



PRIVACY POLICY

Contents

1. What does the policy cover?.....	2
2. Policy Statement.....	2
3. Who is covered by the policy?.....	2
4. Definitions	3
5. Data Collection.....	3
6. Data Use.....	4-5
7. Data Disclosure and transfer.....	5
8. Data retention and data breach.....	5
9. Monitoring and Reviewing.....	6



1. What does the policy cover?

- 1.1 Regency Shipping Limited takes the responsibility of data security very seriously, including the personal data we collect during our working practices.
- 1.2 This policy provides a source of information and guidance, defining the personal data Regency Shipping collect, explaining how we use, disclose, transfer and store the data we hold.

2. Policy Statement

- 2.1 Regency Shipping Limited is committed to processing personal data fairly and lawfully in accordance with individuals' rights. We are bound by the laws of the Data Protection Act 1998 and the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679).
- 2.2 Regency Shipping Limited will collect and process personal information in order to provide services including shipping, transport, warehouse storage, specialised packaging and special events, we also use personal data to provide and acquire quotes and respond to enquiries.
- 2.3 Regency Shipping Limited is a Joint Data Controller with partner groups, Ferrari Express Limited, Fairlea Online and Pinehurst Financial Services. Each partner has signed a Joint Data Controller Agreement in accordance with GDPR.
- 2.4 This policy supplements our other policies which are available on request.

3. Who is covered by the policy?

- 3.1 The policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK). The policy also applies to Officers, Trustees, Board, and/or Committee members at any level.
- 3.2 In the context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, potential employees, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.
- 3.3 Any arrangements our company makes with a third party is subject to clear contractual terms.



4. Definitions

- 4.1 **'Personal Data'** relates to a person's private, professional or public life. A non-exhaustive list of personal data includes name, address, email address, I.P. address, phone number, fax number.
- 4.2 **'Sensitive Personal Data'** refers to a person's racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health or details of criminal offences.
- 4.3 **'Biometric Personal Data'** relates to a person's personal data resulting from a specific technical process. A non-exhaustive list could include photographs, photographic ID, CCTV images and recorded telephone conversations.
- 4.4 The **'Data Subject'** is an identified or identifiable natural person, i.e. you.
- 4.5 Regency Shipping Limited are responsible for the control of the data processed and are defined as the **'Data Controller'**
- 4.6 Regency Shipping Limited may provide personal information to third-parties who are known as **'Data Processors'**. Regency Shipping remain responsible for any breach of Data Protection brought about by the Data Processor (e.g. overseas agents).
- 4.7 **'Legitimate Interest'** Regency Shipping may not require explicit consent to process personal data as we have a legitimate interest to fulfil or obtain contracts with our clients, suppliers and employees. Regency Shipping also have a responsibility to the security and protection of our products and services as well as the individuals defined in section 3 of this policy.

5. Data Collection

- 5.1 Regency Shipping will ensure that any personal data is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained (e.g. to fulfil a contract).
- 5.2 In the rare cases where we process sensitive personal data we will require the data subject's explicit consent to do this unless exceptional circumstances apply or where we are required to do this by law (e.g. to comply with legal obligations to ensure health and safety at work). Any consent will clearly identify what the relevant data is, why it is being processed and to whom it will be disclosed.
- 5.3 Consent can be revoked at any time, preferably by email or in writing, although this may mean that Regency Shipping may no longer be able to provide a service or continue to employ an individual.
- 5.4 Individuals have a right to rectify personal data Regency Shipping holds. If it is believed information we hold is inaccurate or the data we hold needs to be updated,



please email the Regency Shipping Limited Administrative Supervisor and General Manager info@rslhr.co.uk

- 5.5 Individuals have a right to access the personal data Regency Shipping holds. If you would like to obtain information about yourself held by Regency Shipping, please send a request to the Administrative Supervisor and General Manager detailing the information or processing activity to which the request relates, quoting DSAR (Data Subject Access Request). We ask that the request is specific to a date/time, clearly detailing a description of the type of data you want to have access to in order for us to acquire the information effectively and within one month of receipt of the request.
- 5.6 Regency Shipping are committed to the security of our services, we therefore request that any request for personal data includes two forms of identification which can include a Passport, Driving Licence, Birth Certificate, utility Bill (from the last 3 months), Current Vehicle Registration form, Bank Statement (from the last 3 months) or rent book (from the last 3 months). In certain instances, we will freely provide information after a full risk assessment.
- 5.7 A Data Subject has the 'Right to Erasure' and may request that the information held on them is deleted in accordance with regulatory procedures. Once erased, we will no longer be able to provide services to the individual, this should not affect the company employing the individual (e.g. we can delete the name, email address and mobile telephone number of someone no longer employed by a client). Please send requests by email with the subject header 'Erasure request' to the Admin Supervisor or General Manager.
- 5.8 Regency Shipping Ltd do not collect, trade, sell or profile personal data for marketing purposes.
- 5.9 Emails sent to Regency Shipping Limited are not encrypted unless both the sender and the receiver have a matching encryption key, therefore we cannot guarantee the confidentiality of the information you provide by email.

6. Data Use

- 6.1 Regency Shipping Limited will use your personal information to provide or acquire services, offer online content (via our website), to offer or acquire quotes and respond to enquiries. We may use biometric data (passport ID) to identify an individual i.e. when collecting or delivering goods to a named person, for security reasons.
- 6.2 Regency Shipping Limited website contains hyperlinks to third-party websites. The third-party websites have their own privacy policies, we recommend you review them to understand how they handle your personal information. Regency Shipping accept no responsibility or liability for the privacy practices of third-party websites and use of them is entirely at your own risk.
- 6.3 BoxTrax users are required at registration to provide a name, address, email address, billing information, and business profile. This information is collected to enable us to provide you quotes and access to our services as well as invoice you for



services when they have been utilised. We will never ask you for your BoxTrax username or password, please be cautious of any request to provide this information claiming to be from Regency Shipping. BoxTrax is an online service, it uses a secure connection process combined with encryption tools to ensure only authorised users may have access.

- 6.4 Our accounts department have strict authorised access to financial data you have provided to fulfil a contract with Regency Shipping. Accounting documents are stored encrypted using DocuWare.
- 6.5 Credit Card information used by Regency Shipping is processed in accordance with the Payment Card Industry Data Security Standard (PCI DSS), to which we are fully compliant.

7. Data Disclosure and transfer

- 7.1 Regency Shipping Limited are committed to the security of the goods we carry and the protection of the individuals handling the goods. The disclosure of personal information is only provided on a 'need to know' basis, including where required to do so by law.
- 7.2 When shipping goods to third countries (outside the EU), Regency Shipping will transmit personal information you provide to local UK Customs and UK Border Force, overseas brokers and the Customs authorities in the third country, the data will be processed in accordance with the laws and regulations of that country.
- 7.3 Regency Shipping will disclose data to third-parties to fulfil business transactions and processing, as a Data Controller Regency Shipping will appoint data processors who can provide sufficient guarantees that the rights of data subjects are protected.
- 7.4 Regency Shipping are proud members of Lognet Global Network and OFN Octopus Freight Network, all members are vetted and approved before membership and adhere to strict mutual agreement to maintain the security of customer bases and confidential business data, including personal data.

8. Data Retention and Breach

- 8.1 Personal data will be held for as long as necessary for the relevant activity or until such time we receive a request to erase the data we hold.
- 8.2 Regency Shipping will ensure all systems, software and equipment exceed acceptable security standards.
- 8.3 Operational data is retained on the grounds of archiving purposes to satisfy Customs regulations and for defence of legal claims for no longer than 7 years.
- 8.4 In cases where data is stored on printed paper, it is kept in a secure place where only authorised personnel have access for no longer than 7 years.
- 8.5 Printed data is shredded after the retention period has ended.
- 8.6 Data stored on a computer is protected by strong passwords which are regularly changed, in certain circumstances data is encrypted.
- 8.7 Cloud based storage is approved by the Managing Director and IT Manager.



- 8.8 Servers containing personal data are kept in a secure location, away from the general office space.
- 8.9 Data is regularly backed up in line with Regency Shipping Limited IT Procedures.
- 8.10 All servers are protected by security software and a strong firewall
- 8.11 Significant breaches of the security of personal data, which incurs high risk to the rights and freedoms of individuals (i.e. could result in identity theft), will be reported to supervising authority within 72 hours of Regency Shipping becoming aware of it. Where feasible the persons affected will be informed within 72 hours of a data breach. A full investigation and remedial action will be taken. Where such notification to a Data Subject cannot be achieved within 72 hours, the reason for the delay will accompany the notification and information may be provided in phases without undue further delay.
- 8.12 ISO 9001 quality management system aids Regency Shipping Limited in continually monitoring and managing quality across all operations. As the world's most widely recognised quality management standard, it ensures ways to achieve, as well as benchmark, consistent performance and service to our clients and suppliers.
- 8.13 Decommissioned computers and hardware are wiped of all data before being shredded on site.

9. Monitoring and reviewing

- 9.1 Regency Shipping Limited's Administrative Supervisor is responsible for monitoring and reviewing the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy and effectiveness.
- 9.3 Any need for improvements will be applied as soon as possible. You are encouraged to offer feedback on this policy and if you have any suggestions for how it may be improved. Feedback of this nature should be addresses to the Administrative Supervisor, General Manager or Managing Director.
- 9.4 This policy does not form part of a contract and Regency Shipping Limited may amend it at any time to improve its effectiveness at handling personal data.
- 9.2 Internal control systems and procedures designed to prevent breaches are subject to regular audits to ensure that they are effective in practice.

