



## **Data Protection Privacy Notice**

### **Customers**

This Notice applies to all active and trading companies in the Davies Turner Group of Companies, which are:

- Davies Turner Holdings plc
- Davies Turner plc
- Davies Turner & Co Limited
- Davies Turner Air Cargo Limited
- Davies Turner Ireland Limited

These companies are collectively referred to in this Notice as 'Davies Turner'.

## **1. Introduction**

This Notice (Privacy Notice) applies to information held about you and individuals connected to your business by members of the Davies Turner Group of Companies as data controllers, as described below. It explains what information we collect about you and individuals who are connected to your business including, in turn, your customers, how we'll use that information, who we'll share it with, the circumstances when we'll share it, and what steps we'll take to make sure it stays private and secure. It continues to apply even if your agreement for services with us ends. It should also be read alongside our standard terms and conditions i.e. the then current British International Freight Association Standard Terms and Conditions.

Wherever we've said 'you' or 'your', this means you, any authorised person in your business who we have dealings with in relation to your account and other related people (including authorised signatories).

Parts of this Notice relate only to individuals, and we have highlighted this where relevant. This includes individuals whose business does not have a separate legal identity (e.g. sole traders and partners in a general partnership, but excluding limited companies and other forms of corporate entity), and individuals connected to your business. An individual connected to your business could be any guarantor, a director, officer or employee, partners or members of a partnership, any substantial owner, controlling person, or representative (e.g. authorised signatories), agent or nominee, or any other persons or entities with whom you have a relationship that's relevant to your relationship with us, for example, a customer of yours.

You must ensure that any relevant individuals are made aware of this Notice and the individual rights and information it sets out, prior to providing their information to us or our obtaining their information from another source. If you, or anyone else on your behalf, has provided or provides information on an individual connected to your business to us, you or they must first ensure that you or they have the authority to do so.

When we say 'we', we mean the Davies Turner Group of Companies which act as a data controller in respect of your personal data.

## **2. What information we collect relating to you and individuals connected to your business**

We'll only collect your information and information relating to individuals connected to your business, in line with relevant regulations and law. We may collect it from a range of sources and it may relate to any of our services. We may also collect information about you and individuals connected to your business when you or they interact with us, e.g. visit our website, call us or visit one of our branches, or ask about any of our services.

Some of this information will come directly from you and individuals connected to your business, e.g. when providing information to open an account or to perform our contract with you. We might also get some of it from publicly available sources. The information we collect may include:

### **2.1 Information relating to you and individuals connected to your business that you provide to us, or which others provided to us on your behalf e.g.:**

- Where you're an individual, personal details (e.g. name); we'll also collect this information about individuals connected to your business
- Contact details (e.g. address, email address, position in company, landline and mobile numbers)
- Market research (e.g. information and opinions expressed when participating in market research)
- User login and subscription data (e.g. login credentials)
- Other information about you and individuals connected to your business that you've provided to us by filling in forms or by communicating with us, whether face-to-face, by phone, email, online, or otherwise

## **2.2 Information we collect or generate about you and individuals connected to your business, e.g.:**

- Information about your relationship with us, and the individuals connected to your business and your and their ways of interacting with us
- Marketing and sales information (e.g. details of the services you receive and your preferences)
- Cookies and similar technologies we use to recognise you and individuals connected to your business, remember preferences and tailor the content we provide
- Risk rating information (e.g. credit risk rating)
- Records of correspondence and other communications between you and your representatives and us, including email, instant messages and social media communications

## **2.3 Information we collect from other sources relating to you and individuals connected to your business, e.g.:**

- Information you've asked us to collect for you
- Information from third parties

## **3. How we'll use your information and information relating to individuals connected to your business**

We'll only use information on you and individuals connected to your business where we have consent or we have another lawful reason for using it. These reasons include where we need to:

- Pursue our legitimate interests
- Process the information to carry out an agreement we have with you
- Process the information to comply with a legal obligation

The reasons we use your information and information relating to individuals connected to your business include:

- Delivering our services
- Carrying out your instructions
- Managing our relationship with you, including (unless you tell us otherwise) telling you about services we think may be relevant for you

- Understanding how you use our services
- Undertaking risk management
- Undertaking service improvement
- Undertaking data analytics to better understand your circumstances and preferences so we can make sure we can provide you with the best advice and offer you a tailored service
- Protecting our legal rights and complying with our legal obligations

### **3.1 Tracking or recording what you say or do**

We may record details of your interactions (and the interactions of the individuals connected to your business) with us. We may record and keep track of conversations with us including phone calls, face-to-face meetings, letters, emails, video chats and any other kinds of communication. We may use these to check your instructions to us, assess, analyse and improve our service, train our people, manage risk or to prevent and detect crimes. We may also capture additional information about these interactions (e.g. telephone numbers that we are called from and information about devices or software that are used). We use closed circuit television (CCTV) in and around our sites and these may collect photos videos or voice recordings of you and the individuals connected to your business.

### **3.2 Compliance with laws and regulatory compliance obligations**

We'll use your information and information relating to individuals connected to your business to meet our compliance obligations. We'll only do this on the basis that it's needed to comply with a legal obligation or it's in our legitimate interests and that of others.

### **3.3 Marketing and market research**

We may use your information and information relating to individuals connected to your business to provide information about Davies Turner services. We may send marketing messages by post, email, telephone, text or secure messages. If you or individuals connected to your business wish to change how marketing messages are sent or wish to stop receiving these, please contact us.

We may use your information and information relating to individuals connected to your business for market research. Market research agencies acting on our behalf may get in touch with you or individuals connected to your business by post, telephone, email or other methods of communication to invite you or them to take part in research. We won't invite you or individuals connected to your business to take part in research using a communication method if you (or they) have asked us not to get in touch that way.

## **4. Who we might share information with**

We may share your information and information relating to individuals connected to your business with others where lawful to do so including where we or they:

- Need to in order to provide you with services you've requested
- Have a public or legal duty to do so
- Need to in connection with regulatory reporting, litigation or asserting or defending legal rights and interests
- Have a legitimate business reason for doing
- Have asked you or the individuals connected to your business for your permission to share it, and you (or they) have agreed

We may share your information and information relating to individuals connected to your business for these purposes with others, including:

- Other Davis Turner Group Companies and any sub-contractors, agents or service providers who work for us or provide services to us or other Davies Turner Group Companies (including their employees, sub-contractors, service providers, directors and officers)
- Law enforcement, government, courts, dispute resolution bodies, auditors
- Other parties involved in any disputes, including disputed transactions
- Anybody else that we've been instructed to share your information with by you
- Insurers and their underwriters so they can provide you with a quote or cover

## **5. How long we'll keep information**

We'll keep information in line with our Records Management Policy. For example, we'll normally keep your details for a period of six full years from the end of our relationship with you. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes such as managing your account and dealing with any disputes or concerns that may arise.

We may need to retain information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes (e.g. to help us respond to queries or complaints).

If we don't need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

Where you receive products and services from third parties (e.g. insurance) who Davies Turner has introduced you to, those third parties may keep your information, and information relating to individuals connected to your business, in line with additional terms and conditions that apply to their product and services.

## **6. Rights of individuals**

Individuals have a number of rights in relation to the information that we hold about them. These rights include:

- The right to access information we hold about them and to obtain information about how we process it
- In some circumstances, the right to withdraw their consent to our processing of their information, which they can do at any time; we may continue to process their information if we have another legitimate reason for doing so
- In some circumstances, the right to receive certain information they have provided to us in an electronic format and/or request that we transmit it to a third party
- The right to request that we rectify their information if it's inaccurate or incomplete
- In some circumstances, the right to request that we erase their information; we may continue to retain their information if we're entitled or required to retain it
- The right to object to, and to request that we restrict, our processing of their information in some circumstances; again, there may be situations where individuals object to, or ask us to restrict, our

processing of their information but we're entitled to continue processing their information and/or to refuse that request

Individuals (including individuals connected to your business) can exercise their rights by contacting us. Individuals also have a right to complain to the UK Information Commissioner's Office by visiting [www.ico.org.uk](http://www.ico.org.uk).

## **7. Credit reference checks**

We may perform credit and identity checks on you (and certain individuals connected to your business) with one or more credit reference agencies (CRAs). We may also make periodic searches at CRAs to manage your account with us.

To do this, we'll supply your information (and information of certain individuals connected to your business) to CRAs and they'll give us information about you and them. This will include information from your credit application and about your financial situation, payment data and financial history (and the financial situation and history of the relevant individuals connected your business). CRAs will supply us with both public and shared credit information, financial situation and historic information. CRAs will also share your data with other organisations for the purpose of credit risk insurance. For more information see [Credit Reference Agency Information Notice \(CRAIN\) | Experian](#).

We may use this information to:

- Assess if we can offer you credit
- Verify the accuracy of the data you've provided to us
- Prevent criminal activity
- Manage your account with us
- Recover debts

We'll continue to exchange information about you (and individuals connected to your business) with CRAs while you have a relationship with us.

## **8. What we need from you**

You're responsible for making sure the information you give us, information which is provided by individuals connected to your business, or information which is otherwise provided on your behalf is accurate and up to date, and you must tell us if anything changes as soon as possible.

## **9. How we keep information secure**

We use a range of measures to keep information safe and secure which may include encryption, password protection and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and applying appropriate measures for the use and transfer of information.

## **10. More details about your information and information relating to individuals connected to your business**

You and individuals connected to your business can obtain further information on anything we've said in this Privacy Notice or contact us by writing to: The Head of Legal and Company Secretary, West Midlands Freight Terminal, Station Road, Coleshill B46 1DT or at [info@daviesturner.co.uk](mailto:info@daviesturner.co.uk).