**PUBLIC**

**TELS Global UK Limited**

**External Privacy Notice**

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**TELS Global UK Limited**

**External Privacy Notice**

Last Updated: 07/08/2024

# Who we are and what we do

## **Who we are**

We are TELS Global UK Limited (“TELS Global UK”, “us”, “we”, “our”). We are a limited company registered in England and Wales under registration number 04303303 and we have our registered office at Prospect House Suite 22, 2 Athenaeum Road, Whetstone, London, England, N20 9AE. We are registered with the UK supervisory authority, Information Commissioner’s Office (“ICO”) in relation to our processing of Personal Data under registration number ZB426220.

## **What we do**

TELS Global UK are an international logistics provider, offering comprehensive services in transportation and logistics by all modes of transport. We and our related entities are committed to protecting the privacy and security of the Personal Data we process about you.

Our related entities are as follows:

|  |  |
| --- | --- |
| TELS Global CZ spol. s r.o. | Pekařská 621/7, 155 00 Praha 5, Jinonice, Česká republika  e-mail: [tels@telsglobal.cz](mailto:tels@telsglobal.cz)  Tel: +420 226 259 799; Fax: +420 235 311 311  Společnost zapsaná v OR Městského soudu v Praze pod sp. zn. C 358646 IČ: 14001187, DIČ: CZ14001187  Zmocněnec - Liudmila Subbotsina |
| TELS Polska Sp. z o. o. | 03-717, Warszawa, Polska, ul. Kłopotowskiego, 22  e-mail: [tels-pl@telsglobal.pl](mailto:tels-pl@telsglobal.pl)  Tel: + 48 22 517 90 00; Fax: + 48 22 517 90 10  Sąd Rejonowy dla m. st. Warszawy XIII Wydział Gospodarczy KRS Nr KRS: 0000262036 Kapitał zakładowy 50.000 PLN  NIP 1132624028, REGON 140617479  PREZES ZARZĄDU  GRZEGORZ  WOLIK |
| TELS Ukraine LLC | 04112, Ukraine, Kiyv, Rizka Street, building 8А, office 403  e-mail: [tels-ua@telsglobal.com.ua](mailto:tels-ua@telsglobal.com.ua)  Теl.: + 380 44 454 72 31  Fax: + 380 44 454 72 30  TIN 356251926592  Director Mamonov Andriy Vasiliovich |

## **Controller**

Unless we notify you otherwise, we are the controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it.

# Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘How to contact us’ section.

# Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our website.
2. You purchase logistics services from us.
3. You enquire about our logistics services.
4. You contact us via our website contact form or by social media.
5. You sign up to receive newsletters and/or other promotional communications from us.

# What Personal Data is

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.

# Personal Data we collect

The type of Personal Data we collect about you will depend on our relationship with you. For the type of Personal Data we collect see the table below in the section entitled ‘Purposes and lawful bases’.

# How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email and/or via our website. However, we may also collect your Personal Data from third parties such as:

* others to whom you have provided consent.
* publicly available sources such as social media platforms and transport platforms for carriers and freight forwarders, where we have a license to access it.

# Purposes, lawful bases and retention periods

# We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

|  |  |  |  |
| --- | --- | --- | --- |
| **Categories of individuals** | **Categories of Personal Data** | **Purpose of Processing** | **Lawful Basis** |
| **Clients** | **Name, work email, work telephone number, work address/ site address, business card, job title, payment information, interaction record** | **To provide you with our service as per the terms of our contract and to respond to any queries or complaints** | **Contract and legitimate interests** |
| **Prospective clients** | **Name, work email, work telephone number, work address/ site address, business card, job title, interaction record** | **It is in our legitimate interests to promote our service, to grow our business and to respond to any queries or complaints** | **Legitimate interests** |
| **Contractors and suppliers** | **Name, work address, work email address, payment information, work telephone number** | **To pay you for services/ goods rendered as per the terms of our contract** | **Contract** |
| **Drivers** | **Full name, telephone number, passport/ identification information, vehicle registration number** | **It is in our legitimate interests to enable warehouses to validate the identity of drivers in order to protect the goods being transported** | **Legitimate interests** |
| **Drivers** | **Location data via GPS** | **It is in our legitimate interests to ensure the services we provide to clients are being provided as per the terms of our contract with them** | **Legitimate interests** |
| **Visitors of the website and/or of our social media pages** | **Name, email address, nature of enquiry** | **It is in our legitimate interests to process this data in order to answer any queries and respond to prospective clients** | **Legitimate interests** |

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

# 8. How long we keep your data

We will retain your personal data for as long as is necessary to provide you with our services and for a reasonable period thereafter to enable us to meet our contractual and legal obligations and to deal with complaints and claims.  At the end of the retention period, your personal data will be securely deleted or anonymised.

# 9. Sharing your Personal Data

We may share your Personal Data with carefully selected third parties, including:

1. TELS related entities within the EU and third countries to provide our service and for regulatory and reporting purposes.
2. Warehouses we work with to validate the identity of drivers to as it is in our legitimate interests to ensure the correct goods are being delivered and are protected.
3. Public authorities to comply with legal obligations such as tax authorities, the police and customs control authorities.
4. Lawyers and debt collection agencies to protect the legitimate interests of TELS Global, should a dispute arise.
5. Hosting providers and suppliers of SaaS (software as a service) solutions to assist us in the provision of our service and to improve your experience when visiting our website.

Where we share your personal data with any of the above, this will be done in accordance with our obligations as a data controller under the UK GDPR & EU GDPR.

# 10. International Transfers

Your Personal Data may be processed outside of the UK. This is because the organisations we use to provide our service to you are based outside the UK. In addition, we may work with businesses outside of the UK to handle marketing activities on our behalf.

We have taken appropriate steps to ensure that the Personal Data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

* Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation), or
* We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here [international-data-transfer-agreement.pdf (ico.org.uk)](https://ico.org.uk/media/for-organisations/documents/4019538/international-data-transfer-agreement.pdf)).

# 11. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including to:

* **Right to be informed**

You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.

* **Right of access** (commonly known as a “Subject Access Request”)

You havethe right to receive a copy of the Personal Data we hold about you.

* **Right to rectification**

You have the right to have any incomplete or inaccurate information we hold about you corrected.

* **Right to erasure** (commonly known as the right to be forgotten)

You have the right to ask us to delete your Personal Data.

* **Right to object to processing**

You have the right to object to us processingyour Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.

* **Right to restrict processing**

You have the right torestrict our use of your Personal Data.

* **Right to portability**

You have the right to ask us to transferyour Personal Data to another party.

* **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
* **Right to withdraw consent**

If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

* **Right to lodge a complaint**

You have the right to lodge a complaint with the relevant supervisory authority, if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commissioner’s Office who can be contacted online at:

[Contact us | ICO](https://ico.org.uk/global/contact-us/)

Or by telephone on 0303 123 1113

If you are a client, contractor or supplier of our related entities based in the EU, you can find the contact information for your countries’ supervisory authority here: [Our Members | European Data Protection Board (europa.eu)](https://www.edpb.europa.eu/about-edpb/about-edpb/members_en#member-pt).

**How to exercise your rights**

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called ‘How to contact us and our Data Protection Officer’. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

# 12. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact us as follows:

Prospect House Suite 22,

2 Athenaeum Road,

Whetstone,

London,

England,

N290 9AE.

[tels-uk@telsglobal.com](mailto:tels-uk@telsglobal.com)

[+44 20 83 43 9650](tel:+442083439650)

We have also appointed a Data protection Officer (“DPO”). Our DPO is Evalian Limited and can be contacted as follows:

West Lodge, Leylands Farm

1 Nobs Crook

Colden Common

Winchester

Hampshire

SO21 1TH.

[dpo@evalian.co.uk](mailto:dpo@evalian.co.uk)

03330500111

Please mark your communications FAO the ‘Data Protection Officer’.

# 13. Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified 07/08/2024.

You can find previous versions of this notice here [Privacy policy | TELS GLOBAL](https://telsglobal.com/privacy-policy/).