

*William Kirk*

**Within this document you will find the  
following information:**

**Website Privacy Policy**

**Privacy Notice – Customer and Supplier**

**GDPR Group Statement**



## Website Privacy Policy – 25 May 2018

This privacy notice tells you about the information we collect from you when you use our website. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

### Who are we?

We are William Kirk Limited. Our address is Adlington Industrial Estate, London Road, Adlington, Macclesfield, SK10 4NL. You can contact us by post at the above address, by email at [marketing@kinaxia.co.uk](mailto:marketing@kinaxia.co.uk) or by telephone on +44 (0)1625 728033.

We are not required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to the contact details above.

### When you use our website

When you use our website to browse our products and services and view the information we make available, a number of cookies are used by us and by third parties to allow the website to function, to collect useful information about visitors and to help to make your user experience better.

Some of the cookies we use are strictly necessary for our website to function, and we don't ask for your consent to place these on your computer. These cookies are shown below.

Cookie Name	Purpose
Google Analytics	To register website traffic and activity
Wordpress	To register website traffic and activity

### When you submit an enquiry via our website

When you submit an enquiry via our website, we ask you for your name, company name, contact telephone number and email address.

We use this information to respond to your query, including providing you with any requested information about our products and services. We may also email you several times after your enquiry in order to follow up on your interest and ensure that we have answered your it to your satisfaction. We will do this based on our legitimate interest in providing accurate information prior to a sale.

Your enquiry is stored and processed as an email which is hosted on servers based in London. It is also stored within our website content management system and then archived after 3 months.

We do not use the information you provide to make any automated decisions that might affect you.



We keep enquiry emails for two years, after which they are securely archived and kept for seven years.

### **When you sign up to receive our newsletter**

When you sign up to receive our newsletter, we ask for your name and your email address.

We will ask for your consent to use your name and email address to email you our newsletter which contains information about our products and other information which we feel might be of interest to you.

You can withdraw your consent at any time and we will stop sending you the newsletter.

Your name and email address are shared with a third party mailing system. This company has contractually committed to providing appropriate safeguards for your personal data which means it will be protected in line with the legal requirements of the European Union.

We do not use the information you provide to make any automated decisions that might affect you.

We keep your personal data for as long as we produce and distribute our newsletter. If you withdraw your consent, we will mark your details so that they are not used and delete them after two years.

### **Your rights as a data subject**

By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate. If we have asked for your consent to process your personal data, you may withdraw that consent at any time.

If we are processing your personal data for reasons of consent or to fulfil a contract, you can ask us to give you a copy of the information in a machine-readable format so that you can transfer it to another provider.

If we are processing your personal data for reasons of consent or legitimate interest, you can request that your data be erased.

You have the right to ask us to stop using your information for a period of time if you believe we are not doing so lawfully.

Finally, in some circumstances you can ask us not to reach decisions affecting you using automated processing or profiling.

To submit a request regarding your personal data by email, post or telephone, please use the contact information provided above in the Who Are We section of this policy.

### **Your right to complain**

If you have a complaint about our use of your information, we would prefer you to contact us directly in the first instance so that we can address your complaint. However, you can also contact the Information Commissioner's Office via their website at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) or write to them at:



Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

### **Updates to this privacy policy**

We regularly review and, if appropriate, update this privacy policy from time to time, and as our services and use of personal data evolves. If we want to make use of your personal data in a way that we haven't previously identified, we will contact you to provide information about this and, if necessary, to ask for your consent.

## PRIVACY NOTICE – CUSTOMER AND SUPPLIER

**Data Controller:** All subsidiary Companies, of Kinaxia Logistics (“the Group”), which includes Bay Freight, William Kirk Ltd, BC Transport, NC Cammack, Foulger Transport, Mark Thompson Transport, Maidens of Telford, Lambert Brothers Haulage Ltd and Panic Transport.

As part of our operational / business processes, the Group collects and processes personal data relating to customers and suppliers. The Group is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### What information does the Group collect?

The Group collects a range of information about our customers and suppliers. This includes:

- Company name, address, telephone numbers, e-mail address, rates, contracts, terms and conditions, proposals and costs;
- Transactional / invoicing history and bank / finance details;
- Company employees name, work address, e-mail, and telephone numbers.

The Group collects this information in a variety of ways. For example, Group website enquiries, individual company or supplier websites or directly from the data subject.

Data will be stored in a range of different places, including a Customer Relationship Management system (CRM), accountancy, vehicle planning and warehouse management systems, Driver delivery notes, dropbox files and other IT systems (including email).

**Why does the Group process personal data?** The Group needs to process data prior to entering into a contract with a Customer or Supplier. It also needs to continue processing this data to enter into and maintain a contract with a Customer or Supplier.

The Group’s lawful basis of processing this data is the ‘performance of a contract’.

### Who has access to data?

Your information will be shared internally for the purposes of continuing with a contract. This includes members of the Transport, Warehouse, Customer Service and Sales and Marketing departments.

The Group will not transfer your data outside the European Economic Area.

## How does the Group protect data?

The Group takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

## For how long does the Group keep data?

The Group will hold customer / Supplier data in accordance with the Groups Retention Policy.

## Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Group to change incorrect or incomplete data;
- require the Group 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 Group is relying on its legitimate interests as the legal ground for processing; and
- ask the Group to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Group's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact [GDPR@Kinaxia.co.uk](mailto:GDPR@Kinaxia.co.uk)

If you believe that the Group has not complied with your data protection rights, you can complain to the Information Commissioner's Office via their website at [www.ioc.org/concerns](http://www.ioc.org/concerns) or write to them at: Information Commissioner's Office, Wycliffe House, water Lane, Wilmslow, Cheshire, SK9 5AF.

## What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Group, However, if you do not provide the information, the Group may not be able to provide a service or enter into a contract.

## GDPR GROUP STATEMENT

The General Data Protection Regulation (GDPR) is a Regulation of the European Union and, from 25 May 2018, it applies to all organisations that collect and process the personal data of EU citizens.

As a responsible, forward-looking business, all subsidiary companies of Kinaxia Logistics (“the Group”) recognise the need to comply with the GDPR and ensure that effective measures are in place to protect the personal data of our customers, suppliers, employees and other stakeholders, and to ensure that it is processed lawfully, fairly and transparently.

Commitment to the security of personal data is demonstrated through the relevant policies and the provision of appropriate resources to establish and develop effective data protection and information security controls.

As part of meeting our legal obligations, we have put in place a comprehensive programme to understand and validate our use of personal data and to confirm the lawful basis of our processing.

Further to this, we can confirm that:

- A policy is in place for the protection of personal data within the Group which has been approved by management and communicated to all employees and other relevant people;
- All employees have been made aware of their responsibilities regarding data protection and the GDPR;
- Everyone understands their roles in the protection of personal data, and has received training where required;
- We have identified the personal data we process, including special categories where applicable;
- For each occasion we process personal data, we have established the lawful basis of the processing under the GDPR;
- Where we have used the lawful basis of legitimate interest, we have conducted a documented balancing test to assess the benefits versus the impact on the data subject of the processing;
- The length of time we keep personal data for, or the way we decide this, has been defined in each area of processing, and has been minimised;
- We are keeping records of processing as required by the GDPR;
- Where we act as a processor, we are committed to complying with the requirements of the GDPR;
- All of our employees are subject to confidentiality obligations with respect to personal data;
- Where appropriate, a data protection impact assessment approach which is in line with the requirements and recommendations of the GDPR and relevant best practice, will be used;
- We have procedures in place to fulfil our obligations in the event of a breach of personal data, both as a controller and as a processor;
- We have policies and other controls in place to provide appropriate protection of personal data, based on a careful assessment of risk.

We will continue to develop and improve our data protection policies and controls over time, guided by legal requirements and the needs and preferences of our customers and partners.

Yours sincerely,

Debbie Blackwell  
Kinaxia Logistics Group HR Manager