



# Privacy Policy

**Policy last updated:** 1 July 2025

**Registered name:** ACC Shipping Limited

We are the controller of your personal data. For more information on controllers and their responsibilities please see ICO's guidance on [data protection principles, definitions, and key terms](#).

This privacy notice tells you what to expect us to do with your personal information.

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## Contact details

**Post:** Whitehall Place, 47 The Terrace, Gravesend, Kent, DA12 2DL

**Telephone:** 01474 333387

**Email:** [info@accworldwide.com](mailto:info@accworldwide.com)

## What information we collect, use, and why

We collect or use the following information to **provide services and goods, including delivery:**

- Names and contact details
- Addresses
- Purchase or account history
- Payment details (including card or bank information for transfers and direct debits)
- Credit reference information
- Account information
- Website user information (including user journeys and cookie tracking)
- Records of meetings and decisions
- Information relating to compliments or complaints

We collect or use the following information for **the operation of customer accounts and guarantees:**

- Names and contact details
- Addresses
- Payment details (including card or bank information for transfers and direct debits)
- Purchase history
- Account information, including registration details
- Marketing preferences

We collect or use the following information for **service updates or marketing purposes:**

- Names and contact details
- Addresses
- Marketing preferences
- Location data
- Recorded images, such as photos or videos
- Call recordings
- Purchase or viewing history
- IP addresses
- Website and app user journey information
- Records of consent, where appropriate

We collect or use the following information to **comply with legal requirements:**

- Name
- Contact information
- Identification documents
- Financial transaction information
- Any other personal information required to comply with legal obligations
- Health and safety information

We collect or use the following information for **recruitment purposes:**

- Contact details (eg name, address, telephone number or personal email address)
- National Insurance number
- Copies of passports or other photo ID

- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Address
- Payment details
- Account information
- Purchase or service history
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety
- Correspondence

## Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access.](#)
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification.](#)
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure.](#)
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing.](#)
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing.](#)
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - At ACC Worldwide (ACC Shipping Ltd), we rely on legitimate interests as a lawful basis for processing personal data where it is necessary to provide our logistics services and related goods effectively. We collect and use personal information such as contact details, shipment data, delivery instructions, and communication history to: Provide freight forwarding and logistics services by air, sea, road, and rail. Facilitate customs clearance and regulatory compliance. Coordinate the supply, storage, or movement of goods on behalf of clients. Manage client relationships and respond to service enquiries or issues. Deliver documentation and tracking updates related to goods in transit. Maintain accurate records for operational and regulatory purposes. Share important service communications, updates, and commercial offers where appropriate. This processing is necessary to deliver our core services and ensure goods reach their intended destinations

safely, efficiently, and legally. Without this data, we would not be able to meet contractual obligations or maintain the operational standards expected by our clients and global partners. We believe our use of personal information is proportionate and expected, and brings clear benefits to individuals and businesses, such as faster processing, better communication, reduced risk of delays, and improved customer support. These benefits outweigh any potential risks or impact on the individuals concerned. We do not use this data in ways that are intrusive or misleading, nor do we sell personal information to third parties. Any data shared with third parties is limited to what is required for fulfilling the services or goods requested, and always handled securely. We respect individuals rights and maintain transparency through clear privacy notices, opt-out options, and robust data protection practices.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **the operation of customer accounts and guarantees** are:

- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - At ACC Worldwide (ACC Shipping Ltd), we process personal information relating to the operation of customer accounts and guarantees under the lawful bases of contractual necessity and legitimate interests. We collect and use personal data — including contact names, job roles, business

addresses, telephone numbers, email addresses, and relevant account reference details — in order to: Open, administer, and maintain customer accounts. Verify the identity and authority of individuals acting on behalf of a business. Set up payment terms and manage invoicing or credit arrangements. Provide service guarantees, payment guarantees, or letters of credit where applicable. Fulfil our contractual obligations when providing freight and logistics services. Communicate with account holders regarding service delivery or account status. Keep appropriate financial and transactional records for auditing and regulatory compliance. The contractual basis applies where the processing is essential to fulfil a contract with the client or to take steps at their request before entering into a contract. The legitimate interest basis applies where the processing enables us to manage our business effectively, reduce risk, protect our financial interests, and provide high-quality, accountable service to our customers. We have carefully assessed the balance between our interests and individuals' rights, and we believe this processing is reasonable, necessary, and beneficial to both parties. It ensures secure, traceable, and accountable account handling and contributes to the smooth operation of international freight services. We handle all data securely, retain only what is necessary, and never use personal data for unrelated purposes. We also provide individuals with rights to access, correct, or object to the processing of their data.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection

rights may apply, except the right to portability. Our legitimate interests are:

- At ACC Worldwide (ACC Shipping Ltd), we process certain personal data under the lawful basis of legitimate interests to keep our clients and contacts informed about relevant service updates and marketing communications that are useful and appropriate to their business needs. We may collect and use personal information — such as names, job roles, company details, email addresses, and communication preferences — to: Share important operational updates affecting freight, logistics, customs, or transport routes. Notify clients about service changes, delays, or improvements that may impact their shipments. Provide useful insights, newsletters, or thought leadership relevant to the logistics and freight industry. Inform clients and prospects about our services, events, promotions, or market developments. Maintain ongoing communication with existing or potential customers in a B2B context. This use of personal information is necessary for us to build and maintain strong professional relationships, ensure transparency in our operations, and support our clients with timely, relevant, and value-adding information. We have assessed that our legitimate interest in maintaining responsible and informed communication is balanced with individuals' privacy rights. We only send marketing content to individuals in a professional capacity where there is a reasonable expectation of such communication, and always offer a clear opt-out or unsubscribe option. We do not sell or share personal data for third-party marketing purposes, and we only process what is necessary for our communications to be effective, appropriate, and respectful. We believe this approach benefits both our business and our clients by ensuring clear, consistent communication without being intrusive or excessive.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **legal requirements** are:

- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - At ACC Worldwide (ACC Shipping Ltd), we collect and process personal information for recruitment purposes under the lawful bases of consent, contractual necessity, legal obligation, and legitimate interests, depending on the stage and context of the recruitment process. We may collect personal data such as CVs, contact details, employment history, qualifications, references, and interview notes to: Assess candidates suitability for roles within our organisation. Contact applicants regarding interview arrangements or next steps. Verify identity, work eligibility, and professional references. Comply with legal and regulatory obligations (e.g. right-to-work checks under UK immigration law). Make fair and informed hiring decisions. Create and manage employment contracts if an offer is made. Keep unsuccessful candidate records temporarily, in case of future opportunities

(with consent). We rely on legitimate interests where the processing supports fair, efficient recruitment that benefits both the candidate and our organisation, without causing undue risk or harm. For example, retaining shortlisted CVs for a limited time may allow us to re-engage a candidate for similar roles therefore providing a clear mutual benefit. We ensure candidates are given full, clear information about how their data will be used, and we only retain it for as long as is necessary for recruitment purposes. All applicants have the right to request access, correction, or deletion of their data, and we uphold those rights in accordance with data protection law. Personal information is never used for unrelated purposes or shared without lawful basis, and we are committed to handling all recruitment data securely, fairly, and transparently.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
  - At ACC Worldwide (ACC Shipping Ltd), we collect and use personal information when handling queries, complaints, or claims under the lawful bases of consent, legal obligation, and legitimate interests. We may collect personal data such as names, contact details, reference numbers, and details of the

enquiry or issue to: Respond to customer queries or service-related questions. Investigate and resolve formal complaints professionally and fairly. Manage and defend against claims made against our company. Maintain records of correspondence and outcomes for future reference and improvement. Comply with legal and regulatory requirements, such as complaint-handling standards or audit obligations. Improve the quality of our services and customer experience based on feedback or reported issues. Where individuals voluntarily contact us or submit information, we rely on consent to process their data appropriately in the context of that enquiry. We also rely on legal obligation where the law requires us to keep complaint records, cooperate with authorities, or respond to regulatory investigations. In other cases, we rely on legitimate interests, such as ensuring effective customer support, protecting our legal rights, and identifying trends to improve services. We ensure that this processing is necessary, proportionate, and aligned with individuals reasonable expectations — without causing undue risk or harm. All personal information is handled securely, used solely for the purpose of managing the query, complaint, or claim, and is retained only for as long as necessary to fulfil our obligations or defend legal rights.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

## Where we get personal information from

- Directly from you
- Publicly available sources
- Previous employers
- Market research organisations
- Credit reference agencies
- Providers of marketing lists and other personal information
- Suppliers and service providers

## How long we keep information

<b>Data Type</b>	<b>Retention Period</b>
Customer account records	6 years after last transaction (HMRC)
Shipment documentation	6–7 years (customs and tax regulations)
Recruitment (unsuccessful applicants)	6 months – 1 year
Employee records	Duration of employment + 6 years
Marketing contacts (opted in)	Until consent withdrawn or 2 years inactive
Complaint/claim records	6 years from resolution

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

## Who we share information with

### Data processors

#### **HubSpot**

This data processor does the following activities for us: HubSpot is a customer relationship management (CRM) platform we use to collect information with chatbots and forms, to store contact details, manage communications, send marketing emails and post social media content, and track engagement with our website, social media and emails.

HubSpot processes this data on our behalf to help us manage client relationships, lead development, improve customer service, and deliver relevant updates.

## **BrightHR**

This data processor does the following activities for us: BrightHR is a cloud-based HR software platform we use to manage employee records, absence tracking, holiday entitlement, and HR documentation. It processes personal data on our behalf to support efficient and compliant HR administration.

## **Microsoft Corporation**

We use Microsoft 365, including Outlook and OneDrive, for email, calendar, and cloud-based file storage. Microsoft processes personal data on our behalf to support internal communication, document management, and day-to-day operations. Data may be stored or accessed outside the UK, including in the United States. Microsoft uses the EU Standard Contractual Clauses (SCCs) with the UK Addendum to ensure data protection compliance when transfers occur.

## **Google LLC**

We use Google Analytics to collect anonymous and aggregated usage data from our website. This helps us understand visitor behaviour, improve user experience, and optimise our website's performance. Google may process this data on servers located outside the UK, including in the United States. Google relies on the EU Standard Contractual Clauses (SCCs) with the UK Addendum and additional safeguards to protect transferred data in compliance with UK data protection laws.

## **Others we share personal information with**

- Insurance companies
- Professional or legal advisors
- Financial or fraud investigation authorities
- Relevant regulatory authorities
- External auditors or inspectors

- Professional consultants
- Organisations we're legally obliged to share personal information with
- Emergency services
- Publicly on our website, social media or other marketing and information media
- Previous employers
- Suppliers and service providers

## Sharing information outside the UK

Where necessary, we will transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place.

For further information or to obtain a copy of the appropriate safeguard for any of the transfers below, please contact us using the contact information provided above.

**Organisation name:** Microsoft Corporation

**Category of recipient:** Cloud-based email and productivity software provider

**Country the personal information is sent to:** United States

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** HubSpot, Inc.

**Category of recipient:** CRM and marketing software provider

**Country the personal information is sent to:** United States

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** Google LLC

**Category of recipient:** Analytics and cloud service provider

**Country the personal information is sent to:** United States

**How the transfer complies with UK data protection law:** Addendum to the EU Standard Contractual Clauses (SCCs)

**Organisation name:** Various trusted international logistics agents

**Category of recipient:** Freight forwarding and customs clearance partner

**Country the personal information is sent to:** Varies depending on shipment (e.g. USA, China, EU, etc.)

**How the transfer complies with UK data protection law:** An exception listed in UK GDPR

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

### **The ICO's address:**

Information Commissioner's Office,

Wycliffe House, Wa, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>