

1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The Data Protection Officer – Simon Guest is responsible for ensuring that this notice is made available to data subjects prior to Guest Express Transport Ltd collecting/processing their personal data.
- 2.2 All Employees/Staff of Guest Express Transport Ltd who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

Guest Express Transport Ltd provide Air Freight Logistics and general warehousing .

Our software suites automate critical operational tasks and each component accords and in many instances, goes well beyond statutory compliance standards and "reasonable" standards of data system management.

Registered Address: Guest Express Transport , Unit 2 Colndale Road, Colnbrook ,SL3 0HQ.

Data Protection Officer: Simon Guest

Data Officer: Garry Macpherson

Our Data Protection Officer can be contacted directly here:

- dataprotection@guestex.com
- 01784 250016

3.2 Consent

Guest Express could at some stage use all 6 lawful processing methods. Typically, the most appropriate basis for lawful processing by Guest Express Transport is legitimate interest, specifically carrying out contractual obligations and working with active and recent customers about data system security and compliance.

Where consent is required we will always tell you why and how the information will be used.

You may withdraw consent at any time by contacting Guest Express Transport Data Officers and completing a Withdrawal of Consent Procedure. [GDPR DOC 2.7A](#).

3.3 Disclosure

Guest Express Transport Ltd will pass on your personal data to qualified third parties. Please refer to item 3.7 for specific information on the individual products and services that we offer.

3.4 Retention period

Guest Express Transport Ltd will keep your personal data for the duration that you are a customer of Guest Express Transport. We shall retain your data only for as long as is necessary in accordance with applicable laws.

On the closure of your account, we may keep your data for up to 7 years after you have cancelled your services with us. We may not be able to delete your data before this time due to our legal and/or accountancy obligations. We may also keep it for research or statistical purposes. We assure you that your personal data shall only be used for the purposes stated herein.

3.5 Your rights as a data subject

At any point while we are in possession of, or processing your personal data, you the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply you have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review - if in the event that Guest Express Transport refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by Guest Express Transport Ltd (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Guest Express Transport Ltd's data protection representatives Data Protection Officer.

The details for each of these contacts are:

	Supervisory authority contact details	[Data Protection Officer (DPO)] contact details
Contact Name:	Information Commissioner	Simon Guest
Address line 1:	Wycliffe House	Unit 2 Colndale Road
Address line 2:	Water Lane	
Address line 3:	Wilmslow	Colnbrook
Address line 4:	Cheshire	Berkshire
Address line 5:	SK95AF	SL3 0HQ
Email/Web:	https://ico.org.uk/concerns/	dataprotection@guestex.com

Commented [A1]: In line with Subject Access Request Procedure ([GDPR DOC 2.2](#)) and Subject Access Request Form ([GDPR REC 4.2](#)). [Organisation Name] may want to link to a location whereby the data subject can download/access the SAR Form.

Telephone:	0303 1231113	01784 250016
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3.7 **Privacy statement**

Read more about how and why we use your data in our Privacy Statement.

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How do we collect personal data from you?

We receive information about you, from you, when you use our website, complete forms on our website, if you contact us by phone, email, or otherwise in respect of any of our products and services. Additionally we also collect information from you when you sign up, enter a competition, promotion or survey or when you inform us of any other matter.

If you provide us with personal data about a third party, you warrant that you have obtained the express consent from the third party for the disclosure and use of their personal data.

Your personal data may be automatically collected when you use our services, including but not limited to, your IP address, device-specific information, server logs, device event information, location information and unique application numbers.

Where we store your personal data.

We follow accepted ISO and GDPR standards to store and protect the personal data we collect, including the use of encryption if appropriate.

All information you provide to us is stored on our secured servers within the EEA. From time to time, your information may be transferred to and stored in a country outside the EEA in relation to provision of the services. The laws in these countries may not provide you with the same protection as in the EEA. However, any third party referred to above outside of the EEA has agreed to abide by European levels of data protection in respect of the transfer, processing and storage of any personal data. By providing your data to us, you agree to transfer and storage. However, we will ensure that reasonable steps are taken to protect your data in accordance with this privacy notice.

As the transmission of information via the internet is not completely secure, we cannot guarantee the security of your data transmitted to our site and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

Any sensitive data (payment details for example) are encrypted and protected.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping the password confidential. We ask you not to share a password with anyone.

How we use your information

We use information about you in the following ways:

- To process orders that you have submitted to us
- To provide you with products and services
- To comply with our contractual obligations, we have with you
- To help us identify you and any accounts you hold with us
- To enable us to review, develop and improve our services
- To provide customer care, including responding to your requests if you contact us with a query
- To administer accounts, process payments and keep track of billing and payments

- To detect fraud and to make sure what you have told us is correct
- To carry out marketing and statistical analysis
- To review job applications
- To notify you about changes to our services
- To provide you with information about products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes and
- To inform you of service and price changes

Why does Guest Express Transport Ltd need to collect and store personal data?

In order for us to provide you with a service we need to collect personal data for correspondence purposes and/or certain service provisions. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes Guest Express Transport Ltd would contact you for additional consent.

The personal data that we may collect from you includes your name, address, email address, phone numbers, payment information and IP addresses. We may also keep details of your visits to our site including, but not limited to traffic data, weblogs and other communication data. We also retain records of your queries and correspondence, in the event you contact us.

Commented [A2]: There is advice on the ICO website on marketing - refer to the PECR.

Please be aware that any video, image or other content posted, uploaded or otherwise made available by you onto your website, whether published content or not, is not subject to our Privacy Notice.

We merely process data on your behalf, subject to our Terms and Conditions and you are responsible for any applicable legal requirement in respect to your content.

How will Guest Express Transport Ltd share and use the personal data it collects about me?

Below is a list of all the ways Guest Express Transport uses your personal data and how we share the information with third parties. For clarity, we have grouped them into the specific products and services that we offer. Guest Express Transport provide GDPR compliant services, we also process data for our clients with services of their choosing. The client is responsible for understanding which services they use that may include personal data and ensuring their own legislative compliance:

Applications and Software as a Service

We process your data for administration, billing, support and the provision of services. Your data may be exchanged with your application vendor or software providers. Guest Express Transport only directly host applications with personal data inside the EEA but we may act as a processor for applications and software services that you control. These may include providers outside of the EEA. You should ensure that data assets which include personal data are stored and processed compliantly by the applications and providers you use.

Websites, intranet, Electronic pages, Certificates

WE process your data for administration and the provision of services. Guest Express Transport use a third party to host sites and pages with known personal data inside the EEA but we may act as a processor for sites and hosted pages that you control. These may include providers outside of the EEA. Please ensure that where sites and pages could contain personal data that they are compliantly stored and processed.

Anti-Virus and Security

We process your data for administration, billing, support and the provision of services.

Guest Express Transport only use security platforms in EEA region or with Privacy Shield. Where no access risk to personal data exists non-EEA providers may contribute to security processing.

Management, Monitoring and Reporting

We process your data for administration, billing, and the provision of services. Guest Express Transport only use management platforms in EEA region or with Privacy Shield. Where no access risk to personal data exists non-EEA providers may contribute to our management, monitoring and the provision of reporting tools we use.

Connectivity

We process your data for administration, billing, support and the provision of services. Guest Express Transport only use connectivity providers and platforms in EEA region or with Privacy Shield.

Hardware

We process your data for administration, billing, support and the provision of hardware. Guest Express Transport recommend that all hardware be secured, maintained and monitored in real-time. It should be securely configured at the outset with compliant access controls. However, may act as a processor for hardware that you choose to maintain or use. This may include hardware that is not secured or maintained to reasonable standards of compliance. You should ensure that all data assets which include personal data transits, is stored and is processed compliantly by the hardware you choose to use. Example: Business hardware assets may be deemed as reasonably secured and maintained but the business may choose for users to access data via home or personal (BYOD) mobile devices that are not.

Third Parties

For the avoidance of doubt, we do not and never shall sell your personal data to third parties for marketing or advertising purposes.

We work closely with a number of third parties (including business parties, service providers and fraud protection services) and we may receive information from them about you. These third parties may collect information about you including, but not limited to, your IP address, device-specific information, server logs, device event information, location information, and unique application numbers. We use their features within our website, however in some instances, they may be acting as data controller and they will have their own privacy policies, which we advise you to read.

We may pass your personal data to third parties for the provision of services on your behalf (for example processing your payment) however, we will only ever share information about you that is necessary to provide the service. We have specific contracts in place, which ensure your personal data is secure and will not be used for any marketing purposes.

We may share your information if we are acquired by a third party and therefore your data will be deemed an asset of the business. In these circumstances, we may disclose your personal data to the prospective buyer of our business, subject to both parties entering appropriate confidentiality undertakings. Similarly, we may share your personal data if we are under a duty to disclose data to comply with any legal obligation or to protect the rights, property, or safety of Guest Express Transport, our customers, or others. This includes but is not limited to exchanging information with other companies and organisations for the purposes of fraud protection, credit risk reduction and dispute policies. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

Under what circumstances will Guest Express Transport Ltd contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that the organisation holds about me?

Guest Express Transport Ltd at your request, can confirm what information we hold about you and how it is processed. If Guest Express transport Ltd does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Guest Express Transport or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

Guest Express Transport Ltd accepts the following forms of ID when information on your personal data is requested:

Passports, driving licences, birth certificates, utility bills (from last 3 months) – please contact our Data Protection Officer for further information.

Contact details of the Data Protection Officer / GDPR Owner:

Data Protection Officer contact details	
Contact Name:	Simon Guest
Address line 1:	Unit 2 Colndale Road
Address line 2:	Colnbrook
Address line 3:	Berkshire
Address line 4:	SL3 0HQ
Email:	dataprotection@guestex.com
Telephone:	01784 250016

Document Owner and Approval

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the Company intranet and is published on our website.

Signature:

Date:30/05/2019

Change History Record

Issue	Description of Change	Approval	Date of Issue
1	Initial issue	S.Guest	30/05/2019

