



## Our Privacy Policy

Working with us in any capacity or using our services in any form means that you have read and accept how to access and manage your data.

### Our Privacy Policy

Customs Manager Ltd. (“CM”, “us”, “our” or “we”), operates the [customsmanager.com](https://customsmanager.com), [cusotmsmanager.info](https://cusotmsmanager.info) and [customsmanager.org](https://customsmanager.org) website (including all content and functionality available through both websites).

CM is committed to ensuring the privacy and protection of information users provide to us. The following privacy policy governs. CM’s practices for information collection, use, processing, disclosure, transfer and retention on the site. This policy should be read with any other policy or terms developed by CM from time to time and notified on the site or any part of the site (including the General Terms and Conditions if you are a subscriber).

This policy may change from time to time and, if it does, the latest version will be available on our website or our app (and, where appropriate, brought to your attention). This privacy policy was last updated on 1 January 2021.

Mr Arne Mielken is the data controller of personal information processed through your use of our site. The type of the personal information processed by us includes information that you provide when using our site or services, technical information about your device, settings and site use, information that we receive from third parties.

We use your data, amongst other things, to provide you with our site and services or information about our site and services, tailor our services to you, carry out analysis of our services, provide (or allow others to provide) targeted ads, comply with any legal or regulatory obligation.

You agree that we may send you marketing materials relating to our services which you can opt-out of at any time by sending an email to [info@customsmanager.com](mailto:info@customsmanager.com) or clicking unsubscribe at the bottom of any marketing email.

We share data with our service providers and other third parties for the performance of our contractual obligations to you, to provide you with information, for the serving of advertising and (where relevant) run credit and background checks.

Depending on where you are located, you have several rights that you may exercise concerning our use of your personal data, and you may exercise these by contacting us through the communication methods set out in the 'Your rights' section below.

## **TERMS USED IN PRIVACY POLICY**

In this policy:

- “you” means you, the person using our services, or visiting the site.
- “Customs Manager” means Customs Manager Lt.d;
- “Services” means the Customs Manager any subscription service. The Services may be provided to you on our desktop site, or via our app.

## **INFORMATION WE COLLECT ABOUT YOU**

We will collect and process the following information about you:

### **INFORMATION YOU GIVE US**

This is information about you that you give us when you browse or use the site, correspond with us by phone, SMS, email, social media or otherwise. It includes information you provide when:

- You register to use our site;
- Subscribe to our Service;
- Place an order on our site;
- Participate in discussion boards or other social media functions on our site;
- Enter a competition; and
- you report a problem with our site.

The information you give us includes your name, address, date of birth, e-mail address and phone number, credit card information (which is captured for payment but not stored) if you subscribe to our Services or place an order on our site, personal description and photographs,

videos, images or comments, your interests and preferences such as your marketing preferences.

This information is required to provide the Services to you. If you do not provide such information, it may delay or prevent us from providing the Services.

## **INFORMATION WE COLLECT ABOUT YOU**

Concerning each of your visits to our site we will automatically collect the following information:

- technical information, including the IP address used to connect your computer or device to the Internet, your login information, browser type and version, time zone setting, location data, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full URL, clickstream to, through and from our site (including date and time), pages or products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page; and.
- information about how you use the Services, including but not limited to your video consumption and playback, sign-in and sign-out and playback error.

### **A word about cookies**

Some pages on our site use cookies, which are small files placed on your internet browser when you visit our site. We use cookies to offer you a more tailored experience in the future, by understanding and remembering your particular browsing preferences.

Where we use cookies on our site, you may block these at any time. To do so, you can activate the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our site or to use all the functionality provided through our site.

## **INFORMATION WE RECEIVE FROM OTHER SOURCES**

Other CM websites: We may receive information about you if you use any of the other websites operated by CM

Third parties: We also work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, advertisers, search information providers, credit reference agencies, third parties that enable sign-on functionality and social network integration) and may receive information about you from them.

Social Media: If you connect with us via certain social media platforms, or you choose to use features on this site or the websites of other CM that connect to your online profiles or social media accounts (“Social Media Accounts”), we may collect any information that you permit through your settings on those Social Media Accounts. For example, if you log in to our site using your LinkedIn account and you have allowed LinkedIn to share your profile information with us, we may collect that information. Information we receive from your Social Media Accounts includes email address, first and last name, location (hometown and country), gender, date of birth, likes, interests, number of connections, occupation, posts or other social activity. The information that your social media platform may provide to us via your Social Media Account may change from time to time. Please review your Social Media Account privacy settings to control what information is shared with us.

## **HOW YOUR INFORMATION WILL BE USED**

We use information held about you in the following ways.

### **INFORMATION YOU GIVE TO US (INCLUDING THROUGH SOCIAL MEDIA ACCOUNTS)**

- a. To the extent permitted under applicable law, we process data for the following purposes based on our legitimate interests:
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - to ensure that content from our site is presented most effectively for you and your computer;
  - to tailor your experience on the site;

- for data analysis, testing, research, statistical, editorial, feedback and survey purposes.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information.

b. To the extent permitted under applicable law, we will process data where it is necessary to fulfil our contract with you:

We collect, store and use your personal information including your name, e-mail address, login details and payment information and information about how you use and access the Services because it is necessary to provide the Services requested by you according to the contract made between you and us when you agreed to our Terms of Use.

This includes:

- making the Services available to you;
- providing any Services that you request and respond to your enquiries;
- administering the Services and processing your payment where you are purchasing Services from us (including but not limited to using third-party service providers to process such payment);
- notifying you about changes to our services; and
- service and account administration requirements such as where we need to contact you for reasons related to the Services (for example, where we need to send you a password reminder, to notify you about Services updates or amendments to our Terms of Use, or this Privacy Policy).

c. We will process data for the following purposes based on your consent:

- to provide you with the latest information and offers relating to customs or global trade.

d. We will process data where necessary to comply with all legal requirements.

For example:

- if you have a paid subscription to use the Services and live in the European Union (the "EU"), we are legally required to allow you, and you are legally entitled, to watch the Services when you're visiting another country in the EU provided that we have verified your country of residence. We verify your country of residence using [e.g. your IP address and payment information].
- if we receive a request for information from a regulator, we may also need to process your personal information to respond to such request regulator.

## INFORMATION WE COLLECT ABOUT YOU

A. We will process data for the following purposes based on our legitimate interests:

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented most effectively for you and your computer;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them;
- to provide (or permit third parties to provide) targeted advertising via websites you visit about goods or services that you may find interesting (see more on this in our Cookies Notice below);
- To track the progress and number of entries in competitions and promotions.
- To the extent permitted under applicable law, if we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your interests or fundamental rights and freedoms which require protection of the personal information.

B. We will process data for the following purposes based on your consent:

To allow you to participate in interactive features of our service, when you choose to do so. This includes any public forum features we provide on our site such as community forums, comments posting or chat features.

### **Withdrawing Consent**

If we rely on your consent for us to use your personal information in a particular way, but you later change your mind, you may withdraw your consent by contacting us at [info@customsmanager.com](mailto:info@customsmanager.com) and we will stop doing so. However, if you withdraw your consent, this may impact the ability for us to be able to provide you with our services (for example, we may not be able to provide marketing information to you regarding our suppliers' products and services).

## **DISCLOSURE OF YOUR INFORMATION**

### **SERVICE PROVIDERS**

For some of the purposes for which we use personal data (see above), we will engage a third party. If such third party needs access to personal data to carry out its task, we will share the data with them, to the extent permitted by applicable laws, we will ensure that the third party will only use the data based on our instructions. Such a party is a processor on our behalf and we remain responsible for your data. We will engage the following processors:

Companies that provide services to us such as vendors, service providers, and other partners who globally support our business. These third parties provide services such as providing technical infrastructure services, analyzing how our services are used, measuring the effectiveness of ads and services, providing customer service, facilitating payments, or conducting academic research and surveys. These partners must adhere to strict confidentiality obligations in a way that is consistent with this policy and the agreements we enter into with them; and

Analytics and search engine providers such as AWS and Google Analytics that assist us in the improvement and optimisation of our site. We want our site and advertising to be as relevant and interesting to you as it can be. With this in mind, we use all of the information we have about you to show you relevant ads, and to be able to optimize our site. We do not share

information that personally identifies you (personally identifiable information is information like name or email address that can by itself be used to contact you or identifies who you are) with advertising, measurement or analytics partners. We may provide these partners with information about the reach and effectiveness of their advertising without providing information that personally identifies you, or if we have aggregated the information so that it does not personally identify you.

## **OTHER THIRD PARTIES**

We will, when we have the right to do so according to applicable personal data regulations, share your personal information with CM the following selected third parties:

business partners, authorised distributors, suppliers, service providers and sub-contractors who provide us with services which allow us to perform the contract we enter into with you;

business partners, authorised distributors, suppliers, service providers to provide you with information about promotions and offers, or for any of the other purposes described the “How your information will be used” section above;

advertisers and advertising networks that require the data to select and serve relevant advertising to you and others. Except as stated in the bullet point directly below, we do not disclose personal information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their ad on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women within a certain postcode). We may make use of the personal information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience. These third-party advertising companies collect, store and use data by integrating cookies and other tracking software on our Services. Please see our Cookies Policy for further information. In some cases these third parties will also use the data that they collect for their own purposes, for example, they may aggregate your data with other data they hold and use this to inform advertising related services provided to other clients and work with other advertising companies and share collected information with such companies as part of the process. Please see our Cookies Policy for more information on the third-party advertising companies which collect, use,

process and store data about you, and the use of cookies and other tracking technologies on our Services;

social media or other similar platforms so that we can serve relevant content to you via that platform. For example, we may share your email address with Facebook so that we can include you within a custom audience that we (or a third party on our behalf) will serve content to on Facebook, or we may create an audience of other Facebook users based on the information in your Facebook profile; and

credit reference agencies to assess your credit score where this is a condition of us entering into a contract with you.

## **DISCLOSURE UNDER CERTAIN CIRCUMSTANCES**

We will, when we have the right to do so according to applicable personal data regulations, also disclose your personal information to third parties in the following circumstances:

If we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets;

If CM or substantially all of its assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets;

If we are under a duty to disclose or share your personal information to comply with any legal obligation or to enforce or apply our terms of use or purchase terms and other agreements; or to protect the rights, property, or safety of CM our customers, or others.

## **DATA RETENTION**

We retain the personal information we collect only if we need it to support justifiable business requirements or when our lawful purposes for using the information requires retention. Subject to any special circumstances or applicable laws requiring otherwise, after account closure, we will only hold your personal information for 2 years following account closure. When we no longer require personal information we or our third-party suppliers will securely delete and/or archive the information. For more information on where and how long your personal information is stored, and for more information on your rights of erasure and portability, please contact us at [info@customsmanager.com](mailto:info@customsmanager.com)

## **SECURITY OF YOUR INFORMATION**

To help protect the privacy of data and personally identifiable information you transmit through the use of our site and portals, we maintain physical, technical and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your data to those employees who need to know that information to provide benefits or services to you. Also, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

## **SOCIAL NETWORKS**

You may be able to log in to our site using social sign-in services such as Facebook Connect. These services will authenticate your identity and provide you with the option to share certain personal information with us such as your name and email address to pre-populate our sign up form. Services like Facebook Connect give you the option to post information about your activities on this site to your profile page to share with others within your network.

## **LINKED SITES**

The site may contain links to other websites. We are not responsible for the reliability of the content or privacy practices of such other websites.

Our site may also contain social media features, such as the Facebook Like button. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our site. Your interactions with these features are also governed by the privacy policy of the company providing it.

## **PUBLIC FORUMS**

We may provide you with chat features, instant messaging, message boards, community forums and/or news groups through the site or otherwise. Please remember that any information that you disclose in public areas of the site will become public information, and be accessible to the public. We do not intend (but reserve the right) to monitor, moderate or screen the contents of user postings. We bear no responsibility for any such content and you should be cautious when considering whether to disclose your personal information in the on the site through public or private forums.

## **LOST OR STOLEN INFORMATION**

You must not share your user name or password with anybody and you should keep these secure. Please notify us promptly email [info@customsmanager.com](mailto:info@customsmanager.com) if your user name or password is lost, stolen or used without permission. Upon notice, we will cancel that user name or password and update our records accordingly. We recommend that different passwords are used for all of your online accounts.

## **OPT-OUT OPTION**

You have the right to decline our use of your personal information for (or opt-out of) marketing communications. The records for those individuals who opt-out of future marketing mailings will be marked in our records so that their names will be excluded from any contact of that type in the future unless they later request or agree to future contact.

You can “opt-out” by:

- using the contact details provided for this purpose in our mailing to you;
- using the “unsubscribe” option at the foot of any electronic communication we send to you; or

by emailing us at any time at [info@customsmanager.com](mailto:info@customsmanager.com)

## **YOUR RIGHTS**

Depending on where you are located, you may have rights over your personal data.

You may have the right to request access to certain personal data that we hold about you including any information we have shared to CM for direct marketing purposes, subject to certain conditions and limited exceptions set out in relevant data privacy laws.

If you wish to do so, please email your request to [info@customsmanger.com](mailto:info@customsmanger.com) and to the extent that we are required to do so under applicable law, we will process your request.

We will be as open as we can with you but sometimes, to the extent permitted by applicable laws, we might not hold any personal information about you or may have to withhold personal information from you. For example, where the information is not personal information about you, is commercially sensitive, is legally privileged, relates to the personal information of

another person, or it may impact on the safety or security of our employees or customers to release it. In these circumstances, we will withhold the information but we'll tell you why.

You have the right to ask us not to use your personal information for marketing purposes. You can exercise the right at any time by contacting us at [info@customsmanager.com](mailto:info@customsmanager.com)

Residents of the EU may also have special rights under data protection legislation in the European Union, in addition to those rights set out above. You may also have a right under applicable laws to request information about: the purpose of the processing; the categories of personal data concerned; who else outside the Customs Manager Ltd. might have received the data from us; what the source of the information was (if you didn't provide it directly to us); and how long it will be stored. You may have a right to:

request that we correct (rectify) the record of your personal data maintained by us if it is inaccurate or out of date;

request that we erase that data or cease processing it, subject to certain exceptions;

ask us not to process your personal information for the legitimate interests that we have set out above. In certain circumstances we may not be able to stop using your personal information but, if that is the case, we'll let you know and tell you why;

receive the personal information that you have provided to us in a structured, commonly used and machine-readable format, and to transmit that data to another data controller; and

lodge a complaint with the appropriate data protection authority if you have concerns about how we process your personal data. The local authority differs depending on the country. Alternatively, you may seek a remedy through the courts if you believe your rights have been breached.

If you wish to exercise any of the above rights, please your request to [info@customsmanager.com](mailto:info@customsmanager.com)

CONTACT US

To exercise your opt-out privileges, access your user information, obtain more information about this Privacy Policy or advise us of other matters regarding your experiences with Customs Manager Ltd. or the site, please contact us by post or email at:

Arne Mielken, 66 Long Lane, Barbican, EC1a 9RQ, [info@customsmanager.com](mailto:info@customsmanager.com)

## **CHANGES TO THIS POLICY**

We may update or change this Privacy Policy at any time. We will tell you about any changes by posting an updated policy on our site and (where appropriate) notified to you by post or email. Any such modification will be effective immediately upon posting on the site. Where applicable law requires us to do so, we will seek your consent for such changes and allow you to cancel your subscription.