

## Privacy Notice (Annex B)

### DATA PROTECTION INFORMATION FOR UK CUSTOMERS FRESH WAYS LOGISTICS LTD - UK DOMESTIC TRANSPORT SERVICES

#### 1. WHO WE ARE

**Data Controller:** FRESH WAYS LOGISTICS Ltd  
Company Registration Number: 14752509  
Registered Office: Lympne, United Kingdom

**Contact Details:**

e-mail: 'gdpr@freshwayslogistics.co.uk'  
- telephone: +44 1303 905017  
- website: 'www.freshwayslogistics.co.uk'

#### 2. PURPOSE OF THIS NOTICE

This Privacy Notice explains how Fresh Ways Logistics Ltd collects, uses, stores, and protects your personal data when you engage our domestic UK transport services.

We are committed to protecting your privacy and complying with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This notice applies to customers using our services for shipments within the United Kingdom only.

#### 3. WHAT PERSONAL DATA WE COLLECT

We collect and process the following categories of personal data:

##### 3.1 Company and Business Contact Information

- company name and registration details
- VAT number / Company registration number
- trading address and registered office address
- main business telephone number
- general business e-mail address

##### 3.2 Individual contact details

- names of your operational contacts (logistics managers, warehouse staff, authorised signatories)
- business e-mail addresses
- business telephone and mobile numbers
- job titles and department information

##### 3.3 Account and system access data

- username and password for our booking system
- login credentials and authentication data
- user activity logs and booking history
- IP addresses (for security purposes)

##### 3.4 Shipment and operational data

- collection and delivery addresses (UK locations)
- goods descriptions (type, quantity, temperature requirements)
- shipping instructions and special handling requirements
- consignment notes and waybills
- proof of Delivery (POD) documents including signatures
- photographs of goods condition (when relevant for claims or quality control)
- booking and reservation details
- pallet exchange records and accounts
- vehicle temperature logs (for temperature-controlled shipments)

##### 3.5 Financial and billing information

- invoicing details and billing addresses
- payment history and transaction records
- bank details (if provided for direct debit or payment processing)
- credit terms and account status
- outstanding balances and payment reminders
- pallet accounting records

##### 3.6 Claims and customer service data

- correspondence regarding damage claims, loss, or service issues
- supporting documentation (photographs, inspection reports, witness statements)
- insurance claim documentation
- credit notes and debit notes
- complaints and their resolution
- quality feedback and service reviews

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### 3.7 CCTV and vehicle tracking

- CCTV footage at our depots and warehouses (where signage is displayed)
- vehicle location data via GPS tracking (for operational efficiency and security)

**We do not process special categories of personal data** (such as health data, racial or ethnic origin, political opinions, religious beliefs, trade union membership, genetic data, biometric data, or data concerning sex life or sexual orientation) nor criminal conviction data.

## 4. HOW WE USE YOUR PERSONAL DATA (PURPOSE AND LEGAL BASIS)

### 4.1 Contract performance (legal basis: art. 6(1)(b) UK GDPR)

We process your personal data to perform our contract with you, including:

- managing and executing transport bookings
- organising collections and deliveries across the UK
- managing temperature-controlled transport operations
- issuing consignment notes and transport documentation
- processing invoices and managing payments
- administering pallet exchange accounting
- providing customer service and operational support
- communicating about specific shipments (delays, issues, confirmations)

**Necessity:** without this data, we cannot provide the transport services you have requested.

### 4.2 Legal obligations (legal basis: Art. 6(1)(c) UK GDPR)

We process personal data to comply with legal requirements, including:

- UK tax and accounting obligations (Companies Act 2006, HMRC requirements)
- VAT compliance and reporting
- health and safety regulations
- transport and logistics regulations (including food safety regulations for temperature-controlled goods)
- insurance and liability requirements
- employment law obligations (where relevant to driver records)
- responding to lawful requests from authorities

### 4.3 Legitimate interests (legal basis: art. 6(1)(f) UK GDPR)

We process personal data based on our legitimate business interests where these do not override your rights:

#### Claims management and dispute resolution:

- investigating and resolving damage or loss claims
- managing disputes and exercising our contractual rights
- defending against unjustified claims
- operating our right of retention (lien) over goods where payment disputes arise
- enforcing payment terms and debt collection

#### Business operations and security:

- fraud prevention and detection
- credit risk assessment and management
- network security and system integrity
- CCTV monitoring for security and safety at our premises
- vehicle tracking for fleet management, security, and efficiency
- managing relationships with carriers and logistics partners

#### Service improvement:

- quality control and service improvement initiatives
- business planning and operational analytics
- customer satisfaction monitoring
- training and performance management

#### Legitimate interest assessment:

we have balanced our legitimate interests against your rights and freedoms and determined that our processing is proportionate and necessary for our business operations without causing unwarranted harm to your interests.

## 5. WHO WE SHARE YOUR PERSONAL DATA WITH

We may share your personal data with the following categories of recipients:

### 5.1 Transport and Logistics Partners

- road hauliers and freight carriers (including owner-operators contracted to us)
- warehouse and storage facilities
- partner logistics companies for specific routes or services
- pallet network operators

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### 5.2 Service providers (data processors)

- transport management system and booking platform providers
- IT infrastructure, hosting, and cloud service providers
- e-mail and communication service providers
- document management and archiving services
- payment processing and merchant services
- customer relationship management (CRM) providers

All service providers acting as processors are bound by written contracts under article 28 UK GDPR, requiring them to protect your data and process it only on our instructions.

### 5.3 Financial institutions and credit services

- banks and payment service providers
- credit reference agencies (for credit vetting when credit terms are requested)
- debt collection agencies (in case of payment default)
- factoring companies (where we assign receivables)

### 5.4 Insurance and legal

- insurance companies and brokers (for goods in transit insurance and liability cover)
- loss adjusters and claims assessors
- legal advisors and solicitors
- expert witnesses and technical consultants
- alternative dispute resolution providers

### 5.5 Public authorities (when legally required)

- HM Revenue & Customs (HMRC)
- Driver and Vehicle Standards Agency (DVSA)
- Health and Safety Executive (HSE)
- Information Commissioner's Office (ICO)
- Police and law enforcement agencies
- Courts and tribunals
- Local authorities (for waste carrier licenses, if applicable)

### 5.6 Professional advisors

- accountants and auditors
- legal counsel
- business consultants
- GDPR and data protection advisors

### 5.7 Corporate transactions

In the event of a sale, merger, acquisition, or other corporate restructuring, personal data may be transferred to the prospective buyer or new owner (subject to appropriate confidentiality obligations).

## 6. INTERNATIONAL TRANSFERS OF PERSONAL DATA

### 6.1 General Position

Our UK domestic transport service operates within the United Kingdom. We do not routinely transfer personal data outside the UK.

### 6.2 Limited International Transfers

In some limited circumstances, personal data may be transferred internationally:

Service provider infrastructure: Some of our IT service providers (e.g., cloud hosting, e-mail services) may store data on servers located outside the UK.

Where this occurs:

- we only use providers in countries with a UK adequacy decision (e.g., EEA countries, if adequacy regulations remain in place), OR
- we implement Standard Contractual Clauses approved by the ICO or the UK International Data Transfer Agreement (IDTA)
- we conduct Transfer Risk Assessments to ensure appropriate safeguards.

### Current service providers with international infrastructure:

- E-mail services are hosted on Microsoft Office 365 servers located within the EU.
- Omnia services are hosted on Amazon Web Services (AWS).
- Domain names are registered with Aruba Business (Italy); DNS records may point to additional third-party providers.

### 6.3 Your rights

You have the right to:

- request information about any international transfers
- obtain a copy of the safeguards in place (SCCs/IDTA)
- object to transfers in specific circumstances

Contact 'gdpr@freshwayslogistics.co.uk' for information about international transfers relevant to your data.

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### 7. HOW LONG WE KEEP YOUR PERSONAL DATA

We retain personal data for as long as necessary to fulfil the purposes outlined in this notice and to comply with legal obligations.

Data Category	Retention Period	Reason
Account and contact data	Duration of relationship + 7 years	Contract claims limitation period; business continuity
Consignment notes and transport documents	7 years from date of shipment	Limitation period for contract and negligence claims; evidence preservation
Financial records (invoices, payments)	7 years from end of financial year	HMRC requirements; Companies Act 2006
VAT records	6 years from end of relevant tax year	HMRC VAT regulations
Claims and dispute records	7 years from claim resolution	Limitation Act 1980 (contract claims); potential litigation
System credentials	Duration of account + 12 months	Security; audit trail; account recovery
Operational correspondence	Duration of relationship + 3 years	Evidence of instructions; dispute resolution
CCTV footage	30 days (unless required for investigation)	ICO guidance; operational necessity balanced with
Vehicle tracking data	12 months	Fleet management; insurance requirements

Automatic deletion:

Once retention periods expire, personal data is securely deleted or anonymised unless retention is required for:

- compliance with a legal obligation
- establishment, exercise, or defence of legal claims
- legitimate archiving purposes

### 8. YOUR DATA PROTECTION RIGHTS

Under the UK GDPR, you have the following rights regarding your personal data:

#### 8.1 Right of access (article 15)

You can request:

- confirmation whether we process your personal data
- a copy of your personal data
- information about how we use it, who we share it with, and how long we keep it

**How to request:** e-mail 'gdpr@freshwayslogistics.co.uk' with "Subject Access Request" in the subject line.

**Response time:** within one month (extendable by two months in complex cases).

**Cost:** free of charge (unless requests are manifestly unfounded or excessive).

#### 8.2 Right to rectification (Article 16)

You can request correction of inaccurate personal data or completion of incomplete data.

**Practical note:** You can update operational contact details directly through your account manager or our customer service team.

#### 8.3 Right to erasure / "Right to be Forgotten" (Article 17)

You can request deletion of your personal data where:

- it's no longer necessary for the purposes we collected it
- you withdraw consent (where consent was the legal basis)
- you object to processing based on legitimate interests and we have no overriding grounds
- the data was unlawfully processed
- deletion is required to comply with a legal obligation

**Limitations:** we cannot delete data where retention is necessary for:

- compliance with legal obligations (e.g., HMRC requirements, limitation periods)
- establishment, exercise, or defence of legal claims.

#### 8.4 Right to restriction of processing (article 18)

You can request we restrict processing (i.e., store but not use) your data where:

- you contest the accuracy of the data (while we verify it)
- processing is unlawful but you don't want erasure
- we no longer need the data but you need it for legal claims
- you've objected to processing (pending verification of our legitimate grounds)

#### 8.5 Right to data portability (article 20)

Where processing is based on consent or contract performance and carried out by automated means, you can request to:

- receive your personal data in a structured, commonly used, machine-readable format (e.g., CSV, JSON)
- transmit that data to another controller

**Practical applicability:** this right applies primarily to data you directly provided through our booking system.

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### 8.6 Right to object (article 21)

Objection to processing based on legitimate interests:

You can object at any time to processing based on our legitimate interests (e.g., claims management, credit control, direct marketing). We will cease processing unless we demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or the processing is necessary for legal claims.

#### Objection to direct marketing:

If we send you marketing communications (e.g., information about new services), you have an absolute right to opt out at any time by:

- clicking "unsubscribe" in any marketing e-mail
- contacting 'gdpr@freshwayslogistics.co.uk'
- calling our customer service team

We will action your request immediately.

### 8.7 Right not to be subject to automated decision-making (article 22)

We **do not** use automated decision-making or profiling that produces legal effects or similarly significant effects on you.

All significant decisions (including credit decisions, claims assessments, and service provision) involve human review and judgement.

### 8.8 How to exercise your rights

#### Contact details:

- **e-mail:** 'gdpr@freshwayslogistics.co.uk' (preferred method)
- **Telephone:** +44 1303 905017
- **Post:** Fresh Ways Logistics Ltd, Spicer House, Lympne Industrial Park, Lympne, Hythe CT21 4LR – United Kingdom

#### What to include in your request:

- your full name and company name
- contact details for our response
- clear description of the right you wish to exercise
- copy of proof of identity (e.g., passport, driving licence - for security)
- reference to relevant account number or shipments (if applicable)

#### Our response time:

we will respond to your request **within one month** of receipt. In complex cases (e.g., voluminous data, multiple requests), we may extend this by a further two months, and we will notify you of any extension and the reasons.

#### Cost:

exercising your rights is generally **free of charge**. We may charge a reasonable administrative fee only where requests are:

- manifestly unfounded or excessive
- repetitive in nature

We will inform you of any charges before proceeding.

## 9. RIGHT TO LODGE A COMPLAINT

If you believe we have not handled your personal data properly or have concerns about our data protection practices, you have the right to lodge a complaint with the UK supervisory authority.

#### Information Commissioner's Office (ICO)

- **Website:** 'www.ico.org.uk'
- **Telephone:** 0303 123 1113 (Monday to Friday, 9am to 5pm)
- **live chat:** available on ICO website during office hours
- **post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- **e-mail:** 'casework@ico.org.uk'
- **online reporting tool:** Available at 'www.ico.org.uk/make-a-complaint'

#### Before contacting the ICO:

we encourage you to contact us first at 'gdpr@freshwayslogistics.co.uk' so we can try to resolve any concerns directly and promptly.

#### Further options:

you also have the right to seek a judicial remedy through the UK courts if you believe your data protection rights have been infringed.

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### 10. DATA SECURITY

We take the security of your personal data seriously and have implemented appropriate technical and organisational measures to protect it against unauthorised access, accidental loss, destruction, or damage.

#### 10.1 Technical Security Measures

##### Network and System Security:

- encryption of data in transit using TLS/SSL protocols (minimum TLS 1.2)
- encryption of sensitive data at rest
- firewalls and intrusion detection/prevention systems
- regular security patching and updates
- anti-malware and antivirus protection across all systems
- multi-factor authentication for administrative access

##### Access controls:

- secure authentication mechanisms for booking system (strong password requirements)
- role-based access controls (staff access data only on a "need to know" basis)
- individual user accounts with activity logging
- regular access reviews and prompt deactivation of leavers

##### Infrastructure Security:

- secure data centres with physical access controls
- regular security audits and penetration testing
- secure backup procedures with off-site storage
- business continuity and disaster recovery plans

#### 10.2 Organisational security measures

##### Staff security:

- confidentiality and data protection clauses in employment contracts
- regular data protection and security awareness training
- clear acceptable use policies
- background checks for staff with access to sensitive data

##### Policies and procedures:

- information security policy reviewed annually
- clear data retention and secure disposal policies
- incident response and data breach procedures
- documented procedures for handling data subject requests
- regular management review of security measures

##### Third-party management:

- article 28 Data Processing Agreements with all processors
- due diligence on processors' security measures
- regular reviews of processor compliance
- contractual audit rights

#### 10.3 Physical security

##### Premises security:

- secure perimeter with controlled access
- CCTV monitoring (with appropriate signage)
- visitor management procedures
- secure storage for physical documents
- clear desk policy for sensitive information
- secure disposal of confidential waste (shredding/secure bins)

##### Vehicle security:

- GPS tracking on all vehicles
- secure locking mechanisms
- driver authentication and authorisation procedures
- procedures for securing paperwork in vehicles

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### 10.4 Data Breach response

In the unlikely event of a personal data breach:

#### Our obligations:

- we will assess the risk to your rights and freedoms
- where required, we will notify the ICO within 72 hours of becoming aware
- if the breach poses a high risk to you, we will notify you without undue delay
- we will document all breaches and our response

#### What we will tell you:

- the nature of the breach
- categories and approximate number of individuals affected
- likely consequences
- measures we have taken or propose to take to address the breach
- contact point for further information

#### Your actions:

- we will provide guidance on steps you can take to protect yourself
- you have the right to lodge a complaint with the ICO if you believe we have not handled a breach appropriately

## 11. SOURCE OF PERSONAL DATA

### 11.1 Data we collect directly from you

- most personal data is obtained directly from you through:
  - completion and signing of our service agreements and terms
  - registration and use of our booking system
  - e-mail, telephone, and written communications
  - booking forms and shipment instructions
  - commercial correspondence

### 11.2 Data we receive from third parties

In limited circumstances, we may receive personal data from:

#### Third parties acting on your behalf:

- agents or brokers booking shipments for you
- staff members of your organisation providing information
- authorised representatives

#### Delivery recipients:

- signatures and contact details on PODs
- damage reports or claims noted by consignees
- feedback on delivery service

#### Carriers and logistics partners:

- operational data during transport execution
- driver reports and delivery notes
- exception reports (delays, issues)

#### Credit reference agencies:

- credit scores and financial information (only where you apply for credit terms)
- information about your credit history and payment behaviour

#### Public sources:

- companies House (for verification of company details)
- your company website (for contact information)

### 11.3 Data we generate

We generate certain data through our operations:

- invoice and payment records
- account status and credit limits
- vehicle tracking and GPS location data
- CCTV footage at our facilities
- system activity logs and audit trails

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### 12. PROVIDING PERSONAL DATA - CONSEQUENCES OF NOT PROVIDING

#### 12.1 Data Required for Contract Performance

The following data is **mandatory** to perform our transport services:

**Essential information:**

- company identification and contact details
- at least one operational contact (name, e-mail, telephone)
- collection and delivery addresses for each shipment
- description of goods being transported
- special requirements (temperature control, handling instructions)
- billing information

**Consequence of not providing:**

We cannot execute transport bookings or fulfil our contractual obligations if you do not provide this essential data. The contract cannot be performed without it, and we will be unable to provide the service.

#### 12.2 Data required for credit terms

If you request credit terms, we require:

- full company financial information
- directors' details
- trade references
- permission to conduct credit checks

**Consequence of not providing:**

Without this information, we cannot offer credit terms. However, you can still use our services on a pro forma or cash-on-delivery basis.

#### 12.3 Optional data

Additional data (e.g., mobile numbers for SMS alerts, additional contact persons, customer reference numbers) is optional but may:

- improve service efficiency and communication
- enable enhanced features (e.g., real-time tracking notifications)
- facilitate quicker resolution of issues

Choosing not to provide optional data does not prevent us from providing the core transport service.

### 13. CCTV AND MONITORING

#### 13.1 CCTV at our premises

We operate CCTV systems at our depots and warehouses for:

- security (preventing theft, vandalism, and unauthorised access)
- health and safety monitoring
- investigating incidents and accidents
- evidence for insurance and legal claims

**Legal basis:** legitimate interests (security and safety).

**Signage:** clear signage is displayed at all monitored locations informing you that CCTV is in operation.

**Retention:** CCTV footage is retained for 30 days unless required for an ongoing investigation, insurance claim, or legal matter.

**Access:** footage is only accessible to authorised personnel and is shared with police or other authorities only where legally required or for legitimate investigation purposes.

#### 13.2 Vehicle tracking

Our fleet vehicles are equipped with GPS tracking systems for:

- route optimisation and efficiency
- customer service (providing accurate delivery ETAs)
- driver safety and security
- fleet management
- insurance requirements

**Legal basis:** legitimate interests (operational efficiency, safety, security).

**Data collected:** vehicle location, speed, routes, stop times.

**Retention:** tracking data is retained for 12 months.

**Driver awareness:** our drivers are informed that vehicles are tracked.

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### 14. COOKIES AND ONLINE TRACKING

#### 14.1 Our booking system

Our online booking system uses the following types of cookies:

##### Strictly necessary cookies:

- session management (keeping you logged in)
- authentication tokens (verifying your identity)
- security cookies (preventing fraud and securing your session)

These cookies are essential for the system to function and do not require your consent.

##### Functional cookies:

- remembering your preferences (e.g., language, layout)
- saving your booking preferences
- remembering your login details (if you choose "remember me")

These cookies improve your experience. You can disable them in your browser settings, but some functionality may be reduced.

##### Analytics cookies:

- We use Google Analytics 4 to understand how customers use our booking system
- this helps us improve the user experience
- these cookies are anonymised where possible

#### 14.2 Marketing cookies

We do not currently use marketing or advertising cookies on our booking system.

#### 14.3 Managing cookies

You can control and delete cookies through your browser settings. Please note that disabling essential cookies will prevent you from using our booking system.

**Cookie policy:** For full details, see our Cookie Policy at '[www.freshwayslogistics.co.uk/privacy-policy/](http://www.freshwayslogistics.co.uk/privacy-policy/)' or contact 'gdpr@freshwayslogistics.co.uk'.

### 15. AUTOMATED DECISION-MAKING AND PROFILING

#### We do not use automated decision-making or profiling.

All decisions that have legal or similarly significant effects on you involve human assessment and judgement, including:

- decisions about credit terms
- claims assessments and settlements
- pricing decisions
- service allocation and prioritisation

If we introduce automated decision-making in the future, we will:

- update this Privacy Notice
- notify you clearly
- provide information about the logic involved
- offer you the right to human review and to challenge decisions

### 16. DIRECT MARKETING

#### 16.1 Our marketing practices

We may send you marketing communications about:

- new services and routes
- special offers and promotions
- industry news and updates
- customer satisfaction surveys

##### Legal basis:

- **existing customers:** legitimate interests (soft opt-in for similar services)
- **prospective customers:** consent

#### 16.2 Your right to Opt Out

You have the right to opt out of marketing communications at any time by:

- clicking "unsubscribe" in any marketing email
- emailing 'gdpr@freshwayslogistics.co.uk' with "UNSUBSCRIBE" in the subject line
- calling our customer service team
- updating your preferences in your account settings

**Important:** opting out of marketing does not affect essential service communications (e.g., booking confirmations, invoice notifications, service updates).

We will action opt-out requests immediately and certainly within 28 days.

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### 17. CHANGES TO THIS PRIVACY NOTICE

**We may update this Privacy Notice from time to time to reflect:**

- changes in our business practices or services
- legal or regulatory changes (UK GDPR amendments, new ICO guidance)
- new technologies or processing activities
- feedback from customers or regulators

**How we notify you of changes:**

Material changes will be communicated by:

- e-mail notification to your registered contact address
- prominent notice on our website
- pop-up notice when you log into our booking system

Minor updates (e.g., formatting, clarifications) will be made without individual notification, but the revision date will be updated.

**Effective date:**

Changes take effect from the date of publication unless otherwise specified. We encourage you to review this notice periodically, particularly if we notify you of updates.

**Version Control:**

- current version: V1 - 2026/03/18
- last updated: 2026/03/18
- next scheduled review: not scheduled yet

### 18. CONTACT US

If you have questions, concerns, or requests regarding this Privacy Notice or how we handle your personal data, please contact us:

**Fresh Ways Logistics Ltd - Privacy Team**

- **e-mail:** 'gdpr@freshwayslogistics.co.uk' (preferred method - we aim to respond within 2 working days)
- **Telephone:** +44 1303 905017
- **Post:** Fresh Ways Logistics Ltd, Spicer House, Lympne Industrial Park, Lympne, Hythe CT21 4LR – United Kingdom

**For formal data subject rights requests:** Please use the subject line "Data Subject Request" and include:

- your full name and company name
- proof of identity
- clear description of your request
- any relevant reference numbers

**Response times:**

- general enquiries: within 5 working days
- data subject rights requests: within one month (as required by law)
- urgent security matters: within 24 hours

### 19. RELATIONSHIP WITH OUR TERMS AND CONDITIONS

This Privacy Notice should be read in conjunction with:

- our General Terms and Conditions of Service
- our transport terms
- our website Terms of Use
- our cookie Policy

All documents form part of our overall relationship with you and are available on request or on our website.

**In case of conflict:** If there is any inconsistency between this Privacy Notice and our other terms, this Privacy Notice will prevail in relation to data protection matters.

### 20. LEGAL BASIS AND COMPLIANCE

This Privacy Notice complies with:

- **UK General Data Protection Regulation (UK GDPR)** - the UK GDPR as retained in UK law following Brexit
- **Data Protection Act 2018** - the UK's implementation and supplementation of GDPR
- **Privacy and Electronic Communications Regulations (PECR)** - for electronic marketing and cookies
- **Information Commissioner's Office (ICO) Guidance** - we follow ICO codes of practice and guidance

Fresh Ways Logistics Ltd is committed to processing personal data in accordance with the seven key principles of UK GDPR:

1. **lawfulness, fairness, and transparency** - we process data legally, fairly, and transparently
2. **purpose limitation** - we collect data for specified, explicit, and legitimate purposes
3. **data minimisation** - we only collect data that is adequate, relevant, and necessary
4. **accuracy** - we keep data accurate and up to date
5. **storage limitation** - we don't keep data longer than necessary
6. **integrity and confidentiality** - we keep data secure
7. **accountability** - we take responsibility for compliance and can demonstrate it

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### 21. CHILDREN'S DATA

Our services are provided to businesses only. We do not knowingly collect personal data from children under 18 years of age. If we become aware that we have inadvertently collected data from a child, we will take steps to delete it promptly. If you believe we have collected data from a child, please contact 'gdpr@freshwayslogistics.co.uk' immediately.

### 22. UPDATES AND DOCUMENT HISTORY

This Privacy Notice replaces all previous versions.

Document History:

- Version 1 2026/03/18 initial publication

Annual Review: we review this Privacy Notice at least annually to ensure it remains accurate and compliant with current law and best practice.

#### Declaration

Fresh Ways Logistics Ltd, as Data Controller, confirms its commitment to protecting your personal data and respecting your privacy rights under UK data protection law.

We will process your personal data fairly, lawfully, and transparently, and only for the legitimate purposes set out in this notice.

This Privacy Notice is available:

- on our website: '[www.freshwayslogistics.co.uk/privacy-policy/](http://www.freshwayslogistics.co.uk/privacy-policy/)'
- on request in hard copy (contact 'gdpr@freshwayslogistics.co.uk')
- in large print format on request

Questions? Contact our Privacy Team at 'gdpr@freshwayslogistics.co.uk' - we're here to help.

**Electronically signed by the Data Controller  
in accordance with the Electronic Communications Act**

Read, approved, and signed in Lympne,

**The Client**

**Nicola Sorace**  
CEO

