# J.R. Rix & Sons Ltd Privacy Policy

## 1. Introduction

This policy applies to your use of:

- The Rix (a trading style of J.R. Rix and Sons Limited) website which is accessible via https://www.rixgroup.co.uk/
- The Rix Shipping website (referred to as 'Website'), which is accessible via https://www.rixshipping.co.uk/
- The Rix Renewables website (referred to as 'Website'), which is accessible via https://rixrenewables.co.uk/
- The Rix Sea Shuttle website (referred to as 'Website'), which is accessible via https://www.rixseashuttle.co.uk/
- The Seaway Logistics website ("Website") accessible via https://seawaylogistics.co.uk/.
- The Maritime Bunkering website (referred to as 'Website'), which is accessible via https://maritimebunkering.co.uk/
- Any 'Services' provided by the above companies where you have contacted us in writing, over the phone, via SMS, via social media, or in person. These services include:
  - J. R. Rix and Sons: Parent company who holds and manages the assets of the subsidiaries held.
  - o **Rix Shipping:** The provision of warehousing, stevedoring, ships agency, crane & forklift hire, land, transport, grain drying & storage, renewables and offshore support, operation and management of ships, customs clearance, and fuel bunkering.
  - o **Rix Sea Shuttle:** Personnel and equipment transfers.
  - Rix Renewables: The provision of technicians, inspectors, vessels, operations and maintenance, balance of plant services, and oil exchange services.
  - Seaway Logistics: The provision of freight forwarding, ships agency, machinery services, vehicle shipping services, and containerised services.
  - Maritime Bunkering: The provision of self-service fuel bunkering, ship-to-ship fuel bunkering, and the provision of marine gas oil and very low sulphur fuel oil.
  - J.R. Rix & Sons Limited (Property Division): The provision of property and land management services.

For the following companies/brands please see their specific privacy policies located on their respective websites.

- Rix Petroleum Group: The provision of fuel distribution and heating services https://www.rix.co.uk/privacy-policy/
- Fuelmate: The provision of fuel cards and relates services https://fuelmate.co.uk/privacy-policy/
- Jordans: Retailing of cars, van and motorhomes together with services relates to the purchase of vehicles including servicing, maintenance & repairs, parts, and insurance.
   These insurances include warranties, mechanical breakdown cover, gap, and paint protection services. <a href="https://www.jordanscars.co.uk/privacy-legal.aspx">https://www.jordanscars.co.uk/privacy-legal.aspx</a>
- Victory Leisure Homes: The provision of holiday homes, lodges and holiday home relates services including after sales, warranty and stocking loans.
   <a href="https://www.victoryleisurehomes.co.uk/policy-hub/privacy-policy">https://www.victoryleisurehomes.co.uk/policy-hub/privacy-policy</a>
- o **Accountibl:** Provision of expense management systems and related services.

Please note that data provided to us to support a new job application or in relation to an existing employment contract, this is covered in our separate HR & Payroll Services Data handling policy. This can be found by visiting <a href="https://www.rixgroup.co.uk/hrpayrollservicesdatahandlingpolicy/">www.rixgroup.co.uk/hrpayrollservicesdatahandlingpolicy/</a>

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. The website is not intended for children, and we do not knowingly collect data relating to children.

Please read the following document carefully to understand how we treat your personal data and our practices regarding your personal data.

#### 2. Who We Are

The J.R. Rix & Sons group are responsible for a number of company-specific websites, which are listed above. We will also be referred to in this document as "we," "us," or "our." We are the controller of all personal data collected in relation to the provision of company-based services.

We are registered as a controller with the Information Commissioner's Office and our registration number is Z1941448.

This specific policy refers to the following companies:

- Rix Shipping Company Ltd
- Rix Shipping (Scotland) Limited
- Rix Grain Drying Limited
- Rix Renewables Limited
- Seaway Logistics Limited
- Maritime Bunkering Limited
- J. R. Rix and Sons Limited

#### 3. Contact Details

We will be happy to deal with any queries or requests regarding the data we hold about you.

You can contact us by:

Post:

Data Compliance Officer Two Humber Quays Wellington Street West Hull

HU1 2BN

• Telephone: 01482 224422

• Email: datainformationofficer@rix.co.uk

You have the right to make a complaint to us at any time by using the contact details above.

If you have any concerns with regard to the way in which we have processed your personal data, you also have the right to complain to the Information Commissioner's Office ("ICO"), which is the UK's supervisory authority for data protection issues.

# 4. Changes to the Privacy Policy & Your Duty To Inform Us of Changes

We hold regular reviews of our privacy policy, which was last updated on 11/01/2022.

Our privacy policy may change and, if it does, these changes will be posted to this page and, where appropriate, we will notify you. The new policy may be displayed on our website and you may be required to read and accept the changes to continue your use of our website or to use our services.

The personal data we hold about you must be accurate and current. Please keep us informed if your personal data changes during our relationship with you.

#### 5. The Data We Collect About You

We may collect, use, store, and transfer different kinds of personal data about you. Examples of these types of data are:

- Identity Data: Data that is used for contacting and delivering products and services to you. For example, your name, place of work, job title, and contact information. Your contact information may include your e-mail address, telephone numbers, postal address, your bank and/or building society details, and any specific delivery details.
- **Business Contact Data:** This can include your position within the company, the company address, the company business type, business status (such as a sole trader or limited), and the email addresses and telephone numbers of key contacts.
- Application For Credit Data:
  - Business customers: For example, the company and trading name(s), length of time trading, the company registration number, VAT number, the credit amount required, the business type, turnover, the number of employees, the registered address, and bank details. Bank details include the account holder, account number, sort code, and the name and address of the bank/building society. We may also require and record an instruction to pay a direct debit and an acknowledgement that J.R. Rix & Sons Ltd is permitted to share data with credit reference agencies or a credit insurer to obtain and support a credit fee.
  - o **Domestic customers:** For example, tenure and bank details.
  - **Terms and Conditions:** An agreement with the specific terms and conditions for each business listed above.
  - Financial Data: For example, your business financial accounts and details.
  - Transaction Data: For example, information regarding the services you have purchased.
  - Payment Data: For example, direct debits and credits made to customers' accounts.
  - Device Data: For example, the type of mobile device used, a unique device identifier, the MAC address of the device's wireless network interface, the mobile phone number used by the device, mobile network information, the mobile operating system, the type of mobile browser used and time zone setting.
  - **Profile Data:** For example, your username, password, preferences, feedback, and survey responses.
  - Usage Data: For example, details of your use of our websites.

Marketing and Communications Data: Such as your marketing preferences.

We may also collect, use, and share Aggregated Data, such as statistical or demographic data, for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law, as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature of the website. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data, which will be used in accordance with this privacy policy.

We do not collect any special categories of personal data about you, such as details about your race, ethnicity, religious beliefs, philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, or genetic and biometric data. Nor do we collect any information about criminal convictions or offences.

#### 6. Third Parties

In most cases, J.R. Rix & Sons will collect your information directly. However, there may be situations where this information is obtained by us from third parties. Examples of this would include:

- Directly from a third party. For example:
  - Port authorities, Border Force, HMRC, Chamber of Commerce, and third-party companies (as the Custos entries).
  - o credit reference agencies.
  - o data providers for business development.
- From a third party with your consent. For example:
  - your bank or building society.
  - o professional body.
- From a third-party data profiling company, where you have given your consent for that company to pass such information on to us.
- From publicly available sources. For example:
  - o Electoral Roll.
  - o Companies House.
  - HM Land Registry.
  - o Government VAT checker.

#### Sharing Data With Third Parties, Including Our Service Providers and Suppliers

We will supply your identity data and the nature of goods transported to HMRC and SEPA as required by law.

We will never sell or rent our customer data to other organisations for marketing purposes. We will not sell, distribute, or lease your personal information to third parties for their control unless we have your permission or another lawful basis to do so. Lawful basis includes our legitimate interests, as long as our interests are not overridden by the impact on you, a contractual obligation to you, or a legal requirement to do so. Where we do seek your permission, we will name the relevant third party at the time we seek permission from you and any such permission shall be limited to the specified third party.

Please note that we may provide information for processing to certain third parties as outlined in the following paragraph and also in section 9 below.

In order to make certain 'Services' available to you and to make payments to your bank account, we may need to share your personal data with some of our service partners. These include:

# **Rix Shipping:**

- Providing information to HM Revenue and Customs and SEPA, managing imports, and exports services (available through the HMRC portal).
- Management of timber imports and export services with BizTrak.

#### **Rix Renewables:**

• Managing client data, available through Kinetic.

#### **Seaway Logistics:**

- Providing information to HM Revenue and Customs and SEPA, managing imports, and exports services (available through the HMRC portal).
- Freight management services, available through DataFreight.
- Managing customs and exercise services, using resources provided by Destin8 and Sequoia.

# J.R. Rix and Sons (Property Services Division):

- Property management system services, available through Re-Leased.
- Accounting system, available through Xero.

## For all group companies (listed above):

- Accounting systems provided by Microsoft Dynamics Great Plains platform and Business Central.
- Email & SMS management systems, provided by Dotdigital, Outlook, Mimecast, & Sophos.
- Customer survey platforms, such as Forms in Office 365.
- Microsoft Office documents, provided by Office 365.
- Our payment gateway, provided by Opayo.
- Payment of bills and invoices to suppliers, provided by various accounting platforms.
- Various third-party delivery companies. Whereby we provide your contact details to third-party carriers to deliver goods and services.

We may also appoint third-party data profiling companies to, on our behalf, establish trends and other buying/profile data to the extent that we are lawfully able to do so.

J.R. Rix & Sons only allows its service providers to manage your personal data when we have confirmed that they apply appropriate data protection and security controls. We also impose contractual obligations on service providers relating to data protection and security. This means that they are only authorised by us to use your data to provide services to J.R. Rix & sons and you and for no other purposes.

## 6.1 Third-Party Links

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies. We do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services,

such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

#### 7. How Your Personal Data Is Collected

We will collect and process the following data about you:

- Information you provide us. This includes information such as identity, contact, financial, or
  marketing and communications data that you give us when downloading, accessing, using, or
  visiting our websites (including submitting forms to us), using our services, and corresponding
  with us (for example, by email). If you contact us, we may keep a record of that
  correspondence.
- Information we collect about you and your device. Each time you use our websites, we will automatically collect personal data including the device, content, and usage data. We collect this data using cookies and other similar technologies.
- Information we receive from other sources, including third parties and publicly available sources. We may receive personal data about you from various third parties, such as your employer and from analytics providers such as Google.

In addition to the above, the list below explains places we may get data that count as part of your personal information.

# **Data You Give To Us:**

- When applying for an account with one of our businesses.
- When you purchase services provided by one or more of our businesses.
- When you talk to us on the phone, to one of our sales representatives, or when you speak with our admin or service teams. Please note that we record all calls for training and development purposes.
- When completing a form on one of our websites.
- In e-mails, letters, forms, and customer surveys.
- If you take part in competitions or promotions.
- As part of payment and transaction data.
- When you communicate with us via social networks.
- As part of legal or insurance claims, as well as other documents.
- In documents and forms that you are required to complete as part of a contract with us.
- Profile and usage data. This includes the security details that you create and use in connection
  with our services, as well as your settings and marketing choices. We also gather data from the
  devices that you use (such as computers and mobile phones) to connect to our internet
  services. We also use cookies and other internet tracking software to collect data whilst you are
  using our website.

#### 8. How We Use Your Personal Data

We will only use your personal data when the law allows us to do so. Most commonly, we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Purposes for which we will use your personal data:

Purpose/Activity	Type of Data	Lawful Basis for Processing
When applying for an account with one of our companies.	Identity data, application for credit data, business contact data, financial data, and terms and conditions data.	Legitimate interest: to process the application and contact you in relation to the application.
When you purchase services provided by our businesses.	Identity data, business contact data, application for credit data, transaction data, and payment data.	Legitimate interest: to comply with our obligations to your employer if our contract is with your employer.  Performance of a contract: where our contract is with you.
To manage our relationship with you or your business, internal record keeping, account management, and the provision of servicebased communications or updates.	Identity data, business contact data, marketing and communications data, and transaction data.	Legitimate interest: to keep records and keep you up to date with our services, product updates, and changes in our terms and conditions. Your consent. Performance of a contract.
To undertake a credit or other financial checks on you.	Application for credit data.	Your consent.
When contacting us to discuss your account details and transactions.	Profile data, content data, and usage data.	Legitimate interest: to provide personalised content to you about your account, enable you to pay bills, and update your contact details and preferences. Your consent.
To deliver services to you.	Identity data, business contact data, marketing and communications data, and transaction data.	Legitimate interest: to keep records and to keep you up to date with our services, product updates and changes in terms and conditions. Your consent. Performance of a contract.
To provide you with marketing communications about our products and services.	Marketing and communications data and business contact data.	Legitimate interest: to make existing customers aware of suitable products, blog updates, and sending our surveys to improve our service offering to you. Your consent.

To respond to your queries.	Identity data, transaction data, and business contact data.	Legitimate interest: to manage your queries and ensure we fix issues at the root cause.
To obey laws and regulations that apply to us.	Identity data, business contact data, application for credit data, terms and conditions data, financial data, transaction data, payment data, content data, device data, profile data, usage data, and marketing and communications data.	Regulatory requirement.
To respond to complaints and seek to resolve them.	Identity data, business contact data, application for credit data, terms and conditions data, financial data, transaction data, payment data, content data, device data, profile data, usage data, and marketing and communications data.	Legitimate interest: to ensure that we resolve our complaints and that we follow our complaints procedure
To collect and recover monies owed to us.	Identity data, business contact data, transaction data, and payment data.	Legitimate interest: to recover monies owed on the account. Performance of a contract.
To enable you to participate in a prize draw, a competition, or to complete a survey.	Identity data, business contact data, transactional data, and marketing and communications data.	Legitimate interest: sending out and administering surveys and competitions to improve our service offering to you. Your consent.
To administer and protect our business and websites including troubleshooting, data analysis, and system testing.	Identity data, business contact data, transaction data, payment data, and profile data.	Legitimate interest: to ensure that our systems are usable, safe, and working correctly.

# 9. Additional Disclosures of Your Personal Data

We may also share personal data about you:

- With third parties who are directly involved in dealing with any request, enquiry, or application made by you. For example, we may share your personal data with third-party credit reference agencies or credit insurers in order to enable you to make purchases with one of our group companies.
  - Where such disclosure is required by law.
  - With third parties who are providing us with professional advice.
  - Where the disclosure is in connection with any criminal investigation, legal proceedings, or prospective legal proceedings, where permitted by law.

- Where the disclosure is to establish, exercise, or defend our legal rights. This includes in connection with court cases and/or providing information to others for fraud prevention and reducing credit risk.
- Where we are required to enforce our Terms of Use.
- Where we have stated or informed you otherwise (e.g., in this policy or on our website).
- We will not pass on your information to any third party for the purpose of marketing.
- We may also disclose your personal data to third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

## 10. If You Choose Not To Provide Your Personal Information

We may need to collect personal information by law or to enter into or fulfil a contract we have with you or your employer. If you do not give us any such personal information, we may not be able to enter into a contract with your business for the provision of our services. Moreover, if you do not provide your personal information, we will not be able to provide a service that is directly linked to your own usage whilst working for your employer

We sometimes ask for information that is useful but not required by law or a contract. We will make this clear when we ask for it. You do not have to give us these extra details and it will not affect the products or services you have with us.

## 11. International Transfers

If we are required to transfer your personal data out of the United Kingdom and European Economic Area (EEA), we will ensure a similar degree of protection is afforded to it by verifying at least one of the following safeguards is implemented:

- Your personal data will be transferred to a country that has been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in the UK and Europe.

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

# **12.** Account Security

If you contact us or we contact you, we may ask for certain information from you to confirm your identity, check our records, and deal with your account efficiently and correctly.

We aim to protect all of our customers from fraud. As part of this, we may use your personal information to verify your identity to help prevent or detect fraud. These checks may involve your information being disclosed to credit reference agencies, who may keep a record of that information. This is not a credit check and your credit rating will be unaffected.

## 13. Data Security

The security of your information is very important to us. As part of our commitment to keeping your data safe, our technical experts maintain physical, electronic, and managerial procedures to keep safe the information we collect online.

We use a secure server when you contact us via our websites. We take appropriate measures to ensure that the personal information disclosed to us is kept secure, accurate, and up to date. We will ensure that your personal information is kept only for so long as is necessary for the purposes for which it was collected and is securely destroyed in accordance with our data retention and disposal policy.

Only authorised employees and carefully checked agents, contractors, and sub-contractors, who provide a particular data processing service for us, are permitted access to our data systems on a day-to-day basis. These people will only be allowed access to your data for the purposes identified within this privacy policy, processing it on our behalf, or for IT security and maintenance.

Where a third party is processing your data on our behalf, we will take steps to ensure that such third party gives us commitments that it will process your data in line with applicable data protection law. If a third party is located outside of the UK, we will always take appropriate additional steps to ensure that your personal information is kept safe and secure. This will generally involve ensuring that such third party agrees to sign up for a formal legal agreement committing them to comply with data protection standards equivalent to those in the UK.

All information you provide to us is stored on our secure servers.

Once we have received your personal data, we will use strict procedures and security features to try to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator when we are legally required to do so.

#### 14. Data Retention

We only retain your personal data for as long as we need it for the purpose for which it was collected. Whilst taking into consideration our legal obligations, we will on an ongoing basis: review the length of time we retain your personal data; consider the purpose or purposes for which we hold your personal data in deciding whether (and for how long) to retain it; securely delete your personal data if it is no longer needed for such purpose or purposes; and update, archive, or securely delete your personal data if it goes out of date.

Where we are using your personal information to send you marketing information, we will generally retain that information for marketing purposes for two years from the point of the last order or quote that you requested from us. We understand that, even if you do not buy from us on every occasion, often we see repeat purchases from customers within this period.

We will retain relevant account information for eight years in line with legal tax and contract requirements. In the case of commercial customers, we may retain personal information for a longer period depending on the order and contracting cycles of the customer. For example, if a customer

commonly enters into five-year deals, we will retain their information for a short period beyond when we would expect such an agreement to be renewed.

For further information on how long we retain your personal data, please contact us using the contact details set out above.

# 15. Your Legal Rights

Under certain circumstances, you have the following rights under data protection laws in relation to your personal data:

- Request access to your personal data (commonly known as a "data subject access request").
   This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of your personal data. This enables you to have any incomplete or
  inaccurate data we hold about you corrected, though we may need to verify the accuracy of the
  new data you provide to us.
- Request the erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data. This is where we are relying on a legitimate interest
  (or those of a third party) and there is something about your particular situation which makes
  you want to object to processing on this ground, as you feel it impacts your fundamental rights
  and freedoms. You also have the right to object where we are processing your personal data for
  direct marketing purposes. In some cases, we may demonstrate that we have compelling
  legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - o if you want us to establish the data's accuracy.
  - o where our use of the data is unlawful, but you do not want us to erase it.
  - where you need us to hold the data even if we no longer require it, as you need it to
    establish, exercise, or defend legal claims; or you have objected to our use of your data
    but we need to verify whether we have overriding legitimate grounds to use it.
- Request transfer of your personal data. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Right to withdraw consent where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing conducted before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Where you are an active customer of ours, we may direct market to you by post, email, SMS, or telephone on the basis that we consider we have a legitimate interest in marketing to you in this

way and that it does not substantially impact your privacy. You have a right to object to this at any time and may request that we cease to contact you for direct marketing in this manner at any point. We will comply with any such request.

If you want to remove consent, request that we cease contacting you for direct marketing purposes, or request the exercise of any of the above rights in respect of your personal information, you may do so at any time by emailing us at datainformationofficer@rix.co.uk, by telephone at 01482 224422, or by writing to us at:

Data Information Officer c/o J R Rix & Sons Limited Two Humber Quays Wellington Street West Hull HU1 2BN

#### 16. Cookies

One of the most important reasons we use cookies is to enhance our customers' experience.

Cookies are an essential tool in the development and maintenance of a website. Collecting small amounts of information gives us great feedback, insight and understanding into our customers' site visits. By tracking our website's performance in this way, we can successfully deliver the products and services you are looking for and improve navigation and usability, ultimately creating a safe and secure environment for you to browse in.

If you do not allow cookies to be used, you will have restricted access to some of the features on our website. It will also mean your user journey will not be tracked so any opportunity to improve your online experience with us will be lost.

A cookie is a small file which asks permission to be placed on your device's storage. Once you agree, the file is added, and the cookie helps analyse web traffic when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes, and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website to tailor it to customer needs. We only use this information for statistical analysis purposes before the data is removed from the system.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your device or any information about you, other than the data you choose to share with us.

Websites use cookies to ensure you receive the best possible visitor experience. A cookie contains text and is like an identification card which can only be translated by the server it originated from.

Cookies cannot tell us information such as your email address, which we can only collect where you tell us. For example, if you submit an enquiry to us. Most internet browsers allow you to prevent cookies from being stored on your computer. Alternatively, you may be able to configure your browser to accept all cookies or notify you when a cookie is offered by our server. You may also be

able to delete all cookies currently stored on your web browser. For more detailed information on the cookies that we use and the purpose for which we use them, see our Cookie Policy.

We may also collect information about where you are on the internet (e.g., the URL you came from, IP address, and domain types such as ".co.uk" and ".com"), your browser type, the country where your computer is located, the pages of our website that were viewed during your visit, and any search terms that you entered on our website. We will use this information to administer our website, for internal operations (including troubleshooting, data analysis, testing, research, or statistical and survey purposes) and as part of our efforts to keep our website safe and secure.

For further information about cookies and how they are used, please visit www.aboutcookies.org.