



DATA PRIVACY POLICY NOTICE

Universal Commercial Relocation Limited (hereinafter “Universal”, “UCR” or “we”) are committed to delivering the services it provides to the highest standards. We appreciate how important your privacy is and recognise that we are being trusted with protecting it, so the purpose of this privacy notice is to give you a clear explanation about how we collect and use your personal data.

Universal Commercial Relocation Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you about how we look after your personal data when you visit our website and tell you about your privacy rights and how the law protects you.

This privacy policy contains important information about how we collect, store and process personal data through our website and other media. Given its importance, we would therefore recommend that you read this privacy notice in full so that you understand what data we collect about you, how we collect, use and look after that data, what privacy rights you have and how the law protects you.

The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from). We'll also tell you about your privacy rights and how the data protection law protects you.

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1. WHO WE ARE AND IMPORTANT INFORMATION

Universal Commercial Relocation Limited is the data controller of your data and is therefore responsible for your personal data. Universal is registered as a Data Controller with the Information Commission and our registration number is **ZA146541**.

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, you can contact our DPO at dpo@ucr.uk.com. If you feel you need to, you also 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).

Changes to the privacy notice and your duty to inform us of changes

This privacy notice was last updated on 25th May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

If you are using our website (www.ucr.uk.com), please be aware that the website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We



do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect, use, store and transfer different kinds of personal data about you to enable us to provide you with a service or sell you products and, where we are permitted, to tell you more about the services we can provide to you.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Name and contact details – this includes your name, title, billing address, delivery address, email address and telephone numbers.
- Payment information – this includes your bank account and/or payment card details, where it has been provided to us and is necessary to process a payment.
- Purchase history – this includes details about services that we have provided to you and charged you for.
- Profile information – this includes your username and password if you use our Web portal for receiving quotations and accept or pay an invoice through that portal
- Marketing preferences – this includes your preferences in receiving marketing from us and your communication preferences.
- Customer service history – this includes interactions with us over the phone, via the website or on social media.
- Information about your device and how you use our websites and apps – this includes information you give us when you browse our websites or apps, including your internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, as well as how you use our websites and apps.

Unless you are an employee, we do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. HOW WE COLLECT YOUR PERSONAL DATA

We will collect personal data from and about you in the following ways, but we will only collect this data to fulfil legal and lawful processing of it.

- Direct interactions. You may give us your name and contact details and payment information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Request a quotation or purchase products or services from us;
 - subscribe to our mailing lists or newsletters;
 - request marketing materials to be sent to you;
 - take part in a competition, promotion or survey; or
 - give us some feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect information about your device and how you use our websites and



apps. We collect this personal data by using cookies, server logs and other similar technologies.

- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources such as information about your device and how you use our websites and apps from analytics providers such as Google based outside the EU.
- Name and contact details, payment information and purchase history from providers of technical, payment and delivery services.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.
- For certain processing purposes, we may request your **consent** to authorise the processing. For example, if you are not a customer of Universal and have not enquired about our products or services, we would need a clear consent from you in order to send any communications to you about our products or services.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out in the table below a description of what we do with your personal data and why we do it. We have also identified what our legitimate interests are where appropriate.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose / Activity?	What type of data?	The basis for why we lawfully process your data including the basis of legitimate interest?
To register you as a new customer and manage your account and our relationship with you	Name and contact details Profile information	(a) to perform our contract with you (b) necessary to comply with legal obligations (c) necessary for our legitimate interests (to run our business and provide our services to you).
To sell you other products and services	Name and contact details Purchase history	(a) to perform our contract with you (d) necessary for our legitimate interests (to run our business and provide our relocation and associated services to you).



<p>To take payments and give refunds</p>	<p>Name and contact details</p> <p>Payment information</p>	<p>(a) to perform our contract with you</p> <p>(b) necessary for our legitimate interests (to run our business, take payments and where necessary provide refunds).</p>
<p>To manage our relationship with you and send you service messages, such as when we need to tell you about a change to the service</p>	<p>Name and contact details</p> <p>Marketing and communication</p>	<p>(a) to perform our contract with you</p> <p>(b) necessary to comply with legal obligations</p> <p>(c) necessary for our legitimate interests (to run our business and manage our interactions with you as a customer and ensure the right service is delivered to you).</p>
<p>To provide customer service and support</p>	<p>Purchase history</p> <p>Customer service history</p>	<p>(a) to perform our contract with you</p> <p>(b) necessary for our legitimate interests (to run our business and offer the best possible service and support to our customers).</p>
<p>To provide training to our staff</p>	<p>Customer service history</p>	<p>(a) necessary for our legitimate interests (to ensure our staff are highly-trained and provide the highest quality service to our customers).</p>
<p>To send you information about new products and services or improvements to existing services</p>	<p>Name and contact details</p> <p>Marketing preferences</p>	<p>(a) necessary for our legitimate interests (to ensure that the services we offer to clients remain focused and meet their needs and to keep customers informed of new service offerings).</p>
<p>To ask you to leave a review or take a survey</p>	<p>Name and contact details</p> <p>Profile Information</p> <p>Marketing preferences</p>	<p>(a) to perform our contract with you</p> <p>(b) necessary for our legitimate interests (to allow our customers to provide feedback).</p>



<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>Name and contact details Payment information Information about your device and how you use our websites and apps</p>	<p>(a) necessary for our legitimate interests (to ensure we run an effective and security focused system and to prevent fraud). (b) necessary to comply with legal obligations</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>Name and contact details Purchase history Profile information Information about your device and how you use our websites and apps Marketing preferences</p>	<p>(a) necessary for our legitimate interests (to better understand our customer's needs and requirements, both ongoing and in the future).</p>
<p>To use data analytics to improve our website, events/products/services, marketing, customer relationships and experiences</p>	<p>Name and contact details Purchase history Profile information Information about your device and how you use our websites and apps Marketing preferences</p>	<p>(a) necessary for our legitimate interests (to better understand the needs and requirements of customers and offer tailored services to current and potential clients to develop our business and inform our marketing strategies).</p>

MARKETING MESSAGES AND PROMOTIONAL OFFERS

You will receive marketing communications from us if you have requested information from us or purchased products or services from us. You'll also receive these communications if you have said that we can send them to you when you provided us with your details when you first contacted us, requested information signed up to use our portal etc.

You can tell us that you want to stop receiving marketing communications from us at any time. You can do this via our preference centre within your account, by clicking on the unsubscribe link in any email we send you or by contacting us directly by email, post or over the phone.

We'll process any such request as quickly as we can, but it might take a few days for all of our systems to be updated. Don't worry about not getting updates on any services that we are providing at the time – stopping marketing communications won't stop service communications, so you'll continue to get all the information you need.

COOKIES

We use cookies on our websites. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the website may become inaccessible or not function properly.



5. WHO WE SHARE YOUR PERSONAL DATA WITH.

We're serious when we say we're committed to protecting your privacy – we want to earn and maintain your trust, so we do not sell any of your personal data to any third party.

We do not, and will not, sell any of your personal data to any third party – including your name and contact details and your payment information.

We do, however share your personal data with certain companies who play an essential part in enabling us to provide our products and services to you, which include the following:

- The Companies that do things to get your purchases and services to you, such as agents, shipping lines, transport companies and various service partners
- Payment service providers, order packers and delivery companies
- Professional service providers such as IT and system administration providers and website hosts, who help us run our business
- Law enforcement and fraud prevention agencies, so we can help tackle fraud
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Companies approved by you, such as social media sites (if you choose to log in via your accounts with them)

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

As a general rule, we do not envisage transferring your personal data overseas or outside the European Economic Area.

We will only transfer your personal data overseas if there are appropriate safeguards in place to make sure your personal data receives the same protection as when it is being processed inside the EEA.

7. DATA SECURITY

We're committed to keeping your personal data secure and have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

In some circumstances, you can ask us to delete your data: see the section detailing your legal rights below for further information.

We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have many legal rights relating to your personal data, including the right to object to processing of your personal data or to withdraw consent.

- *The right to request access to your personal data.*
- *The right to request correction of your personal data.*
- *The right to request erasure of your personal data.*
- *The right to object to processing of your personal data or to withdraw consent.*
- *The right to request restriction of processing your personal data.*
- *The right to request a transfer of your personal data to another service provider.*
- *The right to withdraw consent.*

If you wish to exercise any of the rights set out above or if you have any questions or a complaint, please [contact us](#) by post, email or telephone using our contact information as set out on our website or in this policy notice.