

## **PRIVACY AND COOKIES POLICY**

Ultra Gold Field Logistics Limited is committed to protecting and respecting your privacy. This Privacy and Cookies Policy (“**Policy**”) (together with and any other documents referred to therein) sets out the basis on which the personal data collected from you, or that you provide to us will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

For the purpose of the General Data Protection Regulation (“**GDPR**”) and the Data Protection Act 2018 (collectively the “**Data Protection Laws**”), the Data Controller is Ultra Gold Field Logistics Limited.

## **YOUR PERSONAL INFORMATION**

Information we collect from you

We collect and process some or all of the following types of information from you in the course of providing our services, in particular your use of the online app and services located at Ultra Gold Field Logistics.com (including subdomains), via the “Ultra Gold Field Logistics” app and website

### **Customers**

- Information that you provide when registering to use the Ultra Gold Field Logistics app and website as a customer (and any subsequent updates to that information):
  - Login details – either directly or through a social media account (Facebook, LinkedIn, Google), in which case we see your email address, full name and which social media site you are using
  - Full name
  - Email address
  - Telephone number(s)
  - Profile photo
  - Whether your account is for business or personal use
  - Home/business address
  - Company name and billing address
  - Industry sector
  - Relevant addresses and contacts
  - Payment card details (card type, last 4 digits, expiry date and a “token” to link our records with our payment provider’s)

- Any other information you include in your customer profile
- Information that you provide in the course of communications with us, or with a Courier via the Ultra Gold Field Logistics app and website. This includes:
  - Details provided as part of the booking process (e.g. location, collection and delivery addresses, contact names)
  - Information you provide when requesting further details of our products and services
  - Information you provide when requesting help in using the Ultra Gold Field Logistics mobile app
- We will keep records of all bookings and payments made via the Ultra Gold Field Logistics App and services.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.

We process information relating to a booking or potential booking between you (the Customer) and the Courier as set out in clause 6 of the **Customer Usage Terms** as a data process on your behalf as the data controller. This includes collection and delivery addresses.

Unless you register using a social media account, the provision of your full name and email address is required from you to enable us to register you as a Customer. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

### **Couriers**

- Login details
- Full name
- Email address
- Telephone number(s)
- Home address
- Copy of driver's licence
- MOT documentation
- Insurance documentation

- Photograph
- Photo of the ID or Passport
- VAT Certificate (if applicable)
- Company name and address
- Information about items you are happy to deliver (e.g. alcohol, pork, beef) which may suggest your religion, although we do not store your religious beliefs expressly
- List of jobs accepted/delivered
- Various location-based and time-based events related to the deliveries

Location-based and time-based events related to the deliveries will be collected automatically from your device, which is necessary as part of providing services to Customers. Other than where the app collects information automatically, we will inform you at the point of collecting information from you, whether you are required to provide the information to us.

#### Information we collect from other sources

We collect names and email addresses of contacts at potential Customers for the purpose of marketing and business development. This information may be found in a number of ways, including using online searches, LinkedIn profiles and word of mouth.

If you are a Courier or are registering to become a Courier, we may obtain:

- personal information about you from background checks, for example criminal records checks,
- information about your insurance, if you provide us with your Zego ID.

Contains public sector information licensed under the Open Government Licence v3.0.

### **USES MADE OF YOUR INFORMATION**

#### **Lawful basis for processing**

We rely on legitimate interest as the lawful basis on which we collect and use your personal data. Our legitimate interests are performance of contracts with Customers, Couriers and our suppliers, marketing and business development and the administration and improvement of the Ultra Gold Field Logistics mobile app and services.

#### **Purposes of processing**

We use information held about you in the following ways:

- To provide you or the organisation that you are engaged by with our services.
- To carry out our obligations arising from any contracts entered into between you and us. This includes:

- Where you are a Customer, to provide Couriers you have booked with the information needed for them to carry out their services.
- Where you are a Courier, to provide Customers who have booked you with the information they need in order to receive your services.
- To provide you with information and offers that you request from us or which we feel may interest you.
- To notify you about changes to our services.
- To ensure that content on the Ultra Gold Field Logistics mobile app and services is presented in the most effective manner for you and for the device(s) you use to access and view the Ultra Gold Field Logistics app and services

## **Marketing**

Our sales team may use personal data to provide potential Customers with information about our services. We use legitimate interests as our lawful basis for collecting and using such personal data. Our legitimate interests are marketing and business development. Individuals have the right to object to our processing of their personal data for marketing purposes.

In addition to the above uses we may use Customer information, to notify you about goods or services which may be of interest to you. Where we do this, we use consent as our lawful basis for processing. This means we will contact you by electronic means (e-mail or SMS) only if you have opted in to receiving such communication.

You can opt out of receiving marketing communications at any time.

If you do not want us to use your data in this way please either:

1. tick the relevant box situated on the form on which we collect your data (for example, the registration form); or
2. unsubscribe from our electronic communications using the method indicated in the relevant communication; or
3. inform us at any time by contacting us at the contact details set out below.

## **DISCLOSURE OF YOUR INFORMATION**

We routinely pass Customer information to Couriers they have booked (as set out in clause 6 of the **Customer Usage Terms**), and Courier information to the Customers who have booked (or are considering booking) their services.

We may pass your information to our third party service providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (e.g. to host our servers, to send out newsletters or surveys on our behalf).

We may also disclose your personal data to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; or
- if we or substantially all of our assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; or
- if 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 Terms and Conditions and other agreements; or
- to protect our rights, property, or safety or that of our affiliated entities and our users and any third party we interact with to provide the Ultra Gold Field Logistics App and services; or
- in relation to selected third parties only, only to the extent that you have consented to such selected third parties notifying you about certain goods or services, which may be of interest to you.

Other than as set out above, and save insofar as is necessary in order for us to carry out our obligations arising from any contracts entered into between us and you, we will not share your data with third parties unless we have procured your express consent to do so.

## **STORING YOUR PERSONAL DATA**

### **Security**

We take appropriate measures to ensure that any personal data are kept secure, including security measures to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of 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 your data transmitted to the Ultra Gold Field Logistics App and services; any transmission is at your own risk. Please make sure your browser indicates “Secure connection”. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

The Ultra Gold Field Logistics App and website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms of

use and that we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any personal data to these websites.

### **Keeping your personal data up to date**

If your personal details change you may update them via the Ultra Gold Field Logistics App or by contacting us using the contact details below.

We will endeavour to update your personal data within seven (7) working days of any new or updated personal data being provided to us, in order to ensure that the personal data we hold about you is as accurate and up to date as possible.

### **How long we keep your personal data**

We will hold the data set out above for a reasonable time having regard to the nature of the personal data and the purpose for which it was collected. In particular:

- Where we hold your personal data in connection with the performance of a contract with one of our customers or suppliers, we will hold your data, and in particular any communications between you and us in relation to the negotiation or performance of the contract by either party for so long as that contract is in force and for a period of at least 7 years after;
- Where we hold your data in connection with the marketing or promotion of our business, we will hold your data for up to 2 years, or for up to 2 years after you last communicated with us, if later.
- In respect of website usage data, we hold your data for 5 years from the date of collection.

### **Where we store your personal data**

All information we hold about you is stored on Google Cloud Platform servers in the UK and/or the European Economic Area.

We may transfer your personal data to, and store it at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your orders, the processing of your payment details and the provision of support services.

Where the United Kingdom and/or the European Commission has not given a formal decision that any country your personal data may be transferred to or stored in provides an adequate level of data protection similar to those which apply in the United Kingdom and EEA, any transfer of your personal data will be subject to a United Kingdom and/or European Commission approved contract designed to help safeguard your privacy rights and give you remedies in the unlikely event of a misuse of your personal data. To obtain a copy of such safeguards or if you would like further information please contact us (see 'Contact' below).

### **YOUR RIGHTS**

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include rights to:

- access to your personal data and to certain other supplementary information that this Policy is already designed to address
- require us to correct any mistakes in your information which we hold
- require the erasure of personal data concerning you in certain situations
- receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations
- object at any time to processing of personal data concerning you for direct marketing
- object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- object in certain other situations to our continued processing of your personal data
- otherwise restrict our processing of your personal data in certain circumstances
- claim compensation for damages caused by our breach of any data protection laws.

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email us (if you prefer to call or write to us, we will need you to follow up by email in order to identify you),
- let us have enough information to identify you (e.g. your email and/or customer id / courier id)
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates, including any account or reference numbers, if you have them.

## **HOW TO COMPLAIN**

We hope that we can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws

occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

## **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to modify this Policy at any time. Any changes we may make to our Policy in the future will be notified and made available to you using the Website. Your continued use of the services and the Website shall be deemed your acceptance of the varied privacy policy.

## **INFORMATION ABOUT OUR USE OF COOKIES AND SIMILAR TECHNOLOGIES**

We may collect information about your mobile phone, computer or other device from which you access the Ultra Gold Field Logistics App and services including where available your IP address, operating system and browser type, for systems administration, to improve our services and applications and to report aggregate information to third party affiliates. This is statistical data about our users' browsing actions and patterns and does not identify any individual. We may, however, use such information in conjunction with the data we have about you in order to track your usage of our services.

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 website and also allows us to improve the Website. By using our website, you agree to our use of cookies as more specifically set out below.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. Cookies do not apply in our downloadable app, but we use similar technologies to achieve the same aim.

The cookies we use include:

- **“Analytical”** cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the Website when they are using it. This helps us to improve the way our Website works, for example, by ensuring that users are finding what they are looking for easily.
- **“Strictly necessary”** cookies. These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website, use a shopping cart or make use of e-billing services.
- **“Functionality”** cookies. These are used to recognise you when you return to our Website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **“Targeting”** cookies. These cookies record your visit to our Website, the pages you have visited and the links you have followed to our affiliates' websites. We will use this information to make our Website, or location or to track effectiveness of our marketing campaigns in the search engines or the external websites. We may also share this information with third parties for this purpose.



Please note that third parties affiliates may also use cookies, over which we have no control.

Cookies which are strictly necessary for the core functionality of the website are enabled by default and set automatically at the point you access the website.

Any cookies which are not strictly necessary for the functioning of the website will not be set unless you expressly consent to them through the cookie banner by clicking “accept”.

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Website.

## **CONTACT**

All questions, comments and requests regarding this Privacy and Cookies Policy should be addressed to [info@ultragoldfieldlogistics.co.uk](mailto:info@ultragoldfieldlogistics.co.uk)