

**Daygard Logistics Group
Consolidated House
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PRIVACY POLICY

Our Commitment

The Daygard Logistics Group, and our brands –

Freight Movers International, or FMI
Cargo Movers International, or CMI
World Freight Movements, or WFM
Hotel & Hospitality Logistics, or HHL
Daygard Clearances, or DGC

understand how important privacy is to our customers, and we strive to be clear about how we collect, use, disclose, transfer, and store any personal information.

Information We Collect

We only collect and process personal information for specific reasons. These are:

Attending to UK import Customs clearance
Attending to UK export Customs clearance
For the purposes of producing an LCL bill of lading (LCL = Less than Container Load)
For the purposes of producing an FCL bill of lading (FCL = Full Container Load)
Attending to USA government requirements, pertaining to exports to the USA
Attending to Canada government requirements, pertaining to exports to Canada
Sending an arrival notice to an importer

Use and Sharing of Information

All information we collect is provided to us by our client, in accordance with the requirements of the work we are undertaking for them. Our clients supply this to us via adequate and appropriate data security systems, being email (we use Microsoft's Office 365 product) or via our password protected online system.

Attending to UK import Customs clearance

In order to arrange Customs clearance for personal effects/private goods we need some personal data to supply to UK Customs. Without this UK Customs will not allow clearance. This data will be the full name, UK address, and origin address of the owner/importer. In the event UK Customs ask for anything further we will inform our client accordingly.

This data is held by us for a period in accordance with the requirements of UK Customs.

Attending to UK export Customs clearance

In order to arrange export Customs clearance for personal effects/private goods we need some personal data to supply to UK Customs. Without this UK Customs will not allow clearance. This data will be the full name, UK address, and destination address of the owner/importer. In the event UK Customs ask for anything further we will inform our client accordingly.

This data is held by us for a period in accordance with the requirements of UK Customs.

For the purposes of producing an LCL bill of lading (LCL = Less than Container Load)

A bill of lading (“b/l”) is a shipping document that is basically a receipt for the goods.

The b/l requires shipper and consignee information to be shown on it, and sometimes a notify party.

Our client determines what they want us to show. There is usually no requirement to show personal information, however if our client wants us to then we will follow their instructions accordingly. On those occasions it will usually only be the name of the owner of the personal effects/private goods and possibly their origin and destination address.

The b/l is provided to our client after the goods have shipped.

For the purposes of producing an FCL bill of lading (FCL = Full Container Load)

For an FCL the b/l may be produced by us, or by the actual shipping line (i.e. service provider).

If we or the shipping line produce the b/l then the same procedures apply as per producing an LCL bill of lading.

Attending to USA government requirements, pertaining to exports to the USA

In order to ship goods to the USA the USA government’s Department of Homeland Security (“DHS”) requires key shipment information to be entered in to their Customs and Border Protection (“CBP”) system for analysis/processing before goods can be exported to the USA. These systems are commonly known as AMS and ISF.

The data elements for AMS / ISF include:

- Full Name
- Origin Address
- Destination Address
- Passport Number
- Date of Birth
- Nationality

LCL shipments

We cannot enter data directly to CBP so we must use a third party provider that is approved by the USA government. We use <https://www.cargomanager.com/> (“CMS”).

Further to us providing this information via CMS, there is a branch of CBP at the port of Felixstowe. For all personal effects shipments they also require the data listed above before goods can ship. We send this to them via email.

FCL shipments

When the shipping line produces the b/l they will also attend to AMS. As such we must provide them with the data listed above so they can use their system to send this to CBP.

Whether LCL or FCL, if DHS/CBP require any further information then we will advise our client accordingly.

Data is held only for a period in accordance with the requirements of the DHS/CBP.

Attending to Canada government requirements, pertaining to exports to Canada

In order to ship goods to Canada the Canadian government's Canada Border Services Agency ("CBSA") requires key shipment information to be entered in to their system for analysis/processing before goods can be exported to Canada. This system is commonly known as ACI.

The data elements for ACI include:

Full Name
Origin Address
Destination Address
Passport Number
Date of Birth
Nationality

LCL shipments

We cannot enter data directly to CBSA so we must use a third party provider that is approved by the Canadian government. We use CMS.

FCL shipments

When the shipping line produces the b/l they will also attend to ACI. As such we must provide them with the data listed above so they can use their system to send this to CBSA.

Whether LCL or FCL, if CBSA require any further information then we will advise our client accordingly.

Data is held only for a period in accordance with the requirements of the CBSA.

Sending an arrival notice to an importer

When we are handling an import shipment, as a courtesy we will always endeavour to send an arrival notice to an importer informing them of a pending shipment, although the responsibility always remains with the importer to contact us.

The importer details we receive are provided by our origin agent who will have received them from the shipper of the goods.

The information we receive and then send on an arrival notice may sometimes include personal data. This will usually be the full name and UK address. We will sometimes receive an email address also and if so then that is where the arrival notice will be sent to.

Data is held only for a period in accordance with the requirements of the UK government.

Security

Via the internet is the common method of communicating data. While no method of transmission via the internet is 100% secure we are committed to ensuring that all personal data is as secure as possible.

In order to prevent unauthorised access or disclosure, we have put in place suitable procedures to safeguard and secure the information we collect, online and physically. Employees are instructed to maintain the privacy and integrity of personal data at all times.

Data Breach

A data breach can be:

- the disclosure of confidential data to unauthorised individuals

- the loss or theft of portable devices or equipment containing identifiable personal, confidential or sensitive data e.g. PCs, USBs, mobile phones, laptops, disks etc
- the loss or theft of paper records
- inappropriate access controls allowing unauthorised use of information
- a suspected breach of the business's IT security and acceptable use policies
- attempts to gain unauthorised access to computer systems, e.g. hacking
- records altered or deleted without authorisation from the data 'owner'
- viruses or other security attacks on IT equipment systems or networks
- breaches of physical security for example forcing of doors or windows into a secure room or filing cabinet containing confidential information
- confidential information left unlocked in accessible areas
- insecure disposal of confidential paper waste
- leaving IT equipment unattended when logged in to a user account without locking the screen to stop others accessing information
- the publication of confidential data on the internet in error and accidental disclosure of passwords
- misdirected emails or faxes containing identifiable personal, confidential or sensitive data

In the event of a data breach in our internal systems, we will;

- a) Report the data breach to the Directors of our company;
- b) Determine the nature of the data breach;
- c) Determine the approximate number of data subjects affected;
- d) Describe the likely consequences of the data breach;
- e) Describe the measures taken or proposed to be taken to address the data breach, including, where appropriate to mitigate its possible adverse effects;
- f) Where possible inform affected data subjects of the breach.

Request for Details

Clients may request details of personal data we hold for their shipments. This data will only be the data elements listed above and may simply be returned in the format provided to us originally, e.g. the email that was sent to us. This is subject to age of the shipment as the data may have been purged from our system by then.

Summary

Personal data is supplied to us by our client. We use no tools, marketing or otherwise, to gather personal information.

We will only process personal data to provide the services requested by our client.

We will not share any personal data with any other company/organisation, except where required which has been detailed above.

Data is held only per the requirements of the relevant authority (e.g. UK Customs).

We will take all reasonable measures against the unauthorised or unlawful processing of personal data, and against the accidental loss, destruction or disclosure of, or damage to, personal data, including ensuring that any personal data that is to be disposed of is done so securely.

We will take all reasonable steps to maintain adequate and appropriate data security programmes and procedures to ensure that unauthorised persons do not have access to the personal data or to any equipment used to process personal data.

We will carry out appropriate data protection training, and where applicable, suitable security checks on all our staff who are given access to personal data.

In the event of a data breach we will follow our policy guidelines as listed above.

A request for details of personal data can be made and we will action accordingly.