



Flight Logistics Group Privacy Notice

Purpose of this privacy notice

Flight Logistics Group respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you interact with us and tell you about your privacy rights and how the law protects you. This privacy notice aims to give you information on how Flight Logistics Group collects and processes your personal data when you interact with us, including any data you may provide to us.

Scope of this privacy notice

This Privacy Notice applies to the following categories of individuals:

- Shippers: shippers, including their employees, or individuals who send a shipment
- Shipment receivers: Any individual who receives a shipment
- Persons showing interest in us and our services
- Business partners: business partners, including their employees
- Employment candidates: individuals that apply for a job with us

All the above subjects are referred to as "you" or "your".

Our website is not intended for children and we do not knowingly collect data relating to children.

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.

Our data protection practices are subject to applicable law in the places in which we operate. This means that we engage in the practices described in this Privacy Notice in a particular country, only if permitted by regional or local data protection laws.

Controller

Flight Logistics Group Limited is the controller and responsible for your personal data (collectively referred to as "Flight", "we", "us" or "our" in this privacy notice).

We have appointed a data privacy manager, 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, please contact the data privacy manager using the details set out below.

Contact details

Our full details are:	Flight Logistics Group Global Logistics Centre, Horton Road, Colnbrook, SL3 0DL.
Full name of legal entity:	Flight Logistics Group Ltd.
Name data privacy manager:	Rob Crane (I.T. Manager)
Email address:	rccrane@flightlg.com
Postal address:	Flight Logistics Group Global Logistics Centre, Horton Road, Colnbrook, SL3 0DL
Telephone number:	01753 763500

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Right to make a complaint

You 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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice

We reserve the right to change this Privacy Notice from time to time according to the changes in our services, the processing of your data or in the applicable law. We therefore recommend that you visit our Privacy Notice periodically. This version was last updated in September 2024 and historic versions are archived and can be obtained by contacting us.

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, where this is required or permitted by law.

Information for our business partners

We process data for you as our business partner, in order for us to manage our contracts with you or to receive services from you. We only collect and process the data necessary for our agreed contractual purposes and will only share data in accordance with applicable data protection laws and limited to the agreed purposes.

We use your services to better serve our employees and our customers. This allows us to guarantee a close proximity to our customers for their pick-up and delivery, shipment data, management services, partners for safety and security, audits, payment providers and IT hosting.

Types of data we process

- **Personal data**
Any information about an individual from which that person can be identified.
Such as: your name, phone number, address, email address
It does not include data where the identity has been removed (anonymous data).
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.
- **Contact data**
Information to contact you e.g. when we pick-up or deliver a package.
Such as: your name, phone number, address, email address
- **Employment candidate administration data**
Information used in HR systems for candidate employee master data.
Such as: your application, your competences, work visa

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- **User authentication and authorization**
Information to identify and verify you as a user of our systems and to verify your access to specific data e.g. On Demand Delivery application will show your pending shipments.
Such as: your login ID, password, IP address
- **Profile Data**
Information on your user profile e.g. to set your delivery preferences.
Such as: your delivery preferences, order/purchase history
- **Contract data**
Information laid down and agreed upon in contracts e.g. the contracting parties.
Such as: activity on contract, party names
- **Shipment data**
Information enabling the pick-up and delivery of your shipment e.g. status of your shipment.
Such as: your address, shipment documents, proof of delivery
- **Financial data**
Information used for invoicing, financial and payment processes e.g. bank account number which is used for payments.
Such as: your bank account, e-payment details
- **Identification data**
Information used to identify you e.g. passport image to verify your identity.
as: your ID data, social security number, passport image
- **Characteristics**
Information that is typical or noticeable related to you, which makes it possible to distinguish you from other persons.
Such as: your signature as a proof of delivery
- **Telecommunication and survey data**
Information communicated via you to one of our employees or by filling in an online survey e.g. when you call our customer service.
Such as: your feedback, when applicable call recording
- **Marketing and Communications Data**
Contact details to provide information about our products and services following referrals or enquiries.
Such as: response to marketing emails

We 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 your Usage Data to calculate the percentage of users accessing a specific website feature. 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.

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We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, gender identification, 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.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

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.

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.

Why we collect your data

We only process your data for specific purposes and where we have a legal basis to do so. This can be for the performance of a contract or when you take steps into starting a contract with us, to comply with a legal obligation or the legitimate interests pursued and to safeguard your and our rights.

We also collect data to increase your customer satisfaction, to deliver and improve our services for you, to facilitate your communication and interaction with us, to provide you with a more efficient, simplified and cost-effective service, to better manage our relationship with you and the opportunities that are presented with it, to optimize our routes and to better protect your data, to make sure no prohibited and unacceptable items enter our network. We will make sure that these legitimate interests are balanced. When applicable, you have the right to object.

How is your personal data collected?

We primarily collect and use your data to pick-up, transport and deliver your shipment and process, pick, pack and ship your orders. We may collect your data directly or indirectly. When you actively share information with us by e.g. creating an account, contacting us or filling in a form on our website or an order, we receive your data directly from you. When we receive your data from an external third party (e.g. shipper), we receive your data indirectly. In this case, it is the responsibility of the supplier of the data to ensure its accuracy and to transfer it to us in accordance with applicable law.

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

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our products or services
 - create an account on our website
 - subscribe to our services

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- provide information relative to our services
- give us some feedback.

- Automated technologies or interactions.
As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. 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:
 - analytics providers such as Google based outside the UK
 - Contact, Financial and Transaction Data from providers of services such as Federal Express, DHL, DPD based both inside and outside the UK.
 - Identity and Contact Data from data brokers or aggregators such as Federal Express, DHL, DPD based both inside and outside the UK.
 - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the UK.
 - Supplier contact information.
 - Printed lists and or computer files set via post, email or FTP providing information allowing us to provide our services.

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 your vital interests.

The following are the purposes for which we process your data.

For everyone

Purpose	Lawful ground for processing
To ensure the security of our networks and information systems	Legal obligation Legitimate interest
To protect you	Legal obligation Legitimate interest
To identify you	Performance of a contract Legal obligation Legitimate interest Consent

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For you as a customer to provide our services and manage our relationship

Purpose	Lawful ground for processing
To onboard you as a new customer	Performance of a contract Legitimate interest
To pick-up and deliver your shipment	Performance of a contract
To manage your shipment in our global network	Performance of a contract
To comply with all import and export regulations	Performance of a contract Legal obligation
To support you with the use of our tools	Performance of a contract
To allow our business partners to serve you	Performance of a contract
To improve customer experience	Performance of a contract Legitimate interest Consent
To process financial data from you	Performance of a contract
To improve customer experience	Performance of a contract Legitimate interest Consent
To keep you up to date on our products and services that may interest you	Legitimate interest Consent
To expand our products and services	Performance of a contract Legitimate interest Consent
To facilitate your visit on our website	Consent
To onboard you as a new customer	Performance of a contract Legitimate interest
To communicate with you	Performance of a contract Legitimate interest

For you as a business partner

Purpose	Lawful ground for processing
To manage our relationship with you	Performance of a contract Legitimate interest
For you to provide services to us	Performance of a contract
To process financial data from you	Performance of a contract
To communicate with you	Performance of a contract Legitimate interest

For you as a candidate employee

Purpose	Lawful ground for processing
To register you as a candidate e.g. job fairs	Performance of a contract Legitimate interest
To check your eligibility	Performance of a contract Legitimate interest
To onboard you	Performance of a contract

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Shipment screening

Shipments are screened to verify their content, to match the detailed description, to check their value and to comply with the applicable law and our Terms of Carriage. We screen all shipments for security purposes to avoid that prohibited and unacceptable items enter our network or to detect criminal offences or misuse. We have a legitimate interest for this processing as it ensures the smooth operation and continuous improvement of our products for your benefit.

Shipment exceptions

We strive to deliver your shipment with the utmost care and without undue delay. If we cannot deliver your shipment, it will be returned to the shipper. When no address can be found, it will be handled in our own facility where we may be obliged to open your shipment to identify a return or delivery address. Therefore, we have a legitimate interest to process your data.

Denied Party Screening

Denied Parties are individuals or entities who are involved in illegal activities such as drug trafficking, money laundering, counterfeiting, fraud or terrorism. For these reasons they are denied shipping privileges by government agencies. Any transaction with someone on a Denied Party list is prohibited.

Every shipment sent via our network is screened for any possible link to a Denied Party. In the event a potential link is detected, the shipment will be held back for further screening. To do this and to facilitate the quick release of your shipment, we will request a proof of your identification. Once your identity is verified, the provided document will be deleted.

Based on our and your legitimate interests, we will process your data and may keep strictly necessary data for a limited period. This prevents your future shipments from being delayed due to the screening process. Nonetheless, you have the right to object, verbally or in writing.

Customs clearance

We want to ensure that your shipment arrives as quickly as possible by facilitating the customs clearance process for you. To do this, it is necessary that you provide us with all the required documents for customs clearance. As customs varies on country level, different legal requirements can apply.

Certain customs authorities require social security number, national ID or a passport copy to clear a shipment. To comply with the customs regulation and to fulfil our contractual obligations, the processing of your data is necessary. In cases where we keep your data for future shipments, we will ask your consent which you can withdraw at any time.

Calls and call recordings

In certain cases, we will call you to clarify contractual topics, to gather your feedback or for marketing purposes. The legal basis is either performance of a contract, legitimate interest or consent.

If you call us or we call you, the call can be recorded for shipment related matters, training and quality assurance. We will process your call recording according to the applicable data protection and telecommunication laws.

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Digital messaging

To facilitate the communication between us, we offer you to contact us via third party communication channels of your choice (e.g. Facebook, WhatsApp). Therefore, we have a legitimate interest in processing your data for the facilitation of our communication. If you do not wish to make use of such a channel, you are welcome to contact our customer service. For further information on data protection practices of the channel providers, please visit their websites.

Our Website

When you visit our websites, we capture your data which is necessary for us to make the website accessible to you (e.g. IP address, date and duration of your visit). Further storage in log files is performed to ensure the functionality of our websites and the security of our systems. We therefore have a legitimate interest in processing your data. We delete your data as soon as it is no longer needed to fulfil the purpose for which it was collected.

Our 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.

Cookies and other technologies

We make use of various technologies to store your user preferences or other information to make our services to you as efficient as possible. When you access our website you will be notified your consent is required to the use of certain cookies, such as analytical cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

Video Surveillance 'CCTV'

We have installed video surveillance cameras to control the access to the building and specific areas, as well as to perform oversight on business operations within the warehouse. Video surveillance is used to guarantee the safety and health of its visitors, personnel, and property, as well as any monitoring of the operational processes in its facilities. Therefore, we have a legitimate interest for security and access control purposes, which is necessary for the management of our buildings.

Payment partners

We accept debit and credit cards. Your payment data will be processed in accordance with payment industry standards to provide the service you request and to fulfil our contractual obligations.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We do not undertake direct marketing and only provide marketing information in response to direct enquiries.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside the Flight Logistics Group of companies for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, product/service experience or other transactions.

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Disclosures of your personal data

We share your personal data within the Flight Logistics Group.

We will only share or transfer your data in the course of carrying out the purposes outlined in this Privacy Notice, when permitted by applicable law and with appropriate safeguards.

We will transfer your data to the following category of recipients

- Internal Third Parties as set out in the Glossary.
- External Third Parties as set out in the Glossary.
- 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.

International transfers

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside 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:

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

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

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.

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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.

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.

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.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

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.

Your legal rights

- **Right to access information**
You have the right to be informed on the information we hold on you (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. This includes the right to ask us supplementary information about the categories of your data we are handling, for which purpose, the categories of business partners to whom the data may be send to and your other rights regarding our use of your data. We will provide you this information within one month after your request in so far as we are not affecting the rights and freedoms of another person by doing so.
- **Right to restrict processing**
You have the right to request a limitation in the way your data is used. 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.
- **Right to object**
You have the right to challenge the 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

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- **Right to withdraw your consent**
You have the right to 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
- **Right of rectification**
You have the right to request a correction of any inaccurate data about yourself. 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.
- **Right of portability**
You have the right to port your data to another company. 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.
- **Right to erasure/be forgotten**
You have the right, in certain circumstances, to request a deletion of your data. Where your right to be forgotten is valid, and only if necessary, minimal data about you can be kept to ensure you will not be contacted again (i.e. do-not-contact-me list).
- **Right related to automated decision making including profiling**
You have the right to request a review of automated processing. At this moment, we do not apply any automated decision making with legal consequences for you. In case it will be done in the future, we will do so in accordance with the applicable law.

You can direct your request based on the above rights or any other questions about this Privacy Notice to our privacy controller. We cannot handle your request without sufficient proof of your identity. Please note that the applicable data protection laws may impose conditions on exercising the above rights.

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.

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.

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.

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Glossary

Lawful Basis

- **Legitimate Interest**
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**
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.
- **Legal Obligation**
Where processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.
- **Consent**
Where you have given your consent for the use of the data.

External Third Parties

- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, the Police, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Service providers in several countries who provide services to complete our business undertakings, including couriers, transport & logistics companies, freight handlers.