

# Cross Trades and Logistics Ltd – Privacy Policy

## Privacy Policy

### Background:

Cross Trades and Logistics Ltd understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits our websites (“Our Sites”) and we do not collect personal data via our websites (“Our Sites”) about you unless you contact us (see below). Any personal data we do collect will only be used as permitted by law under legitimate interest.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

### Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

<b>“personal data”</b>	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that we hold. This definition shall, where applicable, incorporate the definitions provided in the Data Protection Act 1998 or EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”); and
<b>“Our Sites”</b>	Refers to: <ol style="list-style-type: none"><li>1. <a href="http://www.ctll.co.uk">www.ctll.co.uk</a></li><li>2. <a href="http://www.crosstradesandlogistics.co.uk">www.crosstradesandlogistics.co.uk</a></li><li>3. <a href="http://www.ctfnetwork.com">www.ctfnetwork.com</a></li></ol>
<b>“We/Us/Our”</b>	Refers to: <ol style="list-style-type: none"><li>1. Cross Trades and Logistics Ltd, a limited company registered in England under company number 6920722, whose registered address is 22 Oswyn Close, Bury St Edmunds IP32 7DP and whose main trading address is at the same address.</li><li>2. Cross Trades Forwarders Network. A Trading name as part of Cross Trades and Logistics Ltd.</li></ol>

### Information about us

Our Data Protection Officer is David Cross, and can be contacted by email at [david@ctll.co.uk](mailto:david@ctll.co.uk) or by telephone on 01284615884, or by post at Cross Trades and Logistics Ltd, 22 Oswyn Close, Bury St Edmunds IP32 7DP. We are a members of the BIFA, FIATA, Suffolk Chamber of Commerce.

### Which websites does this policy cover?

This Privacy Policy applies only to your use of “Our Sites”. “Our Sites” may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

## **Your Rights**

As a data subject, you have the following rights under the GDPR, which this Policy and its procedures and Our use of personal data, have been designed to uphold:

- The right to be informed about Our collection and use of personal data;
- The right of access to the personal data we hold about you;
- The right to rectification if any personal data We hold about you is inaccurate or incomplete;
- The right to be forgotten – i.e. the right to ask us to delete any personal data we hold about you (Unless required for legitimate interest)
- The right to restrict (i.e. prevent) the processing of your personal data;
- The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);
- The right to object to Us using your personal data for particular purposes;
- Rights with respect to automated decision making and profiling.

If you have any cause for complaint about Our use of your personal data, please contact the DPO and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

## **What data do we collect?**

We do not place cookies on your computer or device, nor do we use any other means of data collection via "Our Sites".

If you send us an email, we may collect your name, your email address, your ip address, location and any other information which you choose to give us.

## **How do we use your data?**

If we do collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected, or as required under legitimate interest. We will comply with Our obligations and safeguard your rights under the Data Protection Act 1998 or GDPR at all times.

As noted above, we do not generally collect any personal data. If you contact us and we obtain your personal details from your email, we may use them as follows:

- To reply to your email
- To keep you informed of our Services and relevant information

You have the right to withdraw your consent to us using your personal data at any time, and to request that we delete it.

We will not share any of your data with any third parties for any purposes other than stated in this policy (namely for payroll purposes)

## **How and where do we store your data?**

We only keep your personal data for as long as we need to in order to use it as described above in this policy, and/or for as long as we have your permission to keep it. Your data will only be stored in the UK. Data security is very important to us, and to protect your data We have taken suitable measures to safeguard and secure any data We hold about you (even if it is only your email address).

Steps We take to secure and protect your data include:

Information stored on PC's is password protected as is any stored on mobile phones

## **How Can You Access Your Data?**

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge. Please contact the DPO for more details.

## **Contacting Us**

If you have any questions about Our website or this Privacy Policy, please contact David Cross by email at david@ctl.co.uk or by telephone on 01284615884, or by post at Cross Trades and Logistics Ltd, 22 Oswyn Close, Bury St Edmunds IP32 7DP. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

## **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

- All the above will receive training on the new GDPR and how this will affect them and the receipt and use of personal data.
- The GDPR Policy & Procedure will become part of the induction training for new starters. All staff currently employed will receive a copy of and introduction to the GDPR Policy & Procedure.
- All staff will sign to say that they have received a copy of and will adhere to the Policy.
- All staff will sign the declaration of consent to their personal data being stored in the aforementioned places and be made aware of the right to optout of data being held which is not being used legitimately.

## **Training**

Currently only the DPO and Accounts Team have access to all or specific areas of personal data.

## **Policy & Procedure Review**

The General Data Protection Regulations implementation date is 25<sup>th</sup> May 2018.

As this is new legislation the Policy & Procedures will be monitored and records kept on a monthly basis by the Data Protection Officer.

Any amendments required will be addressed and the changes approved by the Board of Directors within the company.

Cross Trades and Logistics Ltd

May 2018