# **BLACKTHORNE**

# **Privacy Notice - Website Users**

This is Blackthorne's Privacy Notice for our website users and details how we protect and process any personal data that is collected during your visit to our site: <u>https://blackthorneit.com/</u>. We'll also tell you about your privacy rights and how data protection legislation protects you.

You can click through to a specific section by clicking the links below.

- 1. PURPOSE OF THIS PRIVACY NOTICE
- 2. THE PERSONAL DATA WE COLLECT ABOUT YOU
- 3. HOW WE USE YOUR PERSONAL DATA AND OUR LAWFUL BASIS FOR DOING SO
- 4. WHO WE SHARE YOUR PERSONAL DATA WITH
- 5. INTERNATIONAL TRANSFERS
- 6. DATA SECURITY
- 7. DATA RETENTION
- 8. YOUR LEGAL RIGHTS
- 9. KEEPING YOUR DATA UP TO DATE
- **10. QUERIES, REQUESTS OR CONCERNS**

#### 1. What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process and protect your personal data through your use of this website, including any data you may provide through this website when you use any of the interactive tools.

This website is not intended for children and we do not knowingly collect data relating to children, nor do we collect any Special Category or criminal record data.

Blackthorne International Transport Ltd is the Data Controller and, as such, is responsible for identifying an appropriate lawful basis for processing your data and establishing practices that will protect your data.

If you navigate to third-party websites via links within our website, we are not responsible for your data once you access these third-party sites; please read the relevant Privacy Notices to see how they process your data.

#### 2. The Personal data we collect about you

We collect the personal data you submit when interacting with certain parts of our website, such as when logging in to specific pages or after submitting the contact/enquiry form.

Any statistical data we collect to monitor traffic on our website does not identify individuals.

#### Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please click the link on the footer of our website to view our Cookie Policy.

# **Blackthorne International Transport Ltd**

Unit 1, Windsor Trade Centre Fairacres Industrial Estate Windsor SL4 4LE, UK

T +44 (0) 1753 687848 E LHR@BlackthorneIT.com

VAT number: GB976827261 Registered in England No. 07006098 Registered Office: Osborne House, 143-145 Stanwell Road, Ashford, Middlesex TW15 3QN All business undertaken according to our Terms & Conditions. Copies available on request.

www.BlackthornelT.com

# 3. How we use your personal data and our lawful basis for doing so

We may use your data to (i) record your details on our electronic systems to enable us to calculate, retrieve and follow up your quote, (ii) facilitate the service/s you request and that constitutes our contract, (iii) manage payment, (iv) collect and recover monies owed to us (v) to manage our relationship with you, (vi) send you details of our goods and services.

Our legal grounds for processing your data in relation to points (i) to (v) above are for performance of a contract with you and in relation to (vi) above, necessary for our legitimate interests to develop our products/services, grow our business and continue our relationship with you.

We will not share your details with third parties for marketing purposes except with your express consent.

# 4. Who we share your personal data with

We may have to share your personal data with (i) service providers who provide IT and system administration support, (ii) professional advisors including lawyers, bankers, auditors and insurers (iii) HMRC and other regulatory authorities (iv) third parties to whom we sell, transfer or merge parts of our business or our assets and/or (v) our approved business partners and agents who are part of our supply chain.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

# 5. International Transfers

Some of our third-party providers within the supply chain are businesses outside the UK in countries which do not always offer the same levels of protection for your personal data. We do our best to ensure a similar degree of security by ensuring that contracts, code of conduct or certifications are in place which give your personal data the same protection it has within the UK. We limit the personal data we share with these third parties to only what is necessary, i.e. your name and company contact details as this is required to fulfil our obligations under the contract we have with you to provide the services you requested.

# 6. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

# 7. Data Retention

We will only keep your personal data for as long as is necessary to fulfil the purposes for which we collected it. We may retain your data to satisfy any legal, accounting or reporting requirements.

You have the right to ask us to delete the personal data we hold about you in certain circumstances. See section 8 below.

#### 8. Your legal rights

You are able to exercise certain rights in relation to your personal data that we process. These are set out in more detail at <a href="https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/individual-rights/">https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/</a>.

In relation to your right to access, you may request that we inform you of the data we hold about you and how we process it. We will not charge a fee for responding to this request unless your request is clearly unfounded, repetitive or excessive, in which case we may charge a reasonable fee or decline to respond.

We will, in most cases, reply within one month of the date of the request unless your request is complex or you have made a

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large number of requests, in which case we will notify you of any delay and will in any event reply within 3 months.

If you wish to exercise you right to access, please email Adrian Creagh, General Manager, on <u>info@blackthorneit.com</u> or write to us at Blackthorne International Transport Ltd, Unit 1 Windsor Trade Centre, Dedworth Road, Windsor SL4 4LE, UK.

### 9. Keeping your data up to date

We have a duty to keep your personal data up to date and accurate so from time to time we may contact you to ask you to confirm that your personal data is still accurate and up to date.

If there are any changes to your personal data (such as a change of contact details) please let us know as soon as possible by contacting us via the addresses detailed at the bottom of section 8 above.

#### 10. Queries, requests or concerns

To exercise all relevant rights, queries or complaints please in the first instance contact our General Manager, Adrian Creagh, in the first instance via <u>info@blackthorneit.com</u>, on +44 (0)1753 687848 or write to us at the address above.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the <u>Information</u> <u>Commissioner's Office</u> on 0303 123 1113, via their website <u>https://ico.org.uk/global/contact-us/</u> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.