored on the servers of our hosting services providers.

4.2 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

## **5. International transfers of your personal data**

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the United Kingdom and the European Economic Area (EEA).
- 5.2 The hosting facilities for our website are situated in The Netherlands.

## **6. Retaining and deleting personal data**

- 6.1 This Section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain your personal data as follows:
- (a) contact data will be retained for a minimum period of 2 years following the date of the most recent contact between you and us, and for a maximum period of 5 years following that date;
  - (b) customer relationship data will be retained for a minimum period of 2 years following the date of termination of the relevant customer relationship and for a maximum period of 5 years following that date; and
  - (c) communication data will be retained for a minimum period of 2 years following the date of the communication in question, and for a maximum period of 5 years following that date.
- 6.4 If you grant to us a licence to publish any of your personal data, we may continue to retain and publish that personal data after the end of the relevant retention period specified in this Section 6 in accordance with the applicable licence terms, subject to your data subject rights. If we cease to publish such personal data after the end of the relevant retention period specified in this Section 6, that personal data will be retained for minimum period of 2 years and a maximum period of 3 years following the date that publication ceases.
- 6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 7. Security of personal data

- 7.1 We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.
- 7.2 The following personal data will be stored by us in encrypted form: your name, contact information, password(s).
- 7.3 You acknowledge that the transmission of unencrypted (or inadequately encrypted) data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 7.4 You should ensure that your password is not susceptible to being guessed, whether by a person or a computer program. You are responsible for keeping the password you use for accessing our website confidential and we will not ask you for your password (except when you log in to our website).

## 8. Your rights

- 8.1 In this Section 8, we have listed the rights that you have under data protection law.
- 8.2 Your principal rights under data protection law are:
- (a) **the right to access** - you can ask for copies of your personal data;
  - (b) **the right to rectification** - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
  - (c) **the right to erasure** - you can ask us to erase your personal data;
  - (d) **the right to restrict processing** - you can ask us to restrict the processing of your personal data;
  - (e) **the right to object to processing** - you can object to the processing of your personal data;
  - (f) **the right to data portability** - you can ask that we transfer your personal data to another organisation or to you;
  - (g) **the right to complain to a supervisory authority** - you can complain about our processing of your personal data; and
  - (h) **the right to withdraw consent** - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
- 8.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.
- 8.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

## 9. Updating information

- 9.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

## 10. About cookies

- 10.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 10.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 10.3 Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

## 11. Cookies that we use

- 11.1 We use cookies for the following purposes:
- (a) **authentication and status** - we use cookies to identify you when you visit our website and as you navigate our website, and to help us determine if you are logged into our website;
  - (b) **analysis** - we use cookies to help us to analyse the use and performance of our website and services; and
  - (c) **cookie consent** - we use cookies to store your preferences in relation to the use of cookies more generally.

## 12. Managing cookies

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
  - (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
  - (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
  - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
  - (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and

(f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you will not be able to use all the features on our website.

### **13. Amendments**

13.1 We may update this policy from time to time by publishing a new version on our website.

13.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

### **14. Our details**

14.1 This website is owned and operated by CurbCargo Ltd.

14.2 We are registered in England and Wales under registration number 13383594, and our registered office is at 86-90 3rd Floor, 86-90 Paul Street, London EC2A 4NE

14.3 Our principal place of business is at 86-90 3rd Floor, 86-90 Paul Street, London EC2A 4NE

14.4 You can contact us:

(a) by post, to the postal address given above; or

(b) using our website contact form.

### **15. Data protection registration**

15.1 We are registered as a data controller with the UK Information Commissioner's Office.

15.2 Our data protection registration number is ZB178970.