

Information on the processing of personal data – TSL Services

The protection of personal data is very important to us.

In this privacy notice, we would like to explain what information we collect about you, who is responsible for protecting your data, with whom we share your data, and what rights you have.

TSL Services is a company that coordinates and manages processes related to the fulfilment of transport orders by freight forwarders, including a helpline, contact forms and a portal for carriers, available at: <https://www.tslservices.pl/>

1. What terms do we use in this notice?

TSL	refers to TSL Services sp. z o.o., based in Warsaw. This company provides services to freight forwarding companies (including in the area of customer communication, operating a helpline and a portal for carriers).
Freight forwarding company	refers to the freight forwarding company that is carrying out your transport order. You can find details of which company this is, for example, in the transport order document. Example: If the order you are contacting us about is being carried out by Ligural sp. z o.o. (the freight forwarding company), TSL supports Ligural sp. z o.o. in areas such as customer communication, e.g. via the helpline or email.
We	refers to TSL or the freight forwarding company.
You	means the freight forwarding company's client, the carrier, their representatives or any other person who contacts us and whose personal data we collect.

2. Who is the controller of your personal data?

The data controller is the entity responsible for your personal data and its security.

The controllers of your data are, separately:

- **The freight forwarding company**, to the extent that your data is used to process and fulfil a transport order, including enquiries to carriers carrying out the order;
- **TSL**, insofar as it uses your personal data to analyse or improve the quality of the services it provides, as well as to ensure the security of those services.

We explain:

The freight forwarding company uses TSL's services, amongst other things, for communication with customers and carriers. Therefore, TSL processes personal data on behalf of the freight forwarding company. TSL also acts on its own behalf and processes personal data for its own purposes (e.g. it uses call recordings to improve the quality of the services provided by TSL).

3. How can you contact us?

If you have any questions or requests regarding your personal data, you can contact us:

- via email: rodo@tslservices.pl;
- by post to the following address: ul. Franciszka Bohomolca 21, 01-613 Warsaw.

4. What personal data do we process and from what sources?

We receive your personal data directly from you when you provide it to us, for example during a telephone conversation or in a message you send us. In particular, this includes data such as: first name, surname, contact details (e.g. email address, telephone number), place of work, job title, and, depending on the method of contact:

voice recordings, including the content of the conversation or correspondence, and details regarding invoices and transport orders.

If we are contacting you regarding an order, we have obtained your personal data in the course of concluding and fulfilling the order, e.g. from your employer or directly from you.

5. Is providing personal data mandatory or voluntary?

- **Mandatory data:** In order for us to process your enquiry, you must provide us with the VAT number of the company on whose behalf you are contacting us and the transport order number. We may also need your first name, surname and job title.
- **Voluntary data:** You may decide whether you wish us to record your call via the helpline. If you do not agree, please contact us by email at: cs@tslservices.pl.

6. For what purposes and on what legal grounds do we process your personal data?

The freight forwarding company and TSL, as separate controllers of your personal data, have different purposes and legal bases for processing your data. We explain these purposes and legal bases below.

Data controller	Purposes and legal bases
Freight forwarding company	A. Purpose: processing of transport order requests <u>Legal basis:</u> • performance of a contract concluded directly with you (Article 6(1)(b) of the GDPR). If you are a representative of an entity for which the freight forwarding company is carrying out an order, or if you are contacting us regarding an order as another person, then the legal basis for the processing of your personal data is the legitimate interests pursued by the freight forwarding company, consisting of the proper handling of your request and the correct execution of the order (Article 6(1)(f) of the GDPR); • if the communication relates to actions arising from legal provisions, e.g. concerning a complaint, then the legal basis for processing your personal data may be the necessity to fulfil the legal obligations incumbent on the freight forwarding company (Article 6(1)(c) of the GDPR); • if you contact us via the helpline, your call is recorded based on your voluntary consent to the recording of the call (Article 6(1)(a) of the GDPR). B. Purpose: establishing, exercising or defending against legal claims <u>Legal basis:</u> • the legitimate interest of the freight forwarding company (or a third party) in being able to establish, pursue or defend against claims relating to the order or the course of communication (Article 6(1)(f) of the GDPR).
TSL	A. Purpose: analysis and improvement of the quality of services provided and security of communications <u>Legal basis:</u> • TSL's legitimate interest, consisting of analysing the services provided to freight forwarding companies and improving the quality of services provided by TSL, as well as ensuring the security of communications by being able to monitor their progress (Article 6(1)(f) of the GDPR); • if you contact us via the helpline, your call is recorded based on your voluntary consent to the recording of the call (Article 6(1)(a) of the GDPR).

	B. Purpose: establishing, exercising or defending against legal claims <u>Legal basis:</u> the legitimate interest of TSL (or a third party) in being able to establish, pursue or defend against claims relating to the course of communication (Article 6(1)(f) of the GDPR).
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7. To whom may we disclose your personal data?

We may disclose your personal data to:

- entities providing various services to us, in particular providers of helpline and email communication systems, IT service providers, service providers in the field of accounting process outsourcing,
- legal or tax advisers,
- postal operators, courier companies,
- entities authorised by law, in particular institutions authorised to inspect the activities of a freight forwarding or TSL company,
- the freight forwarding company may also transfer personal data to its subcontractors, e.g. companies within the group to which it belongs, if they are involved in the execution of a given order.

8. How long do we retain your personal data?

We retain recordings of telephone conversations for a period of 3 full calendar months from the date the recording was made.

However, we retain information obtained from recorded telephone conversations (e.g. in the form of written notes), as well as the content of transport documents, email correspondence and other enquiries, for the duration of the order to which the communication relates, and subsequently for the limitation period applicable to any potential claims.

The periods indicated above may be extended if proceedings are pending concerning claims related to the communication or the order (until such proceedings are finally concluded).

9. What are your rights?

You have the following rights regarding the protection of your personal data:

- access to data, including obtaining a copy of the data,
- to rectify data (with the exception of the voice recording itself),
- deletion of data,
- restriction of data processing,
- data portability (this right applies to data we process on the basis of your consent, or which is necessary for the conclusion and performance of a contract),
- object to the processing of data if we process your data on the basis of our legitimate interest. We will take your objection into account if it is justified (after weighing up our and your interests and rights),
- withdrawal of consent to the processing of voice recordings at any time. We will then delete the recording, but we may continue to process the personal data you provide to us during the telephone conversation on another legal basis as indicated above. Withdrawing your consent does not affect the lawfulness of the processing of your data prior to the withdrawal of consent. You may withdraw your consent by contacting us at: cs@tsslservices.pl,
- lodge a complaint with the President of the Personal Data Protection Office; further information is available [here](#).

If you submit a request regarding your personal data, we may ask you to answer questions to verify your identity.

10. Do we transfer your personal data outside the EEA?

We process your personal data within the EEA. The EEA is the European Economic Area, comprising the European Union (EU) plus countries such as Iceland, Norway and Liechtenstein.

We use service providers that operate within the EEA and do not transfer your data outside the EEA. However, it may be the case that some of our IT service providers (due to the global nature of such services) may process your personal data outside the EEA. In such cases, we safeguard such data transfers outside the EEA in accordance with data protection regulations. We generally use the European Commission's standard contractual clauses and assess such data transfers for security in accordance with legal requirements. If you would like to find out more about the safeguards we apply to data transfers outside the EEA (including obtaining a copy of such safeguards), please contact us (you will find our contact details in section 3 of this notice).

11. Do we use profiling or automated decision-making?

We do not make automated decisions based on your personal data, and we do not profile you.