

Privacy Policy

About this policy

This policy describes how we may use your personal data when you use our websites www.mcpplc.com & www.mcp

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Who we are and how you can contact us

We are Maritime Cargo Processing PLC, registered company number 01919399. Our registered address is at The Chapel, Maybush Lane, Felixstowe, Suffolk, IP11 7LL.

You can contact us in writing at the address given above or by emailing gdpr@mcpplc.com If you would like to speak to us, please call us on 01394 600200.

Please refer to the sections on <u>Your rights to know what personal data we hold and to control how we use it</u> and <u>How to make a complaint</u> for further contact information.



What personal data we collect about you

We collect:

- **Personal data that you provide to us**. There are several ways in which you may share your personal data with us, for example, you may complete the 'contact us' form on our website, register an account on our website, post on social media sites that we run, or contact us by telephone, email or in person in connection with products or services that you would like to buy, or have already bought, from us. The personal data that you provide to us may include your name, address, e-mail address, phone number, details of the company you work for and your job role and any further details you choose to provide.
- **Personal data that we receive from third parties.** If we work with other businesses or use subcontractors these parties may collect personal data about you which they will share with us. For example, we may have your name and contact details passed to us by a Shipping Line or Terminal Operator, which refers you to us so that we can provide you with our products or services.
- **Personal data about your use of our website.** This is technical information and includes details such as your IP address, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, as well as details of [how you navigated to our website and where you went when you left, what pages or products you viewed or searched for, page response times, download errors, length of visits to certain pages and page interaction information (such as scrolling, clicks, and mouse-overs).

What we use your personal data for

We use your personal data in the following ways:

- Personal data that you provide to us is used to:
 - provide you with the information, products and services that you request from us
 - provide you with marketing information in accordance with your marketing preferences (see <u>How we use your personal data for marketing</u>)
 - manage and administer our business
 - review and improve our products and services
- Personal data that we receive from third parties is combined with the personal data that you
 provide to us and used for the purposes described above.
- Personal data about your use of our websites is used to:
 - administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes
 - to improve our websites to ensure that content is presented in the most effective manner for you and for your computer or mobile device
 - as part of our efforts to keep our sites safe and secure
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you
 - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them

Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our websites and allows us to improve them. For detailed information on the cookies we use and the purposes for which we use them see our <u>Cookie policy</u>.



When we need your consent to use your personal data

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. In the day-to-day running of our business, we may use your personal data without asking for your consent because:

- we are entering into and carrying out our obligations under a contract with you
- we need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our services) and our doing so will not interfere with your privacy rights

In exceptional circumstances, we may wish to use your personal data for a different purpose, which does require your consent. In these circumstances, we will contact you to explain how we wish to use your data and to ask for your consent. You are not required to give consent just because we ask for it. If you do give consent, you can change your mind and withdraw it at a later date.

Please refer to the section on <u>How we use your personal data for marketing</u> to read about marketing consents.

Personal data you are legally obliged to provide

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with your personal data we may be unable to provide our products or services to you.

Your rights to know what personal data we hold and to control how we use it

You have a legal right to know what personal data we hold about you - this is called the right of subject access. You can exercise this right by sending us a written request at any time. Please mark your letter "Subject Access Request" and send it to us by post or email using the details in the Who we are and how you can contact us section.

You also have rights to:

- prevent your personal data being used for marketing purposes (see <u>How we use your personal data</u> for marketing for further details)
- have inaccurate personal data corrected, blocked or erased
- object to decisions being made about you by automated means, or to your personal data being used for profiling purposes
- object to our using your personal data in ways that are likely to cause you damage or distress
- restrict our use of your personal data
- require that we delete your personal data
- require that we provide you, or anyone that you nominate, with a copy of any personal data you have given us in a structured electronic form such as a CSV file

You can find full details of your personal data rights on the Information Commissioner's Office website at $\underline{www.ico.org.uk}$

Automated decision making and profiling

We do not make use of automated decision making or profiling.



When we will share your personal data with others

We share your data with the following people in the day to day running our business:

 any business partners, organisations, suppliers and sub-contractors we work with to provide you with goods or services that you have requested from us

We may also share your personal information with third parties on a one-off basis, for example, if:

- we sell or buy any business or assets (including our own), in which case we will disclose your personal data to the prospective seller or buyer of such business or assets
- we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our website terms of use or our Terms and Conditions of Supply of Consumer Services, and other agreements; or to protect the rights, property, or safety of our customers, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction

How we keep your personal data safe

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- only storing your personal data on our secure servers
- ensuring that our staff receive regular data security awareness training
- keeping paper records to a minimum and ensuring that those we do have are stored in a locked fireproof filing cabinet on our office premises
- maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems
- enforcing a strict policy on the use of mobile devices and out of office working

Please remember that you are responsible for keeping your passwords secure. If we have given you (or you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. Please do not to share your passwords with anyone.

Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data sent to our website; you send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access.

How we use your personal data for marketing

We will add your details to our marketing database if:

- you make an enquiry about our products or services
- you buy our products or services
- you have told a third party that you would like them to pass us your contact details so that we can send you updates about our products and services
- you have registered an account on our website and have indicated during the sign up process that you
 are happy to receive marketing communications

We may send you marketing communications by email, telephone, or post.

You can ask us to only send you marketing communications by particular methods (for example, emails but not telephone calls), about specific subjects (for example Destin8) or you may ask us not to send you any marketing communications at all.



We may ask you to indicate your marketing preferences when you first register for an account with us. You can check and update your current marketing preferences at any time, using the details set out in the <u>Who we are and how you can contact us</u> section above.

We never share your personal data with third parties for marketing purposes.

When we will send your personal data to other countries

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") by us or by our sub-contractors. In the event where we, or our sub-contractors, use IT systems or software that is provided by non-UK companies, your personal data may be stored on the servers of these non-UK companies outside the EEA. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

How long we keep your personal data

We only keep your personal data for as long as we actually need it. In practice, this means that we will keep:

- your name and contact details for 7 years
- a record of the goods and services, (including a copy of your full customer file) we provide to you for 7 years
- complaint records for 7 years

How you can make a complaint

If you are unhappy with the way we have used your personal data, please contact us to discuss this using the contact details set out in the <u>Who we are and how you can contact us section above</u>.

You are also entitled to make a complaint to the Information Commissioner's Office, which you can do by visiting www.ico.org.uk. Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

How we keep this policy up to date

We will review and update this policy from time to time. This may be to reflect a change in the goods or services we offer or to our internal procedures, or it may be to reflect a change in the law.

The easiest way to check for updates is by looking for the latest version of this policy on our website (www.mcpplc.com) or you can contact us (see Who we are and how to contact us) to ask us to send you the latest version of our policy.

Each time we update our policy we will update the policy version number shown at the end of the policy and the date on which that version of the policy came into force.

This is policy version GDPR/PP/01 which came into effect on 25/05/2018.