

# Severn Transport Services Privacy Policy

The success of our company is built on our ability to apply a high level of data protection and security in relation to personal data that our employees, customers and third parties entrust to us. This privacy policy tells you what to expect when Severn Transport Services Ltd collects personal information and how we process your data.

## How we use personal data

This Privacy Policy sets out our arrangements to inform you of what to expect from our business in how we collect, control and process personal information.

The ways in which we collect information is listed below:

- Visitors to our websites
- People who arrange to use our services with consent, for example who arrange transportation services from our business
- Contract or service contract arrangements, for example, employee or business contract arrangements and/or agreements
- From consent given when we arrange marketing activities

## Legal Basis

The legal basis that we rely on for processing your data will depend upon the circumstances in which it is being collected and used, but will in most cases fall into one of the following categories:

- Where you have provided your consent to allow us to use your data in a certain way 6(1)(a)
- Where the processing is necessary to carry out for the performance of a contract with you 6(1)(b)
- Where the processing is necessary for your legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests 6(1)(f)
- Where the processing is necessary in order for us to comply with a legal obligation 6(1)(c)

The primary legal basis we rely on to process your personal data is article 6(1)(b) and 6(1)(a) of the GDPR, which allows us to process personal data for the purpose of providing the service of logistical distribution to fulfil your requirements.

We can assure you that we do not rent, swap, share or sell your personal data to third parties.

Occasionally, if we feel it is of your interest to introduce you to a third party, we will ask you first and only introduce you are interested.

### **Service providers**

We use service providers (such as software platform providers) to help us provide you with our services. We may give relevant persons within these service providers access to your personal information, but only to allow them to perform their services for us. We carry out data protection checks to make sure that the processing of your data is subject to appropriate security measures.

### **Third Parties**

In some circumstances we are legally obliged to share information, for example under a court order. In any scenario, we'll satisfy ourselves that we have a lawful basis on which to share the information and document our decision making and satisfy ourselves we have a legal basis on which to share the information.

### **Cookie Data**

When someone visits our website, we may collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site and we collect this information in a way which does not identify anyone directly.

We do not make any attempt to find out the identities of those visiting our site and we will not associate any data gathered from this site with any personally identifying information from any source.

If we do want to collect personally identifiable information through our website, we will be up front about this and make it clear when we ask you for your consent and permission to collect your personal information. This includes an explanation of what we intend to do with such information.

### **Your Rights**

Your rights are important to us, if you wish to; access, update, restrict, remove, object to or no longer want hear from us, we will take action and make sure the appropriate steps are taken to ensure we fulfil your request.

Your right of access - You have the right to ask us for copies of your personal information in which you are the subject.

Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to update relevant information you think is incomplete or incorrect.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing - You have the right to object to processing in certain conditions.

Your right to data portability - This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent.

You are not required to pay any charge for exercising your rights. We have one month to respond to you for any requests.

### **Complaints**

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We will keep personal information contained in complaint files in line with our company retention policy. This means that information relating to a complaint will be retained for a period of time from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

### **How to contact us**

Further details of our data protection arrangements can be obtained by writing to our Data Protection Manager at the following address:

Attention: Data Protection Manager  
Severn Transport Services Ltd,  
Unit 1, Severn Farm Industrial Estate,  
Welshpool,  
Powys,  
SY21 7DF