



Howard Tenens Privacy Policy

1. Background

This document is issued in the light of new enhanced data protection requirements, specifically the General Data Protection Regulation (GDPR). There is a lot of jargon used within the GDPR, but basically this is about how personal information about individuals is collected, used and looked after. This document sets out the detail about how the personal information provided by you will be used and looked after and explains your rights in relation to it. For our business personal information is typically the contact details of those with whom we do business, information necessary in order to fulfil our commitments to our clients and to provide information to prospective clients as well as dealing with business contacts.

2. Our commitment to you

Our commitment is to:-

Keep personal information provided by you safe and private;

Not use personal information for any purposes other than in connection with undertaking work for you, for the effective running of our business, for account management purposes, keeping you informed of information about our business and as otherwise set out in this document;

Make it easy for you to approach us if you have any concerns or questions relating to the holding of personal information.

3. Who we are and how we operate

Howard Tenens Limited provides third party logistics services to all sectors. We specialise in providing solutions to our customers' supply chain challenges, fulfilling all contracts to the highest level of service. Our professionally trained teams offer value for money supported by industry leading warehouse and transport management systems. Howard Tenens offer an end to end solution, from import to export, customs and excise bonds, container clearance, transport, storage, handling, re-work, kitting, value added services, full loads, parcel and pallet deliveries.

There is more information about us on our website: <https://www.tenens.com>.

The individual responsible for data protection matters at Howard Tenens is James Bishop, whose email address is james.bishop@tenens.com.

4. How information is collected from you

We will often collect personal information directly from you. This will often be when we are dealing with your questions about the services which we can provide or the products which we supply or when we start to provide services or products to you. Further personal information may be collected as work proceeds. Information may be collected by face-to-face meetings, by telephone, by email or other electronic communications. This could be by interaction with our website. You are referred to our Cookie Policy in this respect at <https://www.tenens.com>.

5. What personal information will we collect?

We will require contact and context details such as:-

Company

Name

Job Title

Address

Fax and Phone numbers

Email address

Areas of relevant business interests

As our relationship develops we may also gather contextual information about you.

We will also collect such personal information as we may reasonably require from you in order to provide products and services to you.

If your access to us is via our website we may use cookies, see <https://www.tenens.com>.

6. Who will personal information be provided to?

We will not provide your personal information to anyone else save in the circumstances set out at 7 and 8 below or where you consent to us doing so.

7. What about outsourcing?

We will pass personal information to other organisations from time to time, not for them to use for their own benefit but rather to assist us. This might include holding personal information to assist in the efficient administration and running of our business and to assist with customer relationship management, accounting and regulatory purposes and the holding and processing of information in electronic form including its storage and maintenance.

What will the personal information be used for?

To fulfil our contractual obligations towards you:-

To progress the provision of products or services to you including dealing with enquiries;

To regulate the quality of what we do on your behalf;

We may from time to time provide personal information to those outside of The Lines Group to assist us in providing products and services to you. For example, we may make use of specialist IT providers to assist us with our work for you.

When it is our legal obligation

There is a requirement for us to keep records for VAT and other financial and regulatory purposes. Also, in very rare circumstances we may be required to provide information to local or public authorities including the police.

When legitimate interests apply

It is possible that from time to time we may wish to communicate with you concerning matters which may be of interest to you. The nature of such contact will be:-

To inform you of our products and services and changes to them;

To provide you with news in our field of operation which may be of interest or relevance to you;

To communicate about offers and promotions, product launches or other developments of a similar nature:

To communicate other developments at Howard Tenens Limited.

We will not communicate to you under this heading where there is any perceived detriment to you in receiving the communication. The communications may be by email, social media, telephone, post, verbally or by other means.

If you do not wish to receive communications under this heading please contact James Bishop at james.bishop@tenens.com. In making contact please confirm the type of communications listed which you do not wish to receive. In almost all circumstances we will then cease to send communications to you of this nature. However, if for some reason we propose to continue to provide communications to you of the particular nature we will explain to you why we propose to do so and enter into a dialogue with you about this.

Access via our website

When contact is made via our website information may be used for purposes of Analytics, heat mapping and Usage Information in order to provide a more useful and relevant interaction for you within the site. More information is provided in our Cookie Privacy Notice.

When you consent

There are certain uses to which we will not put personal information without your specific consent. For example, we will not provide any information about you in publicity material without your consent. If we wish to use your personal information for any purpose other than those listed under the other heads we will seek your specific consent.

Other

We may also use personal information for management and statistical purposes to enable the efficient running of Howard Tenens Limited.

8. What happens if I don't wish to provide personal information to Howard Tenens Limited?

We seek personal information from you to be able to provide the services and supply the products required by you. Without such information we are not likely to be in a position to trade with you. If, of course, we have personal information relating to you and you have no wish to deal with us, or if the information is not strictly necessary to enable us to trade with you, please let us know as we would not wish to contact you or retain personal information about you unnecessarily.

9. How long will Howard Tenens Limited keep personal information for?

We will only retain personal information:-

For as long as necessary to fulfil the purposes it was collected for as set out in this Privacy Notice;

In relation to those who enquire about our products and services but do not go on to purchase them or who we are told may have an interest in our products or services but do not go on to purchase them, we would not normally keep personal information for longer than 26 months after the last communication from you, or where we do not receive a communication from you for longer than 26 months from the point of our initial contact. Note, we have chosen 26 months as it is in line with the default period operated by Google Analytics.

If we are providing products and services to you we will retain personal information for the duration of the supply. Thereafter we will usually retain the personal information for 7 years. There may be certain circumstances in which the period may be longer, where for example we have provided you with a specific product, in which case it will be for the lifetime of the product plus 7 years.

In some circumstances you have the right to request erasure of personal information held. This will be addressed below.

10. Your rights in relation to the information held in relation to you

Access – the right to make what is known as a Subject Access Request to obtain a copy of the personal information which we hold about you. If you make such a request we are required, in most circumstances, to provide a copy of the personal information without charge and within 30 days.

You may also seek confirmation of the nature of personal information which we hold about you without seeking a copy of the information itself.

Correction – it is important that you keep us up to date with any changes to the personal information provided. Subject to that you have the right to ask us to correct or complete any inaccurate or incomplete data held about you. It is possible that evidence will be required of the new information provided.

Erasure – you are entitled to ask us to delete or remove personal information held where there is no good reason for us to continue to hold it. It may not always be possible to comply with your request due to ongoing obligations in relation to the personal information. Where this is the case you will be informed and be told of the reasons why it is not possible to comply with the request.

Object to processing – you may object to us processing personal information. There are some circumstances in which it will not be possible to comply with your request, for example if it is necessary to process the information in connection with obligations which we have and which have been explained to you in this document. If you object to us processing information which has been processed under the legitimate interest head, we will stop processing it.

Restriction of processing – you may ask us to suspend processing of personal information in the following situations:-

If you want the data accuracy to be established;

Where the use of the personal information is unlawful but you do not want it to be erased;

You need the data to be held even though we no longer require it as you need it to establish, exercise, or defend legal claims; or

You have objected to the use of the data by us but we need time to determine whether we have overriding legitimate grounds to process it.

One option is also to ask for personal information about you to be suppressed. This means that we have permission to hold information about you simply to tell us that you no longer wish to be contacted by us, such that if information might come to us from another source suggesting that you may want a contact from us, we know not to contact you.

Request the transfer of information – sometimes rights apply to request a transfer of personal information held to other organisations, such as other suppliers of similar products and services. This right only applies to personal information that is processed by automated means and is held because it was necessary for the performance of the contract with you or personal information which is processed on the basis of your consent.

11. Keeping personal information safe

We have put in place appropriate security measures to prevent the personal information provided from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Access to personal information is limited to those employees and contractors who have a business need to know the personal information. Personal information will only be processed upon instructions from ourselves. Procedures have been put in place to deal with any suspected breach of the requirements under the GDPRs. You and/or the Regulator referred to below will be notified of any potentially significant breach.

12. What happens if you want to complain?

It is hoped that you will not have cause to complain. If you do complaints should be referred to James Bishop in the first place where possible. In the event that it is not possible or appropriate to refer a complaint to James Bishop it may be referred to the Regulator, the Information Commissioner's Office (ICO) whose address is:-

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

13. Miscellaneous

It is not anticipated that any personal information will be transferred outside of the European Union save where you provide it to us from outside of the European Union. We will update the Privacy Notice if this position changes.

We don't anticipate using automated decision making in relation to the personal information provided.

14. If I have any questions who do I ask?

Please ask the individual with responsibility for dealing with your matter. If this person cannot help, or if it is inappropriate to contact him or her, then please contact James Bishop.