



## **International Lifting and Shipping**

### Data Privacy and Security Policy 2018

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## Introduction

International Lifting and Shipping Ltd [ILS] is based at International House, Colonnade Point, Central Boulevard, Prologis Park, Coventry CV6 4BU United Kingdom. We're a specialist lifting contractor active across exhibition and event sites around the world.

We operate conscientiously within the requirements of the General Data Protection Regulations 2018 and other electronic marketing legislation. We work within the principles of fair data processing, namely:

- Using information in a way that people would reasonably expect.
- Thinking about the impact of our processing.
- Being transparent and ensuring that people know how we'll use their information.

This Policy (together with our Terms and Conditions), as may be amended from time to time by updates on this page, sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us, as **data controller** and a **data processor**. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### 1. What This Privacy Policy Covers

This Policy covers how we treat any personal information that we collect and receive either from our website or as part of our broader operating processes.

We do not sell or pass on any personal information about our clients or prospects and we only use any information shared with us for running and improving our services and in that capacity operate as a data controller and, in the extent that we process the data, as a data processor.

This Policy tells you what information we collect, the steps we take to protect and secure it, how we use and share information, and finally, how you can contact us with questions or concerns.

### 2. Information We Collect

**(a) Personal Information.** We collect personal information (e.g., name, email address, phone number, etc.) when you:

- Send us an enquiry through our website
- Email us
- Work with us as a customer, supplier or employee

- Exhibit at an event where we are the official lifting contractor and your contact data has been lawfully shared with us

We also maintain a simple prospect database justified under a Legitimate Interest assessment where we collate names and contact details of B2B decision makers who are known buyers of our type of service.

**(b) Other User Information.** When you access and use our services, we may collect additional contextual information about your company as well as your operational requirements. We do not link this additional data to any other information we collect about you and do not undertake any profiling activity from this type of data.

**(c) Billing Information.** If you contract us we will require your billing information in order to process the transaction. Billing information includes your name, address, telephone number, bank details and other information necessary to process the transaction.

**(d) IP Addresses and Cookies.** We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. We use both "session" cookies and "persistent" cookies on the website. We will use the session cookies to keep track of you whilst you navigate the website; we will use the persistent cookies to enable our website to recognise you when you visit. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at.

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking "Tools", "Internet Options", "Privacy", and selecting "Block all cookies" using the sliding selector. You may refuse to accept cookies by activating this setting on your browser, however, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

We use this information held about you in the following ways:

- To ensure that content from our site is presented in the most effective manner to you and to your computer
- To provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To cross reference information you have supplied with information supplied by our client for purposes of verifying whether you are an authorised user.
- To notify you about changes to our service.

We may also contact you by email, post or telephone. Please note that where you have provided sensitive data to us, we shall only use your sensitive data for the purpose for which the data was provided to us.

If you do not want us to use your data in this way, or wish to withdraw your consent for use of the data, you can do so by contacting us via telephone on (0) 24 7633 7955 or email at [lift@i-l-s.co.uk](mailto:lift@i-l-s.co.uk)

Please note that at the time you contact us, it may be the case that we no longer process, hold or store your personal information/data as data processor, in which case we would advise you of this and the need to contact the data controller.

Disclosure of this information

We may disclose your personal information to third parties:

- If ILS or substantially all of our assets are acquired by a third party, in which case personal data held by it about our customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions and other agreements; or to protect the rights, property, or safety of our clients, customers or others.
- Our site may, from time to time, contain links to and from the websites of our partner networks, clients, affiliates or other external websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these privacy policies. Before you submit any personal data to our site, you may want to check the policies of our client, for whom we are collecting the data, and whom for your purposes is the data controller. In the absence of any details being listed on our site, you may contact us at or on the details provided below.

### 3. Information Use, Legal Basis, Sharing, Disclosure, and Retention

#### (a) Use and Legal Basis.

Sales and Service Delivery. ILS uses personal data for developing and issuing sales proposals and for providing its products and services – and justifies this under the legal basis of “Contract”.

Marketing Emails. ILS uses personal data to contact prospective B2B clients with information about our services. We justify this through a “Legitimate Interests” assessment and offer opt-out functionality for those no longer wishing to hear from us in this way.

Administrative and Legal. We also process small amounts of employee and subcontractor data under the legal basis of “Contract” and, if in the Vital Interests of the data subject, or with specific consent, or to comply with Employment or Health and Safety or another Legal requirement will hold special category data such as medical history or driving convictions.

**(b) Sharing.** ILS does not share, sell, rent or trade personal information with any third parties for marketing or promotional purposes. It will only share limited data with suppliers where required operationally.

It does share small quantities of employee data for administrative and legal purposes.

It also reserves the right to share data with relevant authorities if compelled to do so to comply with legal obligations.

**(c) Disclosure.** ILS may disclose personal information under the following circumstances:

- In certain situations, we may disclose personal data in response to lawful requests by public authorities, including but not limited to national security or law enforcement requests. We may also disclose your personal information as required by law, such as to respond to court orders, or similar legal processes, to establish or exercise our legal rights or, defend against legal claims, or if in our judgment in such circumstances disclosure is required or appropriate.
- If we believe it is necessary in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our various terms of use, or as otherwise required by law.

**(d) Retention.** We will retain existing customer information for as long as a customer account is active with us or as needed to provide our services – and where required to comply with our legal obligations, resolve disputes, and enforce our agreements. We will retain all prospective customer data ongoingly until any such time that we receive a request to opt-out.

#### 4. Confidentiality and Security

We use physical, electronic, and procedural safeguards to protect personal information - Our IT arrangements aspire to “Data Protection by Design” and should be able to **detect** a significant data breach. Where such a breach could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage we will **notify the ICO**. Where a breach is likely to result in a high risk to the rights and freedoms of individual data subjects, we will also **notify those concerned** directly and at the earliest practical opportunity. We shall then fully **investigate** a data breach and implement corrective action to **prevent recurrence**.

By using our services or providing personal information to us, you are consenting to ILS communicating with you electronically regarding security, privacy, and administrative issues related to your use of our services. We may post a notice on our website if a security breach occurs. In these circumstances, we may also send an email to you at the email address you have provided to us.

Data transmissions over the Internet are not 100% secure. Consequently, we cannot guarantee or warrant the security of any information you transmit to us and you do so at your own risk. Once we receive your transmission, we use reasonable efforts to ensure security on our systems.

ILS retains the services of a professional IT support partner that uses secure cloud based storage. They monitor and control all access to the data held and use encryption. Internally at ILS we have firewalls and anti-virus to protect our data and we have a separate server for accounts which gives an added layer of security.

For our office based data security, we currently have CCTV in the warehouse, which is registered with ICO with awareness signage positioned as applicable. We also have an alarmed office and an additional key pad to the entry door, so that access to hardcopy data is also restricted. All of our internal doors are locked each night and access to the office is restricted to key holders only, so all other employees cannot gain access without a senior staff member in attendance. Inside the office we have locked doors to the Director’s office and to our server room where specific data is stored.

In terms of exhibitor client data we password protect these files, restrict access to them to operations personnel only and maintain a retention policy of a 2 event cycle. Hardcopy show files are kept in locked office cupboards.

All files over 7 years are shredded onsite by a professional shredding company, storage between operational use and shredding is on a mezzanine where a future development will facilitate locked storage for this paperwork.

All email contact with exhibitors contains a mechanism to opt out of receiving information from us and we maintain records of those who do. We don’t share exhibitor data and instead send exhibitors our agents’ details if they require overseas assistance.

As a rule, data is not stored on laptops or external computers, there is a small amount of data on our phones, but these are all password protected.

## **5. Right to Be Informed**

We strive to ensure that all those engaging with us are informed of our arrangements for processing personal data through our Privacy Statement which is linked to from our email signatures and website home page.

## **6. Right of Access**

We will respond to data requests within 1 month and will only charge for requests that are manifestly unfounded or excessive. If we have grounds to refuse a request we will inform the data subject and make them aware of their right to complain to the ICO or to seek civil action – again within 1 month of receiving the request

## **7. Right to Rectification**

For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will correct any inaccuracies in a data subject's personal data upon receipt of a request. For personal data held under the legal basis of "Contract" or "Vital Interests" or "Legal Obligations" we will endeavour to correct the data upon request but may not be able to do so if changing the data may conflict with our legal obligations or disadvantage us in a future legal action. In cases where we cannot rectify the data for these reasons we shall inform the data subject and make them aware of their right to complain to the ICO or to seek civil action

## **8. Right to Erasure**

For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will erase a data subject's personal data upon receipt of a request / opt-out notification. For personal data held under the legal basis of "Contract" or "Vital Interests" or "Legal Obligations" we will endeavour to erase data upon request but will not be able to do so if holding the data is necessary to fulfil our legal obligations or may be necessary as evidence in a future legal action involving us. In cases where we cannot erase the data for these reasons we shall inform the data subject and make them aware of their right to complain to the ICO or to seek civil action

## **9. Right to Restrict Processing**

For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will restrict the processing of a data subject's personal data upon receipt of a request / opt-

out notification. For personal data held under the legal basis of “Contract” or “Vital Interests” or “Legal Obligations” we will endeavour to facilitate the requested restriction upon request but will not be able to do so if restricting the processing of the data prevents us from fulfilling our legal obligations or the current processing of the data may be necessary as evidence in a future legal action involving us. In cases where we cannot restrict the processing of the data for these reasons we shall inform the data subject and make them aware of their right to complain to the ICO or to seek civil action

## **10. Right to Data Portability**

For personal data obtained directly from a data subject under the legal basis of consent – we shall provide, upon receiving a request, the data that we hold in a standard, widely accessible format

## **11. Right to Object**

For personal data obtained directly from a data subject under the legal basis of consent – and obtained indirectly from a data subject under the legal basis of legitimate interest – we will cease to process a data subject’s personal data upon receipt of a request / opt-out notification

## **12. Changes to this Privacy Policy**

ILS reserves the right to revise, modify, or update this Policy at any time. We will notify you via email about material changes in the way we treat personal data or by placing a prominent notice on this website.

## **7. Contacting ILS**

If you have a privacy concern regarding ILS, or this Policy, you may contact us via [lift@i-l-s.co.uk](mailto:lift@i-l-s.co.uk)