

**VERSION 3 – December 2020**



## **PRIVACY STATEMENT FOR CUSTOMERS, PARTNERS AND SUPPLIERS**

Europa Worldwide Group Ltd and all subsidiaries, respect your concerns about privacy. This Privacy Statement describes the types of personal information we collect about our customers and suppliers and how we may use the information and with whom we may share it. The notice also describes the measures we take to safeguard the personal information. In addition, we tell you how you can ask us to:

- access or change the personal information we maintain about you.
- withdraw consent you previously provided to us.
- refrain from sending you certain communications.
- answer any questions you might have about our privacy practices.

### **1. Information we obtain**

We may obtain customer, partner or supplier personal information (such as name, contact details and email address) about various activities such as:

- use of the Europa website and applications.
- shipping activities, including delivery and pick-up of shipments.
- requests to track shipments or answer questions.
- events in which we participate.
- marketing, promotions and other offers.

The types of personal information we may obtain include:

- Individual and business contact information (such as name, company name, physical address, email address and telephone or fax number).
- Shipping information - such as:
  - shipping-related contact details like the shipper's, and consignee's name, physical address, email address and telephone number.
  - signature for proof of delivery.
  - information given to us that helps us access locations to which we provide services and information provided to us regarding the content of certain shipments, but only to the extent an identifiable person can be linked to such content.
- Information that enables us to verify an individual's identity.
- Names, email addresses and telephone numbers of others to whom we are asked to send information.
- Information provided in response to surveys.
- Username, password and other credentials used to access Europa's services.
- Social media handles, content and other data posted on our official social media pages or elsewhere on the Internet (such as other public locations), and information (such as email address and other information you allow to be shared) we obtain through Europa related social media, (including third-party login services such as "Login with Facebook")
- Other personal information that may be provided to us to obtain a Europa service

When we pick up or deliver a shipment or provide other services, we may obtain physical location data. This includes, for example, data identifying the actual location of a physical address using information such as GPS data, geocodes, latitude and longitude information, and images of the various locations.

In addition, when you visit our websites, we may collect certain information by automated means, such as cookies and web beacons. The information we collect in this manner includes IP address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken, and dates and times of activity.

A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. A "web beacon" also known as an Internet tag, pixel tag or clear GIF, links web pages or apps to web servers and may be used to transmit information back to a web server. Through these automated collection methods, we obtain and store "clickstream data to tell us usage patterns. We may link certain data elements we have collected through automated means, such as your browser information, with other information we have obtained about

you to let us know, for example, whether you have opened an email we sent to you. We also may use third-party analytics tools that collect information about visitor traffic on our website. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies.

Please note, however, that without cookies you may not be able to use all the features of our website. Both we and others (such as our advertising networks) may collect personal information about our visitors' online activities, over time and across third-party websites, when using our websites.

The providers of third-party apps, tools, widgets and plug-ins on our website, such as Facebook "Like" button, also may use automated means to collect information regarding your interactions with these features. This information is subject to the privacy policies or notices of these providers.

## **2. How We Use the Information we obtain**

We may use the information we obtain to:

- Pick up, deliver and track shipments.
- Provide products and services you request (such as logistics, supply chain management, customs clearance and brokerage services, and financial services).
- Process and collect payments.
- Provide customer support and respond to and communicate with you about your requests, questions and comments.
- Establish and manage your Europa account.
- Offer you products and services we believe may interest you.
- Communicate about, and administer your participation in, special events, programmes, surveys, contests, prize draws and other offers or promotions.
- Enable you to post on our blogs and interact with Europa through social media.
- Send information to your contacts if you ask us to do so.
- Process claims we receive about our services.
- Operate, evaluate and improve our business (including developing new products and services, managing our communications, determining the effectiveness of our sales, marketing and advertising, analysing and enhancing our products, services, website and performing accounting, auditing, invoicing, reconciliation and collection activities).
- Perform data analyses (including market and consumer search, trend analysis, financial analysis and anonymization of personal information).

- Protect against, identify and prevent fraud and other criminal activity, claims and other liabilities.
- Comply with applicable legal requirements and our policies.

In addition, we use information collected online through cookies, web beacons and other automated means for purposes such as:

- customising our users' visits to our website.
- delivering content (including advertising) tailored to our users' interests and the way our users browse our website.
- managing our business.

We may supplement data we collect through automated means with information about your location (such as your postcode) to provide you with content that may be of interest to you. We also use this information to help diagnose technical and service problems, administer our website, identify users of our websites and gather demographic information about our users.

### **3. Interest-based advertising**

On our website, we may collect information about your online activities for use in providing you with advertising about products and services tailored to your individual interests. This section of our Privacy Statement provides details and explains how to exercise your choices.

You may see certain ads on other websites because we participate in advertising networks. Ad networks allow us to target our messaging to users through demographic, interest-based and contextual means. These networks track your online activities over time by collecting information through automated means, including using cookies, web server logs and web beacons. The networks use this information to show you advertisements that may be tailored to your individual interests.

The information our ad networks may collect includes information about your visits to websites that participate in the relevant advertising networks, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our websites and on third-party websites that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts.

### **4. Information we share**

We do not sell or otherwise share personal information about you, except as described in this Privacy Notice. To perform our pick-up and delivery services, we share shipping information with third parties such as shippers, consignees, third party payers and recipients. We also share personal information with third parties who perform services on our behalf based on our instructions. These third parties are not authorised by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

We also may share the personal information we obtain with our affiliates, franchisees, resellers and joint marketing partners. These entities, which collectively are referred to here as the Europa Worldwide Group Ltd "Business Partners", may use the information for the purposes described in this Privacy Notice. We may share physical location data with our

Europa Business Partners and other third parties to, for example, enhance location-based services and develop accurate and up-to-date maps. In addition, except as described below, unless you object, we may share other personal information with third parties who are not Europa Business Partners for those parties' own purposes, such as to offer products or services that may interest you.

Information collected through third-party apps, tools, widgets and plug-ins (such as information obtained through third-party login services or relating to your use of a Facebook "Like" button) is collected directly by the providers of these features. This information is subject to the privacy policies of the providers of the features, and Europa is not responsible for those providers' information practices.

Many of our customers outsource all or a part of their supply chains to us. Through our forwarding and logistics business units, we manage these supply chains, focusing on supply chain optimisation, freight forwarding and international trade and brokerage services for our customers worldwide (including a broad range of transportation solutions such as air, ocean and ground freight).

We also provide information technology systems and distribution facilities adapted to the unique supply chains of specific industries such as health care, technology and consumer/retail businesses. During providing forwarding and logistics services, we may obtain, use and disclose personal information about our customers' customers. In these circumstances, we process the information based on the agreement with our customer.

We also may disclose information about you:

- if we are required to do so by law, regulation or legal process (such as a court order or subpoena).
- in response to requests by government agencies, such as law enforcement authorities.
- when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or about an investigation of suspected or actual illegal activity. We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganisation, dissolution or liquidation).

## **5. Your Options**

We offer you certain choices about how we communicate with you and what information we collect from you. You may choose not to receive marketing email communications, by contacting us as specified in the "How to Contact Us" section below, and we will honour your request. Consistent with the choices available in the "Information We Share" section, you may withdraw your consent or object to certain information sharing by contacting us as indicated below.

In addition, as required by law, you may object at any time on legitimate grounds and free of charge to the processing of your personal information, and we will apply your preferences going forward.

## **6. Access and Correction**

Subject to applicable law:

- you may obtain a copy of certain personal information we maintain about you or update or correct inaccuracies in that information through contacting Europa.
- you may have the right to obtain access to personal information we maintain about you by contacting us as indicated in the "How to Contact Us" section of this Privacy Notice. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that personal information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated below.

## **7. Non-Europa Places and Services**

For your convenience and information our website may contain links to non-Europa places that may be operated by companies not affiliated with Europa. These companies may have their own privacy policies or notices, which we strongly suggest you review. Our services also may be made available to you through third-party platforms (such as providers of app stores) or through other third-party channels. We are not responsible for the privacy practices of any non-Europa places or services.

## **8. Data Transfers**

We may transfer the personal information we collect about you to countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information.

When we transfer your information to other countries, we will protect that information as described in this Privacy Notice and in accordance with applicable law. We use contractual protections for the transfer of personal information among various jurisdictions (including, for example, the European Commission's standard contractual clauses).

## **9. How We Protect Personal Information**

We maintain administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use.

Although we take steps to limit access to our facilities and vehicles to authorised individuals, information that is located on the outside of a package or letter may be visible to others.

## **10. Europa Contact Centre**

In addition to all the above, Europa Worldwide Group Ltd operates a Contact Centre based in Ashford Kent, which processes customer data on behalf of several customers. The purpose is dependent upon each customer's requirements, but in the main is processed to place customer orders, process customer service requirements, process payments and process memberships.

In all cases the Contact Centre acts purely as the third-party data processor and are not data controllers when working with its customers. All data held belongs to the Customers.

A schedule of processing activity is attached at Appendix I.

## **11. Updates to Our Privacy Notice**

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a prominent notice on our website to notify you of any significant changes to our Privacy Notice and indicate at the top of the notice when it was most recently updated.

## **12. How to Contact Us**

If you have any questions or comments about this Privacy Statement, or if you would like us to update information we have about you or your preferences, please contact Europa's Data Protection Officer (Ian Kirkpatrick – Central Services Director) by e-mail in the first instant at:

[ian.kirkpatrick@europa-worldwide.com](mailto:ian.kirkpatrick@europa-worldwide.com)

You also may write to us at:

Europa Worldwide Group Ltd  
Attention: Data Protection Officer  
Shield Road  
Dartford  
Kent  
DA1 5UR

## SCHEDULE OF PROCESSING – EUROPA CONTACT CENTRE

### General Summary of Contact Centre Activity

Please note that in all cases the contact centre act purely as the 3<sup>rd</sup> Party Data Processor and are not data controllers when working with our clients. All data held belongs to our clients.

<b>Nature &amp; Purpose of Processing</b>	The contact centre processes customer data on behalf of a number clients. The purpose is dependent upon each client's requirements but in the main data is processed to place customer orders, process customer service enquiries, process payments and process memberships.
<b>Categories of Data Subjects</b>	Consumers and Members of Associations
<b>Types of Personal Data</b>	<ul style="list-style-type: none"> <li>• Name, email address, telephone numbers, home and delivery postal addresses, customer account numbers, membership numbers.</li> <li>• Products ordered, and donations given.</li> <li>• Sensitive data processed.</li> <li>• Qualifications.</li> <li>• Credit card/bank details (details are not stored on the system)</li> </ul>
<b>Duration of Processing</b>	For the term outlined in our client contracts
<b>How data will be transferred</b>	All data transferred is via SFTP
<b>How data will be stored and for how long</b>	<ul style="list-style-type: none"> <li>• Hard copy data (postal responses) are stored in a secure storage area or returned to our clients dependent upon what is agreed in the contract.</li> <li>• Call data – call recordings are stored for a period of 90 days or less if directed by the client.</li> <li>• System data – for some clients we process data on to their systems, but the retention and storage is managed by them. Data</li> </ul>

	<p>stored in our systems (Apollo – Menzies controlled) is retained in line with the customer requirements agreed in contracts.</p> <ul style="list-style-type: none"> <li>• Menzies IT data security requirements in Apollo, have been confirmed by Europa IT.</li> </ul>
<b>How data will be destroyed</b>	<ul style="list-style-type: none"> <li>• Hard copy data is securely destroyed.</li> <li>• Call Recordings are managed by Genesys</li> <li>• Data stored in Apollo – Please refer to Chris Mitchell – Head of IT</li> </ul>
<b>Sub Processors</b>	<p>We do not outsource services, but data can be accessed by Menzies as they provide Apollo.</p>