



INTRODUCTION

DERBY may, amongst other things, process and collect personal data and in most cases, we do this basis agreements with our Clients and Suppliers. This is regarded as data controllers within the meaning of the General Data Processing Regulation ("GDPR"), in that role also determines the purpose and means of processing and collecting personal data. If we process your personal data, you are a data subject within the meaning of the GDPR and this Privacy Policy also applies to you.

DERBY must meet the requirements of the GDPR. We also want to be transparent about the types of data we process and collect from others, the purposes and basis for this processing, and with whom we share data and what rights Clients and Suppliers have regarding their own data. We would like to inform you about this by means of this Privacy Policy.

1. TYPES OF DATA

- 1.1 DERBY strives to process only personal data that are required, relevant and proportionate to the purposes for which it was collected. If any function can be achieved with anonymous data, we will try to anonymize that personal data. In cases where anonymous or non- personal data is combined with personal data, we will treat this as personal data.
- 1.2 Depending on the services provided by us to the client or supplier, we may process the following personal data by any of them:
- your contact details, such as name, address, telephone number and email address
 - your age and sex
 - your (driving) licence details
 - details of your employment, profession and employer

2. PURPOSES AND LEGAL GROUNDS FOR THE PROCESSING OF DATA

- 2.1 We process and collect the personal data first and foremost to execute the (supply) agreement which we have concluded with our client, and which is aimed at improving our service to that client. It is also possible that legal obligations may require us to retain your personal data. In the context of our business operations, the data recorded by us from you can be used by us to offer new or current services to the client, for the improvement and/or further development of the current or future services provided to the client and for other functionalities that may be relevant to the client, for analysis purposes and/or for research purposes.
- 2.2 We also assume when collecting and processing your personal data that DERBY or any party on its behalf
- (i) has sufficiently ascertained your interests
 - (ii) has properly balanced these interests of yours, and its own - legitimate - interests in the collection and processing of relevant personal data, and
 - (iii) has been able to make the reasoned decision that it has a legitimate interest in the processing of your data on these grounds or for these purposes.
- 2.3 You can also restrict the collection and processing of your personal data at any time by making use of the rights assigned to you by the GDPR.

3. STORAGE AND RETENTION PERIOD OF PERSONAL DATA

- 3.1 DERBY or any party on its behalf, as the controller, keeps a record of the processing activities that take place under its responsibility.





- 3.2 DERBY will only retain your personal data for as long as and to the extent that we need it to be able to fulfil the agreement with our clients and suppliers, for our business operations, for the time required to fulfil our legal obligations or for a maximum of the statutory storage periods applicable to us.

4. INFORMATION, MODIFICATION, DELETION AND OBJECTION

- 4.1 DERBY strives to ensure that your personal data is accurate and up to date. We will always try to delete or change incorrect and incomplete personal data. Your personal data belongs to you, and you therefore have specific rights regarding how it is processed; of course you can always contact us on this process.
- 4.2 This certainly applies (also) to the following subjects:
- whether we process your personal data
 - how we process your personal data
 - access to the personal data we process on you
 - objections to the processing of your personal data
 - modification of your personal data if it is or may be incorrectly processed
 - restricting your personal data
 - deletion (erasure) of your personal data
 - transfer of your personal data to yourself or to another organization at your request.
- 4.3 Of course, you can always contact our Data Protection Office (details below) if you have any questions about the content of this Privacy Policy.
- 4.4 Modifying or deleting personal data may not always be possible (technically or otherwise). In such cases, we will provide you with a reasoned explanation as to why the change or deletion you want is not possible. If possible and desirable, we will then keep a separate note of the corrections you require.

5. PROTECTION OF YOUR DATA

- 5.1 DERBY makes every effort to adopt and implement such technical and organizational measures as may reasonably be expected to protect your personal data against accidental or unlawful destruction, accidental loss, unintentional modification, unauthorized disclosure or making available and all other forms of unlawful processing. We do this by taking the measures that may reasonably be expected of us based on the state of technology.

6. PROVISION OF DATA TO THIRD PARTIES

- 6.1 We do not provide your personal data to others without good reason. We may do this if such provision serves the purposes of processing the personal data (as set out in article 2 of this Privacy Policy and only if the client has given his consent to this), if we or the parties involved in the proper performance of the agreement are obliged to do so by law or a court order, to safeguard our rights or those of the parties involved in the proper performance of the agreement, to protect the personal security of (the employees of) DERBY or the parties involved in the proper performance of the supply agreement, or if you have given us permission for this to be done.
- 6.2 For the purpose of our business operations and depending on the products and services we provide to our client, we may also provide your personal data to the following persons or parties:
- external parties that process data under our control and responsibility
 - external parties that (at the request of the client) are or should be involved in the proper performance





of an agreement with our client, such as loss adjusters, auditors, logistics service providers, suppliers of software and hardware, etc.

Processing shall not take place outside countries belonging to the European Union, unless these countries offer at least guarantees equal to those of the European Union and it has been agreed in writing with the client that processing may also take place in those countries.

- 6.3 External parties that process the personal data under our control and responsibility do so exclusively for the purposes and under the conditions agreed to by DERBY. We lay this down in writing in processor's or sub-processor's agreements that also ensure that these external parties assume at least the same obligations as we have agreed with our client. In addition, oblige these external parties to treat the data provided by us safely and confidentially.
- 6.4 We reserve the right to share aggregated (not personally identifiable) information obtained while providing our services to the client with third parties for any purpose whatsoever.

7. AMENDMENTS TO THE PRIVACY POLICY

- 7.1 It is possible that we will provide updates to this Privacy Policy in line with prevailing Regulations. The most current Policy will always be available to download directly from our website and the Policy will show the latest version and date at the end of the document.

8. RIGHT TO COMPLAIN

- 8.1 If you have any questions regarding the information contained within the Privacy Policy, or any concerns with how we process your personal data and your human rights, then please feel free to contact the Data Protection Officer using one of the following contact means:

in writing: The Data Protection Officer
DERBY Trading Limited
Unit 2, The Curve
2 Victoria Road
London NW4 2AF
United Kingdom

by email: qm@derbygroup.net

by phone: +44 (0)20 8359 1010

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