

1. Introduction

This is the privacy policy of Frachtmeister International, and its subsidiaries.
This document was last updated on 08. May 2018

In its everyday business operations Frachtmeister International makes use of a variety of data about identifiable individuals, including data about:

- Current, past and prospective employees
- Customers
- Users of its websites
- Subscribers
- Other stakeholders

In collecting and using this data, the organization is subject to a variety of legislation controlling how such activities may be carried out and the safeguards that must be put in place to protect it.

The purpose of this policy is to set out the relevant legislation and to describe the steps Frachtmeister International is taking to ensure that it complies with it.

This control applies to all systems, people and processes that constitute the organization's information systems, including board members, directors, employees, suppliers.

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2. Data Protection (GDPR) Principles

The General Data Protection Regulation

The General Data Protection Regulation 2016 (GDPR) is one of the most significant pieces of legislation affecting the way that Frachtmeister International carries out its information processing activities. Significant fines are applicable if a breach is deemed to have occurred under the GDPR, which is designed to protect the personal data of citizens of the European Union. It is Frachtmeister International's policy to ensure that our compliance with the GDPR and other relevant legislation is clear and demonstrable at all times.

Definitions

There are a total of 26 definitions listed within the GDPR and it is not appropriate to reproduce them all here. However, the most fundamental definitions with respect to this policy are as follows:

Personal data is defined as:

any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person; 'processing' means:

any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction; 'controller' means:

the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Principles Relating to Processing of Personal Data

There are a number of fundamental principles upon which the GDPR is based.

These are as follows:

1. Personal data shall be:

*(a) processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
(b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');*

(c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimization');

(d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

(e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organizational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');

(f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ('integrity and confidentiality').

2. The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability').

Frachtmeister International will ensure that it complies with all of these principles both in the processing it currently carries out and as part of the introduction of new methods of processing such as new IT systems.

3. What personal data do we collect, how do we collect it, and why?

3.1 Data that you provide voluntarily to us

When you use our websites, portals, products or services we may request personal data voluntarily, including but not limited to your name, company position, postal address, telephone number, mobile number, fax number, email address, account usernames

and passwords. For example, we may ask you to provide some or all of this personal data when you register an account with us, subscribe to our marketing communications, purchase services, and/or submit enquiries to us. We use this information to create

and administer your account, send you marketing communications, provide you with the products and services you request, and to respond to your enquiries.

3.2 Data collected automatically

When you use our websites, portals, products, or services, we may collect certain data automatically from your computers or devices (including mobile devices). The data we collect automatically may include your IP address, device, browser-type, language, operating system, geographic location and other technical information. We may also collect data about how your device has interacted with our Site, products or services, including the pages or features accessed and links clicked, the amount of time spent on particular pages, mouse hovers, the date and time of the interaction, error logs, referring and exit pages and URLs, and similar information. Collecting this data enables us to better understand the visitors who use our Site, products, and services, including where they come from and what features are of interest to them. We use this information for our internal analytics purposes, and to improve the quality, relevance, and security of our Site, products and services.

3.3 Data that we obtain from third party sources

From time to time, we may receive personal data about you from third party sources, but only where such third parties have confirmed that they have your consent or are otherwise legally permitted or required to disclose your personal data to us.

We also receive information from other members of the industry that forms part of or otherwise helps us to develop, test, and enhance our own product offering some of which could contain personal data (where permitted by applicable law).

We may combine information that we collect from you with information about you that we obtain from such third parties.

3.4 Data collected through our products and services

We use data that we collect from products and services for the purposes for which you provided it, usage and audience counts, monitoring the performance and effectiveness of the products/services, monitoring compliance with our terms and conditions, enabling compatibility with third party operating systems/products/services, planning future roadmap strategy, planning product/service/feature lifecycles and retirements, developing new products and services, enhancing existing products and services, troubleshooting product issues, generating statistics, reporting, and trend analysis. This may include incidental personal data (for example usernames and IP addresses).

Our products and services may collect further additional personal data about you beyond the data described in this privacy policy or use your personal data in ways that are different to or in addition to those described in this privacy policy.

3.5 Cookies and similar tracking technology

A cookie is a piece of text that gets entered into the memory of your browser by a website, allowing the website to store information on your machine and later retrieve it.

Our Site, products, and services may use cookies, unique device identifiers (like Apple ID For Advertisers on iOS devices, and Android Advertising ID on Android devices), and other tracking technologies (collectively, "Cookies") to distinguish you from other users and better serve you when you return to the Site, product, or service, and to monitor and analyze the usage of the Site, product, or service. Cookies also enable us and our third-party partners to track and target the interests of our users to enhance the onsite or in-product experience through content, features, and advertisements.

We, along with our service providers, may also use other Internet technologies, such as Web beacons or pixel tags, Flash technologies and other similar technologies, to deliver or communicate with cookies and track your use of the Site, product, or service. We may also include Web beacons in email messages, newsletters, and other electronic communications to determine whether the message has been opened and for other analytics, personalization, and advertising. As we adopt additional technologies, we may also gather additional information through other methods. This practice is explained further under the heading "4.5 Marketing and promotions".

Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies by visiting the Help portion of your browser's toolbar. If you choose to decline cookies, please note that your ability to sign in, customize, or use some of the interactive features of our Site, product, or service may be impeded, and the advertisements you see may not be as relevant to you.

4. Other specific ways we collect and use your personal data

4.1 Job applications

If you are making a job application or inquiry, you may provide us with a copy of your CV or other relevant information. We may use this information for the purpose of assessing your application or inquiry. We may also keep this information on file to contact you about future opportunities, unless you ask us not to do this.

4.2 Account management

If you obtain products or services from us, we may use your contact details for the purposes of order processing and billing in accordance with the terms and conditions of your agreement with us, carrying out checks for export control, anti-bribery, anti-corruption, the prevention of modern slavery, and other compliance purposes in accordance with requirements under applicable law; contacting you (including by email communication) regarding license expiry, renewal, and other related notices, and maintaining our company accounts and records.

4.3 Market research and surveys

If you participate in surveys, we may use your personal data for our internal business analysis and training purposes in order to improve our understanding of our users' demographics, interests and behavior, to measure and increase customer satisfaction, and to improve our products and services.

4.4 Competitions, contests, promotions

If you participate in a competition, contest, or promotion conducted by us or on our behalf, we may use your personal data in order to administer such competition, contest, or promotion.

4.5 Marketing and promotions

We may contact you from time to time in order to provide you with information about products and services that may be of interest to you. Such communications may contain tracking technology that tells us whether you opened the communication and whether you followed the hyperlinks within the communication, in order to help us analyze the effectiveness of, monitor, and improve our marketing campaigns. All marketing communications that we send to you will respect any marketing preferences you have expressed to us and any consent obligations required under applicable privacy and anti-spam rules. You have the right to ask us not to process your personal data for certain or all marketing purposes, but if you do so, we may need to share your contact information with third parties for the limited purpose of ensuring that you do not receive marketing communications from them on our behalf.

Use of MailChimp newsletter software

If you would like to receive our newsletter, we need an e-mail address and additional information that will allow us to verify that you are the owner of the e-mail address provided and agree to receive the newsletter.

We use the so-called double opt-in procedure to ensure that newsletters are sent in a consistent manner. This way the potential recipient can be included in a distribution list. After the registration, the user receives a confirmation e-mail to confirm. The address is only actively included in the distribution list if the registration is confirmed.

We use this data exclusively for sending the information and offers (information about our products, services and company news, etc.). As newsletter software we use MailChimp. MailChimp is a US-based marketing automation service provided by the Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA.

MailChimp is prohibited from selling your provided above mentioned data and from using it for purposes other than sending newsletters. For further information, please visit <https://mailchimp.com/legal/privacy/>. As MailChimp is an US-based service

provider, it might be interesting for European users to read the Compliance information under the headlines “15. We Operate in the United States” and “16. Data Transfers from Switzerland or the EU to the United States”.

MailChimp participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U. S Privacy Shield Framework. To learn more about the Privacy Shield Framework, please visit <https://www.privacyshield.gov/>

Frachtmeister International has signed a Data-Processing-Agreement with MailChimp to ensure that all data of our newsletter subscribers are handled according to data protection laws.

4.6 Network monitoring

We may collect logs and other data about access to and traffic passing through our network and equipment for the purposes of availability and performance monitoring, maintenance, security monitoring and investigations, conducting spam, threat and other scientific research, new product and service development, the enhancement of existing products and services, generating statistics, reporting, and trend analysis.

5. Legal basis for processing personal data

Our legal basis for collecting and using personal data will depend on the personal data concerned and the specific context in which we collect it. However, we will normally collect personal data from you only where we need the personal data to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms, or where we have your consent to do so.

If we collect and use your personal data in reliance on our legitimate interests (or those of any third party) other than as described in this privacy policy, we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal data or wish to submit a Data Access Request, please contact us using the contact details provided under the “14. Contact” heading.

6. With whom might we share your personal data

We may transfer or disclose your personal data to the following categories of recipients:

- to our group companies, third party services providers, suppliers, agents, and other organizations who provide data processing services to us, or who otherwise process personal data on our behalf for purposes that are described in this privacy policy or notified to you when we collect your personal data (such as advertising, analytics, customer support);
- to any government department, agency, court or other official bodies where we believe disclosure is necessary as a matter of applicable law or regulation (such as in response to a subpoena, warrant, court order, or other legal process), to exercise, establish, participate in, or defend our legal rights, or limit the damages we sustain in litigation or other legal dispute, or to protect your vital interests, privacy, or safety, or those of our customers or any other person;
- to any other person with your consent to the disclosure.

Except as set out above, we will not disclose your personal data save where we need to do so in order to enforce this privacy policy, our rights generally, or where required or permitted by applicable local or foreign law.

Whenever we share personal data, we take all reasonable steps to ensure that it is treated securely and in accordance with this privacy policy. This may include without limitation aggregating or de-identifying information so that it is not intended to be used by the third party to identify you.

7. Data retention

We retain personal data we collect from you for as long as necessary for the purposes for which the personal data was collected or where we have an ongoing legitimate business need to do so, or to comply with applicable legal, tax, or regulatory requirements. Even if you close your account, we will retain certain information in order to meet our obligations.

When we have no ongoing legitimate business need to process your personal data, we will either securely destroy, erase, delete or anonymise it, or if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

8. Your data protection rights

You have the following data protection rights:

- If you wish to access, correct, or update your personal data, you can exercise these rights at any time by contacting us using the contact details provided under the “14. Contact” heading.
- In addition, with effect from 25 May 2018, you can object to processing of your personal data, ask us to restrict processing of your personal data, ask us to delete your personal data, or request portability of your personal data. Again, you can exercise these rights by contacting us using the contact details provided under the “14. Contact” heading.
- You have the right to opt-out of marketing communications we send you at any time. You can usually exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. Alternatively, or to opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “14. Contact” heading.
- If we have collected and process your personal data with your consent, then you can withdraw your consent at any time by contacting us using the contact details provided under the “14. Contact” heading. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

9. Rights of the Individual

The data subject also has rights under the GDPR. These consist of:

- 1.The right to be informed
- 2.The right of access
- 3.The right to rectification
- 4.The right to erasure
- 5.The right to restrict processing
- 6.The right to data portability
- 7.The right to object
- 8.Rights in relation to automated decision making and profiling.

Each of these rights are supported by appropriate procedures within Frachtmeister International that allow the required action to be taken within the timescales stated in the GDPR.

These timescales are shown in Table 1.

Data Subject Request	Timescale
The right to be informed	When data is collected (if supplied by data subject) or within one month (if not supplied by data subject)
The right of access	One month
The right to rectification	One month
The right to erasure	Without undue delay
The right to restrict processing	Without undue delay
The right to data portability	One month
The right to object	On receipt of objection
Rights in relation to automated decision making and profiling.	Not specified

Table 1 - Timescales for data subject requests

Lawfulness of Processing

There are six alternative ways in which the lawfulness of a specific case of processing of personal data may be established under the GDPR. It is Frachtmeister International policy to identify the appropriate basis for processing and to document it, in accordance with the Regulation. The options are described in brief in the following sections.

Consent

Unless it is necessary for a reason allowable in the GDPR, Frachtmeister International will always obtain explicit consent from a data subject to collect and process their data. Transparent information about our usage of their personal data will be provided to data subjects at the time that consent is obtained and their rights with regard to their data explained, such as the right to withdraw consent. This information will be provided in an accessible form, written in clear language and free of charge.

If the personal data are not obtained directly from the data subject, then this information will be provided to the data subject within a reasonable period after the data are obtained and definitely within one month.

Performance of a Contract

Where the personal data collected and processed are required to fulfil a contract with the data subject, explicit consent is not required. This will often be the case where the contract cannot be completed without the personal data in question e.g. a delivery cannot be made without an address to deliver to.

Legal Obligation

If the personal data is required to be collected and processed in order to comply with the law, then explicit consent is not required. This may be the case for some data related to employment and taxation for example, and for many areas addressed by the public sector.

Vital Interests of the Data Subject

In a case where the personal data are required to protect the vital interests of the data subject or of another natural person, then this may be used as the lawful basis of the processing. Frachtmeister International will retain reasonable, documented evidence that this is the case, whenever this reason is used as the lawful basis of the processing of personal data. As an example, this may be used in aspects of social care, particularly in the public sector.

Task Carried Out in the Public Interest

Where Frachtmeister International needs to perform a task that it believes is in the public interest or as part of an official duty then the data subject's consent will not be requested. The assessment of the public interest or official duty will be documented and made available as evidence where required.

Legitimate Interests

If the processing of specific personal data is in the legitimate interests of Frachtmeister International and is judged not to affect the rights and freedoms of the data subject in a significant way, then this may be defined as the lawful reason for the processing.

10. Security

Whilst all efforts will be taken to protect your personal data, no data storage or transmission can be guaranteed as 100% secure. We endeavor to protect all personal data using reasonable and appropriate physical, administrative, technical, and organizational measures, and in accordance with our internal security procedures and applicable law.

If you have been given or have created log-in details to provide you with access to certain parts of our Site, you are responsible for keeping those details confidential in order to prevent unauthorized access to your accounts.

11. Privacy by Design

Frachtmeister International has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect, or process personal data will be subject to due consideration of privacy issues, including the completion of one or more data protection impact assessments.

The data protection impact assessment will include:

- Consideration of how personal data will be processed and for what purposes
- Assessment of whether the proposed processing of personal data is both necessary and proportionate to the purpose(s)
- Assessment of the risks to individuals in processing the personal data
- What controls are necessary to address the identified risks and demonstrate compliance with legislation
- Use of techniques such as data minimization and pseudonymization will be considered where applicable and appropriate.

12. Breach Notification

It is Frachtmeister International's policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with the GDPR, where a breach is known to have occurred which is likely to result in a risk to the rights and freedoms of individuals, the relevant supervisory authority will be informed within 72 hours.

13. Addressing Compliance to the GDPR

The following actions are undertaken to ensure that Frachtmeister International complies at all times with the accountability principle of the GDPR:

- The legal basis for processing personal data is clear and unambiguous
- A Data Protection Officer is appointed with specific responsibility for data protection in the organization (if required)
- All staff involved in handling personal data understand their responsibilities for following good data protection practice
- Training in data protection has been provided to all staff
- Rules regarding consent are followed
- Routes are available to data subjects wishing to exercise their rights regarding personal data and such enquiries are handled effectively
- Regular reviews of procedures involving personal data are carried out
- Privacy by design is adopted for all new or changed systems and processes
- The following documentation of processing activities is recorded:
 - Organization name and relevant details
 - Purposes of the personal data processing
 - Categories of individuals and personal data processed
 - Categories of personal data recipients
 - Agreements and mechanisms for transfers of personal data to non-EU countries including details of controls in place
 - Personal data retention schedules
 - Relevant technical and organizational controls in place

These actions are reviewed on a regular basis as part of the management process concerned with data protection.

14. Contact

This is the policy of Frachtmeister International, a company registered in Austria under company number FN 112.766 h whose registered office is at:

Lindenweg 28, 2351 Wiener Neudorf, Austria

and whose VAT registration number is ATU37913503. Frachtmeister International is the controller of personal data collected under this privacy policy (unless we indicate otherwise).

We have appointed individuals who are responsible for the protection and security of your personal data. If you have any questions, comments, concerns, grievances, or complaints about this privacy policy or the manner in which we treat your personal data, or if you want to request any information about your personal data or believe that we are holding incorrect personal data on you, please contact our Data Protection Officer and Privacy team at office@frachtmeister.com

If you wish to unsubscribe from marketing communications, please use the unsubscribe link on any email communication.

15. Notification of changes

We reserve the right to amend or vary this policy from time to time to reflect evolving legal, regulatory, or business practices. When we update our privacy policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make (which, for minor changes, may include posting the revised privacy policy to our Site with immediate effect). Please check this page periodically for changes. We will obtain your consent to any material privacy policy changes if and where this is required by applicable data protection laws.

You can see when this privacy policy was last updated by checking the “last updated” date displayed at the top of this privacy policy under the “General” heading.