

AWL
ADVANTAGE WORLDWIDE (UK) LTD

Policy Respecting Personal and other Confidential Information

I. INTRODUCTION

The purpose of this Policy is to identify the types of confidential information collected by AWL, whether personal information from employees or commercial information from customers. The Policy identifies the purposes for which that information is collected, the uses to which it may be put and the extent to which it may be disclosed to others. This Policy also describes the security appropriate for each type of information held and the duration for which that information will be held. Finally, it identifies the way in which any person or customer whose information we hold may review that information and may, if not satisfied with either that information or these policies, make complaint to a designated individual. AWL recognizes its responsibility for the personal information it collects and holds. These procedures are intended to assure that personal information is given the protections required by the Data Protection Regulation. Where information is personal, we, in general, collect use and disclose information subject to the limitations provided for in the Act. Because there are some basic differences, as respecting the collection, use and disclosure of customer information, third party information and employee information we deal with these types of information separately.

II. CUSTOMER INFORMATION

In relation to the Data Protection Regulation, AWL must hold in strict confidence all information acquired in the course of the relationship concerning the business and affairs of a customer. At the most general level, we collect information:

For the purpose of establishing and maintaining customer and supplier contact, and
For such purposes as are required by the nature of the matter in respect of which we are engaged.

A. Information collected for the purpose of establishing and maintaining customer contact for the purpose of establishing and maintaining customer contact, we receive contact information including business address, telephone, fax numbers, email addresses, and IP addresses to provide our services. In certain cases, and when the customer volunteers the information, we collect additional contact information. We consider that the information relates to business activities and is not personal information, but we still hold it confidential as set out in this policy memorandum. This information is used for the purpose of maintaining customer contacts, including direct marketing activities. It is not disclosed to third parties except as may be required for the purposes of a particular engagement. In no case is it sold or transferred to third parties for valuable consideration. LEI maintain this data on a password-protected server. The information is maintained for an indefinite period of time. We ask that customers who wish to continue their contacts with us provide us with updated information as necessary. We engage to correct our records within a reasonable time of receiving such updated information. Any customer who wishes to have information deleted from our files may request such deletion and we will comply with all such requests within a reasonable period of time.

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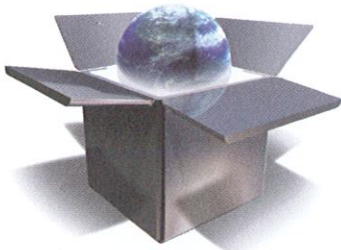
All Business is transacted According to the British International Freight Association (BIFA) Standard Trading Conditions - latest edition - a copy of which will be supplied on request.



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B. Information Collected for such purposes as are required by the nature of the matter in respect of which AWL is engaged We collect information relating to customers for purposes which vary depending upon the nature of our engagement. As previously stated, we consider that the information relates to business activities and is not personal information, but we still hold it confidential as set out in this policy memorandum. We collect addresses and other contact details required to maintain contact with the customer or customer representative for the purpose of gathering information related to our engagement, providing services, and forwarding accounts for payment. In some cases, we collect information relating to the financial state of customers for purposes connected with the engagement. Such contact information may be disclosed to third parties as necessary to advance the objective of the engagement or as required by law. From time to time we may use your information to contact you with details of our products/services which we feel may be of interest to you. You have the right at any time to stop us from contacting you for marketing purposes by unsubscribing where shown or contacting us directly. This information is maintained in confidential files and is not used for purposes other than those described above.

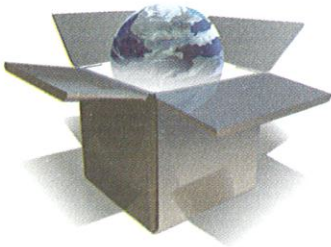
III. THIRD PARTY (SUPPLIERS) INFORMATION

We collect information relating to suppliers who have relevant connections to our business. In some cases, we are required to and do collect information relating to the financial state or condition of such suppliers for purposes connected with the engagement. Such contact information is disclosed to other third parties as may be necessary to advance the objective of the retainer or as required by law. You have the right at any time to stop us from contacting you by unsubscribing where shown or contacting us directly. This information is maintained in confidential files and is not used for purposes other than those described above.

IV. EMPLOYEE INFORMATION

We maintain information for purposes of personnel administration and such information as is required by government authorities for purposes of taxation or security and providers of benefits under benefit plans maintained by the firm for the benefit of its partners and employees from time to time. We retain this information in compliance with the Data Protection Regulation.

A. Personnel Administration In connection with applications for employment, we collect information from candidates. This includes contact details, relevant educational and work experience, and background information on security issues. We normally retain this information after a decision has been made unless an unsuccessful candidate asks us not to retain the information. We collect information relating to the job history of employees up to the date of hire. During the course of employment, we collect and retain periodic work evaluations, attendance data and records respecting compensation history. We also collect and maintain contact information respecting relatives and next of kin. This information is used for employer-employee communications and in connection with our continuing evaluation of personnel requirements and performance assessment. It is kept in secure files to which only designated administrative personnel have access. We do not sell or transfer this information to third parties for valuable consideration. In connection with persons who have left the employ of the firm we do maintain the right to provide such information to prospective employers on request, solely for the purpose of assisting such employers in their assessment of an employment application.



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B. Government Authorities for Tax and Security Purposes In connection with our obligations under taxation statutes we collect personal information respecting employees, including current address, date of birth and social insurance numbers. We are subject to laws, that require us to conduct background checks on the persons we hire. We request persons whom we may hire as employees to authorize such back-ground checks. We use and disclose this information for the purposes specified by the legislation. It is kept in secure files to which only duly authorized personnel have access.

V. ADMINISTRATION OF PERSONAL INFORMATION POLICY AND COMPLAINTS

An officer of AWL as designated from time to time by Management, will be responsible for ensuring that this Policy is applied. Any person may on request, and on reasonable notice, review this policy and may request access to the personal information we hold on such person. You have the right to request a copy of the information we hold about you at any time. In line with the General Data Protection, we will not make a charge for this and will return all queries within one calendar month. In the first instance, any questions or requests for access should be directed to the Managing Director in writing

Contact Us

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