



## GDPR Comments Policy

Last Updated: Nov 08, 2019

Comments are welcomed and encouraged on Inter Continental Logistics Ltd website, but there are some instances where comments will be edited or deleted. Comments are subject to the website's Terms and Conditions and Privacy Policy. Violations of this policy may result in comments being deleted and/or commenters being blocked from access to commenting or to [www.iclogistics.co.uk](http://www.iclogistics.co.uk) entirely. *Commenting is a privilege, not a right.*

### 1. Comments Policy

**1.1 All Rights Reserved. Inter Continental Logistics Ltd** reserves the right to edit, delete, move, or mark as spam any and all comments. **Inter Continental Logistics Ltd** has the right to block access to any one or group from commenting or from the entire website.

**1.2 Comment Form Guidelines** The comment form must be filled in with a proper or legitimate sounding name and URL. Comments using keywords, spam or splog-like URLs, or suspicious information in the comment form will be deleted. Your comment will not be edited, it will simply be deleted in its entirety.

**1.3 Links** If you are leaving a comment and want to point to a link on your own or someone else's site that is relevant to the topic, please feel free to do so. Keep in mind, however, the link must be relevant and add value to the article and its readers. **Inter Continental Logistics Ltd** is set up to automatically hold any comment with more than one link in moderation, which may delay your comment from appearing.

**1.4 Thank You Comments.** Superficial comments that appear to be an attempt to get a backlink or get past comment moderation will be deleted.

**1.5 Copyright and Plagiarism.** If notice is received that a comment contains proprietary, copyrighted or plagiarized information, that comment will be deleted and the commenter may be blocked from further commenting.

**1.6 Email Privacy.** Email addresses are required for commenting, and they are not published on **Inter Continental Logistics Ltd**, nor shared. They may be used by our administrators to privately contact the commenter.

**1.7 Commenter Privacy and Protection.** Comments containing email addresses, physical mail addresses, phone numbers, and any private and personal information will be deleted as soon as possible to protect the privacy of the affected party. To prevent such editing, never share private information within **Inter Continental Logistics Ltd** comments.



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**1.8 Attachments.** If you want to post an image or a workbook, please upload it to a file sharing service such as Photobucket (images) or SkyDrive (files) and link to it in your comment. Keep in mind that your comment may be held if it contains links. Please do not post screenshots of VBA code — copy and paste the code into the comment directly.

**1.9 Language and Manners.** Comments which include offensive or inappropriate language, or considered by **Inter Continental Logistics Ltd** administrators to be rude and offensive, will be deleted. In the interest of fair play, no personal attacks are permitted in **Inter Continental Logistics Ltd** comments. You may question or argue the content, but not attack **Inter Continental Logistics Ltd** administrators, nor any other commenters. Failure to respect fellow participants on **Website** could result in removal and blocked access.

**2.0 What To Do If Your Comment Does Not Appear?** Please be patient. Comments cannot always be approved right away. Please do not submit the same comment unless you think your original comment was not submitted correctly the first time.

**2.1 Multiple Comments on the same Article.** Multiple related comments on the same post (usually one after the other) may be combined into a single comment.

**2.2 Irrelevant Comments.** If a comment is irrelevant to a specific topic, it may be moved to another post to which it is relevant, if possible. If no suitable post can be found, it may be deleted.

**2.3 Comment Spam.** Any comment assumed to be possible comment spam will be deleted and marked as comment spam. In addition, it will be reported to services such as Project HoneyPot, Botscout and/or Stop Forum Spam.

**2.4 Liability.** All comments within **Inter Continental Logistics Ltd** are the responsibility of the individual commenter. By submitting a comment on our website, you agree that the comment content is your own, and to hold this site, and all subsidiaries and representatives harmless from any and all repercussions, damages, or liability.

**2.5 Trackbacks Are Comments.** All trackbacks will be treated inline with our Comments Policy.

**2.6 Contact information:**

### INTER CONTINENTAL LOGISTICS LTD

Head Quarter at:

F 54, Centre court building,

1301 Stratford road,

Birmingham, United Kingdom – B28 9HH

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PADMANABHAN SURESH THEKKEDATH  
Director



INTERCONTINENTAL  
LOGISTICS

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Tel : +44 121 7653324

Email : info@iclogistics.co.uk

Web : www.iclogistics.co.uk

### DPR Terms of Use

Last Updated: Nov 08, 2019

Please read these Terms of Use (the "Terms") carefully.

This agreement (these "Website Terms of Use") is a legally binding agreement between **INTER CONTINENTAL LOGISTICS LTD**. ("Company", "us", "our", and "we"), the owner and operator of **WWW.ICLOGISTICS.CO.UK** (the "Site"), and you ("you" or "You"), a user of the Site, that governs your access to and use of the Site. Certain features of the Site may be subject to additional guidelines, terms, or rules, which may be posted on the Site from time to time and which are incorporated by reference into these Website Terms of Use.

By accessing or using the site, you are accepting these website terms of use (on behalf of yourself or the entity that you represent), and you represent and warrant that you have the right, authority, and capacity to enter these website terms of use (on behalf of yourself or the entity that you represent).

YOU AGREE THAT BY REGISTERING FOR, ACCESSING OR USING THE SERVICES, YOU ARE ENTERING INTO A LEGALLY BINDING AGREEMENT WITH **INTER CONTINENTAL LOGISTICS LTD**. IF YOU DO NOT AGREE WITH THESE TERMS, YOU MUST NOT ACCESS OR USE THE SERVICES.

**INTER CONTINENTAL LOGISTICS LTD** reserves the right to modify, supplement or replace these Terms, effective upon posting an amended version on the Site or notifying you otherwise. Your continued use of the Services following the posting of changes to these Terms or receipt of notice will mean that you accept and agree to such changes. You are responsible for regularly consulting the current version of the Terms prior to your use of the Services.

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PADMANABHAN SURESH THEKKEDATH  
Director



# INTERCONTINENTAL LOGISTICS

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### **1. Access to or use of the site**

#### **1.1 License.**

Subject to these website terms of use, company grants you a limited, non-transferable, non-exclusive, revocable license to access and use the site solely for your own personal, noncommercial use only during the term of this agreement.

#### **1.2 Certain restrictions.**

The rights granted to you in these website terms of use are subject to the following restrictions: (a) you shall not license, sell, rent, lease, transfer, assign, distribute, host, or otherwise commercially exploit the site, whether in whole or in part, or any content displayed on the site; (b) you shall not modify, make derivative works of, disassemble, reverse compile or reverse engineer any part of the site; (c) you shall not access the site in order to build a similar or competitive website, product, or service; and (d) except as expressly stated herein, no part of the site may be copied, reproduced, distributed, republished, downloaded, displayed, posted or transmitted in any form or by any means. Unless otherwise indicated, any future release, update, or other addition to functionality of the site shall be subject to these website terms of use. All copyright and other proprietary notices on the site (or on any content displayed on the site) must be retained on all copies thereof.

#### **1.3 Modification.**

Company reserves the right, at any time, to modify, suspend, or discontinue the site (in whole or in part) with or without notice to you. You agree that company will not be liable to you or to any third party for any modification, suspension, or discontinuation of the site or any part thereof.

#### **1.4 No support or maintenance.**

You acknowledge and agree that company will have no obligation to provide you with any support or maintenance in connection with the site.

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Director



### **1.5 Ownership.**

Excluding any user generated content that you may provide (defined below), you acknowledge that all the intellectual property rights, including copyrights, patents, trademarks, and trade secrets, in the site and its content are owned by company or company's suppliers. Neither these website terms of use (nor your access to the site) transfers to you or any third party any rights, title or interest in or to such intellectual property rights, except for the limited access rights expressly set forth in section 1.1. Company and its suppliers reserve all rights not granted in these website terms of use. There are no implied licenses granted under these website terms of use.

## **2. User Accounts**

### **2.1 User account creation.**

In order to use certain features of the site, you may be required to create a user account ("user account") by providing certain information about yourself as prompted by an account registration form. You represent and warrant that: (a) all registration information you submit is truthful and accurate; (b) you will maintain the accuracy of such information. You may delete your user account at any time, for any reason, by request to the company or by following the instructions on the site. Company may suspend or terminate your user account in accordance with section 10.

### **2.2 User account responsibilities.**

You are responsible for maintaining the confidentiality of your user account login information (e.g. username and password) and are fully responsible for all activities that occur under your user account. You agree to immediately notify company of any unauthorized use, or suspected unauthorized use of your user account or any other breach of security. Company cannot and will not be liable for any loss or damage arising from (i) your failure to comply with the above requirements or (ii) from unauthorized use of your user account or any other breach of security, either with or without your knowledge.



### **2.3 Use of other user accounts.**

You may not use anyone else's account at any time, without the permission of the account holder.

### **2.4 Account security.**

The company cares about the integrity and security of your personal information. However, the company cannot guarantee that unauthorized third parties will never be able to defeat the site's security measures or use any personal information you provide to us for improper purposes. You acknowledge that you provide your personal information at your own risk.

### **3. Privacy Policy**

For information about how **WWW.ICLOGISTICS.CO.UK** collects, uses, and shares your information, please review our privacy policy. You agree that by using the site you consent to the collection, use, and sharing (as set forth in the privacy policy) of such information, including the transfer of this information to the united states and/or other EU countries for storage, processing, and use by the company.

### **4. User Generated Content**

4.1 User generated content. "user generated content" means any and all information and content that a user submits to, or uses with, the site. You are solely responsible for all of your user generated content. You assume all risks associated with use of your user generated content, including any reliance on its accuracy, completeness or usefulness by others, or any disclosure of your user generated content that personally identifies you or any third party. You hereby represent and warrant that your user generated content does not violate our acceptable use policy (defined in section 5.3). You may not represent or imply to others that your user generated content is in any way provided, sponsored or endorsed by company. Because you alone are responsible for your user generated content, you may expose yourself to liability if, for example, your user generated content violates the acceptable use policy. Company is not obligated to backup any user generated content, and your user generated content may be deleted at any time without prior notice. You are solely responsible for creating and maintaining your own backup copies of your user generated content if you desire.

### **4.1 License.**

You hereby grant (and you represent and warrant that you have the right to grant) to company a worldwide, non-exclusive, irrevocable, royalty-free, transferable and fully paid, worldwide license to reproduce, distribute, publicly display and perform, prepare derivative works of, incorporate into other works, and otherwise use and exploit your user generated



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content solely for the purposes of including your user generated content in the site. You hereby irrevocably waive (and agree to cause to be waived) any claims and assertions of moral rights or attribution with respect to your user generated content.

### 4.2 Acceptable use policy.

The following terms constitute our “acceptable use policy”:

(a) You agree not to use the site to collect, upload, transmit, display, or distribute any user generated content (i) that violates any third-party right, including any copyright, trademark, patent, trade secret, moral right, privacy right, right of publicity, or any other intellectual property or proprietary right; (ii) that is unlawful, harassing, abusive, threatening, harmful, invasive of another’s privacy, vulgar, defamatory, false, intentionally misleading, trade libelous, pornographic, obscene, patently offensive, promotes racism, bigotry, hatred, or physical harm of any kind against any group or individual or is otherwise objectionable; (iii) that is harmful to minors in any way; or (iv) that is in violation of any law, regulation, or obligations or restrictions imposed by any third party.

(b) In addition, you agree not to: (i) upload, transmit, or distribute to or through the site any computer viruses, worms, or any software intended to damage or alter a computer system or data; (ii) send through the site unsolicited or unauthorized advertising, promotional materials, junk mail, spam, chain letters, pyramid schemes, or any other form of duplicative or unsolicited messages, whether commercial or otherwise; (iii) use the site to harvest, collect, gather or assemble information or data regarding other users, including e-mail addresses, without their consent; (iv) interfere with, disrupt, or create an undue burden on servers or networks connected to the site, or violate the regulations, policies or procedures of such networks; (v) attempt to gain unauthorized access to the site (or to other computer systems or networks connected to or used together with the site), whether through password mining or any other means; (vi) harass or interfere with any other user’s use and enjoyment of the site; or (vii) use software or automated agents or scripts to produce multiple accounts on the site, or to generate automated searches, requests, or queries to (or to strip, scrape, or mine data from) the site (provided, however, that we conditionally grant to the operators of public search engines revocable permission to use spiders to copy materials from the site for the sole purpose of and solely to the extent necessary for creating publicly available searchable indices of the materials, but not caches or archives of such materials, subject to the parameters set forth in our robots.txt file).

### 4.3 Enforcement.

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PADMANABHAN SURESH THEKKEDATH  
Director



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We reserve the right (but have no obligation) to review any user generated content, and to investigate and/or take appropriate action against you in our sole discretion if you violate the acceptable use policy or any other provision of these website terms of use or otherwise create liability for us or any other person. Such action may include removing or modifying your user generated content, terminating your user account in accordance with section 10, and/or reporting you to law enforcement authorities.

#### **4.4 Feedback.**

If you provide company with any feedback or suggestions regarding the site (“feedback”), you hereby assign to company all rights in such feedback and agree that company shall have the right to use and fully exploit such feedback and related information in any manner it deems appropriate. Company will treat any feedback you provide to company as non-confidential and non-proprietary. You agree that you will not submit to company any information or ideas that you consider to be confidential or proprietary.

#### **5. Indemnification.**

You agree to indemnify and hold company (and its officers, employees, and agents) harmless, including costs and attorneys’ fees, from any claim or demand made by any third party due to or arising out of (a) your use of the site, (b) your violation of these website terms of use, (c) your violation of applicable laws or regulations or (d) your user generated content. Company reserves the right, at your expense, to assume the exclusive defense and control of any matter for which you are required to indemnify us, and you agree to cooperate with our defense of these claims. You agree not to settle any matter without the prior written consent of company. Company will use reasonable efforts to notify you of any such claim, action or proceeding upon becoming aware of it.

#### **6. Third-party links & ads; third-party competitions; other users**

##### **6.1 Third-party links & ads.**

The site may contain links to third-party websites and services, and/or display advertisements for third parties (collectively, “third-party links & ads”). Such third-party links & ads are not under the control of company, and company is not responsible for any third-party links & ads. Company provides access to these third-party links & ads only as a convenience to you, and does not review, approve, monitor, endorse, warrant, or make any representations with respect to third-party links & ads. You use all third-party links & ads at your own risk, and should apply a suitable level of caution and discretion in doing so. When you click on any of the third-party links & ads, the applicable third party’s terms and policies apply, including the third party’s privacy and data gathering practices. You should make whatever investigation you feel necessary or appropriate before proceeding with any

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Director



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transaction in connection with such third-party links & ads. The company disclaims any responsibility or liability related to your access or use of any third-party links & ads.

### **6.2 Third-party competitions.**

Some users may promote competitions, promotions, prize draws and other similar opportunities on the site (“third-party competitions”). The company is not the sponsor or promoter of these third-party competitions and does not bear any responsibility or liability for the actions or inactions of any third parties who organize, administer or are otherwise involved in any of promotion of these third-party competitions. If you wish to participate in any of these third-party competitions, you are responsible for reading and ensuring that you understand the applicable rules and any eligibility requirements and are lawfully able to participate in such third-party competitions in your country of residence.

### **6.3 Other users.**

Each site user is solely responsible for any and all of its own user generated content. Because we do not control user generated content, you acknowledge and agree that we are not responsible for any user generated content, whether provided by you or by others. We make no guarantees regarding the accuracy, currency, suitability, or quality of any user generated content. Your interactions with other site users are solely between you and such users. You agree that company will not be responsible for any loss or damage incurred as the result of any such interactions. If there is a dispute between you and any site user, we are under no obligation to become involved.

### **6.4 Release.**

You hereby release and forever discharge the company (and our officers, employees, agents, successors, and assigns) from, and hereby waive and relinquish, each and every past, present and future dispute, claim, controversy, demand, right, obligation, liability, action and cause of action of every kind and nature (including personal injuries, death, and property damage), that has arisen or arises directly or indirectly out of, or that relates directly or indirectly to, the site (including any interactions with, or act or omission of, other site users or any third-party links & ads).

## **7. Disclaimers**

7.1 The site is provided on an “as-is” and “as available” basis, and company (and our suppliers) expressly disclaim any and all warranties and conditions of any kind, whether express, implied, or statutory, including all warranties or conditions of merchantability, fitness for a particular purpose, title, quiet enjoyment, accuracy, or non-infringement. We

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Director



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(and our suppliers) make no warranty that the site will meet your requirements, will be available on an uninterrupted, timely, secure, or error-free basis, or will be accurate, reliable, free of viruses or other harmful code, complete, legal, or safe. If applicable law requires any warranties with respect to the site, all such warranties are limited in duration to ninety (90) days from the date of first use.

### **8. Limitation on Liability**

To the maximum extent permitted by law, in no event shall company (or our suppliers) be liable to you or any third party for any lost profits, lost data, costs of procurement of substitute products, or any indirect, consequential, exemplary, incidental, special or punitive damages arising from or relating to these terms or your use of, or inability to use, the site, even if company has been advised of the possibility of such damages. Access to, and use of, the site is at your own discretion and risk, and you will be solely responsible for any damage to your device or computer system, or loss of data resulting therefrom.

### **9. Term and Termination**

Subject to this section, these website terms of use will remain in full force and effect while you use the site. We may suspend or terminate your rights to use the site (including your user account) at any time for any reason at our sole discretion, including for any use of the site in violation of these website terms of use. Upon termination of your rights under these website terms of use, your user account and right to access and use the site will terminate immediately. You understand that any termination of your user account may involve deletion of your user generated content associated with your user account from our live databases. Company will not have any liability whatsoever to you for any termination of your rights under these website terms of use, including for termination of your user account or deletion of your user generated content. Even after your rights under these website terms of use are terminated, the following provisions of these website terms of use will remain in effect: sections 1.2 through 1.5, section 5 and sections 6 through 10.

### **10. General**

#### **10.1 Changes.**

These website terms of use are subject to occasional revision, and if we make any substantial changes, we may notify you by sending you an e-mail to the last e-mail address you provided to us (if any), and/or by prominently posting notice of the changes on our site. You are responsible for providing us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described

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Director



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in the notice. Any changes to these website terms of use will be effective upon the earlier of thirty (30) calendar days following our dispatch of an e-mail notice to you (if applicable) or thirty (30) calendar days following our posting of notice of the changes on our site. These changes will be effective immediately for new users of our site. Continued use of our site following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

### **10.2 Electronic communications.**

The communications between you and company use electronic means, whether you use the site or send us emails, or whether company posts notices on the site or communicates with you via email. For contractual purposes, you (a) consent to receive communications from company in an electronic form; and (b) agree that all terms and conditions, agreements, notices, disclosures, and other communications that company provides to you electronically satisfy any legal requirement that such communications would satisfy if it were be in a hardcopy writing. The foregoing does not affect your non-waivable rights.

### **10.3 Entire terms.**

**WWW.ICLOGISTICS.CO.UK** website terms of use constitute the entire agreement between you and us regarding the use of the site. Our failure to exercise or enforce any right or provision of these website terms of use shall not operate as a waiver of such right or provision. The section titles in these website terms of use are for convenience only and have no legal or contractual effect. The word “including” means “including without limitation”. If any provision of these website terms of use is, for any reason, held to be invalid or unenforceable, the other provisions of these website terms of use will be unimpaired and the invalid or unenforceable provision will be deemed modified so that it is valid and enforceable to the maximum extent permitted by law. Your relationship to company is that of an independent contractor, and neither party is an agent or partner of the other. These website terms of use, and your rights and obligations herein, may not be assigned, subcontracted, delegated, or otherwise transferred by you without company’s prior written consent, and any attempted assignment, subcontract, delegation, or transfer in violation of the foregoing will be null and void. Company may freely assign these website terms of use. The terms and conditions set forth in these website terms of use shall be binding upon assignees.

### **10.4 Copyright/trademark information.**

Copyright © 2019 **INTER CONTINENTAL LOGISTICS LTD**. All rights reserved. All trademarks, logos and service marks (“marks”) displayed on the site are our property or the property of

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Director



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other third parties. You are not permitted to use these marks without our prior written consent or the consent of such third party which may own the marks.

### 10.5 Contact information:

Inter Continental Logistics Ltd,  
F 54, Centre court building,  
1301 Stratford road,  
Birmingham, United Kingdom – B28 9HH  
Tel : +44 121 7653324  
Email : [info@iclogistics.co.uk](mailto:info@iclogistics.co.uk)  
Web : [www.iclogistics.co.uk](http://www.iclogistics.co.uk)

## GDPR Privacy Policy

Last Updated: Nov 08, 2019

This Privacy Policy (the “Policy”) describes the personal data that **WWW.ICLOGISTICS.CO.UK** (“**INTER CONTINENTAL LOGISTICS LTD**”, “we”, “us” or “our”) collects from or about you when you use website **WWW.ICLOGISTICS.CO.UK** and related services (the “Services”), how we use that information, and to whom we disclose it. For the purposes of the Policy, the term “personal data” will have the same meaning as in EU General Data Protection Regulation 2016/679 (“GDPR”).

This Policy should be read in conjunction with the Terms of Use, into which it is incorporated by reference.

We may modify this Policy from time to time. We will provide you with notice of any material changes to this Policy by publishing or communicate the changes through our Services or by other means so that you may review the changes before continuing to use our Services. Your continued use of the Services after we publish or communicate a notice about any changes to this Policy means that you are consenting to the changes.

In short, **WWW.ICLOGISTICS.CO.UK** stores and processes your personal data and your contacts’ personal data solely to perform the services you have signed up for. We do not sell your information or use it for profiling secondary business objectives. The policies below describe this in greater detail.

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**PADMANABHAN SURESH THEKKEDATH**  
Director



# INTERCONTINENTAL LOGISTICS

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### 1. Accountability and Openness/Compliance

**INTER CONTINENTAL LOGISTICS LTD** is responsible for personal data under our control. We have established policies and procedures to effectively safeguard any confidential personal data that we collect and to deal with complaints and inquiries. We are committed to maintaining the accuracy, confidentiality, and security of your personal data, and we will ensure that you have access to information regarding the policies and procedures that we use to manage your personal data.

**INTER CONTINENTAL LOGISTICS LTD** has designated a Privacy Officer/Data Protection Officer (“Privacy Officer”) who is accountable for our compliance with this Policy and for ensuring that information about our policies and practices relating to the management of personal data is easily accessible. All questions or concerns regarding this Policy and our compliance with it should be directed to the Privacy Officer in writing and sent by email or postal mail to:

#### **INTER CONTINENTAL LOGISTICS LTD**

Attn: Privacy Officer  
SURESH@ICLOGISTICS.CO.UK  
F 54, Centre court building,  
1301 Stratford road,  
Birmingham, United Kingdom – B28 9HH  
Tel : +44 121 7653324

Every complaint or challenge regarding our compliance with this Policy will be investigated, and where a deficiency is found to exist, we will take appropriate measures to address it. This may include amending our policies and procedures as necessary. We will also cooperate with regulatory authorities to resolve any complaints that cannot be resolved between us and an individual user.

### 2. Consent

By using the Services, you signify your agreement to the terms and conditions of this Policy and to our collection, use and disclosure of your personal data as set out herein. You may change or withdraw your consent to the collection, use or disclosure of your personal data at any time by contacting the Privacy Officer in writing at the address listed above (see: Accountability and Openness/ Compliance). In some circumstances, a change or withdrawal of consent may affect your ability to use the Services.

### 3. Collection and Retention of Information

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PADMANABHAN SURESH THEKKEDATH  
Director



# INTERCONTINENTAL LOGISTICS

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We collect personal data only to the extent that it is necessary for the purposes set out below (see: Purpose – Why We Collect, Use and Disclose Information).

Subject to any legal or accounting requirements, we will retain personal data only as long as necessary to fulfill the purposes for which it was collected. Personal data that is no longer required will be destroyed, erased or made anonymous, although copies of deleted information may continue to exist on backup media. Information that we may collect includes:

### **User Submitted Information**

We collect certain personal data at the time users register to create an account or update their account details including a user's name, e-mail address, and other contact information. We also collect personal data that users submit through their use of the Services, including when they submit contact and other information, they have collected from their email subscribers and when they create and send email campaigns.

### **Usage Data**

We collect certain non-identifying information about the usage of the Services, including information about how users are using the Services and the characteristics of those users. This information is anonymized and is not used by us to identify you as an individual.

### **Account Deletion Requests**

At any time, you can request to have your account data deleted by contacting us. Upon receiving the request, we will send you an email to confirm this request. After successful confirmation, your account will be marked for deletion in 30 days. During this 30-day period, you may request to have your account reactivated by contacting us. After 30 days your account is permanently deleted and cannot be reactivated. For more information about account deletion processes, please see the section called Data Retention Policy below.

### **Account Inactivity**

To protect your privacy and your data, if your account is not active for a period of 1 year, it will automatically be permanently deleted. 30 days prior to this deletion, an email notification will be sent to the account email address with information about the deletion and instructions on how to keep the account active if desired. For more information about account deletion processes, please see the section called Data Retention Policy below.

### **Data Retention Policy**

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Director



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An account can be permanently deleted by either a deletion request or from account inactivity. We retain personal data only for as long as necessary to provide the Services you have requested and thereafter for a variety of legitimate legal or business purposes. These may include retention periods:

- needed to maintain adequate and accurate business and financial records
- for resolving, preserving, enforcing or defending our contractual/legal rights
- mandated by law, contract or similar obligations applicable to our business operations
- to protect recipients from spam or malicious emails

### **Technical and Device Information**

We collect certain non-identifying information related to a user's access to the Services, including the Internet Protocol (IP) address of the user's computer, the date and time the user accessed the Services and the operating system that the user is using. We make no attempt to link this information with the identity of individuals visiting our website without express permission. We may, however, review server logs and anonymous traffic for system administration and security purposes, for example, to detect intrusions into our network, for planning and improving web services, and to monitor and compile statistics about website usage. The possibility, therefore, exists that server log data, which contains users' IP addresses, could in instances of criminal malfeasance be used to trace and identify individuals. In such instances, we may share raw data logs with the appropriate authorities for the purpose of investigating security breaches.

### **Cookies and Web Beacons**

A "cookie" is a small piece of information stored on your computer by a web page. It is used to identify you to the web server. It tells the server who you are when you return to a page on the same website. Your browser will only send a cookie back to the domain that originally sent it to you. A cookie cannot run any programs, deliver any viruses, or send back information about your system.

We use cookies to determine your access privileges on our websites, to complete and support a current activity, and to track website usage. Most web browsers automatically accept cookies, but if you do not wish to have cookies on your system, you should adjust your browser settings to decline them or to alert you when cookies are being sent. If you decline cookies, you will still be able to use the Services, but your ability to access certain features and functions may be affected.

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**PADMANABHAN SURESH THEKKEDATH**  
Director



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As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information. Here are the current relevant information pages for the main browsers:

Microsoft Internet Explorer:

<http://www.microsoft.com/info/cookies.htm>

Google Chrome:

<https://support.google.com/accounts/answer/61416>

Mozilla Firefox:

[http://www.mozilla.org/projects/security/pki/psm/help\\_21/using\\_priv\\_help.html](http://www.mozilla.org/projects/security/pki/psm/help_21/using_priv_help.html)

A "web beacon" is an invisible electronic image that is used to track certain information. We use web beacons on our websites, in emails, we send to you and in emails, you send through the Services. The information gathered from the web beacons, such as who opened emails or clicked on links in the emails or on our websites, allows us to measure the success of email campaigns and to improve the Services.

#### **4. Purpose – Why We Collect, Use and Disclose Information**

We will identify the purposes for which we collect personal data before or when we request the information. We will not collect personal data which is not necessary and, except as specified below, will not use or disclose personal data for any purpose other than the purpose(s) for which it was collected without first obtaining your consent. The information that we collect is used and disclosed only for business purposes. This includes:

- to enable you to access and use the Services;
- to process, track and communicate with you about the usage of the Services;
- to establish, maintain and manage business relations with you so that we may provide you with the information, products or services that you request;
- internal business purposes, such as administering or improving the Services;
- to perform internal market research and conduct polls and surveys;
- to obtain feedback regarding the Services and our ability to address a user's needs;
- to provide users with information and promotional materials regarding **INTER CONTINENTAL LOGISTICS LTD's** products and services;
- to protect us against error, fraud, theft or damage to our goods, our business or our property;

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- to comply with any legal, accounting and regulatory requirements, including reporting requirements, applicable laws, and any search warrants, subpoenas or court orders; and any other reasonable purpose for which you provide consent.

We may collect, use or disclose your personal data without your knowledge or consent where we are permitted or required to do so by applicable law, government request or court order, or based on our good faith belief that it is necessary to do so in order to comply with such law, request or court order, or to protect our assets, the users of our website, or the public.

### **5. Disclosure to Third Parties**

We may disclose your personal data in response to requests from government agencies, law enforcement authorities, and regulators, or to satisfy legal or regulatory requirements. We may also disclose your personal data when we buy a business or sell all or part of our business.

You further acknowledge and agree that, in the course of providing the Services to you, we may delegate our authority to collect, access, use, and disseminate your information to third party subcontractors. Third party subcontractors may include web hosts, payment processors, delivery and logistics providers, social network integrators, and membership vendors. If we transfer any personal data to a third-party subcontractor, we will provide the subcontractors only with the information needed to perform the subcontracted service, and will use appropriate contractual or other means to provide a comparable level of protection while the information is being used by them.

### **6. Safeguards – How Information is Protected**

We maintain reasonable security safeguards to protect personal data in our possession or under our control from loss or theft, and from unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held. The safeguards applied will depend on the sensitivity of the personal data, with the highest level of protection given to the most sensitive personal data. We use user IDs, passwords and encryption technology, and restrict the employees and contractors who have access to personal data to those having a “need to know” and who are bound by confidentiality obligations in order to ensure that information is handled and stored in a confidential and secure manner.

When destroying personal data, we delete electronically stored personal data and shred any tangible materials containing personal data. While we will endeavor to destroy all copies of

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Director



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personal data, you acknowledge that deleted information may continue to exist on backup media but will not be used unless permitted by law.

We will continually review and update our security policies and controls as technology evolves. However, no security technology can be guaranteed to be failsafe. Using the Internet or other public means of communication to collect and process personal data may involve the transmission of data on an international basis and across networks not owned and/or operated by us.

Therefore, by using the Services and/or communicating electronically with us, you acknowledge and agree to our processing of personal data in this way and agree that we are not responsible for any personal data which is lost, or which is altered, intercepted or stored by a third party without authorization.

### **7. Accuracy / Access**

**INTER CONTINENTAL LOGISTICS LTD** has a responsibility to ensure that all personal data contained in our records or which is disclosed to third parties for the purposes described above is accurate, complete and up-to-date. You may make a request in writing for access to your personal data. We will inform you of your personal data held by us, and provide an account of the use that has been made of the information, as well as identify any third parties to whom the information has been disclosed. You may have reasonable access to your personal data, and if you demonstrate the inaccuracy or incompleteness of personal data, the information will be amended as appropriate. You should advise us immediately if you discover inaccuracies in our data, if your personal data changes, or if you wish to have your information removed from our files. All notices and requests should be in writing and sent to the Privacy Officer at the address listed above (see: Accountability and Openness/Compliance).

### **8. International Transfer and Storage of Information**

You acknowledge and agree that your personal data may be transmitted, transferred, processed, and/or stored outside of Canada, including in the United States and in the EU, and therefore may be available to governmental authorities under lawful orders and laws applicable in such jurisdictions. We will use reasonable means to ensure that your information is protected, but cannot guarantee that the laws of any foreign jurisdiction will accord the same degree of protection as the laws of Canada.

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### 9. Third Party Content and Links to other Websites

The Services may contain optional links to third party Internet websites and services. You acknowledge that these third parties may collect data from users or their computers. The accessing and use of third-party websites or services is at your own risk, and we cannot assume responsibility for the privacy practices, policies or actions of the third parties who operate those websites or services. This Policy applies only to the [WWW.ICLOGISTICS.CO.UK](http://WWW.ICLOGISTICS.CO.UK) Services, and we encourage you to review the privacy policies of any third parties when using their websites or services.

### 10. Minors

Minors (persons under the age of majority as defined in your jurisdiction) are not eligible to use the Services unsupervised, and we request that minors do not submit any personal data to us. If you are under the age of majority in your jurisdiction, you may only use the Services in conjunction with and under the supervision of an adult. **INTER CONTINENTAL LOGISTICS LTD** does not knowingly collect personal data from minors.

### 11. Notice of Breach

In the event of a security breach causing unauthorized intrusion of our Services that materially affects you or your contacts, **ICLOGISTICS.CO.UK / INTER CONTINENTAL LOGISTICS LTD** will notify you as soon as possible and later provide a report of the action we took in response to this intrusion.



## 12. Other Data Rights

**ICLOGISTICS.CO.UK / INTER CONTINENTAL LOGISTICS LTD** takes reasonable steps to ensure the data we collect is accurate, complete and up to date and is reliable for its intended use. You can manage most of your data through the Services, however, you can always contact us directly through our contact page if you have any questions about your data. If you would like to contact us directly about deleting, updating or accessing your personal data you can email us directly at **SURESH@ICLOGISTICS.CO.UK**. We will honor your request in accordance with applicable laws.

If you are using our Services to process personal data from certain territories such as the European Union, you may have broader data protection rights identified below:

- The right to be informed: (see: Collection and Retention of Information)
- The right of access/rectification: (see: Collection and Retention of Information for details on what data we collect and how we use it). Contacts can contact **INTER CONTINENTAL LOGISTICS LTD** directly to request their information to be updated or corrected.
- The right to erasure: At any time, you can cancel your **ICLOGISTICS.CO.UK / INTER CONTINENTAL LOGISTICS LTD** account as referenced in section 9 of our Terms of Use.
- The right to restrict processing: You can ask us to restrict processing your personal data in certain circumstances.
- The right to data portability: At any time, you can export your data and you can ask us to provide your personal data in a structured, commonly used and machine-readable form in certain circumstances.
- The right to object: You may object to the further processing of your personal data in certain circumstances.

## GDPR Cookies

<https://iclogistics.co.uk/cookies/>

Last Updated: Nov 8, 2019

**INTER CONTINENTAL LOGISTICS LTD** uses Website Navigational Information to collect information about how our visitors and users navigate our websites

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(<https://iclogistics.co.uk>, its subdomains and other websites) or our Dashboard (<https://iclogistics.co.uk/my-account/>).

The technology we use to collect this information is called cookies and it helps us analyze trends, track and measure user's movement around our websites and services and save targeted advertisements.

This article explains what this technology is and why we use it as well as visitors' and user's rights to control our use of it.

### **Cookies**

#### **What are cookies?**

A "cookie" is a small piece of information stored on your computer by a web page. It is used to identify you to the web server. It tells the server who you are when you return to a page on the same website. Your browser will only send a cookie back to the domain that originally sent it to you. A cookie cannot run any programs, deliver any viruses, or send back information about your system.

#### **Why do we use cookies?**

We use cookies to determine your access privileges on our websites, to complete and support your current activity, and to track website usage. Most web browsers automatically accept cookies, but if you do not wish to have cookies on your system, you should adjust your browser settings to decline them or to alert you when cookies are being sent. If you decline cookies, you will still be able to use our services, but your ability to access certain features and functions may be affected.

#### **What cookies are served through our website and our services?**

##### **Analytics cookies**

- These cookies are used to collect information to help us understand how our websites and services are being used or how effective our marketing campaigns are.
- These cookies are served by Google Analytics etc.
- To opt-out please click here for Google Analytics.

##### **Advertising cookies**

- These cookies are used to serve you ads more relevant to you and your interests.
- These cookies are served by Google. To opt-out, please click here.

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### **Social Networking cookies**

These cookies are used for advertising purposes as well as to enable you to share content from our websites through third-party social networking platforms. These cookies are served by Facebook, Twitter, and LinkedIn. To opt-out please use:

- for Facebook: <https://www.facebook.com/ads/settings>
- for Twitter: <https://twitter.com/personalization>
- for LinkedIn: <https://www.linkedin.com/psettings/guest-controls?trk>

### **How you can control cookies**

You can manage your cookie preferences in two ways. You can click on one of the opt-out links provided above or you can change your set up in your browser settings. Most web browsers automatically accept cookies, but if you don't wish to have cookies on your system, you should adjust your browser settings to decline them or to alert you when cookies are being sent. If you would like to opt-out of targeted advertising you can use one of these links to set up your ads preferences:

- <http://youonlinechoices.com/>
- <http://www.aboutads.info/choices/>
- <http://www.networkadvertising.org/choices/>

### **Additional information**

If you have questions or concerns regarding cookies, please contact us at **INFO@ICLOGISTICS.CO.UK** or email our Privacy Officer/Data Protection Officer at **SURESH@ICLOGISTICS.CO.UK**

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**PADMANABHAN SURESH THEKKEDATH**  
Director



## GDPR Data Protection Policy

### Context and overview

#### Key details

- Policy prepared by: **INTER CONTINENTAL LOGISTICS LTD**
- Approved by board / management on: June 19, 2019
- Policy became operational on: Nov 08, 2019
- Next review date: June 15, 2020

### Introduction

**INTER CONTINENTAL LOGISTICS LTD** needs to gather and use certain information about individuals. These can include customers, suppliers, business contacts, employees and other people the organization has a relationship with or may need to contact. This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards — and to comply with the law.

### Why this policy exists

This data protection policy ensures **INTER CONTINENTAL LOGISTICS LTD**:

- Complies with data protection law and follow good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

### Data protection law

The Data Protection Act 1998 describes how organizations — including **INTER CONTINENTAL LOGISTICS LTD** — must collect, handle and store personal information. These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

**The Data Protection Act is underpinned by eight important principles. These say that personal data must:**

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date



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5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

### **People, risks and responsibilities**

Policy scope

This policy applies to:

- The head office of **INTER CONTINENTAL LOGISTICS LTD**
- All branches of **INTER CONTINENTAL LOGISTICS LTD**
- All staff and volunteers of **INTER CONTINENTAL LOGISTICS LTD**
- All contractors, suppliers and other people working on behalf of **INTER CONTINENTAL LOGISTICS LTD**

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the Data Protection Act 1998. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
  - plus any other information relating to individuals

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Director



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### Data protection risks

This policy helps to protect **INTER CONTINENTAL LOGISTICS LTD** from some very real data security risks, including:

- Breaches of confidentiality. For instance, information being given out inappropriately.
- Failing to offer choice. For instance, all individuals should be free to choose how the company uses data relating to them.
- Reputational damage. For instance, the company could suffer if hackers successfully gained access to sensitive data.

### Responsibilities

Everyone who works for or with **INTER CONTINENTAL LOGISTICS LTD** has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

- The board of directors is ultimately responsible for ensuring that **INTER CONTINENTAL LOGISTICS LTD** meets its legal obligations.

### The data protection officer, **SURESH MENON**, is responsible for:

- Keeping the board updated about data protection responsibilities, risks and issues.
- Reviewing all data protection procedures and related policies, in line with an agreed schedule.
- Arranging data protection training and advice for the people covered by this policy.
- Handling data protection questions from staff and anyone else covered by this policy.
- Dealing with requests from individuals to see the data **INTER CONTINENTAL LOGISTICS LTD** holds about them (also called 'subject access requests').
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data.

### The web developer, **Jijy Mathew (mathew@iclogistics.co.uk)**, is responsible for:

- Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
- Performing regular checks and scans to ensure security hardware and software is functioning properly.
- Evaluating any third-party services, the company is considering using to store or process data. For instance, cloud computing services.



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**The marketing manager, Jijy Mathew (mathew@iclogistics.co.uk), is responsible for:**

- Approving any data protection statements attached to communications such as emails and letters.
- Addressing any data protection queries from journalists or media outlets like newspapers.
- Where necessary, working with other staff to ensure marketing initiatives abide by data protection principles.

### **General staff guidelines**

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, employees can request it from their line managers.
- **INTER CONTINENTAL LOGISTICS LTD** will provide training to all employees to help them understand their responsibilities when handling data.
- Employees should keep all data secure, by taking sensible precautions and following the guidelines below.
- In particular, strong passwords must be used and they should never be shared.
- Personal data should not be disclosed to unauthorized people, either within the company or externally.
- Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
- Employees should request help from their line manager or the data protection officer if they are unsure about any aspect of data protection.

### **Data storage**

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the IT manager or data controller.

When data is stored on paper, it should be kept in a secure place where unauthorized people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept in a locked drawer or filing cabinet.
- Employees should make sure paper and printouts are not left where unauthorized people could see them, like on a printer.
- Data printouts should be shredded and disposed of securely when no longer required.

When data is stored electronically, it must be protected from unauthorized access, accidental deletion and malicious hacking attempts:

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- Data should be protected by strong passwords that are changed regularly and never shared between employees.
- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers, and should only be uploaded to an approved cloud computing services.
- Servers containing personal data should be sited in a secure location, away from general office space.
- Data should be backed up frequently. Those backups should be tested regularly, in line with the company's standard backup procedures.
- Data should never be saved directly to laptops or other mobile devices like tablets or smart phones.
- All servers and computers containing data should be protected by approved security software and a firewall.

### Data use

Personal data is of no value to **INTER CONTINENTAL LOGISTICS LTD** unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, employees should ensure the screens of their computers are always locked when left unattended.
  - Personal data should not be shared informally. In particular, it should never be sent by email, as this form of communication is not secure.
  - Data must be encrypted before being transferred electronically. The IT manager can explain how to send data to authorized external contacts.
  - Personal data should never be transferred outside of the European Economic Area.
  - Employees should not save copies of personal data to their own computers.
- Always access and update the central copy of any data.

### Data accuracy

The law requires **INTER CONTINENTAL LOGISTICS LTD** to take reasonable steps to ensure data is kept accurate and up to date.

The more important it is that the personal data is accurate, the greater the effort **INTER CONTINENTAL LOGISTICS LTD** should put into ensuring its accuracy.

It is the responsibility of all employees who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

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- Data will be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated. For instance, by confirming a customer's details when they call.
- **INTER CONTINENTAL LOGISTICS LTD** will make it easy for data subjects to update the information **INTER CONTINENTAL LOGISTICS LTD** holds about them. For instance, via the company website.
- Data should be updated as inaccuracies are discovered. For instance, if a customer can no longer be reached on their stored telephone number, it should be removed from the database.
- It is the marketing manager's responsibility to ensure marketing databases are checked against industry suppression files every six months.

### Subject access requests

All individuals who are the subject of personal data held by **INTER CONTINENTAL LOGISTICS LTD** are entitled to:

- Ask what information the company holds about them and why.
- Ask how to gain access to it.
- Be informed how to keep it up to date.
- Be informed how the company is meeting its data protection obligations.

If an individual contact the company requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the data controller at **SURESH@ICLOGISTICS.CO.UK** The data controller can supply a standard request form, although individuals do not have to use this.

Individuals will be charged **ENTER AMOUNT £10** per subject access request. The data controller will aim to provide the relevant data within **14 days**.

The data controller will always verify the identity of anyone making a subject access request before handing over any information.

### Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, **INTER CONTINENTAL LOGISTICS LTD** will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the board and from the company's legal advisers where necessary.

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Director



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### Providing information

**INTER CONTINENTAL LOGISTICS LTD** aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, the company has a privacy statement, setting out how data relating to individuals is used by the company. This is available on request.



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**PADMANABHAN SURESH THEKKEDATH**  
Director