

# **Privacy Policy**

By using the ControlPay website and all the online platforms linked with this website, you agree to the collection and use of information in accordance with this policy.

### Who does this Privacy Policy apply to?

ControlPay, The Global Freight Audit company (from this point on also referred to or mentioned as "us", "we", or "our") operates http://www.controlpay.com (also referred to as the "site"), which is based in Breda, The Netherlands and represents several locations (please see <a href="https://www.controlpay.com/contact/">https://www.controlpay.com/contact/</a> for additional information).

We act as a data controller for all personal data collected and processed by ControlPay. We process personal data as safely and reasonably as possible and in strict compliance with the applicable data protection legislation, including the General Data Protection Regulation 2016/679 of 27 April 2016 ('GDPR').

#### What is covered by this Privacy Policy?

This Privacy Policy tells you:

- which personal data we collect and process;
- how we store and process your personal data while we perform freight audit-related business activities;
- what your rights are and whom you may contact for more information or queries.

The site is linked with other ControlPay-owned web-based platforms used for freight audit activities to which the same rules apply.

#### Which personal data do we collect?

While using our site or while performing business-related activities on any platforms available through this site, we may ask you to provide us with personal data that can be used to contact or identify you.

Personal data may include, but is not limited to: your full name, e-mail address, company name and address ("personal information").

#### How do we obtain your personal data?

We may obtain your personal data:

- because you provided it to us (e.g. by providing it to us via the site and/or its related platforms, via an e-mail you sent to us, via a contract we have with you), or
- in the framework of the execution of our business activities because someone else has provided it to us (a colleague of yours or your business partner, to use in the framework of ControlPay business activities).

## How we store and process your personal data:

Your personal data will be stored on our server in Europe. All ControlPay staff members, in all offices, will have access to your personal data for the business-related purposes described above.

To achieve the objective of our processing, as described above, we may allow to process your personal data outside the European Economic Area (EEA). This ability is granted to ControlPay staff members, including those in our offices outside the EEA.

We only retain the personal data collected as long as the user's account is active or otherwise for a limited period of time as long as we need it to fulfill a reasonable business purpose.

# The legal grounds for processing your personal data:

We process your personal data for the purposes mentioned in the previous section relying upon the following legal basis:

- due to the fact that by using this site and all related web-platforms you have given your consent to the processing of your personal data for freight audit activities related to this site and its platforms;
- due to the fact that processing is necessary for the performance of a contract to which the subject/content of the data is relevant in terms of the performance of freight audit activities.

In this respect, we will always determine whether our interests are not overridden by your interests, fundamental rights and freedoms:

- for the fulfilment of our contractual obligations (in case we have a contract with you);
- consent, where necessary.

### How is your personal data secured?

We employ strict technical and organizational (security) measures to protect your personal data from access by unauthorized persons and against unlawful processing, accidental loss, destruction and damage, both online and offline.

These measures include:

• training relevant staff to ensure they are aware of our privacy obligations when handling personal data;

- administrative and technical controls to restrict access to personal data to ControlPay staff members;
- technological security measures, including firewalls, encryption and anti-virus software;
- back-up systems;
- login access blocks in case of loss or theft of devices;
- physical security measures.

The security of your personal data is important to us, but please note that no method of transmission over the Internet, or method of electronic storage, is 100% secure, thus we cannot guarantee its absolute security.

# How do we use your personal data for communication?

We may use your personal data to contact you with ControlPay newsletters, marketing or promotional materials.

We may also send you notification e-mails related to your site account or changes related to this site, corresponding notification letters related to freight audit activities whenever these changes or informational points appear or in case particular actions are required from your side.

# Log data

Like many site operators, we collect information your browser sends whenever you visit our site ("Log data").

This log data may include information such as your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

In addition, we may use third party services such as Google Analytics that collects, monitors and analyzes these logs.

### How we use Cookies:

Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. You can refuse the installation of cookies on your device via the ability to enable, disable and/or delete cookies in your browser. You can delete all cookies that are already on your device and you can set most browsers to prevent them from being placed.

The site and its related platforms use the following types of cookies:

• Necessary cookies: are used to identify individual clients behind a shared IP address and apply security settings on a per-client basis. It does not correspond to any user ID in your web application, and does not store any personal data.

• Statistic cookies: helps us to understand how visitors interact with websites by collecting and reporting information anonymously:

The Google Data processing amendment is accepted for all these cookies.

• Marketing cookies: are used to track visitors across websites.

## What are your rights regarding personal data?

- You have the right to access the personal data that we use relating to you.
- If your personal data is incorrect, you can ask us to change your personal data.
- You can also ask us to restrict the processing of your personal data on a temporary basis. This is possible in the following situations:
  - You think that your personal data is incorrect;
  - We no longer require your personal data.

### **Changes to this Privacy Policy**

This Privacy Policy is effective as of 01-01-2019 and will remain in effect, except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any changes to this Privacy Policy, we will notify you either through the e-mail address you have provided us, or by placing a prominent notice on our website.

### How to Contact Us

We hope that this Privacy Policy helps you to understand and feel confident about the way we collect and process your data. If you have any further queries about this Privacy Policy, please contact us, by e-mail, at helpdesk@controlpay.com