

Privacy policy

This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site and all online platforms linked to this website.

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 (hereinafter referred to as "us", "we", or "our") operates <http://www.controlpay.com> (hereinafter referred to as "site"), which is based in Breda, The Netherlands and represents several locations (please see <https://www.controlpay.com/contact/> for additional information). We act as a data controller for all personal data collected by ControlPay and we may request to perform processing activities from any of ControlPay divisions depending on the business specifics. 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") and Brazil's Lei Geral de Proteção de Dados, the Brazilian General Data Protection Law, Federal Law no. 13,853/2019 ("LGPD").

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 through ControlPay Service Desk platform or e-mail communication, we may ask you to provide us with personal data that can be used to contact you or identify you in terms of freight audit activities. Personal data may include, but is not limited to: your full name, e-mail address, phone number, company name and address ("personal information").

How do we obtain your personal data?

We may obtain your personal data:

- due to the fact that you have provided it to us (e.g. via the site and/or its related platforms, via the Service Desk platform, 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, due to 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 do we store and process your personal data?

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

In case personal data was received by us from your colleague or your business, we act according to the agreed with ControlPay Clients processing activities rules. To achieve the objective of our processing, as described above, we may allow to process your personal data outside the European Economic Area (EEA) or outside Brazil ensuring proper technical and organizational measures for the data protection. This ability is granted to ControlPay staff members, including those in our offices outside the EEA or Brazil.

According to Article 5 (e) GDPR and Article 16 LGPD 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 your personal data processing

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 the freight audit activities related to this site and its platforms (Article 6 (a) GDPR and Article 7 (I) LGPD);
- due to the fact that the 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 the freight audit activities (Article 6 (b) GDPR and Article 7 (V) LGPD).
- for the purposes of the legitimate interests of our company (Article 6 (f) GDPR and Article 7 (IX) LGPD). In this respect, we will always determine whether our interests are not overridden by your interests, fundamental rights and freedoms.

How is your personal data secured?

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

These measures include:

- training relevant staff to ensure that they are aware of our privacy obligations during the personal data handling;
- administrative and technical controls to restrict an access to the personal data to ControlPay staff members. We use strict criteria for the access authorization to your personal data (with the approach as few people as possible) and exclusively for the specified purposes;
- 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.

Our security measures comply with international standards, such as ISO27001 for the data security and availability.

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. We may also use your e-mail or phone number in order to contact you in terms of freight audit related activities within contract obligations fulfillment.

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.

Web Analytics

We use third party services, such as:

1. Google Analytics – a web analytics service of Google Inc. ("Google") that collects, monitors and analyzes logs of the website visits. The information generated by service is used to evaluate your use of the website and compile reports on the website activity.
2. Lead Forensics B2B software that is used for marketing purposes and leads generation. ControlPay transfers business IP addresses based on the website visits and the service matches them to a wholly owned global database of businesses and business information.

These services become active only after you provide consent via accepting particular cookies and can be disabled any time via rejecting these cookies.

More detailed information about the data processing with the help of Web Analytics can be found at the sources of third party providers:

- Google Analytics (<https://marketingplatform.google.com/about/analytics/features/>)
- Lead Forensics (<https://www.leadforensics.com/software-data-compliance/>).

How do 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 website 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.

By default, this website uses only strictly necessary cookies required for the website functioning. Other cookies are used only upon you consent (all details can be found in customized cookies settings) available through the Privacy Policy web page. You can also prevent the saving of cookies by selecting the appropriate browser setting. Please note, that if you do so, some functions of this website may not be fully available.

Google Analytics, which we use upon your consent as a 3rd party service may transmit these cookies to a Google server in the US and stored there.

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.
- **Analytics cookies:** help to understand how visitors interact with websites by collecting and reporting information anonymously.
- **Marketing cookies:** are used to track visitors across websites.

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

What are your rights regarding the personal data?

- You have the right to access the personal data that we use relating to you (Article 15 (1) GDPR and Article 18 (II) LGPD).
- If your personal data is incorrect or incomplete/outdated, you can ask us to change your personal data (Article 16 GDPR and Article 18 (III) LGPD).
- You can request to erase your personal data unless processing of such data is required for exercising the right of freedom of expression and information; compliance with legal obligations; for reasons of public interest; for the establishment, exercise or defense of legal claims (Article 17 GDPR and Article 18 (VI) LGPD). You can also ask us to restrict the processing of your personal data. This is possible in the following situations: You think that your personal data is incorrect or we no longer require your personal data (Article 18 GDPR and Article 18 (IV) LGPD).
- You have the right to withdraw your previously given consent (Article 7 (3) GDPR and Article 8 (5) LGPD).
- You have the right to object for your personal data processing in terms of legitimate interest (Article 21 GDPR).
- You can pose your complaint to supervising authority (Member state of residence or place of work) (Article 77 GDPR and Article 18 (IX, 1) LGPD).

Changes to this Privacy Policy

This Privacy Policy is effective as of 19.10.2020 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:

Questions related to GDPR (EEA region) by e-mail at helpdesk@controlpay.com

Questions related to LGDP (Brazil): by e-mail at customerservice@controlpay.tech