

Nationworld Limited Privacy Policy – Published 24th May 2018

Summary Detail

The purpose of this document is to set out the parameters in which we process any personal data that is provided to Nationworld Limited (which term in this policy includes Aspray Transport Limited T/A Aspray24 and Aspray Logistics Limited) whether that data is provided to us by you either directly or via a third party.

This Privacy Policy explains what happens to any data that you provide to us, or that we collect from you whilst you visit our website or when using our customer portal or tracking services.

Please read the following privacy policy to understand how we use and protect the information that you provide to us.

By registering and using this site, you agree and consent to the collection and use of your information under the terms of this policy.

Nationworld Limited and all subsidiary companies based at Nationworld House, Noose Lane, Willenhall, West Midlands WV13 3AP, UK take all steps to safeguard and preserve the privacy of all users of our website and visitors who use our other services.

Our Company registration numbers are: 02739088 – Nationworld Limited, 01687432 – Aspray Transport Limited and 04926296 – Aspray Logistics Limited

We use your data to provide our services and to perform our business activities to your organisation as well as meeting our legal obligations and also to improve our website and the services provided. We sometimes share the data provided with third parties for delivery purposes – in this case we only provide the data for our limited business purposes.

We store data for specified periods for our business purposes as set out in this policy.

You have certain rights, detailed in law in relation to the processing of your data such as rights to request access, rectification or deletion of your personal information etc. – this information is provided in detail in accessing and updating of information section of this policy.

The Aspray24 website uses cookies – we will ask for your consent to our use of cookies in accordance with the terms and conditions when you first visit the Aspray24 website.

This privacy policy does not apply to our employees or contract workers as we have separate internal policies that apply to this data group.

Use of your personal information

This section details the personal data categories that we may process and the purposes for which we may process personal data and also the legal basis of the processing as described in article 6 of the general data protection regulation (GDPR) under which we undertake the relevant processing.

Your information will enable us to provide you with access to all parts of our site and to supply the services you have requested us to undertake. We will also use and analyse the information we collect so that we can administer, support, improve and develop our service to customers.

In particular, we may use your information to contact you about important changes or developments to the Aspray24 web site or our services that we offer. In addition to this we may use this information for one or more of the following purposes:

- To provide information to you that you request from us relating to our services;
- To provide information to you relating to the services that you currently use;
- To inform you of any changes to the website, services or service related products offered to you – including functional and technical changes within our customer portal or tracking delivery services;
- To progress fraud prevention and reduce the risk of fraud;
- To our agents and sub contractors via a secure data exchange to provide delivery tracking services to you;
- Where we are required by law to disclose your personal information;

Aspray24 website and customer portal user data

We may process data about your use of the Aspray24 website – this may include your IP address, geographical location based, browser type / version, length of web session as well as information and logs about the time and frequency of your usage of the Aspray24 website and/or customer portal. We process usage data for the purpose of improving our website and customer portal - this is the legal reason for the processing of data.

Delivery advice email data

Aspray24 customers

Aspray24 offer all despatching customers the functionality and ability to supply a delivery contact email address (up to a maximum of two email addresses per consignment). Despatching customers must ensure they have the recipient's permission and right to send the tracking link email. Aspray24 act as your agent and send tracking links to your receiving customers / third parties and by forwarding third party details to us you have accepted your responsibilities and have received permission from the receiving customer / third party. If we receive any direct requests from any recipient or third parties to cease sending tracking emails and for future removal we will forward them to you as our customer and request that they be actioned. We also reserve the right to introduce removal of emails and blacklisting of email addresses if requested by the third party. The email details are encrypted using an AES algorithm to preserve the data integrity.

Email recipients

All recipient email data is supplied by the despatching customer and Aspray24 have no control over the information submitted and also no validation or check is undertaken by Aspray24 to ensure that the email address information is correct. Should any tracking email recipient wish to opt out or of this email service or have their data removed from future correspondence they need to contact the despatching customer directly and inform them of their wish to be removed from this service. Aspray24 are the agent who will deliver on the despatching customer's behalf but they have no direct control over the email provision of the data or request to email tracking links to recipients or the recipient email address detail.

Delivery data

We may process personal data contained in data received from you relevant to any consignments which are addressed to you or for which you have supplied a signature. This data may include your name, address, telephone numbers and signature.

We may also process personal data related to our collected driver data when delivering consignments for the reason of confirming a delivery has been completed. This could include longitude and latitude detail for geographical location data to prove that our driver was in your area. Photographic images of your premises plus any additional collected text data related to the delivery location data may also be collected and or processed. This data may be processed by Aspray24 for the purpose of detailing and providing delivery evidence of consignments carried by Aspray24.

CCTV Data

In our vehicles and depot sites we have CCTV systems installed. We may process still or live footage which contains images of individuals and/or premises. CCTV images and data may be processed by us for the purposes of monitoring site and vehicle security and used for crime prevention and / or detection. CCTV data is deleted after ninety (90) days.

Site entry and exit data

At our hub and depot sites we may collect visitor data specifically the name of the visitor, company represented and purpose of visit to the site plus date and time of the visit. This data is deleted after 12 months.

Providing your personal data to other parties / disclosure of information

We may disclose personal data to our sub contractors or suppliers who may complete and process delivery services on behalf of Aspray24. This data is required to provide the business delivery services that the sub contractor is completing on behalf of or in partnership with Aspray24 (for example if Aspray24 subcontract any outlying delivery areas to a business partner). The legal reason for the processing of this data is the requirement to complete the delivery services and obligation.

Postal addresses - Postal addresses, and other information and data may be used to promote other Nationworld companies' products and services.

Telephone Numbers - Telephone numbers of Nationworld (and subsidiary companies) system users may be used by Nationworld Limited to collect re-qualification data and may be used by other Nationworld companies for promotional purposes.

Email Addresses - Email addresses used to login or register with the Aspray24 website or customer portal may be used for re-registration purposes. When you provide your email address to us, you agree to receive emails from other Nationworld Limited companies. We allow users to "opt-out" of receiving e-mails by contacting Nationworld Limited to advise (contact details below in the contact us details at the end of this document).

Disclosure of your information

The information you provide to us will be held on our systems and may be accessed by Nationworld Limited or subsidiary companies who act for us for the purposes set out in this policy.

Where you have consented when providing us with your details, we may also allow other companies in our group, to contact you occasionally about related products and services which may be of interest to you. They may contact you by post and telephone, as well as by email. If you wish to change your decision about being contacted by these companies in the future, please contact us by using the email specified at the end of this policy.

If Nationworld Limited enters into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners. Unless required to do so by law, we will not otherwise share, sell or distribute any of the information you provide to us without your consent.

Information we collect

When you visit or register on aspray24.com you may be asked to provide certain information about yourself including your name, company name and contact details. We may also collect information about your usage of our website as well as information about you from messages you post to the website via the contact form and/or emails/letters you send to us.

In maintaining our business services we may collect and process the following data about you:

- Information about your use of our services such as details of your visit to our website, the pages viewed. Such information includes location data, delivery information and other communication data;
- Information provided voluntarily by you, for example when you use our interactive services such as our customer portal or delivery tracking services;
- Information you provide, such as your name, company represented or contact details

Usage of Cookies

The Aspray24 website and customer portal uses cookies. Unless you have indicated your objection when disclosing your details to us, our system will issue cookies to your computer when you log on to the site. Cookies make it easier for you to log on to and use the site during future visits. They also allow us to monitor website traffic and to personalise the content of the site for you.

If you do not want a cookie to be stored on your computer you should select the appropriate options on your web browser. Please refer to your web browsing provider or your system administrator for detailed information on disabling cookies. Please be advised that disabling cookies will prevent the correct operation of some of our services such as the Aspray24 website and customer portal.

Cookies do not contain personal information, except when such information has been supplied by a registered user of the Aspray24 website and / or customer portal.

To view our cookie policy visit aspray24.com via the information section / Terms & Conditions

Data Security

Nationworld Limited takes reasonable technical and organisational steps and measures to prevent the loss, misuse or dissemination of your personal information including access by unauthorised persons. This also includes the storage of all information provided on our secure servers within our network.

By agreeing to this policy and using our website, customer portal and tracking services you acknowledge that the transmission of information over the internet is insecure and we cannot guarantee the security of data sent over the internet.

We use EV SSL encryption (symmetric 256 Bit) on our website, customer portal and as from June 2018 we will also be encrypting our emailed customer tracking links with AES encryption algorithms.

You are responsible for keeping your customer portal and tracking facility passwords and logins confidential and not divulging these to other parties.

Data retention / deletion of data

This section provides information about our data retention policy – which are setup to help ensure that we comply with our legal obligations and requirement in relation to data retention and deletion.

We will retain your information for a reasonable period or as long as the law requires – Personal data that we process for delivery purposes (or any other purposes) will not be kept for longer than is required.

Delivery data and addressee data will be retained and then deleted from the Aspray24 website after twelve (12) months; the data is kept within the Nationworld Limited business servers for archive, record keeping for accounting and tax record and historical purposes for Eight (8) years.

Any telephone recordings will be retained for Twelve (12) months – we record some phone calls for staff training purposes.

We may retain your personal data where necessary for compliance with a legal requirement to which we are subject, or in order to protect your interests or the interests of another party or in conjunction with any legal claim or process.

Accessing and updating of information

You are entitled to see the information held about you to ensure that it is accurate and kept up to date. If you wish to do this, please contact us. We are entitled by law to charge a fee to meet our costs in providing you with details of the information we hold about you. We will advise the cost on request.

Your main rights under the data protection law are:

1. **The right to access your personal data** - (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
2. **The right to rectification** - This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
3. **The right to erasure** - This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4. **The right to restrict processing of your personal data** - This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
5. **The right to object to processing of your personal data** - where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
6. **The right to data portability** - We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you
7. **The right to complain to a supervisory authority** - You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

More detailed information is available from the ICO website (<https://ico.org.uk/>)

You may exercise any of your rights in relation to your personal data by contacting us (details below in the contact section).

Ownership

This privacy policy should not be shared with any other third party without the written consent of Nationworld Limited. This document and any other associated documents remain the property of Nationworld Limited

Changes to our privacy policy

Any changes or updates to our privacy policy in the future will be posted to the website and, where appropriate shared through email notification.

Contact

All comments, queries and specific requests relating to our use or processing of your data should be addressed to our data protection officer at dpo@aspray24.com or you can write to us at Nationworld Limited, Nationworld House, Noose Lane, Willenhall, West Midlands WV13 3AP