

# Redcliffe International Shipping Ltd. – Privacy Policy

## **WHO ARE WE AND WHAT IS OUR PRIVACY POLICY?**

Redcliffe International Shipping Ltd. is a company registered in England and Wales under company number 02674289. Our registered office is at 7 Albert Court, Prince Consort Road, London SW7 2BJ. Redcliffe International Shipping Ltd. and its subsidiaries are collectively referred to in this Policy as “We”, “Us” or “Our”. If you have any concerns regarding Our use of your personal data that you consider is not addressed adequately in this Policy, you can contact Our Data Protection Officer via Our Website, or at the above address.

## **OVERVIEW**

Maintaining the security of your data is a priority at Us, and We are committed to respecting your privacy rights. We pledge to handle your data fairly and legally at all times. We are also dedicated to being transparent about what access Our Website, provides you with information about:

- how We use your data;
- what personal data We collect;
- how We protect your data;
- what you can do to help protect your data;
- your rights concerning Us holding your personal data;
- the legal basis for Us holding and processing your personal data;
- Our cookie policy;
- copyright and reproduction of Our Website material; and
- Disclaimer.

## **HOW WE USE YOUR DATA**

### **General**

We may use your personal data:

- to provide goods and services to you;
- to manage any registered account(s) that you hold with Us;
- to verify your identity;
- for crime and fraud prevention, detection and related purposes;
- with your agreement, to contact you electronically about products and services which We think may interest you;
- to enable Us to manage customer service interactions with you; and
- where We have a legal right or duty to use or disclose your information (for example in relation to an investigation by a public authority or in a legal dispute).

### **Sharing data with third parties**

#### **Our service providers and suppliers**

- In order to make certain services available to you, We may need to share your personal data with some of Our service partners; and

- We will only allow Our service providers to handle your personal data when We have confirmed that they apply appropriate data protection and security controls. We will require that they can only use your data to provide services to Us and to you, and for no other purposes.

### **Other third parties**

Aside from Our service providers, We will not disclose your personal data to any third party, except as set out below. We will never sell or rent Our customers' data to other organisations for marketing purposes.

We may share your data with governmental bodies, regulators, law enforcement agencies, courts/tribunals and insurers, where We are required to do so:

- to comply with Our legal obligations;
- to exercise Our legal rights (for example in court cases);
- for the prevention, detection, investigation of crime or prosecution of offenders; and
- for the protection of Our employees and customers.

### **How long do we keep your data?**

We will not retain your data for longer than necessary for the purposes set out in this Policy. Different retention periods apply for different types of data, however, the longest we will normally hold any personal data is 6 years.

### **Transferring your data internationally**

Your personal information may be transferred internationally. Sometimes, We may need to transfer your information out of the European Economic Area (EEA), for example to follow up an enquiry you may make. Countries to which We transfer information may have different standards to control how your information is used and protected and these standards may not be as strict as those in place in the EEA. If We transfer your information, We will ensure that any organisation which receives your information has appropriate safeguards in place to protect your information.

## **WHAT PERSONAL DATA WE COLLECT**

We may collect the following information about you:

- your name, age/date of birth and gender;
- your contact details: postal address including billing and delivery addresses, telephone numbers (including mobile numbers) and e-mail address;
- purchases and orders made by you;
- your on-line browsing activities on Our website;
- your communication and marketing preferences;
- your interests, preferences, feedback and survey responses;
- your location;
- your correspondence and communications with Us; and
- other publicly available personal data, including any which you have shared via a public platform (such as a Twitter feed or public Facebook page).

Our Website is not intended for children and We do not knowingly collect data relating to children.

The above list is not exhaustive and, in specific instances, We may need to collect additional data for the purposes set out in this Policy. Some of the above personal data is collected directly, for example when you send an email to Our customer services team. Other personal data is collected indirectly, for example your

browsing activity. We may also collect personal data from third parties who have your consent to pass your details to Us, or from publicly available sources.

## **HOW WE PROTECT YOUR DATA**

We are committed to keeping your personal data safe and secure. Our security measures include:

- encryption of data;
- security controls which protect Our IT infrastructure from external attack and unauthorised access; and
- internal policies setting out Our data security approach and training for employees.
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## **WHAT YOU CAN DO TO HELP PROTECT YOUR DATA**

We will never ask you to confirm any bank account or credit card details via email. If you receive an email claiming to be from Us asking you to do so, please ignore it and do not respond.

If you are using a computing device in a public location, We recommend that you always log out and close the website browser when you complete an online session.

## **YOUR RIGHTS CONCERNING US HOLDING YOUR PERSONAL DATA**

You have the following rights to:

- ask Us what personal data We hold about you at any time;
- ask Us to update, complete or correct any out-of-date or incorrect personal data that We hold about you, free of charge;
- ask Us to erase or restrict Our use of your information;
- ask Us to provide your information to you in a commonly used electronic format and to have that information transmitted directly to another organisation (this is known as 'data portability'), again free of charge; and
- opt-out of any marketing communications that We may send to you.

If you wish to exercise any of the above rights, please contact Us using the contact details set out in this Website or at our registered office detailed above.

## **THE LEGAL BASIS FOR US HOLDING AND PROCESSING YOUR PERSONAL DATA**

### **General**

We collect and use Our customers' personal data because it is necessary for:

- the pursuit of Our legitimate business interests, including;
  - ~ selling and supplying goods and services to Our customers;
  - ~ protecting customers, employees and other individuals and maintaining their safety, health and welfare;
  - ~ promoting, marketing and advertising Our products and services;
  - ~ understanding Our customers' behaviour, activities, preferences, and needs;
  - ~ improving existing products and services and developing new products and services;
  - ~ complying with our legal and regulatory obligations;

- ~ preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies;
- ~ handling customer contacts, queries, complaints or disputes;
- ~ managing insurance claims by customers;
- ~ protecting Us, Our employees and customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to Us;
- ~ effectively handling any legal claims or regulatory enforcement actions taken against Us; and
- ~ fulfilling Our duties to Our customers, colleagues, shareholders and other stakeholders;
- the purposes of complying with Our duties and exercising Our rights under a contract for the sale of goods to a customer; or
- complying with Our legal obligations.

In general, We only rely on consent as a legal basis for processing personal data in relation to sending direct marketing communications to customers via email, or text message.

Customers **have the right to withdraw consent at any time**. Where consent is the only legal basis for processing, We will cease to process data after consent is withdrawn.

## **OUR COOKIE POLICY**

Our Website uses cookies to distinguish you from other users of the Website, recognise and count the total number of visitors and to see how visitors move around the Website when they are using it. This information helps Us to improve Our services generally and to provide visitors with a good experience when browsing Our Website. For example, by understanding which areas are of particular interest and ensuring that visitors are always able to find what they are looking for.

The cookies We use do not allow Us to identify you personally.

If you do not wish to accept cookies you are able to decline them by altering the settings in your browser. If you do choose to block all cookies (including essential cookies) using your browser's settings, you may not be able to access all or parts of Our Website.

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to Our advertisers. This is statistical data about Our users' browsing actions and patterns, and does not identify any individual.

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