



PRIVACY POLICY

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1. What does the policy cover?

- 1.1 Karl King Transport Ltd take the security of data stored within our company very seriously, both that of our employees and any customers/clients we deal with and we accept sole responsibility of data security within our company.
- 1.2 The purpose of this policy is to provide a clear source of information and guidance regarding data processing and the security of sensitive data within the company. The policy will explain how we use, disclose, transfer and store the data we hold under the new General Data Protection Regulation (GDPR) that replaces the Data Protection Act as of the 25th May 2018.

2. Policy Statement

- 2.1 Karl King Transport Ltd is committed to processing data fairly and lawfully in accordance with the rights of individuals. Such processing will principally be for personnel, including sickness and ill health monitoring, administrative and payroll purposes. We are bound by the law of the General Data Protection Regulation (GDPR) 2018/679. (Previously the Data Protection Act of 1998.) Individuals have the right to make a formal complaint to the ICO on 0303 123 1113 if they believe, at any time, we are not abiding by this law correctly.
- 2.2 Karl King Transport Ltd will only collect and process your personal information in order to a) be able to provide you with the service you require; these services include, but are not limited to, transport and warehouse storage, or b) provide potential customers with quotes or answers to queries. This policy works in conjunction with our employee terms and conditions and our employee handbook and we recommend employees read these together.

3. Who is covered by the policy?

- 3.1 This policy applies to all temporary, fixed-term and permanent full-time and part-time employees, consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where in the world they are located, and officers, trustees, board and/or committee members at any level.
- 3.2 Within this policy, the term “third party” refers to any individual or organisation our company meets and works with; it refers to actual and potential clients, customers, suppliers, distributors, business contacts, potential employees, agent’s advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians and public parties. Any arrangement our company makes with a third party is subject to clear contractual terms.

4. Definitions

- 4.1 **‘Personal Data.’** According to the law, personal data means any information relating to an identified or identifiable natural individual; an identifiable natural individual is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, cultural or social identity of that natural person;
- 4.2 **‘Sensitive Personal Data.’** This is separate to the above definition as sensitive personal data relates to information concerning a data subject’s racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences;
- 4.3 **‘Biometric Personal Data.’** This relates to an individual’s personal data resulting from a specific technical process; this includes, but is not limited to, photographs, photographic identification, CCTV images and recorded telephone conversations;
- 4.4 **‘Data Subject.’** The data subject is an identified or identifiable natural, living individual to whom personal data relates. i.e. you;
- 4.5 **‘Data Controller.’** The data controller is a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed. i.e. Karl King Transport Ltd;
- 4.6 **‘Data Processors.’** The data processor is any person (other than an employee of the data controller) who processes data on behalf of the data controller. i.e. any third-parties Karl King Transport Ltd has provided personal information to. Please note, Karl King Transport Ltd remains responsible for any breach of GDPR brought about by the data processor;
- 4.7 **‘Legitimate Interest.’** A legitimate interest is one of the six lawful bases for processing personal data. We must have a lawful basis in order to process personal data in line with the ‘lawfulness, fairness and transparency’ principle of the GDPR.

5. Data Collection

- 5.1 Karl King Transport Ltd will frequently ensure that any personal data we are storing is accurate, adequate, relevant and not excessive, given the purpose for which it was obtained.
- 5.2 In the rare event that Karl King Transport Ltd is required to process sensitive personal data, we will request the data subject's explicit consent to do so. The only time we would not ask for their consent would be where exceptional circumstances apply or where we are required not to do so by law. Any consent we request will clearly identify what the relevant data is, why it is being processed and to whom it will be disclosed. Consent will be obtained in the format of a consent form where the data subject specifically has to opt in to agree to the terms.
- 5.3 Consent, of any kind, can be revoked at any time both during or after employment. Karl King Transport Ltd asks that if you wish to revoke your consent, please do so in writing or by email addressed to the General Manager – michael.sitch@karl-king.co.uk. Please note that once this request has been processed Karl King Transport Ltd may no longer be able to provide a service or continue to employ an individual.
- 5.4 Individuals have a right to rectify personal data that Karl King Transport Ltd holds about them; if any information we hold about you is inaccurate or needs to be updated, please also email the General Manager regarding this (email as above.)
- 5.5 Individuals have a right to access the personal data Karl King Transport Ltd holds about them. If you would like to request to obtain your personnel file in Karl King Transport Ltd.'s system, please send a request to the General Manager (email as above) that is specific to a date/time, explains the information/processing activity to which the request relates and clearly describes the type of data you want to have access to in order for us to acquire the information effectively and within one month of the request date.
- 5.6 Karl King Transport Ltd are solely responsible for the security of our services and are committed to minimising breaches of this security; for these reasons, we request that any request for personal data must include two forms of identification from the data subject. Acceptable forms of ID in this instance include a Passport, Driving Licence, Birth Certificate or utility bill within the last 3 months.
- 5.7 A Data Subject has the 'Right to Erasure' which means they have the right to request that the information held about them is deleted in accordance with regulatory procedures. Once erased, we will no longer be able to provide services to the individual. Please send requests by email to the General Manager (email as above.)
- 5.8 Karl King Transport Ltd do not collect, trade, sell or profile personal data for marketing purposes.

6. Data Use

- 6.1 Karl King Transport Ltd will use your personal data to provide or acquire services, to offer or acquire quotes and respond to enquiries. We may also use biometric data, i.e. your passport or driving licence to identify an individual when collecting delivering goods/when employing an individual/when checking a licence.
- 6.2 The Karl King Transport Ltd website contains a hyperlink to a third-party website; this company has their own privacy policy and we recommend you review it if you wish to understand how they handle your personal information. We accept no responsibility or liability for the privacy properties of third-party websites and emphasise that your use of this website will be entirely at your own risk.
- 6.3 The Karl King Transport Ltd accounts department have strict authorised access to financial data you have provided to fulfil a contract with us. Accounting documents have restricted access on our computer systems and all members of our accounts department have signed a non-disclosure agreement stating they agree to keep this information confidential and acknowledge that any breach of the non-disclosure agreement shall be subject to the company's disciplinary procedure.

7. Data Disclosure and Transfer

- 7.1 Karl King Transport Ltd are fully committed to both the security of the goods we carry and the protection of those handling them; data is only ever disclosed on a 'need to know' basis and where required to do so by law, minimising the risk of data breaches within our company.
- 7.2 Karl King Transport Ltd occasionally ships goods to countries outside of the EU; when this happens, we will transmit your personal information to local UK Customs and UK Border Force, overseas brokers and the Customs authorities in the country. The data will then be processed in accordance with the laws and regulations of that country, meaning we accept no responsibility for any breaches that occur on their behalf.
- 7.3 Karl King Transport Ltd will disclose data to third-parties to fulfil business transactions and processing, as a Data Controller we will only ever appoint data processors who can guarantee that the rights of data subjects are protected at all times.

8. Data Retention and Breach

- 8.1 Personal data will be stored in our secure database for as long as deemed necessary for the relevant activity or until we receive a request to erase the data we hold.
- 8.2 Karl King Transport Ltd will regularly ensure that all our systems, software and equipment meet the acceptable security standards at a minimum and will aim to exceed these standards where we can.
- 8.3 Operational Data is retained on the grounds of archiving purposes to satisfy Customs regulations and for defence of legal claims for no longer than 7 years in accordance with GDPR.
- 8.4 In cases where data is stored on printed paper, it is kept in secure filing cabinets in offices that are locked overnight. Only authorised personnel will have access to such data and it will be retained for a period of no longer than 7 years, after which we dispose of securely in sealed bags to be shredded.
- 8.5 All data stored on our computer systems is protected by strong passwords which must be changed monthly to minimise the risk of data breaches within our company.
- 8.6 Servers containing personal data are kept in a secure location away from the general office space and are all protected by security software.
- 8.7 If a significant breach of the security of personal data occurs that incurs a high risk to the rights and freedoms of individuals, this would be reported to supervising authority within 24 hours of Karl King Transport Ltd becoming aware of the breach. Where possible, the person(s) affected will be informed within 24 hours of a data breach, when this is not possible Karl King Transport Ltd will provide a full explanation for this with the notification of the situation; under such circumstances a full investigation will be carried out and remedial action will be taken.

9. Monitoring and reviewing

- 9.1 Karl King Transport Ltd.'s Administrative Team and General Manager are responsible for monitoring and reviewing the effectiveness of this policy on a regular basis. They will frequently assess its suitability, adequacy and effectiveness and update accordingly.
- 9.2 If it is deemed that any changes need to be made within this policy, these will be applied as soon as possible and Karl King Transport Ltd will advertise the updated policy.
- 9.3 This policy does not form part of a contract with Karl King Transport Ltd and we may amend it at any time to improve its effectiveness in line with the law.