



Visitor Privacy Notice

INTRODUCTION

When you visit any of our sites located in the United Kingdom, the data controller of your personal data will be the entity whose site you visit.

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform you as to how we collect, process and look after your personal data when you visit any of our sites and tells you about your privacy rights and how the law protects you.

1. IMPORTANT INFORMATION AND WHO WE ARE

1.1 PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how we collect and process your personal data when you visit any of our sites located in the United Kingdom.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

1.2 CONTROLLER

Our Head of HR 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, please contact our Head of HR using the details set out below.

1.3 CONTACT DETAILS

Constellation Cold Logistics UK Limited (company number 04874009) is registered in the United Kingdom at Birchin Way, Grimsby, North East Lincs, DN31 2SG.

Should you have any questions regarding this privacy notice please contact data.protection.uk@constellationcold.com.

You have the right to make a complaint at any time to the Information



Commissioner's Office (**ICO**), the United Kingdom's supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

1.4 **CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES**

This version was last updated on 26th May 2024, previous versions can be obtained by contacting us.

We may change this privacy notice from time to time. If so, we will notify you by website update or otherwise.

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

1.5 **THIRD-PARTY LINKS**

This privacy notice 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. We encourage you to read the privacy notice of every website you visit.

2. **THE DATA WE COLLECT ABOUT YOU**

2.1 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 may collect, use, store and transfer different kinds of personal data about you when you visit our facilities which we have grouped these together as follows:

- **Identity Data** includes first name, maiden name, last name, title, job title, vehicle number plate and gender.
- **Contact Data** includes company address, residential address, email address and telephone number.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not**



directly or indirectly reveal your identity. For example, we may aggregate personal data to calculate the percentage of individuals who attended one of our sites in a particular month. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We will also collect **Special Categories of Personal Data** about your health, including but not limited to medical conditions, disability and sickness.. We will collect special category data about you when you visit any of our sites for example, when you complete our Visitor Health Screening Questionnaire we will collect information which will reveal information about any health conditions which you might have.

2.2 IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law and you fail to provide that data when requested, we may not be able to permit you access to our sites. In this case, we will notify you that this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity and Contact Data by filling in forms (such as our Visitor Health Screening Questionnaire) or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Book an appointment to attend one of our sites;
 - Contact us to ask questions about attending our site;
 - Complete a sign in sheet at one of our sites so we can register you as attending;
 - Complete our Visitor Health Screening Questionnaire when you attend one of our sites; and
 - When you enter any of our sites and register your vehicle using our entry sign in system.
- **Indirect interactions.** We may obtain your personal data through



images captured on the video surveillance systems we have installed on our sites. We collect operate such systems on our sites for the purposes of safety and the prevention/detection of crime.

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:

- **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.
- **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

4.1 PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data when you visit one of our sites and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that 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	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a visitor at one of our sites	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to keep our records up to date and to ensure we comply with health and safety requirements to understand who is attending our sites at all times) (b) Necessary to comply with a legal obligation
To ensure that we can permit you access to our site by asking you to complete our Visitor Health Screening Questionnaire	(a) Identity (b) Contact (c) Special Category Data	(a) Necessary to comply with a legal obligation (b) Public health (with a basis in law)
Where your image is captured on our video surveillance systems	(a) Identity	(a) Necessary for our legitimate interests (to ensure we comply with health and safety requirements and to assist with the prevention and detection of crime)

4.2 CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.



If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

Internal Third Parties

- Other group companies (as set out in section 1.3) acting as joint controllers or processors and who are based in the UK and provide IT and system administration services and undertake leadership reporting.

External Third Parties

- Service providers acting as processors based in the European Economic Area (EEA) who provide IT and system administration services, email or website hosting services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- Regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

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

Our processing of your personal data may involve us transferring it outside the United Kingdom and the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the United Kingdom Supervisory Authority.
- Where we use certain service providers, we may use specific contracts approved by the United Kingdom Supervisory Authority which give personal data the same protection it has in the United Kingdom.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We 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

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

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.

We will retain your Identify and Contact data for a period of seven years from



the date of collection.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances 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 rights under data protection laws in relation to your personal data.

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we



may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

9.1 NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

9.2 WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.



9.3 TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.