

# **POLARSPEED**

## **Privacy Notice**

Last update: May 14, 2018

We at POLARSPEED, along with our subsidiaries and affiliates (collectively, "POLARSPEED"), respect your concerns about privacy.

This Privacy Notice describes the types of personal information we collect about consumers, how we may use the information and with whom we may share it. The notice also describes the measures we take to safeguard the personal information. In addition, we tell you how you can ask us to (i) access or change the personal information we maintain about you, (ii) withdraw consent you previously provided to us, (iii) refrain from sending you certain communications, and (iv) answer questions you may have about our privacy practices.

### **Information We Obtain**

We may obtain consumer and patient personal information (such as name, contact details and payment information) in connection with various activities such as (i) use of the POLARSPEED websites and applications, (ii) shipping activities, including delivery and pick-up of shipments, (iii) requests to track shipments or answer questions, (iv) events in which we participate, (v) promotions and other offers, and (vi) calls placed with customer service and accounting centers which may be recorded.

The types of personal information we may obtain include:

- Individual and business contact information (such as name, date of birth, company name, physical address, email address and telephone or fax number)
- Shipping information (such as (i) shipping-related contact details like the shipper's, and consignee's name, physical address, email address and telephone number, (ii) signature for proof of delivery, (iii) POLARSPEED account number, and (iv) information given to us that helps us access locations to which we provide service) and information provided to us regarding the content of certain shipments, but only to the extent an identifiable person can be linked to such content.
- Medication and healthcare treatment information required to provide the service to you.
- Information that enables us to verify an individual's identity
- Names, email addresses and telephone numbers of others to whom we are asked to send information
- Information provided in response to surveys
- Username, password and other credentials used to access POLARSPEED products and services
- Payment information (including payment card details or online payment services number and invoicing address) and financial information (such as bank account numbers)
- Other personal information that may be provided to us to obtain a POLARSPEED product or service

We also receive consumer personal information from our customers in order to perform services. We may receive personal information from third parties, including public databases, social media platforms, or third party partners such as analytics or marketing providers.

When we pick up or deliver a shipment or provide other services, we may obtain physical location data. This includes, for example, data identifying the actual location of a physical address using information such as GPS data, geocodes, latitude and longitude information, and images of the various locations.

In addition, when you visit our websites, use our apps, or interact with POLARSPEED-related tools, widgets or plug-ins, we may collect certain information by automated means, such as cookies and web beacons. The information we collect in this manner includes IP address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken, and dates and times of activity. A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. A "web beacon" also known as an Internet tag, pixel tag or clear GIF, links web pages or apps to web servers and may be used to transmit information back to a web server. Through these automated collection methods, we obtain and store "clickstream" data to tell us usage patterns. We may link certain data elements we have collected through automated means, such as your browser information, with other information we have obtained about you to let us know, for example, whether you have opened an email we sent to you. We also may use third-party analytics tools that collect information about visitor traffic on our websites or apps. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all the features of our websites or apps. Both we and others (such as our advertising networks) may collect personal information about our visitors' online activities, over time and across third-party websites, when using our websites and apps.

## **How We Use The Information We Obtain**

We may use the information we obtain to:

- Pick up, deliver and track shipments
- Dispense your prescription and provide relevant healthcare information
- Provide products and services you request
- Process and collect payments
- Provide customer support and respond to and communicate with you about your requests, questions and comments
- Send you tracking updates (from POLARSPEED and/or our business partners) and help you select convenient delivery options
- Establish and manage your POLARSPEED account
- Send information to your contacts if you ask us to do so
- Process claims we receive in connection with our services

- Operate, evaluate and improve our business (including developing new products and services; managing our communications; determining the effectiveness of our sales, marketing and advertising; analysing and enhancing our products, services, websites and apps; ensuring the security of our networks and information systems; performing accounting, auditing, invoicing, reconciliation and collection activities; and improving and maintaining the quality of our customer services)
- Perform data analyses (including market and consumer search and analytics, trend analysis and profiling, financial analysis and anonymisation of personal information)
- Protect against, identify and prevent fraud and other prohibited or illegal activity, claims and other liabilities
- Comply with applicable legal requirements and our policies
- Establish, exercise and defend legal claims
- Monitor and report compliance issues

In addition, we use information collected online through cookies, web beacons and other automated means for purposes such as (i) customising our users' visits to our websites and apps, (ii) delivering content tailored to our users' interests and the manner in which our users browse our websites and apps, and (iii) managing our business. We may supplement data we collect through automated means with information about your location (such as your postcode) to provide you with content that may be of interest to you. We also use this information to help diagnose technical and service problems, administer our websites and apps, identify users of our websites and apps, and gather demographic information about our users. We use clickstream data to determine usage patterns and how we may tailor our websites and apps to better meet the needs of our users. Our websites and apps are not designed to respond to "do not track" requests from browsers.

### **Information We Share**

We do not sell or otherwise share personal information about you, except as described in this Privacy Notice. To perform our pick-up and delivery services, we share shipping information with third parties such as shippers, consignees, third party payers and recipients. We also share personal information with third parties who perform services on our behalf based on our instructions. These third parties are not authorised by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

We also may share the personal information we obtain with our affiliates, franchisees, resellers and joint marketing partners (except for patient related information). These entities, which collectively are referred to here as the "POLARSPEED Business Partners", may use the information for the purposes described in this Privacy Notice. We may share physical location data with our POLARSPEED Business Partners and other third parties to, for example, enhance location-based services and develop accurate and up-to-date maps.

Many of our customers outsource all or a part of their supply chains to us. Through our forwarding and logistics business units, we manage these supply chains, focusing on supply

chain optimisation, freight forwarding and international trade and brokerage services for our customers worldwide (including a broad range of transportation solutions such as air, ocean and ground freight). We also provide information technology systems and distribution facilities adapted to the unique supply chains of specific industries such as health care, technology and consumer/retail businesses. In the course of providing forwarding and logistics services, we may obtain, use and disclose personal information about our customers' customers. In these circumstances, we process the information based on the agreement with our customer.

We also may disclose information about you (i) if we are required to do so by law, regulation or legal process (such as a court order or subpoena), (ii) in response to requests by government agencies, such as law enforcement authorities, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity. We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganisation, dissolution or liquidation).

### **Your Options**

We offer you certain choices about how we communicate with you and what information we collect from you. Consistent with the choices available in the "Information We Share" section, you may withdraw your consent or object to certain information sharing by contacting us as indicated below. In addition, as required by law, you may object at any time on legitimate grounds and free of charge to the processing of your personal information, and we will apply your preferences going forward.

### **Access and Correction**

Subject to applicable law, (i) you may obtain a copy of certain personal information we maintain about you or update or correct inaccuracies in that information through your POLARSPEED account or (ii) you may have the right to obtain access to personal information we maintain about you by contacting us as indicated in the "How To Contact Us" section of this Privacy Notice. To help protect your privacy and maintain security, we will take steps to verify your identity and/or may ask you to provide other details before granting you access to the information. In addition, if you believe that personal information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated below.

### **Non-POLARSPEED Places and Services**

For your convenience and information our websites and apps may contain links to non-POLARSPEED places that may be operated by companies not affiliated with POLARSPEED. These companies may have their own privacy policies or notices, which we strongly suggest you

review. Our services also may be made available to you through third-party platforms (such as providers of app stores) or through other third-party channels. We are not responsible for the privacy practices of any non-POLARSPEED places or services.

## **Data Transfers**

POLARSPEED does not transfer the personal information that we collect about you outside the United Kingdom. In case this changes in the future, POLARSPEED will protect your personal information as described in this Privacy Notice and in accordance with applicable law.

## **How We Protect Personal Information**

We maintain administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. Although we take steps to limit access to our facilities and vehicles to authorised individuals, information that is located on the outside of a package or letter may be visible to others.

## **Updates To Our Privacy Notice**

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a prominent notice on our websites to notify you of any significant changes to our Privacy Notice and indicate at the top of the notice when it was most recently updated.

## **How To Contact Us**

If you have any questions or comments about this Privacy Notice, or if you would like us to update information we have about you or your preferences, please contact us through [\[GDPR@polarspeed.com\]](mailto:GDPR@polarspeed.com) You also may write to us at:

POLARSPEED  
Attention: Data Protection Officer  
8 Chartmoor Road  
Leighton Buzzard  
Bedfordshire  
LU7 4WG  
United Kingdom

## **POLARSPEED: Privacy Notice - EEA Addendum**

If you are a resident of the European Economic Area ("EEA"), the following additional EEA-specific provisions apply to our processing of your personal information. For EEA residents, the provisions of this EEA Addendum prevail over conflicting provisions in the Privacy Notice.

### **Relevant Data Controller**

The relevant data controller for your personal information is POLARSPEED.

### **Information We Obtain**

We process names, email addresses, physical addresses, dates of birth, telephone numbers, medicine and health information of others to whom we are asked to send information on the assumption that the person who provided the information obtained it in accordance with applicable law. If this assumption is incorrect, please do not ask us to send information to third parties on your behalf.

We may need certain of your information in order to provide services, such as street addresses to deliver packages, or to use our website or our apps, such as your IP address. In addition, we may be required by law to collect certain information, such as whether a package contains hazardous materials. Where such information is so required, we may be unable to provide you with our services unless you provide us with this information.

In accordance with applicable law, we may obtain your consent separately before collecting information by automated means using cookies or similar devices. To learn more about the cookies and similar devices we use, please see our [Cookies Policy](#).

### **How We Use The Information We Obtain**

The legal bases for which we collect, use, transfer or disclose your personal information include (i) the performance of the contract we have with you, (ii), improvement of our services and other legitimate business interests, (iii) compliance with a legal obligation, and (iv) the protection of yours and others vital interests. The corresponding purposes for which we process your personal information are systematically included in the "How We Use the Information We Obtain" section in the Privacy Notice above.

We may process your personal information based on your consent, where required by law. If we request your consent, we will inform you of the intended purposes for which your information will be processed. Please note that if you choose to withdraw your consent, you may not be able to participate in or benefit from our programs, services and initiatives for which you provided consent. We also may use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

### **Data Retention**

Your personal information will not be stored for longer than necessary for the purposes for which they were collected or as required under applicable retention policies and/or in accordance

with applicable law. Our retention policies reflect local statute of limitation periods and national statutory obligations of POLARSPEED.

### **International Data Transfers**

POLARSPEED does not transfer the personal information that we collect about you outside the United Kingdom. In case this changes in the future, POLARSPEED will take necessary contractual measures to ensure that your personal information receives an adequate level of protection.

### **Your Personal Information Rights**

In addition to the right to access and correction, as specified above (under “Access and Correction” in the main body of this Notice), you have (i) the right to request the transmission of the personal information you have provided to us to you or another company, (ii) the right to object to any uses or disclosures of your personal information, (iii) the right to withdraw your consent in relation to our processing of your personal information based on your consent, (iv) the right to request deletion of your personal information and (v) the right to request that we restrict processing of your personal information.

You may exercise these rights free of charge unless the request is unfounded, excessive, or otherwise unreasonable, for instance because it is repetitive. In some situations, we may refuse to act or may impose limitations on your rights, as permitted by law. Before POLARSPEED is able to provide you with any information or correct any inaccuracies, we may ask you to verify your identity and/or provide other details to help us respond to your request. For the exercise of your rights, please contact us using the contact information provided above in the “How to Contact Us” section. In all cases, you have a right to file a complaint with a Data Protection Authority.