



FREIGHT AND TRANSIT
COMPANY LIMITED
Privacy Notice

CONTENTS

1	Introduction	3
2	Who we are.....	3
3	The data we collect	3
3.1	Collection of personal data	3
4	Cookie Policy	4
4.1	What is a cookie?	4
4.2	Why do we use cookies?.....	4
4.3	How are third party cookies used?	4
4.4	How do I reject and delete cookies?.....	4
5	How we use your data	4
6	Disclosure of personal data.....	5
7	International transfers	5
8	Personal data security.....	5
9	Your data protection rights.....	6
9.1	Your right to erasure of your personal data	6
9.2	Your right of access to your personal data	6
9.3	Your right to rectification of your personal data	6
9.4	Your right to restriction of processing	6
9.5	Your right to object to processing.....	7
9.6	Your right to data portability	7
10	Definition of personal data	7
11	Changes to this notice.....	7
12	How to contact us	7
	ANNEX A: RECORDS RETENTION AND DISPOSAL SCHEDULE	8

1 Introduction

We respect the privacy of everyone to whom we provide our services. As a result, we would like to inform you regarding the way we would use your personal data. We recommend you read this Privacy Notice so that you understand our approach towards the use of your personal data. By submitting your personal data to us, you will be treated as having given your permission - where necessary and appropriate - for disclosures referred to in this policy. By using this web site, you acknowledge that you have reviewed the terms of this Privacy Notice (hereafter the “**Privacy Notice**”) and agree that we may collect, use and transfer your personal data in accordance therewith.

This Privacy Notice shall be governed by and construed in accordance with the relevant laws. This Privacy Notice explains how we obtain, use and disclose your personal data, as is required by the European Union General Data Protection Regulation (hereafter the “**GDPR**”) and the Data Protection Act 2017 (hereafter the “**DPA**”). Freight and Transit Company Limited is committed to protecting your privacy impact and to ensure that your personal data is collected and used properly, lawfully and openly.

2 Who we are

Operating in the business of transporting goods since 1994, Freight and Transit Company Limited, which forms part of the Eclosia Group, acts as a one-stop-shop for the export and import for air and sea cargo. We excel in providing a full range of logistics solutions and services to businesses worldwide. We have been present in the logistics industry for the past decades and have resisted the test of time, through our personal service, expert knowledge of freight forwarding and project cargo (management).

We, as data controller, are responsible for deciding how we hold and use personal data about you. We are required under the GDPR and the DPA to notify you of the information contained in this Privacy Notice.

3 The data we collect

3.1 Collection of personal data

We collect and process your personal data mainly to provide you with access to our services, to help us improve our offerings to you, to support our contractual relationship with you and for certain other purposes explained below. The type of data we collect will depend on the purpose for which it is collected and used. We will only collect data that we need for that purpose.

We collect data directly from you where you provide us with your personal details, for example when you purchase or supply a product or services to or from us or when you submit enquiries to us or contact us. Where possible, we will inform you what data you are required to provide to us and what data is optional.

The types of personal data that are collected and processed may include:

Categories of Personal Data	Details
Contact details	First name, surname, postal address, billing address, email address, office phone, cell phone, fax number
Individual details	Gender, photo, nationality, birth, age, language
Identification details	Identification numbers issued by government bodies or agencies such as your passport number, identity card number, and residence permit
Financial information	Tax details (TAN), bank details
Others	Location details, location plan and vehicle horse power

4 Cookie Policy

Our website uses cookies to distinguish you from other users and to improve your experience when accessing this site.

4.1 What is a cookie?

Cookies are small data files that your browser places on your computer or device. Cookies help your browser navigate a website and the cookies themselves cannot collect any data stored on your computer or your files. When a server uses a web browser to read cookies they can help a website deliver a more user-friendly service. To protect your privacy, your browser only gives a website access to the cookies it has already sent to you.

4.2 Why do we use cookies?

We use cookies to learn more about the way you interact with our content and help us to improve your experience when visiting our website. Cookies remember the type of browser you use and which additional browser software you have installed. They also remember your preferences, such as language and region, which remain as your default settings when you revisit the website. Cookies also allow you to rate pages and fill in comment forms. Some of the cookies we use are session cookies and only last until you close your browser, others are persistent cookies which are stored on your computer for longer.

4.3 How are third party cookies used?

For some of the functions within our websites we use third party suppliers, for example, when you visit a page with videos embedded from or links to YouTube. These videos or links (and any other content from third party suppliers) may contain third party cookies and you may wish to consult the policies of these third party websites for data regarding their use of cookies.

4.4 How do I reject and delete cookies?

We will not use cookies to collect personally identifiable data about you. However, should you wish to do so, you can choose to reject or block the cookies set by the websites of any third party suppliers by changing your browser settings - see the Help function within your browser for further details. Please note that most browsers automatically accept cookies so if you do not wish cookies to be used you may need to actively delete or block the cookies.

You can also visit www.allaboutcookies.org for details on how to delete or reject cookies and for further data on cookies generally. For details on the use of cookies in mobile phone browsers and for details on how to reject or delete such cookies, please refer to your handset manual. Note, however, that if you reject the use of cookies you will still be able to visit our websites but some of the functions may not work correctly.

5 How we use your data

We will use your personal data only for the purposes for which it was collected or agreed with you, for instance:

- For audit and record keeping purposes;
- In connection with legal proceedings;
- For marketing purposes;
- To assist with business development;
- To carry out our obligations arising from any contracts entered into between you and us.
- To notify you about changes to our service.

- To proceed with custom formalities.
- To respond to your queries or comments.
- To comply with legal and regulatory requirements to which we subscribe or which apply to us, or when it is otherwise allowed by law.
- To collect data about the device you are using to view the site, such as your IP address or the type of Internet browser or operating system you are using, and link this to your personal data so as to ensure that the site presents the best web experience for you;
- For monitoring and auditing site usage;
- You can opt out of receiving communications from us at any time. Any direct marketing communications that we send to you will provide you with the data and means necessary to opt out.

6 Disclosure of personal data

We may disclose your personal data to our business partners who are involved in the delivery of products or services to you. We have agreements in place to ensure that they comply with these privacy terms.

We may share your personal data with, and obtain data about you from:

- Third parties for the purposes listed above (including lawyers, IT firms, bankers and auditors who provide consultancy, banking, legal and accounting services);
- Other companies in Eclasia Group when we believe it will enhance the services we can offer to you, but only where you have not objected to such sharing;
- Other third parties from whom you have chosen to receive marketing data.

We may also disclose your data:

- Where we have a duty or a right to disclose in terms of law or industry codes;
- Where we believe it is necessary to protect our rights.

7 International transfers

In the event third parties to whom we may disclose your personal data may be located outside of Mauritius, those transfers would always be made in compliance with the GDPR and the DPA.

If you would like further details of how your personal data would be protected if transferred outside of Mauritius, please contact our Data Protection Committee (hereafter the “DPC”) by referring to section 12.

8 Personal data security

We are legally obliged to provide adequate protection for the personal data we hold and to stop unauthorised access and use of personal data. We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal data is secure.

Our security policies and procedures cover:

- Acceptable usage of personal data;
- Access to personal data;
- Computer and network security;
- Governance and regulatory issues;
- Investigating and reacting to security incidents;
- Monitoring access and usage of personal data;
- Physical security;
- Retention and disposal of data.

- Secure communication;
- Security in contracting out activities or functions

When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal data that we remain responsible for, is kept secure.

We will ensure that anyone to whom we pass your personal data agrees to treat your data with the same level of protection as we are obliged to.

9 Your data protection rights

Under the GDPR/DPA, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

9.1 Your right to erasure of your personal data

You have the right to ask us to delete your personal data in certain circumstances:

- When we no longer need your personal data;
- If you initially consented to the use of your personal data, but have now withdrawn your consent;
- If you have objected to us using your personal data, and your interests outweigh ours;
- If we have collected or used your personal data unlawfully; and
- If we have a legal obligation to erase your data.

Where we collect personal data for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. In order to protect data from accidental or malicious destruction, when we delete data from our services we may not immediately delete residual copies from our servers or remove data from our backup systems.

9.2 Your right of access to your personal data

You have the right to request a copy of the personal data we hold about you. To do this, simply contact our DPC (refer to section 12) and specify what data you would like. We will take all reasonable steps to confirm your identity before providing details of your personal data.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

9.3 Your right to rectification of your personal data

You have the right to ask us to update or correct your personal data if you think it is inaccurate or incomplete. We will take all reasonable steps to confirm your identity before making changes to personal data we may hold about you. We would appreciate it if you would take the necessary steps to keep your personal data accurate and up-to-date by notifying us of any changes we need to be aware of.

9.4 Your right to restriction of processing

You have the right to ask us to limit how we use your data. If necessary, you may also stop us from deleting your data. To exercise your right to restriction, simply contact our DPC (refer to section 12), say what data you want restricted and state your reasons. You may request us to restrict processing of your personal data in the following circumstances:

- If you have contested the accuracy of your personal data, for a period to enable us verify the accuracy of the data;
- If you have made an objection to the use of your personal data;
- If we have processed your personal data unlawfully but you do want it deleted;
- If we no longer need your personal data but you want us to keep it in order to create, exercise or defend legal claims.

9.5 Your right to object to processing

You also have the right to object to us processing your personal data where your data is being used:

- For a task carried out in the public interest;
- For our legitimate interests;
- For scientific or historical research, or statistical purposes; or
- For direct marketing.

You should contact our DPC (refer to section 12) to inform that you are objecting to any more processing of your personal data and state in your objection why you believe we should stop using your data in this way. Unless we believe we have strong legitimate reasons to continue using your data in spite of your objections, we will stop processing your data as per the objection raised.

9.6 Your right to data portability

The right to data portability allows you to ask for transfer of your personal data from one organisation to another, or to you. The right only applies if we are processing information based on your consent or performance of a contract with you, and the processing is automated. You can exercise this right with respect to information you have given us by contacting our DPC (refer to section 12). We will ensure that your data is provided in a way that is accessible and machine-readable.

10 Definition of personal data

Personal data is any data from which you can be identified and which relates to you.

11 Changes to this notice

This Privacy Notice may be updated from time to time: this version is dated 9th May 2023.

12 How to contact us

We have appointed a DPC to oversee compliance with and questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact us using the details set out below:

Name : Mrs Waz Adam Badurally
Address : Freight and Transit Company Limited, Royal Road Pointe aux Sables, Mauritius
Email Address : FTL-DPO@eclosia.com

You have the right to complain to with a supervisory authority if you believe we have not handled your request in an appropriate manner.

ANNEX A: RECORDS RETENTION AND DISPOSAL SCHEDULE

Categories of Personal Data	Department	Retention period	Start of retention period
Contact details National identification details Individual details Financial information (Tax details)	Customs clearance	7 years	Upon completion of transaction or termination of agreement
	Finance	7 years	After end of business relationship
	Operations	5 years	After end of business relationship
	Quality	2 years	After end of business relationship
	Sales	7 years	Post campaign After end of business relationship
	Warehouse	7 years	Upon completion of transaction