



Hangar 5
North Weald Aerodrome
Merlin Way
North Weald
Essex
CM16 6HR

01279 882 822
kingstransportltd.co.uk

Reg N° 2036062
VAT N° 432 2173 88

PRIVACY NOTICE POLICY

BACKGROUND:

Kings Transport Services Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our Partners and Customers and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

WHAT'S NOT INCLUDED?

This policy does not apply to information about our employees or shareholders. It also doesn't cover other companies or organisations (which advertise our products and services and use cookies, tags and other technology) collecting and using your personal information to offer relevant online advertisements to you. Read our cookie policy for information about how we use cookies on our website <http://www.kingsremovals.co.uk/privacy-cookies-policy.php>

You can link to other organisations' websites, apps, products, services and social media from our websites. This privacy policy doesn't apply to how those other organisations use your personal information.

You should review their privacy policies before giving them your personal information.

1. Information About Us

Kings Transport Services Ltd.

Limited Company registered in England and Wales under company number: 02036062

Registered address: Market House, 10 Market Walk, Saffron Walden, Essex, CB10 1JZ

VAT number: 432 2173 88

Data Protection Officer: Lucy Seagrave

Email address: lucy@kingstransportltd.co.uk

Telephone number: +44 1279 882 822

Postal Address: Hangar 5, North Weald Aerodrome, Merlin Way, North Weald, Essex, CM16 6HR

2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

1. The right to be informed about our or collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
2. The right to access the personal data we hold about you. Part 10 will tell you how to do this.
3. The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
4. The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
5. The right to restrict (i.e. prevent) the processing of your personal data.
6. The right to object to us using your personal data for a particular purpose or purposes.
7. The right to data portability. This means that, if you have provided personal data to us directly, we using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
8. Rights relating to automated decision-making and profiling. we do not use your personal data in this way or Part 6 explains more about how we use your personal data, including automated decision-making and or profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. **What Personal Data Do You Collect?**

We may collect some or all of the following personal data (this may vary according to your relationship with us).

- Name;
- Address;
- Email address;
- Telephone number;
- Business name;
- Job title;
- Profession;
- Payment information;
- Information about your preferences and interests;

Your personal data is obtained from the following third party or parties:

- Contrado
- Haulage Exchange System
- Return Loads System

6. **How Do You Use My Personal Data?**

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data will be used for or may be used for one of the following purposes:



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- Providing and managing your account.
- Supplying our services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our or services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and or post that you have opted-in to (you may unsubscribe or opt-out at any time by sending a letter or email to us).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and or telephone and or post with information, news, and offers on our services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

We use the following automated systems for carrying out certain kinds of decision-making and or profiling. If at any point you wish to query any action that we take on the basis of this or wish to request 'human intervention' (i.e. have someone review the action themselves, rather than relying only on the automated method), the GDPR gives you the right to do so. Please contact us to find out more using the details in Part 11.

- The following automated decision-making method(s) may be used:
 - Electronic invoice system to allow us to price our services on a consistent basis to you.
- The following automated profiling may take place:
 - Electronic invoice system to enable us to keep our prices competitive.

7. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept):

- We keep all invoices up to 7 years for company account reasons
- Personal data will be held until the end of the contract between us plus 7 years. This covers Kings Transport Services in the case of a Claim, and review of Claim history

8. How and Where Do You Store or Transfer My Personal Data?

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

OR

We will only store or transfer your personal data within the European Economic Area (the "EEA"). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

OR

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows.

We share your data within the group of companies of which we are a part. Where this involves the transfer of personal data outside the EEA, our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as "binding corporate rules". More information on binding



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corporate rules is available from the [European Commission](#).

OR

We share your data with external third parties, as detailed below in Part 9, that are based outside of the EEA. The following safeguards are applied to such transfers:

We will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection. More information is available from the [European Commission](#).

OR

We use specific contracts with external third parties that are approved by the European Commission for the transfer of personal data to third countries. These contracts ensure the same levels of personal data protection that would apply under the GDPR. More information is available from the [European Commission](#).

AND/OR

Where we transfer your data to a third party based in the US, this may be protected if they are part of the EU-US Privacy Shield. This requires that third party to provide data protection to standards similar levels of data protection to those in Europe. More information is available from the [European Commission](#).

Please contact us using the details below in Part 11 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

9. Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

OR

We may sometimes contract with the following third parties to supply services to you on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of your personal data that we hold.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR, as explained above in Part 8.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details (what and where any such personal data is held). This is known as a "Subject Access Request".

All Subject Access Requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Letter is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a Subject Access Request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within less than one month and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.



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11. **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, please complete a 'Subject Access request' and send to (for the attention of Lucy Seagrave)

Email address: lucy@kingstransportltd.co.uk

Telephone number: +44 1279 882 822

Postal Address: Hangar 5, North Weald Aerodrome, Merlin Way, North Weald, Essex, CM16 6HR

12. **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Any changes will be made available on our website.



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SUBJECT ACCESS REQUEST LETTER TEMPLATE

[Your full address]

[Phone number]

[Date]

[Name and address of the organisation]

Dear Sir or Madam

Subject Access Request

[Your full name and address and any other details to help identify you and the data you want.]

Please supply the data about me that I am entitled to under data protection law relating to:

[FORS EXAMPLE:

- my personnel file
- emails between 'person A' and 'person B' (from 1 June 2017 to 1 Sept 2017)
- CCTV camera situated at ('location E') on 23 May 2017 between 11am and 5pm
- copies of statements (between 2013 and 2017) held in account number xxxxx.]

If you need any more data from me, or a fee, please let me know as soon as possible. It may be helpful for you to know that data protection law requires you to respond to a request for data within one calendar month.

If you do not normally deal with these requests, please pass this letter to your Data Protection Officer Lucy Seagrave.

Yours faithfully

[Signature]

When to re-submit a request

You can ask an organisation for access more than once. However, it may be able to refuse access if your request is, as the law says, 'manifestly unfounded or excessive'. If you are thinking of resubmitting a request, you should think about whether:

- it is likely that your data has changed since your last request
- enough time has passed for it to be reasonable to request an update on how your data is being used, or
- the organisation has changed its activities or processes recently.

What to do if you disagree with the outcome or remain dissatisfied

If you are unhappy with how the organisation has handled your request, you should first [make a complaint to it](#). Having done so, if you remain dissatisfied you can make a [complaint to the ICO](#). You can also seek to enforce your rights through the courts. If you decide to do this, we strongly advise that you seek independent legal advice first.

What organisations should do

If an organisation reasonably needs more information to help it find your data or identify you, it has to ask you for the information it needs. It can then wait until it has all the necessary information before dealing with your request. When it responds to your request, the organisation should provide you with a copy of your data. It may do this electronically. If you need your data in another format, you must ask if this is possible. You are also entitled to be told the following things:

- What it is using your data for.
- Who it is sharing your data with.
- How long it will store your data, and how it made this decision.
- Information on your rights to challenge the accuracy of your data, to have it deleted, or to object to its use.
- Your right to complain to the ICO.
- Information on where your data came from.
- Whether your data is used for profiling or automated decision making and how it is doing this.
- If it has transferred your data to a third country or an international organisation, what security measures it took..

When can the organisation say no?

An organisation may refuse your subject access request if your data includes information about another individual, except where:

- the other individual has agreed to the disclosure, or
- it is reasonable to provide you with this information without the other individual's consent.

In deciding this, the organisation will have to balance your right to access your data against the other individual's rights regarding their own information. The organisation can also refuse your request if it is 'manifestly unfounded or excessive'. In any case the organisation will need to tell you and justify its decision. It should also let you know about your right to complain to the ICO, or through the courts.

How long should the organisation take and can they charge a fee for this?

An organisation has one month to respond to your request. In certain circumstances it may need extra time to consider your request and can take up to an extra two months. If it is going to do this, it should let you know within one month that it needs more time and why. A copy of your personal data should be provided free. An organisation may charge for additional copies. It can only charge a fee if it thinks the request is 'manifestly unfounded or excessive'. If so, it may ask for a reasonable fee for administrative costs associated with the request.