

**Privacy statement  
customers/charters I.R.F. Holding B.V.**

I.R.F. Holding B.V. and/or its affiliates (hereinafter to as “IRF”) provides logistics services in the broadest sense of the word. Within that framework, IRF also establishes contacts with charters/transport companies (hereinafter referred to as “charters”) and coordinates transports to and from customers.

**Controller and communication**

IRF is the recipient of your data and acts as the controller. If you have any questions about the processing of your data, you can contact IRF at any time.

IRF respects the privacy of customer and charters and ensures that the personal data it is entrusted with or otherwise obtained by IRF is treated in confidence. Through the statement below, IRF informs you about the processing of data, the basis for this and the way in which this is handled.

**SITUATION OF CUSTOMERS**

**What personal data of customers is processed?**

IRF processes the following (types or categories) of personal data for the benefit of the service provision or otherwise provided by the data subject of his own accord:

- name of contact persons (first name and surname);
- (business) telephone number;
- address details of the company;
- (business) e-mail address;

Within the framework of the service provision, IRF can also collect information via public sources in order to carry out the assignment.

**The purpose of processing personal data of customers**

IRF processes the personal data referred to below exclusively for the purposes outlined below:

- to provide/intermediate or coordinate logistics services
- informing customers;
- keeping records;
- collecting invoices.

**The basis for processing personal data**

IRF only process the aforesaid personal data on the basis of the following grounds, as referred to in Section 6 of the GDPR:

- a legal obligation, such as the requirement to keep records and/or file tax returns;
- in addition, there may be specific obligations within the transport sector IRF has to meet;
- the performance of the agreement entered into with the customer and on the basis of which IRF provides its services;
- a legitimate interest of IRF to inform customers about its services and/or news from IRF or to improve the service provision and to offer services to former or potential customers.

**SITUATION OF CHARTERS**

### **What personal data of charters is processed?**

- address details of the charter;
- name of contact persons (first name and surname);
- the telephone number and e-mail address of contact persons;
- copies of the vehicle registration certificates of the trucks deployed;
- GPS data from trucks involved in the transport carried out for IRF;
- the names of the drivers (first name and surname);
- the ID details of the drivers;
- pictures of the drivers (if available).

### **The purpose of processing personal data of charters**

IRF only process the aforesaid personal data of charters on the basis of the following grounds, as referred to in Section 6 of the GDPR:

- First of all, IRF is subject to legal obligations in relation to keeping records and/or filing tax returns. In order to fulfil these obligations, information from the company is required.
- In addition, there are specific legal obligations within the transport sector that IRF must meet, such as obtaining the required permits or ensuring the required permits are in place for carrying out the transport. Within that framework, there is a need to process vehicle registration data and ID cards (among other things).
- In order to enable the implementation of the agreement by the charter, it is relevant that IRF is informed of the whereabouts of the trucks. IRF can, therefore, view and access GPS data and use this data to coordinate the transport;
- Furthermore, IRF has a legitimate interest and, in some cases, a contractual obligation to inform customers about the execution of the transport by charters. GPS data is used for this as well.

### **Processing of photographic material charters/drivers**

IRF processes pictures of drivers in order to be familiar with the actual person loading/unloading goods from customers. ID data of drivers is passed on at the request of customers. IRF has a legitimate interest in the processing of this personal data. In addition, a sound basis underlies the implementation of the agreement with the customer.

Apart from the above processing principles, IRF imposes an obligation on the charter to request permission from the individual drivers for the processing of pictures by IRF. As long as the charter does not object to the processing of pictures, IRF assumes the existence of this permission in the records of the charter. In those instances where objections *are* made, IRF will consult with the charter in order to reach a solution.

## **GENERAL**

### **Transferring/sharing (personal) data from charters and customers**

IRF uses a track-and-trace program from Astrata that enables fleet management. This program makes it possible to track transports through GPS signals, to collect and view information from the charters and monitor loading and unloading activities. In addition, Astrata is used to enable interaction between customers/charters/IRF, to make efficient preparations and to plan activities as effectively as possible.

Customers and charters of IRF can view data with a personal login at Astrata. This provides customers and charters with insight into routes and trips. The drivers and relevant vehicle registration numbers can also be viewed. This way, customers can see which charters and drivers are deployed for the implementation of the agreement and they can also see where the transport is located. Vice versa, charters receive data from customers (such as names of contact persons/address details) in order to be able to carry out the transport.

Apart from the above deployment of Astrata, data from charters/customers is not passed on. Data processing under the care of Astrata is conducted within the EU.

A processor's agreement is concluded with Astrata, obliging that party to comply with the GDPR as well.

### **CCTV surveillance IRF**

Within the framework of safety and surveillance, IRF operates CCTV cameras within the grounds and general areas, such as the entrance/hall, industrial unit and offices, as well as the laundry room if present (washing machine and dryer) and the (drivers') canteen. In those places where CCTV cameras are in operation, stickers provide further information. CCTV images, if any, are stored for a maximum of 7 to 14 days unless in the event of a security incident. In such an instance, IRF may save the images as long as the investigation requires.

### **Processor's agreements**

IRF has concluded processing agreements with third parties that have been engaged (such as (external) accountants, ICT support) and that act as processors.

### **Security of personal data**

IRF attaches great importance to the security and protection of your personal data and ensures, taking into account the prior art, that appropriate technical and organisational measures are in place to guarantee a risk-adjusted level of security.

### **Retention period for personal data**

IRF does not store personal data that is processed for longer than is necessary for the aforesaid purposes of data processing or for longer than is required by virtue of the law and regulations.

### **Privacy rights of data subjects**

Requests for inspection, correction, limitation, objection, portability of data and deletion of your personal data or withdrawal of permission granted previously can be submitted via the contact details below. You will receive further notice from us within four weeks of receiving your request.

There may be circumstances in which IRF cannot honour your request as a data subject or honour it fully. Examples include statutory retention periods or other legal obligations.

Your requests as referred to above can be submitted to [info@irf.eu](mailto:info@irf.eu)

In order to be sure that, following your request, we provide the relevant personal data to the right person, we ask you to submit a copy of a valid passport, driving licence or identity card (in which the passport photo and citizen service number have been redacted) for verification purposes. IRF will only process requests that relate to your own personal data.

### **Changes to the privacy statement**

IRF has the right to change the contents of this privacy statement at any time without prior notice.

### **Questions & Contact**

IRF has not appointed a Data Protection Officer or Privacy Officer because it has no (legal) obligation to do so.

If you have any questions or comments in relation to the processing of your personal data and this privacy statement, please contact your regular contact person.