This privacy policy covers the following website operated by Freightliner Limited:

• https://vbs.gwrr.co.uk

For the purposes of this privacy policy, this website will be referred to as 'the VBS Website' or 'our Website'.

SECTION ONE

Our core beliefs regarding user privacy and data protection

- User privacy and data protection are human rights
- We have a duty of care to the people within our data
- Data is a liability, it should only be collected and processed when absolutely necessary
- We will never sell, rent or otherwise distribute or make public your personal information

SECTION TWO

Relevant Legislation

The VBS Website is operated under the legal jurisdiction of the UK and has been designed to comply with the relevant sections of the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1988 (DPA)
- EU Data Protection Directive 1995 (DPD)
- EU General Data Protection Regulation 2018 (GDPR)

You have legal rights to access and to know how we use the personal data we hold about you.

SECTION THREE

Personal information that this website collects and why we collect it

We collect and process different types of personal data via the VBS Website, which may include the following:

3.1 What we collect?

We collect users email address which you provide to us upon registering to use the VBS Website.

We may ask you to provide additional contact information to provide you with additional site functionality

3.2 What we do with the information we gather?

We will use the information for the following:

- Internal record keeping
- To contact you as part of our customer care processes
- We may use your information to contact you for market research purposes

The VBS Website uses cookies. For details on the cookies we use and the purposes for which we use them please see the cookie policy .https://account.emodal.com/Home/CookiePolicy?Client_id=eModal

3.3 Contact forms

Should you choose to contact us using a contact form such as that found on a <u>contact us page</u> the data you include will be sent to the most relevant individual or department within our organisation <u>via email</u> and saved to a secure, web-based database. Once our staff team have responded to your enquiry the form submission details will be deleted from the database but may be retained within our email systems for auditing purposes.

3.4 Who do we share the information with?

We will never share your personal data with any third party other than as is required by law or only with our third party data processors such as our website administration partner for the purposes of operating the VBS

Website. Some of these processors may be located outside the country where you accessed the Website.

We may collect, transfer and store your personal data within any member of our group, which means subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the Companies Act 2006, including those outside the European Economic Area.

SECTION FOUR

Our third-party data processors

We use a number of third parties to process and store personal data collected by our Websites on our behalf. These third parties have been carefully chosen and all of them comply with the legislation set out in <u>section 2.0</u>. US-based data processors are also <u>EU-U.S Privacy</u> Shield certified. 3rd party data processors are:

Microsoft

Wells Fargo

Cybersource

Sendgrid

SECTION FIVE

Your Rights

Data protection law grants you certain rights in relation to the use of your personal information. These rights include amongst other things:

Right to request a copy of your information

You can request a copy of your information which we hold (this is known as a subject access request). If you would like to exercise this right you should contact us at the details outlined below.

Right to correct any mistakes or erase your information

You can require us to correct any mistakes in your information which we hold. You also have the right to ask us to delete information we hold about you.

You can find full details of your personal data rights on the ICO (Information Commissioner's Office) website at: https://ico.org.uk/

SECTION SIX

Keeping your data secure

We will use technological and organisation measures to ensure that your personal information is kept secure. We will also hold information about you only for so long as we need to hold it which generally is for as long as you continue to use or log into our Website. We will report any unlawful data breach of our Website's database or the database(s) of any of our third party data processors to any and all relevant persons and authorities within 72 hours of the breach if it is apparent that personal data stored in an identifiable manner has been stolen.

However, while we will use all reasonable efforts to secure your personal data, using the site you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that is transferred from you or to you via the internet. Please remember that you are responsible for keeping your passwords secure. If we have given you (or you have chosen) a password to enable you to access the VBS Website, you are responsible for keeping this password confidential.

SECTION SEVEN

Data Controller

The data controller for all VBS Websites is: Freightliner Limited, a UK Private limited Company with company number: 3118392 Whose registered office is:

3rd Floor 90 Whitfield Street, Fitzrovia, London, United Kingdom, W1T 4EZ

SECTION EIGHT

Data Protection Officer

Geraint Harries

General Counsel, G&W UK/Europe Region DataProtection@gwrr.co.uk