



PRIVACY POLICY

1. Introduction and scope

This Privacy Policy is designed to inform you about our practices regarding the collection, use, and disclosure of information that you may provide to us, Neptune Shipping Agency Ltd, ("we" or "us"). We are fully committed to protecting the privacy and security of your personal information and we will always treat you and your data with the respect you deserve.

Together with our trading terms and any other documents referred to in it or in this policy, this Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be stored and processed by us. It applies to current and former Customers, Clients, Suppliers and other Service users.

Please be sure to read this Privacy Policy before using our website or submitting information to us via it. By using our website, you agree to the terms of this Privacy Policy. Whenever you submit information via our website you consent to the collection, use, and disclosure of that information in accordance with this Privacy Policy.

For the purpose of the General Data Protection Regulation (the "GDPR"), the data controller is Neptune Shipping Agency Ltd, Higher Sherwell, Sevenstones, Callington, PL17 8HU.

2. Data we collect and how we use it

The information that we collect and process is to maintain our trading relationship with your business.

The types of information we hold and process on your organisation are as follows:

- Company VAT / EORI / Deferment numbers
- Tariff numbers and commodity codes
- Company trading name
- Company registration number
- Delivery and site address (if applicable, and including your customers)
- Full bank details
- Invoice activity
- Credit application and check
- Various employee company contact names, job titles and email addresses as supplied to us by you
- Company telephone numbers (including mobile numbers and fax numbers)
- Head Office Address (if different from site or delivery address)
- Confirmation to utilise Postponed VAT Accounting (PVA), pay HMRC Directly or use Neptune's Deferment Account

We may collect additional information during the course of our working relationship.



We need all the categories of information identified above to allow us to perform our contract with you and to enable us to comply with our legal obligations and internal due diligence procedures as a UK limited company and an Authorised Economic Operator. The data is processed in the pursuit of our legitimate interests of seeking to promote, develop and grow our business through the sale of products and services and to provide excellent customer service.

It is important that the personal information we hold about you is accurate and current, so please let us know if your information changes.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing the required service), or we may be prevented from complying with our legal obligations.

3. Special category data

Special category data is types of personal data which the GDPR determines are more sensitive, and so need more protection than standard personal data. We do not collect any special category data relating to any current or former Customers, Clients, Suppliers and other Service users.

4. Sharing your data

Your personal information will be shared in accordance with the requirements of the GDPR.

Any information we hold about you is shared with third party contractors such as carriers and hauliers only when necessary to service your account.

We sometimes disclose select information to third-party service providers (such as our insurers), or with a regulator, or to otherwise comply with the law (such as reporting to HMRC). We do this where required by law, where it is necessary in order to administer the contract for services with you, or where we have another legitimate interest in doing so.

We may collect, transfer and store personal data to select countries outside of the European Economic Area ("EEA"). Where we transfer your personal data to countries outside of the EEA we shall do so only where there are adequate provisions in place to ensure your privacy.

5. CCTV

CCTV is installed at our head office, Higher Sherwell, Sevenstones, Callington, PL17 8HU, for the purpose of crime prevention. We do not monitor or record any sound, only images.

While all our CCTV is aimed at entry ways to our business premises, some of the internal cameras capture images of employees or site visitors moving around the building in the course of a normal work day or at their desks if they are positioned immediately next to a monitored external doorway. There is no CCTV equipment in places where you would have an expectation of privacy, such as bathrooms.



We do not use CCTV to monitor our employees or visitors to our site and our CCTV footage would only be reviewed in the event of a crime. The CCTV footage retention period is a maximum of 45 days and is automatically deleted thereafter if it has not already been overwritten when the CCTV storage allocation reached the maximum size limit.

6. Your rights

The GDPR provides individuals with the following rights concerning their personal data:

- **The right to be informed:** You have the right to information about how we use and process personal data. We have the obligation to provide this in a clear, free of charge and easily accessible manner.
- **The right to access:** You have the right to request access to your personal information so you can check it is correct and that we are lawfully processing it. For information on how to make a Data Subject Access Request (DSAR) please refer to section 8 of this Privacy Policy or our Data Protection Policy.
- **The right to rectification:** You can request correction of the personal information that we hold about you if it is incomplete or inaccurate. We are also required to ensure that any third parties who have access to the inaccurate information rectify it too.
- **The right to erasure:** This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to store or process it. Your right of erasure extends to anyone we have disclosed your personal information to and we will take all reasonable steps to inform those with whom we have shared your data about your request.
- **The right to object to processing:** You can object to processing of your personal information where we are relying on a legitimate interest and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we process your personal information for direct marketing purposes.
- **The right to restrict processing:** You can request that we suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **The right to data portability:** This enables you to obtain and reuse your personal information by requesting the transfer of it in a useable format to another party, service or IT environment.
- **The right to withdraw consent:** You have the right to withdraw your consent for the processing of your personal data where the processing is based on consent. To withdraw consent, please specify what you wish to withdraw consent for when submitting your request to us in writing.
- **The right of complaint:** If you are not satisfied with our response to a complaint about the way we have used or are processing your personal data you have the right to lodge a complaint with The Information Commissioner's Office (The ICO), the UK's supervisory authority for data protection issues. You can find full details of your personal data rights on The ICO website at <https://ico.org.uk/>.



In the limited circumstances where you as an individual may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. You should note that the above rights do not override circumstances where we have a legal obligation or legitimate interest in collecting or processing your personal data.

7. Storing your data

We securely store the personal data that we collect from you so that it cannot be accidentally lost or altered, as well as disclosed, used or accessed in an unauthorised way. We use many different data security methods such as encryption, firewalls and anti-virus software. We detect and automatically block security threats from ever reaching your data. We continually review our information collection, storage and processing practices, including physical and electronic security measures, to prevent unauthorised access to our systems. We back up data to offline servers to ensure that we will always have an uncorrupted copy of data.

8. Contact and opting out

We will continue to contact you via the following methods:

- Post
- Email
- Telephone
- Social Media

However you have the right at any time to stop us from contacting you. If you want us to stop contacting you at any time please email or write to us.

To opt-out of marketing email communications you can click the unsubscribe link within the email you have received. You can ask us to only send you marketing communications by particular methods, about specific subjects or you may ask us not to send you any marketing communications at all.

We may ask you to indicate your marketing preferences when you first contact us via our website, which you may subsequently change by emailing us at any time.

9. Data subject access request (DSAR)

You have the right to obtain a copy of the information that we hold about your organisation. Information requests should be made in writing to Legal Department, Neptune Shipping Agency Ltd, Higher Sherwell, Sevenstones, Callington, PL17 8HU.

You may also request correction or removal of any information that you believe to be inaccurate. Any such request should be made in writing to Legal Department, Neptune Shipping Agency Ltd, Higher Sherwell, Sevenstones, Callington, PL17 8HU.



10. Our website, analytics and cookies

Our Website uses cookies to distinguish you from other users. We collect anonymous information from you automatically via the use of “cookies” when you use our website, such as your IP address and browser information. This helps us to provide you with a good experience when you browse our website and also allows us to improve it. Should you require any information on our use of cookies then please contact us.

We will record data about your visits to our website which we collect from your browser including browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and other information about your visit, such as the full Uniform Resource Locators (URL), clickstream to, through and from our website, products or services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information and methods used to browse away from the page. This enables us to monitor the performance and relevance of our website and our marketing campaigns, to ensure that content from our website is presented in the most effective manner for you and for your computer and to keep our website safe and secure. We may also use analytics and search engine providers that assist us in the improvement and optimisation of our website.

Our website may include links to third party websites, plug-ins and other applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third party websites and are not responsible for their privacy statements or use of your personal data. When you leave our website, we encourage you to read the privacy notice of every website you visit.

When we send email marketing communications we collect information about each email we have sent you and your interaction with them including, without limitation, the number of times opened, deliverability and which sections you clicked on. We use this information to measure the effectiveness of our email campaigns and plan future marketing campaigns.

11. Data security

We take every care to ensure that your personal data is kept secure. We have put in place appropriate security measures to prevent your personal data from being accidentally lost or altered, as well as disclosed, used or accessed in an unauthorised way.

In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Please remember that you are responsible for keeping your passwords secure. If we have given you (or you have chosen) a password which enables you to access certain parts of our website or



ConTrak-iT (as applicable), you are responsible for keeping this password confidential. Please do not share your passwords with anyone.

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

12. Complaints and questions

If you have any questions about this Privacy Policy or how we process your personal information, please contact us by writing to Legal Department, Neptune Shipping Agency Ltd, Higher Sherwell, Sevenstones, Callington, PL17 8HU. We will investigate and comprehensively respond to you within 14 days wherever possible. If we have breached our duty of care, we will take appropriate action.

If you are not satisfied by our response you also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

13. Changes to this Privacy Policy

We will review and update this privacy policy periodically. This may be to reflect a change in the law or our internal procedures, or it may be to reflect a change in the services we offer.

The easiest way to check for updates is by looking for the latest version of this policy on our website. Each time we update our Privacy Policy we will update the policy version number detailed within the policy itself, along with the date upon which the version came into force.