



PRIVACY POLICY AND DATA PROTECTION
FOR WEBSITE USAGE AND ONLINE MARKETING
IN EFFECT AS OF 10/05/2018 UNTIL FURTHER ACTION.
LAST UPDATE: 25/07/2018

The Privacy Policy of Eurogate Logistics for website usage and online marketing

A priority goal for **Eurogate Logistics Ltd.** (a member of the Eurogate Logistics Company Group, (hereinafter Eurogate Logistics), is to protect personal information provided by registered users of the Eurogate Logistics database (hereinafter users) and to ensure the right to informational self-determination.

Data controller information:

The data controller is Eurogate Logistics Ltd. („Data Controller“) as member company of the Eurogate Logistics Company Group.

Eurogate Logistic Company Group includes the following companies:

- **Eurogate Logistics Ltd.** - United Kingdom, registered in England and Wales under company number 2389832, registered office at Brooklands House, 4a Guildford Road, Woking, Surrey, GU22 7PZ. Main trading address is 240 Freshwater Road, Chadwell Heath, Essex, RM8 1RX. Our VAT number GB867 2544 93.; regulated by Companies House.
- **Eurogate Logisztikai Kft.** – Hungary (Address: 1021 Budapest, Hűvösvölgyi út 89.)
- **Eurogate Logistics Sp. z o.o.** – Poland (Address: Ul. Łopuszańska 95, 02-457 Warszawa)
- **Eurogate Logistics spol. s.r.o.** – Czech Republic (Address: Sokolovska 100/94, 180 00, Prague)
- **Eurogate International Forwarding B.V.** – Netherlands (Address: Bijdorp Oost 5, 2992 LA Barendrecht)
- **Foreign Representation Office of Eurogate Logisztikai Kft. in Samara, -** Russia (443051 - Samara, Ul. Alma-Atinskaya 29, Sh. 3 office 305.)

Data Controller is responsible for the preparation of this Privacy Policy, for the compliance to it, for the control of it and for the necessary changes. The valid version of the Privacy Policy is always available at the company addresses and on the www.eurogate.com website.

The current Privacy Policy is in effect as of 25/07/2018.

1. PERSONAL DATA HANDLED

The Company is entitled to handle the following personal data at each service category provided by the Company related to its online presence and marketing:

The Company operates the website www.eurogate.com for the whole Eurogate Logistics Company Group.

The Data Controller proceeds with the following data controlling activities related to the website:

1.5.3 Subscription to Contact us

In case of Subscription to Contact us the aim of handling the data provided by the user is: to identify the user, and then contact them by e-mail about their request. The user can give his/her consent to data handling, by providing the data – name, email address, phone number, message - filled out on the "Contact us" form online and submitting it to Eurogate Logistics's email address eurogate@eurogate.co.uk.

1.5.2 Subscription to Newsletter

When a user signs up for the Eurogate Logistics newsletter, personal data will be stored as provided by the user: user's name, e-mail address and company name with the aim to send out a newsletter of Eurogate Logistics to him/her. The data will be stored by the Mailchimp service provider to send out information. The stored data is managed by data processor and will not be transferred on to third parties.

Required data by the user for newsletter subscription: name, email address, company name

The data signed with *are obligatory to fill in.

1.5.4 Career site

The user can send online motivation letter and CV to the Eurogate Logistics based on the Career site published open positions. The data sent in the application documents will be stored by the Company and will not be transferred on to third parties.

2. DATA CONTROLLING AIMS AND DURATION

2.1 Data controlling aims

The Data Controller use the provided data to ensure fulfilment of its services, so specially for the below purpose:

Aims related to the operation of the website (www.eurogate.com):

- Contacting, which has the main target of proper information providing for Users, the effective and quick handling of the possible technical problems, system messages related to services;
- Contacting users;

- Newsletter sending;
- Providing information about each service to fulfil information providing task of the Data Controller and to comply with legal requirements;
- Application to open positions published online by Eurogate Logistics, and in case of further permission the storage of data for future open positions.

2.2 Duration of data management of online activities

The Data controller handles data until the aim of data handling is still on, so primarily the data are handled related to registration, contact, newsletter sending and application on the career site until the user do not ask for deletion of his/her data and do not withdraw his/her permission of data usage.

3. Data controlling claim

In case of registration for newsletter the user expressly and obviously give permission for the Data controller to send emails with marketing content and to handle personal data related to this newsletter sending.

In case of „Open position“ applications as well as emails sent to the email addresses of Eurogate Logistics on the career subsite the users give permission to the Data Controller to handle their data. The data handling is executed based on the users' voluntary permission after users' acknowledgement of understanding and agreeing with this Privacy Policy and Data protection document.

In certain cases, the handling, storage, transferring of set of submitted data is done by mandatory legislation, about that fact the Data Controller send notice to user in each case.

The user can only give their own personal data on the website. In case not their own data is submitted, it is the duty of Data controller to get the permission of the affected user.

4. Access of personal data

Exclusively the Data controller has the right of direct access to personal data.

Eurogate Logistics does everything is expected for the safe storage of data of Clients and Users.

Information by submitting of the data determined in Point 1. are handled with the utmost care and strict confidentiality by the Data Controller. The administrators of the Data Controller have different access rights: some of them have full right, others have limited access and right of data handling.

5. Data transferring

With the approval of this Privacy Policy and Data protection document the users expressly gives permission by acknowledging the data protection principles of the Data Controller, that the Data Controller transfers data to the service providers contracted directly with the Data Controller. The transferred data are allowed to use only for the execution of the contracted tasks, for further usage the transferred data are not allowed to store or transfer to third party in any form.

The aim of data transfer is to provide tailored service for the users, to optimize services provided by the Data controller for the users, to execute the contracted tasks of Data controller. The stored data are not allowed to be accessible for any other third party except it is mandated by law as well as in case it is related to the execution of Eurogate Logistics' contracted obligations.

Data transferring abroad

It may be that as part of the services provided for users, the collected personal information is mandated to be disclosed to a third party, which may be located outside the European Economic Area (EEA). This can happen when at any given time server is located outside the EEA countries, or if the service provider operates in a country outside the EEA. In case such transfer of personal data to third party is needed, Eurogate Logistics has made the necessary organizational and/or contractual action to ensure that processing of personal data is used only for the purposes mentioned above and with the adequate level of protection.

The Data Controller can transfer personal data for third country data controller or data processor outside the European Economic Area (EEA), in case the user gave expressly permission, or the rules of the valid data protection legislation are met and the right level of protection of data is ensured at the data controlling and data processing in the third country.

The Data Controller transfers personal data to third country in case of international legal aid, tax information exchange and execution of international treaty on the avoidance of double taxation according to the purpose, conditions and data specified in the international treaty.

6. Data processor information

The Data Controller uses Data processors, who provides proper guarantees about the compliance to the at all times the applicable data protection legislation, gives priority to the protection of the users' rights, furthermore makes steps for the data protection adequate technical and organizational actions.

Data processors contracted by the Data Controller are the following:

Name: **Salesforce**
Address: located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States
Tax No.: 770493581
The purpose of usage of Data processor: Salesforce is a CRM service providing software what is used by the Data controller

Name: **The Rocket Science Group, LLC.** operator company of Mailchimp - MailChimp is a marketing automation platform and an email marketing service and a trading name of its operator, Rocket Science Group LLC.
Address: 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308, United States
Tax No.: 582554149
The purpose of usage of Data processor: Mailchimp automation platform is used for newsletter, email sending to subscribers.

Name: SurveyMonkey Europe Unlimited Company
Address: 2 Shelbourne Buildings, Second Floor, Ballsbridge, Dublin 4., Ireland
Company No.: 532327
The purpose of usage of Data processor: SurveyMonkey is an online survey development cloud-based software as a service company

Name: Google LLC ("Google"),
Address: located at 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States
Tax No.: 770493581
The purpose of usage of Data processor: Google Analytics, which track your engagement with the Website (e.g. to know how you use our Website, when do you use them, using what device), derive general consumption trends and patterns from this analysis, to allow us to improve our services. Google Adwords, which is an online advertising service developed by Google, where advertisers pay to display brief advertisements, service offerings, product listings, and video content within the Google ad network to web users.

Name: Transorg Kft. (SPEDINFO 2000 software)
Address: 1117 Budapest Hauszmann A. u. 4/A. fszt. 6.
Inc. authority: Fővárosi Törvényszék Cégbírósága
Company No.: 01 09 070577
Tax No.: 10460151-2-43
The purpose of usage of Data processor: Spedinfo 2000 software, client data and order managing software

Name: Dbh It Services Kft. (EXACT GLOBE könyvelő szoftver szolgáltató)
Address: 1027 Budapest, Kacska utca 15-23.
Inc. authority: Debreceni Törvényszék Cégbírósága
Company No.: 09 09 020375
Tax No.: 23118438-4-09
The purpose of usage of Data processor: accounting software service provider (Support, error monitoring and maintenance)

Name: Szeráf Pannónia Kft. (in the past Cashglobal Kft.)
Address: 9161 Győrsövényház, Ady utca 7.
Inc. authority: Győri Törvényszék Cégbírósága
Company No.: 08 09 028441
Tax No.: 25755439-2-08
The purpose of usage of Data processor: - management of outstandings of bigger amount

Name: Cartel Credit Kft.
Address: 1108 Budapest, Tavasz utca 1/C. fszt. 17.
Inc. authority: Fővárosi Törvényszék Cégbírósága
Company No.: 01 09 926058
Tax No.: 14919839-2-42
The purpose of usage of Data processor: - management of outstandings of moderate amount

Name: Zendigital Kft.
Address: 2081 Piliscsaba, Damjanich utca 2/B.
Inc. Authority: Budapest Környéki Törvényszék Cégbírósága

Company No.: 13-09-149584

Tax No.: 23487936-2-13

The purpose of usage of Data processor: IT services (access, email, maintenance of programs, softwares and hardwares)

Name: **T-Systems Magyarország Zrt.**

Address: 1117 Budapest, Budafoki út 56.

Inc. authority: Fővárosi Törvényszék Cégbírósága

Company No.: 01 10 044852

Tax No.: 12928099-2-44

The purpose of usage of Data processor: electronic data storage service.

7. Rights of the user

Data controller give information to the **request of the user about his/her personal data**, the source of these data, the aim, claim and duration of the data controlling, furthermore – in case of transfer of personal data – about the claim of data transfer and addressee. The information can be requested via email sent to this **privacy@eurogate.com** address and via post mail to **Eurogate Logistics Ltd. 1021 Budapest, Húvösvölgyi út 89.**, in both cases with the verification of the identity and postal address. The Data Controller has 30 (thirty) days to answer in written after the arrival date of the request.

The user has the right to **request of rectification of personal data** (indicating the correct data) via this **privacy@eurogate.com** email address and via post sent to **Eurogate Logistics Ltd. 1021 Budapest, Húvösvölgyi út 89.**, in both cases with the verification of the identity and postal address. The Data Controller execute the rectification forthwith and send notice in written to the user about the rectification.

The user can request the **erasure and limitation** of usage of his/her personal data via this **privacy@eurogate.com** email address and via post sent to **Eurogate Logistics Ltd. 1021 Budapest, Húvösvölgyi út 89.**, without explanation, with the verification of the identity and postal address. The Data Controller execute the erasure and limitation forthwith of personal data.

The Data Controller set limitations of handling into force in case the User request it. If the data handling has limitation, the related data can be handled except storage in case of permission of user or to present, enforce or protect legal claims, or in case of protection of the rights of other natural person or legal entity or in case of high priority public interest of the EU as well as any member state of EU.

In case the Data Controller do not execute the user's request of data rectification, limitation of handling or erasure, the Data Controller should send in written the fact based and legal reasons of user's request of data rectification, limitation of handling or erasure within 30 days after receiving the request. In case of refusal of user's request of data rectification, limitation of handling or erasure the Data Controller give information for the user about the judicial remedies and the possibility of turning to the National Data Protection and Information Authority.

The user can object to handle personal data,

- If data handling and transfer is needed for execution of the legal obligation exclusively related to the Data Controller, or it is necessary to enforce its legitimate

interest of the data controller, the data processor or the third party, except mandatory data handling;

- If the usage and transfer of personal data is done for the purpose of direct solicitation, poll or scientific research, and in any case determined by law.

The Data Controller investigate the object request within the shortest possible time after the submission of the request, but maximum within 15 (fifteen) days, the Data Controller decides about the soundness of the request and informs the user in written about the decision. If the User do not agree with the decision of the Data Controller, as well as the Data Controller miss the above deadline, the User can turn to court after the decision sent or within 30 days from the last day of the deadline.

8. Data collected at the usage of website

In case the user does not give any personal data, information on the website, the Data Controller do not collect and handle any personal data related to the user in the form, the user can be identified.

By visiting the website all users give permission to record the data and information subscribed in this section of this Privacy Policy and Data protection document and use cookies for this record.

This information can be the data of your computer, tablet or smartphone which are generated at the usage of the website and which are automatically recorded by the Data Controller's system as the result of the technical processes. The automatically recorded data are automatically logged by the system – without the particular permission or action of the user - when the user enter and exit the website.

IP address of the Web page, pages visited by the users, what web browser is being used for browsing places visited previously / after, as well as how long it took for a visit / session.

These data are not linked to any other personal data, so the user can not be identified based on these data. Exclusively the Data Controller has access to these data. These data can be collected only by using different technologies, like cookies, web beacons and logfiles.

These data contain the following information:

Cookies: cookies are small text files that are sent to your Internet browser so that when you return to the Site, we recognize your browser and it contains information about the.

Logfiles:

The internet browser automatically forward certain other data as well to the website, as the IP address of the user (pl. 192.168.2.1), the operation system of the user, the type of the web browsers, domain name, browsing places visited previously / after, as well as how long it took for a visit / session.

The Data Controller – as any other website owner – makes analysis these data to define which part of the website is more popular among visitors and to be able to develop the website's user experience based on the needs of the users.

9. The data collected during the usage of the website

The above technologies cannot be collected to identify the users and the Data Controller do not link these data to any data suitable for identification.

The aim of data usage is to ensure the website flawless operation by the Data Controller, to that the data about the usage of the website is necessary and to filter the misuse of the website. In the data subscribed in this document can be used based on the personal preferences of the Data Controller (e.g. the most visited content of the website).

On top of the above written the Data Controller can use these data to analyse user trends and to improve, develop website functions and to gain comprehensive traffic data about overall usage of the website.

10. Turn-off cookies:

If you do not want that the Data Controller collect data related to your website usage, you can turn off partially or fully the usage of cookies in the internet browser settings or you can modify the settings of the cookies' messages

However, please note that if you refuse the use of cookies, although you will be able to visit our Web sites, it is possible that some functions will not work properly, and it is also possible that you will not be able to use all the features of the Website and the aimed user experience cannot be ensured by the Data Controller.

11. Links

Our services sometimes link to services run by other companies (e.g. Facebook, LinkedIn, Twitter, Instagram). Those companies have their own privacy and cookies policies. Eurogate Logistics do not take responsibility for the content, data and information protection practice of these websites. If Eurogate Logistics get aware of any misuse of personal data by the linked websites, the link will be removed from the website of the Data Controller.

12. Data security

The Data Controller obliges himself, to care about the data security, and do the technical and organizational actions, and establish those processes and rules, which ensure that the data collected, stored and handled are protected and prevent the annihilation, unauthorized use and unauthorized modification of these data. The Data Controller obliges himself to request from all third party to whom these data were transferred or handover to ensure the requirements of data security.

The Data Controller controls that unauthorized persons do not have access to the data handled, are not be able to publish, transfer, modify and delete these data. Only the employee of the Data Controller can have access to the data handled and Data Controller do not transfer these data to unauthorized persons.

The Data Controller does his best that data is not damaged and annihilated accidently. This obligation is prescribed by the Data Controller for the employees participating in data handling.

Under no circumstances the Data Controller do not collect special data, namely data about racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

In case of data protection incident, the Data Controller without undue delay, latest 72 hours after getting aware of data protection incident notifies the incident to the supervising authority, except the data protection incident do not pose a risk to natural persons' rights and freedoms. In case the notification does not happen within 72 hours, the Data Controller should enclose the reasons proving the delay to the notification.

In case the data protection incident pose high risk potentially to the natural persons' rights and freedoms, the Data Controller should inform the user about the data protection incident without delay.

The Data Controller should include the following information to the Data protection incident document sending to the user:

- Clear information about the feature of the data protection incident;
- Information about the contact name and availabilities of further notice;
- Describe the possible consequences of the data protection incident;
- Describes the actions planned and taken by the Data Controller to mitigate the effect the data protection incident and the disadvantages.

13. Enforcement opportunities

- The Data Controller does his best, to ensure that data handling is happening according to the valid legislation. In case you feel that we are not compliant to this, please write to us to the **privacy@eurogate.com** email address or write to us mail via post to **Eurogate Logisztikai Kft., Hungary 1021 Budapest, Hűvösvölgyi út 89.**

In case you feel that your right to personal data protection was violated you can turn for legal remedy to the supervising authority (please see availabilities per country below) or to court in the related country.

- United Kingdom – Information Commissioner's Office (Address: Wycliffe House, Water Lane Wilmslow, Cheshire, SK9 5AF, United Kingdom)
- Poland - Generalny Inspektor Ochrony Danych Osobowych (Address: Biuro Generalnego Inspektora Ochrony Danych Osobowych, Stawki 2, 00-193 Warsaw, Poland)
- Czech Republic - The Office for Personal Data Protection (Address: Pplk. Sochora 27, 170 00 Praha 7, Czech Republic)
- Hungary - Nemzeti Adatvédelmi és Információszabadság Hatóságnál (Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.)

13. Other provisions

This Privacy Policy and Data Protection policy shall be compliant the Regulation (EU) 2016/679 (General Data Protection Regulation) and the local data protection legislations.

The Data Controller has the right to change this Privacy Policy without any previous announcement over time. You are advised to regularly review the Privacy Policy for possible changes.

Eurogate Logistics
Data Controller