

**Privacy statement**

May 24, 2018



WISETECH GLOBAL GROUP

## 1. INTRODUCTION

Cargoguide International B.V. and its related bodies corporate (Cargoguide, we, our, us) recognize the importance of protecting the privacy and the rights of individuals in relation to their personal data. This document is our privacy policy and it tells you how we collect, manage, and disclose your personal data.

This version was created on May 24, 2018. The most recent version can be found at [www.cargoguide.com/more/privacy/](http://www.cargoguide.com/more/privacy/).

## 2. WHAT IS PERSONAL DATA

You share personal data with Cargoguide if you are our customer or have contact with us for other reasons.

When used in this privacy policy, the term “personal data” has the meaning given to it in the General Data Protection Regulation (the GDPR). In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address but also your computer’s IP address or user log-in time. If the information we collect or use personally identifies you, or you are reasonably identifiable from it, the information will be considered personal data.

## 3. PERSONAL DATA WE COLLECT AND WHY

There are a number of reasons why Cargoguide may collect your personal data.

Your personal data are stored when you sign up or use our services, when you contact us for support, register an interest in one of our services or contact Cargoguide for some other reason. The personal data we collect and can use includes:

We collect the following types of personal data from anyone with whom we have contact:

- **data on who you are and how to contact you.** This includes your name, telephone number, email address, street address, profession, work history and job title. *Why?* This data is needed to identify you and to be able to communicate with you.

We collect the following types of personal data from users of our services or websites:

- **data on where you are and work from.** This includes your IP address, browser type and settings, screen resolution, OS and other technical aspects of hardware and software you use when accessing our services or websites. *Why?* We want to be able to provide you the best possible personalised experience on any of our services and websites.
- **data on what you do on Cargoguide’s websites and in its services,** like log-in and changes made. This data is used for example to monitor the stability of services, to balance the performance and to establish afterwards who executed certain changes in case errors were made.
- **data on contact moments and information exchanged.** This includes the contact details, date and time and content of a complaint, support request or compliment. *Why?* We record our

contact with you in our ticketing system in order to properly follow-up on customer support. We also record your enquiries about other products or services, together with any additional information necessary to deliver those products and services, respond to your enquiries and generally to complete any commercial transaction between you and us.

- **Data used for administration and remuneration.** User specific usage of our services, bank details and subscription(s). *Why?* We need to collect information on the usage of our services, bank details and subscription information in order to be able to charge for the use of our services, to bill and to collect debts. If you are an independent contractor, your bank details and the type of subscriptions you have may be considered personal data.
- **Data on what you do in our services or on our websites.** This includes detailed logging of any user activity in our services or websites, including data entry and data updates through whatever means. We may also collect your IP address in any log entry. *Why?* We need to be able to reconstruct who did what in any supported process of our services and websites, for example if such information is ever needed in an official investigation. Your username and password are strictly personal and must be kept confidential at all time. Specifically for our customs clearing solutions, we need to be able to track all changes that a user processes in any step of the procedure. We may also use this type of information to monitor and improve the performance of our systems, infrastructure and services. And we may use this data to research and develop our products or services.

We may use any of the mentioned personal data in case we need to comply with, or act in accordance with, any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in cooperation with any governmental authority of any country.

We do not collect sensitive information as defined in the GDPR. Sensitive information includes information about your health, religious or philosophical beliefs, membership of professional or trade associations, or a criminal record. We do not use profiling as defined in the GDPR.

We may collect some information that is not personal data because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated or pseudonymised information about how users use our website, service and software.

We seek your consent to our handling of your personal information via our application forms, our administration processes and other methods by which we capture information.

#### 4. HOW DO WE COLLECT PERSONAL DATA?

To the extent legally permissible in your jurisdiction, Cargoguide collects personal data in a number of ways, including:

- directly from you, such as when you provide information by phone or in documents such as an application form;
- from third parties such as our related companies, credit reporting agencies, or your representatives;
- from publicly available sources of information;
- from the organizations identified below under “When we disclose your personal data”; and
- from our own records of how you use our services and software.

## 5. **COOKIE USAGE**

Cookies are small files that are stored on a user's computer. They are designed to hold a modest amount of data specific to a particular client and website, and can be accessed either by the web server or the client computer.

We may use functional cookies to understand and save your preferences for future visits and compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We may use analytical cookies from third-party vendors, including Google Analytics to inform us about and better understand our visitors' visits to our website.

### **Refusing cookies**

You can refuse our usage of cookies by adjusting your browser settings (e.g. Internet Explorer or Mozilla Firefox) to disable all or certain cookies (see your web browser manual or help function). If you disable cookies, some services may not be available to you or may not function properly.

[All About Cookies](#) has instructions for how to manage your cookie settings.

## 6. **YOUR RIGHTS**

Under GDPR, you are (among other things) entitled to:

- receive transparent information regarding the processing of your personal data;
- access your personal data, including the right to obtain free of charge a copy of the personal data undergoing processing in a commonly available electronic format;
- rectification of incorrect personal data and completion of incomplete personal data;
- erasure of your personal data, including the "right to be forgotten";
- restrict the processing of your personal data;
- your data being portable and accessible upon request; and
- object to the processing of your personal data.

Cargoguide takes your preferences into account as much as possible in the provision of services and information. Cargoguide often allows you to specify these yourself: for example, on your own personal login page (such as on Cargo Office) or through your own account.

If you wish to exercise any of the above rights or if you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy, or a possible breach of your privacy, please use the contact details under "How to contact us about privacy" below.

If you do make a complaint or allege a breach, Cargoguide will investigate your complaint and use reasonable endeavors to respond to you in writing within 28 days of receiving the written complaint. If we fail to respond to your complaint within 28 days of receiving it in writing, or if you are dissatisfied with the response that you receive from us, you have the right, depending on the jurisdiction, to make a complaint to the local regulator in your jurisdiction.

## **Cargoguide and other websites**

Cargoguide websites contain some links to other websites. Cargoguide cannot accept any liability for the handling of your information by these parties. For further information, please read the privacy statement (if available) of the website you are visiting.

## **7. WHEN WE DISCLOSE YOUR PERSONAL DATA**

For the purposes set out above under “What personal data do we collect and why?” we may disclose your personal data to organizations or persons outside Cargoguide, to the extent this is legally permissible in your jurisdiction. If we need to disclose your personal data for any other purpose, we will only do so with your consent or - if this is legally permissible in your jurisdiction - where you may otherwise reasonably expect us to do so.

Where appropriate, these disclosures are subject to privacy and confidentiality protections and - as the case may be - other requirements under the GDPR. The organizations and persons to which we usually disclose information include:

- outsourced service providers who manage the services we provide to you, including billing and debt-recovery functions;
- information technology service providers;
- installation, maintenance, and repair service providers;
- your representatives (e.g. your authorized representatives or legal advisers);
- credit reporting and fraud checking agencies;
- our professional advisers, including our accountants, auditors, and lawyers;
- government and regulatory authorities and other organizations, as required or authorized by law; and
- our related companies.

Some of these organizations or persons may be located in other countries. The countries in which these organizations or persons are located will vary, but, in the course of our ordinary operations, we generally disclose personal data to organizations or persons located in Australia, the United States of America and the United Kingdom. We will always ensure that such sharing is compliant with GDPR.

Cargoguide International B.V. is a partner of the Wisetech Global Group, we will however not share any customer information to the Wisetech Global Group without an explicit permission or it being part of an agreement.

## **8. PROTECTION AND QUALITY OF YOUR PERSONAL INFORMATION**

We are committed to protecting your personal information from misuse and loss and from unauthorised access, modification or disclosure. We limit access to those staff and service providers who manage your request, services or visit to our websites, provide you with a services, or supply you with further information on Cargoguide products or services. We have in place a range of security measures designed to prevent unauthorised access or disclosure of your personal information.

Cargoguide relies on the correctness of the information that you supply to us. Please assist Cargoguide by contacting us at [privacy@cargoguide.com](mailto:privacy@cargoguide.com) if any of your personal information is incorrect or requires updating.

## **9. HOW LONG IS YOUR PERSONAL INFORMATION KEPT?**

Your personal information is kept as long as the information is required to manage your product, provide you with a service, or to deal with your enquiry. All financial information is generally kept for a period of seven years, all other information is generally kept for a year.

## **10. HOW TO CONTACT US ABOUT PRIVACY**

If you have any further questions or a complaint about privacy at Cargoguide, please contact us:

- By e-mailing us: [privacy@cargoguide.com](mailto:privacy@cargoguide.com)
- By writing to :

Cargoguide International B.V.  
Europalaan 2C  
3526 KS Utrecht  
The Netherlands

## **11. CHANGES TO OUR PRIVACY POLICY**

We operate in a dynamic business and technological environment. Over time, aspects of our business or technology may change as we respond to changing market and technological conditions. This may require our policies to be reviewed and revised. We reserve the right to change this privacy policy at any time and to notify you by posting an updated version of the policy on our website. If at any point we decide to use personal data in a manner materially different from that stated at the time it was collected, we will notify users by email or via a prominent notice on our website and, where necessary, we will seek the prior consent of our users.