



## **Privacy policy Customs Support Group**

### Customs Support Group

Customs Support Group B.V. is established at the address Willem Barentszstraat 11-19, 3165 AA Rotterdam, the Netherlands and registered in the trade register under number 24294906. Customs Support Group B.V. has several affiliated entities in the Netherlands, Belgium, Germany and other EU member states. Hereinafter Customs Support Group B.V. and its affiliated entities shall jointly and severally be referred to as "CSG".

A current overview of the affiliated entities of Customs Support Group B.V. can be downloaded from our website. You need to choose 'downloads' in the menu. The document *list of entities* can be found under 'Customs Support Group' and can also be found under [this hyperlink](#).

### Activities

CSG performs various customs operations for customers in the form of customs declarations (for example import, export and transit), the preparation of certificates of origin, and preferential documents, and notifications to the Netherlands food and consumer product safety authority (NVWA) and food and product safety authorities in other member states in the case of phytosanitary and veterinary cargo.

### Business information and personal data

Various business information and personal data are collected when preparing and performing the above-mentioned activities. The CSG entity that accepts to perform and performs the services, is responsible for the correct processing of business information and personal data and hereby conforms to the European General Data Protection Regulation (GDPR) and the national laws and regulations based on the GDPR.

### Way of collecting business information and personal data

Different departments of CSG collect business information and personal data. Only employees who need the data to carry out their work, have access. Access is granted on the basis of a *need to know* principle. Below we have listed per business section which data are collected and for what purpose.

#### *→Sales Department*

Via our website [www.customssupport.com](http://www.customssupport.com) potential customers can fill in a contact form to request an offer or to request CSG to contact the potential customer. The following information is requested:

- Company name

- Name and surname of the contact person
- E-mail address
- Telephone number

The customer is also requested to give permission that CSG may contact the customer directly. The customer hereby retains the right to withdraw this permission at any time.

Price proposals will be converted into a quote in case of a positive response. We use the personal data in that case because it is necessary to execute the agreement and because it is necessary in connection with the justified interest of CSG to be able to deliver its services to the customer. The quotation will be archived in accordance with internal procedures and will be adjusted annually if the service is continued. We destroy personal data of our customers latest two years after the end of the activities for that customer.

In addition, newsletters are regularly sent to our customers to inform them of current affairs in the field of customs and developments within CSG. The customer has the option to unsubscribe from these newsletters.

#### *→Finance Department*

In the context of debtor and creditor management, the name and address details of companies and individuals are collected and registered within our accounting system, these data being processed to execute the agreement, to fulfill regulatory requirements and/or in our justified interest. You can for example think of:

- Company name
- Name and surname of the contact person
- Address information
- E-mail address
- Telephone number
- Fax number
- VAT number

These data shall in principle be removed from our systems two years after termination of the agreement, the cooperation or project, except for data we have to keep for a longer period on the basis of regulatory requirements or because of a pending dispute.

#### *→Afdeling Department*

In order to be able to make the various customs declarations and to act as a fiscal representative, it is necessary to record the assignment and the authorization for customs representation and/or fiscal representation in a written agreement / power of attorney. Examples of such agreements/authorizations are:

\*Agreements/powers of attorney for limited or general fiscal representation

\*Agreements/powers of attorney for direct or indirect customs representation

\*Powers of attorney to submit requests for repayment/ remission

\*Powers of attorney to draw up origin or preferential documents.

We request the following information:

- Company name
- Name and surname of the contact person
- Address information
- E-mail address
- Website address
- Telephone number
- Fax number
- VAT number
- EORI number

Apart from that we request the name of and signature by the person/persons authorized to represent the company of the principal (according to the trade register) and proof of the incorporation of the company and of the identity of the authorized representative(s) by way of a copy of the extract from the relevant trade register.

If CSG is requested to act as customs representative or fiscal representative, the customer is also requested to provide a copy of the identity card (ID) of the person/persons authorized to represent the company of the customer. We need a copy ID to verify the authorization (by checking the name of the representative(s) and the signature(s)). CSG believes that as logistics service provider operating in international trade it has to know who its customers are and that CSG has a legitimate interest in managing the (financial) risks connected to the services provided by customs representatives. We use the aforementioned data because it is necessary to execute the agreement and because it is necessary in connection with the justified interest of CSG to be able to deliver its services to the customer. When archiving a copy ID, the *BSN* number (the Netherlands), *rijksregister* number (Belgium) or similar numbers of the holder of the ID shall be made illegible, insofar as the person has not already done so upon providing the copy of the ID. Personal data such as the aforementioned data, but also the portrait photo, can be made illegible by the holder of the ID card before providing a copy.

→*Human Resource Department*

\*Personnel files

CSG processes personal data of its employees in the execution of employment contracts and for reasons of HR management and payroll administration. Employees have the right to view their staff file. The HR Department can explain at any time to employees which data is collected and for what purpose this is done. Personal data is kept until five years have lapsed after termination of the employment contract, except for data we have to keep for a longer period on the basis of regulatory requirements or because of a pending dispute.

\*Application letters and curriculum vitae from potential candidates.

The personal data of job applicants is kept until the vacancy is filled. The personal data of applicants who are not hired, will be destroyed no later than four weeks after this, unless the applicant gives written permission to keep the data in a secured database in view of future vacancies. In this respect we apply a maximum retention period of six months. The permission to keep data may be withdrawn at any time. The personal data shall only be processed if we have another legal basis than permission.

#### Visitors

Persons who visit a location of the CSG may be requested to register upon arrival by registering in our visitor's register. The entities of CSG that have an AEO safety authorization are under the obligations to be aware at all times of who is present in the building, for example in case of an evacuation. Upon registration, visitors are requested to write down their name, the name of the company they represent and the date of the visit and time of arrival and departure. Visitor registrations are kept for a maximum period of 3 months.

#### Protection of personal data

In accordance with applicable laws and regulations CSG has taken adequate technical measures to protect your personal data. CSG stores personal data in a secured database, where technical measures are taken to prevent unauthorized access.

#### Website visitors / third parties

CSG respects the privacy of all visitors to its website ([www.customssupport.com](http://www.customssupport.com)) and ensures that the confidential nature of the personal data you provide to us is preserved.

This relates to the following personal data, which we process in our legitimate interest to optimize our website and to increase the ease of use:

- Company name
- Name and surname of the contact person

- Address information
- E-mail address
- Telephone number

CSG does not make your personal data available to third parties, unless obliged on the basis of mandatory rules, a binding decision by a government agency or an order thereto by a competent court. The website may contain hyperlinks to third-party websites. CSG is not responsible for the content of third-party websites.

#### Rights

Below we have listed your rights in respect of the use of your personal data:

You have the right to inspect your personal data.  
You can object to the use of your personal data.  
You can request that we delete your personal data.  
You can make a request for the transfer of your personal data to another party.  
You can request a change to personal data in case you believe that the data is incorrect.  
You can also ask us to limit the processing of personal data.  
You can withdraw your permission if the processing is based on that. We can still process the data if there is another legal basis allowing us to do so.

We do not process your personal data for profiling or for fully automated decisions.

We will comply with your request unless we have an overriding legitimate interest not to delete the data, that outweighs your privacy interest. If we have deleted the data, for technical reasons we cannot immediately remove all copies of the data from our systems and backup systems. We may refuse to comply with the aforementioned requests if they are made unreasonably often, require unreasonable technical efforts, or have unreasonable technical consequences for our systems or endanger the privacy of others.

You can also file a complaint in respect of the use of your personal data to the relevant data protection authority. CSG has affiliated entities in a.o. the Netherlands, Belgium and Germany. Such complaint can be submitted to the *Autoriteit Persoonsgegevens* (Netherlands), *Gegevensbeschermingsautoriteit* (Belgium), *Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit* (Germany) and the Information Commissioner's Office (UK).

We kindly request you to contact us in the aforementioned situations via email address: [compliance@customssupport.com](mailto:compliance@customssupport.com).

#### Finally

This statement has been prepared with due care. In case you have any further questions, we kindly ask you to contact us via: [compliance@customssupport.com](mailto:compliance@customssupport.com).