

CULINA GENERAL PRIVACY NOTICE

1) WELCOME TO THE CULINA GROUP PRIVACY NOTE:

This information has been produced to help you understand everything you need to know about the way Culina Group collects, uses and shares personal data, what your legal rights are and how to exercise them.

We hope that you'll take some time to read this document; we've tried to keep it all as simple as possible and to avoid jargon, and we'll keep you informed if there are any changes to the way we process your personal data in the future.

Culina Group takes its responsibility of protecting your data very seriously and we do advise you get to know your practices – if there's anything here you don't understand or if you want to ask any questions please feel free to contact us (details are at the end).

2) WHO IS THE DATA CONTROLLER?

We are Culina Group Limited, a UK limited company, registered in England at Culina Group Limited, Shrewsbury Road, Market Drayton, Shropshire, TF9 3SQ (05525931).

In this document, Culina Group will sometimes be referred to as **“we”** or **“the Company”**. Culina Group Limited includes the following Group Companies:

- Culina Logistics Limited
- Great Bear Distribution Limited
- Fowler Welch Limited
- Eddie Stobart Limited
- Integrated Packaging Services Limited
- CML (F&L) Telford Limited
- Warrens' Warehousing and Distribution (Midlands) Limited
- Stobart Truckstops Limited
- iForce Limited
- The Pallet Network Limited
- The Logistics People Limited
- Culina Asset Management
- International Road Ferry

Depending on your relationship with us, the relevant Culina Group company may act as the Data Controller of your personal data.

3) WHAT KINDS OF PERSONAL DATA DOES CULINA GROUP PROCESS?

Culina Group collects personal data for specific purposes; with that in mind we have created a list of the types of data that we may collect, either directly from yourself or from other sources in order to achieve those purposes.

The kinds of personal data we may collect are:

- Identification details (name, date of birth)
- Contact details
- Business information
- Financial information
- CCTV images
- Vehicle registration details
- Access control and visitor records
- Correspondence records
- Website usage data
- Marketing preferences
- Due diligence information
- Complaint and investigation records
- In limited circumstances we may process special category personal data where permitted by law such as information relating to health, disability, criminal allegations, fraud prevention investigations and safeguarding concerns.,

4) WHAT ARE THE PURPOSES CULINA GROUP COLLECTS PERSONAL DATA?

Culina Group uses personal data firstly to fulfil any contractual obligations that exist between us and yourself; where we request personal data be provided to enter into, or meet the terms of any such contract, you will be required to provide the relevant personal data or we will not be able to deliver the goods or services you want. In such cases the lawful basis of us processing the personal data is that it is necessary for the performance of a contract.

We are required by law to process personal data for purposes relating to our legal obligations, these include:

- To provide for the organisation's financial commitments, or to relevant financial authorities.
- To comply with regulatory requirements and any self-regulatory schemes.
- To carry out required business operations and due diligence (e.g. administration, reorganisations, security, investment or corporate/asset sales).
- To cooperate with relevant authorities for reporting criminal activity or to detect and

prevent fraud.

- To investigate any insurance claims, claims of unfair dismissal, claims of any kind of harassment or of discrimination or any other claim whereby the organisation may have to defend itself.

We will also process personal data to achieve our various legitimate business interests; these are purposes that have been defined by us where we have balanced the necessity on our part to process the data for each purpose against your own expectations, interests and legal rights.

Our legitimate interests for processing personal data are:

- To provide you with goods and services you are looking for
- To inform you or other goods or services we provide, or offers that may interest you (direct marketing).
- To notify you of any changes to the goods and/or services we provide, or have provided that may affect you.
- To investigate any insurance claims.
- To protect the company's assets.

5) DIRECT MARKETING

Where permitted by law, we may use your personal data to send information about our services, events, business updates or other information which may be of interest to you. You may opt out of receiving marketing communications at any time by using the unsubscribe facility provided within our communications or by contacting us using the details in this notice. If you object to direct marketing, we will stop processing your personal data for those purposes.

6) WHERE DO WE OBTAIN YOUR PERSONAL DATA?

We will collect personal data directly from you in various ways. This could include when you complete an online form or if you provide the data directly to a representative of Culina Group.

We may also obtain personal data from:

- Recruitment agencies
- Customers and suppliers
- Publicly available sources
- Companies House
- Credit reference agencies
- Regulatory bodies
- Fraud prevention agencies
- Government agencies
- Regulatory authorities

- Professional advisers
- Customer representatives
- Other companies within the Culina Group

7) WHO WILL WE SHARE YOUR INFORMATION WITH?

We may share your personal data with the other members of our group of companies, which includes any subsidiary or the holding company (each as defined by the Companies Act 2006) of the Company.

In order to achieve the above stated purposes for which we process your personal data, we may need to share your personal data with some specific third-party organisations.

We shall make all reasonable efforts to ensure that any third party we share your personal data with is also compliant with data protection law.

Culina Group is not responsible for the data protection compliance of any of these third parties, If we sell or reorganise our business, or if otherwise required by law or by an authorised regulator, we may transfer your personal data as part of the general business data to the relevant parties.

We may share personal data with:

- Group companies
- Professional advisers
- Insurers
- Auditors
- IT Service providers
- Payroll providers
- Recruitment providers
- Regulatory bodies
- Law enforcement agencies
- Courts and Tribunals
- Banking and payment providers

8) WHERE IS MY DATA GOING TO BE STORED?

We shall take all reasonable measures to ensure those third parties are also compliant with data protection law.

We may transfer personal data outside the UK. Where we do so, we will ensure appropriate safeguards are in place including:

- UK adequacy regulations
- International Data Transfer Agreements (IDTAs)
- The UK Addendum to EU Standard Contractual Clauses or
- Other lawful transfer mechanisms recognised under UK data protection law.

9) HOW LONG WILL WE KEEP YOUR DATA FOR?

We will keep your personal data only for as long as required in order to achieve the purposes for which it was collected, in line with this privacy notice.

The following criteria apply that determine the period for which we will store your personal data:

- Until we are no longer required to do so in order to comply with any regulatory requirements or financial obligations that we are subject to.
- Until we are no longer required to do so by law it is subject to.
- Until all purposes for which the data was originally gathered have become irrelevant or obsolete.

Further information about retention periods is available within the Culina Group Data Retention Schedule which can be obtained by contacting us.

10) HOW WE PROTECT YOUR INFORMATION

We have implemented appropriate technical and organisational measures designed to protect personal data against accidental loss, unauthorised access, misuse, alteration and disclosure.

11) YOUR RIGHTS, OUR RESPONSIBILITY:

There are several rights granted to you immediately upon providing us with your personal information and some of these are mentioned above.

We would like you to know that the Company takes your rights as a Natural Person seriously and will always conduct ourselves in a way that is considerate of our responsibility to serve your legal rights.

9.1: You have the Right of Access:

This grants you the right to confirm whether or not your personal data is being processed, and to be provided with relevant details of what those processing operations are and what personal data of yours is being processed.

If you would like access to the personal data we have about you, we ask that you contact us by using any of the contact details below.

9.2: The Right to Rectification:

This one is fairly straight forward. If you notice that the data we have about you is inaccurate or incomplete, you may request we rectify the mistake. We will make every effort to respond to requests of this type immediately.

9.3: The Right to Objection:

You have the right to object to the processing of your personal data where we rely on legitimate interests as our lawful basis. You may object on grounds relating to your particular situation. You also have the right to object to the processing of your personal data for direct marketing purposes.

9.4: The Right to Portability:

You may have the right to receive personal data that you have provided to us in a structured, commonly used and machine-readable format and to that information transmitted to another organisation where technically feasible. This right only applies in certain circumstances.

9.5: The Right to Complain:

We will always try to maintain the highest standards and encourage the confidence our customers have in us as an organisation. In order that we can achieve this we do request that any complaints be first brought to our attention so we can properly investigate matters.

If however you would like to complain about the Company to a supervisory authority you may do so by contacting the Information Commissioners Office on 0303 123 1113, or any of the other reporting methods listed on their website <https://ico.org.uk/concerns>.

9.6: Right to Erasure

You may have the right to request that we delete your personal data in certain circumstances.

9.7 Right to Restriction of Processing

You may have the right to request that we temporarily restrict the processing of your personal data.

9.8 Rights Relating to Automated Decision-Making

You have the right not to be subject to a decision based solely on automated processing where that decision produces legal or similarly significant effects. We do not currently carry out solely automated decision-making which produces legal or similarly significant effects. If this position changes, this Privacy Notice will be updated accordingly.

9.9 Right to withdraw consent

Where we rely on your consent to process personal data, you have the right to withdraw that consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before consent was withdrawn.

12) OUR CONTACT DETAILS:

If you wish to contact the Company, please do so using any of the following contact details:

Culina Group Limited

Shrewsbury Road Market Drayton
Shropshire
TF9 3SQ
☎ 01630 695000
@: DataProtection@culina.co.uk

13) WHO IS THE CULINA'S UK DATA PROTECTION OFFICER?

We have appointed Ametros Group as our external Data Protection Officer (DPO). The DPO can be contacted using the details below regarding any questions about this notice or the way in which we process personal data.

Ametros Group Office
Fourth Floor
Broadway House
32-35 Broad Street
Hereford
HR4 9AR
☎ 0330 223 2246

14) UPDATES TO THIS NOTICE

We may update this Privacy Notice from time to time. The latest version will always be available on our website.