

Introduction

Thank you for visiting our website, LSI group of companies respect your privacy and are committed to protecting your personal data. This privacy notice informs you how we look after your personal data when you visit our website and interact with our companies, regardless of where you are located. We will also outline below your privacy rights and how the law protects you. By interacting with our company and website, you are accepting the practices described in the privacy policy.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how LSI collects and processes your personal data through your interaction with us and use of our website, including any data you may provide through our website.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements any specific notices and is not intended to override them.

Controller or Processor

LSI is made up of different legal entities including but not limited to LSI Logistic Solutions Ireland Limited, LSI Logistic Solutions Midlands Limited, LSI Logistic Solutions (N.I.) Limited, LSI Logistic Solutions London Limited, LSI Logistic Solutions LLC. This Privacy notice is issued on behalf of the LSI Group so when we mention "LSI", "we", "us" or "our" in this privacy notice we are referring to the relevant company within the LSI group responsible for processing your data.

With respect to information collected from our website, LSI is the data controller and is responsible for this website. LSI also processes data on behalf of its customers and in accordance with their

instructions. LSI is a data processor with respect to third-party data provided to it by its customers. Where LSI is the data processor, you should make any requests for information or to exercise your rights directly to the data controller.

How to contact us

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

The Data Privacy Manager

LSI

Pamaron House, Ballybin Road, Ashbourne, County Meath, A84Y198, Ireland

dataprotection@lsilogistics.com

We would appreciate the opportunity to deal with any concerns, so please contact us in the first instance.

You have the right to make a complain at any time to the relevant supervisory authority for data protections issues, In Ireland, this is the Data Protection Commissioner's Office, www.dataprotection.ie

Changes to the privacy notice and your duty to inform us of changes

We keep our Privacy Policy under regular review. Any updates will be published at this URL. It is your responsibility to keep us informed if your personal data changes during your relationship with us.

Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows;

- **Identity Data** includes first name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, collection and delivery addresses, email address and telephone number.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to ad from you and other details of products and services you have purchased from us.

- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). We do not collect any information about criminal convictions and offences other than as required by law.

If you fail to provide personal data

Where we need to personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial, Profile and Marketing Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services;
 - create an account on our website or request logon rights to our system through our website;
 - subscribe to our services or publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey;
 - register for an event; or
 - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical data about you if you visit other websites directing such information to us.

- **Third parties or publically available sources.** We may receive personal data about you from various third parties and public sources as set out below:
- Technical Data from the following parties:
 - (a) analytics providers such as Google which may be based inside or outside the EEA;
 - (b) advertising networks which may be based inside or outside the EEA; and
 - (c) search information providers which may be based inside or outside the EEA.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services which may be inside or outside the EEA.

4. **How we use your personal data**

Lawful basis

We will only use your personal data in accordance with applicable laws. There are a number of lawful basis for processing personal data. Most commonly, we will use your data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you. This means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- This mean the interest of our business in conducting and managing our business to enable us to give you the best service / product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted by law).
- Where we need to comply with a legal or regulatory obligation. This means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us, and unsubscribe links are included on every marketing communication. Please see the table below to understand the lawful basis that we will rely on to process your personal data in various circumstances.

Purposes for which we will use your personal data.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using you data. Please contact us if you need details about specific

legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you are as new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your requested service including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing & Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to the terms of our privacy policy (b) Gathering opinions and feedback on our services	(a) Identity (b) Contact (c) Profile (d) Marketing & Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use of services)
To enable you to register for an event, complete a survey or provide feedback and information about your use of our services	(a) Identity (b) Contact (c) Profile (d) Usage (a) Marketing & Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use of services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, information security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or	(a) Identity (b) Contact (c) Profile	Necessary for our legitimate interests (to study how customers use of services, to develop them, to

understand the effectiveness of the advertising we serve to you.	(d) Usage (e) Marketing & Communications (f) Technical	grow our business and to inform our marketing strategy)
To use data analytics to improve our website, services, marketing, customer relationships and experiences.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and our business)

Marketing

We strive to provide you with the choices regarding certain personal data uses, particularly around marketing and advertising.

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant to you (we call this marketing).

You will receive marketing communications from us if you have:

- Requested information from us;
- Purchased products or services from us;
- Provided us with your details when you attended an event, conference, trade show;
- Provided us with your details when you registered for an event, promotion, or competition;
- Provided us with you details for any other reason

and, in each case, you have not opted out if receiving that marketing.

Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any company outside our group of companies for marketing purposes.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at dataprotection@lsilogistics.com at any time.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when website set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with parties set out below for the purposes set out in the table in paragraph 4 above.

- **Internal Third Parties:** Other companies in the LSI group acting as joint controllers or processors who are based in any of our offices in Ireland, The United Kingdom of Great Brittan and Northern Ireland and the USA.
- **External Third Parties:**

Service providers, acting as processors, who may be based within or outside the EEA, who provide IT, software-as-a-service (SaaS), system administration and other services which support the functions of our business.

Professional advisors, acting as processors or joint controllers, including lawyers, bankers, auditors and insurers who may be based within or outside the EEA, who provide consultancy, banking, legal, insurance, accounting and similar professional services.

Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

Tax authorities, governmental agencies, regulators, public bodies or other parties, acting as joint controllers or processors, based in countries where LSI carries on business operations and where disclosure is required in accordance with applicable law.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We share your personal data with the LSI group. This will involve transferring your data outside the European Economic Area (EEA).

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the USA, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the USA. For further details, see European Commission: EU-US Privacy Shield.

7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed or used in an unauthorised way. In addition, we limit the access to your personal data to those employees, agent, contractors and third parties who have a business need to know. They will only process your personal data on our instructions (where we are the data controller) or on the data controller's instructions (where we are the data processor) and they are subject to a duty of confidentiality.

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

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data, whether we can achieve those purposes through other means, and the applicable legal requirements. Details of the retention periods for different categories of personal data are set out in our Data Retention Policy.

In some circumstances, we may anonymise your personal data (so it can be no longer associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Where we are the data controller, and under certain circumstances, you may have the following rights in relation to your personal data:

- The right to request access to your personal data (a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- The right to request written correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- The right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- The right to object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to the processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- The right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- The right to request the transfer of your personal data to you or a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the

information to perform a contract with you.

- The right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdrew your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

Where we are a data processor, you should make your request directly to the data controller.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data) or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests (where we are the data controller) within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.