

# Privacy Policy

Effective Date: 17 May 2018



This website is owned by CHAMP Cargosystems, headquartered in 2, rue Edmond Reuter, Zone d'Activites "Weiergewan"; L-5326 Contern and we act as data controller.

We at CHAMP Cargosystems / CHAMP Forwarding Systems (collectively, "CHAMP," "we" and "us") know you care about how your personal information is used and shared, and we take your privacy seriously. Please read the following to learn more about how we collect, store, use and disclose information about you when you interact or use our websites, or any related events, sales or marketing, and/or if you use any of our products, or services (collectively the "Services") in any manner.



## Contents

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- 1.1. What does this Privacy Policy cover?**
  - 1.2. What information does CHAMP Collect?**
  - 1.3. How do we use the information?**
  - 1.4. How do we share and disclose information to third parties?**
  - 1.5. Is Personal Information about me secure?**
  - 1.6. Cookies and other tracking technologies**
  - 1.7. Your Privacy Rights**
  - 1.8. International Data Transfers**
  - 1.9. Linked Websites**
  - 1.10. Children**
  - 1.11. Will CHAMP ever change this Privacy Policy?**
  - 1.12. What if I have questions about this policy?**
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### 1.1. What does this Privacy Policy cover?

This Privacy Policy covers our treatment of information that we gather when you are accessing or using our Websites or when you contact us in any manner. We gather various types of information, including information that identifies you as an individual (“Personal Information”), from our users, as explained in more detail below.



## 1.2. What information does CHAMP Collect?

### 1.2.1. Information You Provide to Us:

*When you use the Websites:* We may collect any Personal Information that you choose to send to us to get in touch, e.g. your first and last name, user names, your email address, job title, telephone, company name, your location, as well as any other contact or other information you choose to provide us or upload to our systems in connection with the Services. If you contact us through the Websites, we will keep a record of our correspondence.

Please visit also the [cookie policy](#) section for further information.

## 1.3. How do we use the information?

*Websites:* We will use the information we collect via our Websites:

- To provide you with the information required or with the Services subscribed;
- To administer our Website, our events and for internal operations, including troubleshooting, data analysis, testing, statistical and survey purposes;
- To improve our Website to ensure that content is presented in the most effective manner for you and for your computer;
- Analyse customers' use of the Websites for performance analysis and statistic purposes
- As part of our efforts to keep our Website safe and secure;
- To process access, rectification and opposition requests, and other rights with respect to Personal Information;
- For claims and litigation management;
- To enforce the agreement entered with you, if necessary;
- To comply with our other legal obligations.



We may also use the information you send to us via the Websites, to communicate with you via email and, possibly, other means, regarding products, services, offers, promotions and events we think may be of interest to you or to send you our newsletter, if you consent to such use. However, you will always be able to opt-out of such communications at any time.

The processing of your Personal Information is either necessary to provide you with the requested information or subscribed Services or for your participation in CHAMP's events. This processing is also necessary for the legitimate interest of CHAMP as it enable it to enrich and improve its Websites and offer of products and services and thus to better meet the expectations of its customers.

These purposes constitute the legal basis for the data processing carried out by CHAMP.

## 1.4. How do we share and disclose information to third parties?

Your Personal Information will be processed internally by duly authorized persons, within the limits of their respective attributions.

We do not rent or sell your Personal Information to anyone. We may share and disclose information (including Personal Information) about our customers to third-parties, in the following limited circumstances:

*Vendors, consultants and other service providers:* We may share your information with third party vendors, consultants and other service providers who we employ to perform tasks on our behalf, to the strictest extent necessary and subject to the existence of contractual guarantees to ensure the security and confidentiality of the information. These companies include (for example) website analytics companies, product feedback or help desk software providers, CRM service providers, email service providers and others.



*Business Transfers:* We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. Also, if we (or our assets) are acquired, or if we go out of business, enter bankruptcy, or go through some other change of control, Personal Information could be one of the assets transferred to or acquired by a third party.

*CHAMP Group Companies:* We may also share your personal data with our parent companies, subsidiaries and/or affiliates for purposes consistent with this Privacy Policy, to the strictest extent necessary and subject to the existence of contractual guarantees to ensure the security and confidentiality of the Personal Information, especially where these recipients are not located in the European Union but in third-countries not offering the same level as data protection as in the European Union.

*Public authorities:* We may share your Personal Information with public authorities as necessary to comply with law or court order.

## 1.5. Is Personal Information about me secure?

We use appropriate technical, organizational and administrative security measures to protect any information we hold in our records from loss, misuse, and unauthorized access, disclosure, alteration and destruction. Unfortunately, no company or service can guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. If you enter via your account which is protected by a password for your privacy and security, you must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account.



Personal Information related to the use of the Services are kept for the duration of the agreement entered with the customer, as well as for a maximum period of 10 years after the termination of the said agreement corresponding to the duration of the applicable time limit for Court actions.

Personal Information is kept for the duration of the event, as well as for a maximum period of 10 years from the event corresponding to the duration of the applicable time limit for Court actions. After the event has been hold, personal data will be archived on a separate computer medium and accessible only if necessary by a limited number of persons specifically authorized to do so;

Personal information related to prospects who request information through the Website(s) are kept for a maximum of 3 years after the last contact with us.

## 1.6. Cookies and other tracking technologies

Our Websites and some of our Services use cookies (small text files containing a string of alphanumeric characters that we put on your computer) and other similar tracking technologies (like web beacons, tags and scripts) to uniquely identify your browser and to gather information about how you interact with the Websites and Services. We use this information for the following purposes:

- Assisting you in navigation;
- Assisting in registration, login, and your ability to provide feedback;
- Analysing your use of our products, services or applications; and
- Assisting with our promotional and marketing efforts (including behavioural advertising).

Please consult our [Cookie Policy](#) for more information about the type of cookies and tracking technologies that we use on this Website and why, and how to accept and reject



them. The Cookie Policy can also be consulted for information about Analytics products and web analysis tools.

## 1.7. Your Privacy Rights

### 1.7.1. What choices do I have?

You can always opt not to disclose information to us, but keep in mind some information may be needed to register with us or to take advantage of some of our features.

### 1.7.2. Cookies

You can accept or reject cookies through our Privacy Preference Centre, accessible by clicking the “cookie settings” button in our cookie policy. You can also do so by adjusting your web browser controls. Please consult our [Cookie Policy](#) for more information about our use of cookies and how to accept and reject them.

### 1.7.3. Marketing Communications

You can opt-out of receiving marketing communications from us at any time, by using the unsubscribe link in the emails communications we send.

### 1.7.4. What are my rights regarding my information?

You (or, as the case may be, your beneficiaries who can prove they have a legitimate interest), are entitled to obtain, free of charge:

- access to your Personal Information,
- confirmation that your Personal Information is or is not being processed,
- information concerning at least the purposes of the processing, the categories of Personal Information to which the processing relates and the recipients or categories of recipients to whom the Personal Information are communicated,

- communication, in an intelligible form, of the Personal Information being processed, as well as any available information on the origin of the Personal Information.

You (or, as the case may be, your beneficiaries) also have a right to rectify your Personal Data and a right to object to the collect and processing of such data, on the basis of compelling legitimate grounds.

As of 25 May 2018, you will also be entitled to request the erasure of all or part of your Personal Information, or a restriction of the processing, object to the processing or make use of your right to data portability, within the limits provided by the applicable rules.

In the event of a breach of the data protection rules, you may also lodge a complaint before a supervisory authority such as the National Commission for Data Protection (CNPD).

#### 1.7.5. How can I update and access my information (Exercise my Data Subject Rights)?

If you would like to access, review, update, rectify, and delete any Personal Information we hold about you, or exercise any other data subject right available to you under the EU General Data Protection Regulation (GDPR), as above-described, you can either click the “Exercise your Data Subject Rights” link available on this Privacy Policy, or fill out the Web Form directly

Our Privacy team will examine your request and respond to you in the legal timeframe.

Please note that if you exercise such rights, we may still use any aggregated and de-identified Personal Information that does not identify any individual, and may also retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.



## 1.8. International Data Transfers

Personal Information you submit on the Websites is sent to the United Kingdom and will be primarily processed by us in the United Kingdom, hosted by Lucid Networks, a provider of our web agency “We Are / Born + Raised”. This agreed process on CHAMP’s behalf.

Please note that CHAMP may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## 1.9. Linked Websites

For your convenience, hyperlinks may be posted on the Websites that link to other websites (the “Linked Sites”). We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of any Linked Sites or of any companies that we do not own or control. Linked Sites may collect information in addition to that which we collect on the Websites. We do not endorse any of these Linked Sites, the services or products described or offered on such Linked Sites, or any of the content contained on the Linked Sites. We encourage you to seek out and read the privacy policy of each Linked Site that you visit to understand how the information that is collected about you is used and protected.

## 1.10. Children

We do not knowingly collect or solicit personal information from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any Personal Information about yourself to us. If we learn that we have collected Personal Information from a child under age 13, we will delete that information as quickly as possible. If you believe that a child under 13 may have provided us Personal Information, please contact us at [dpo@champ.aero](mailto:dpo@champ.aero).



## 1.11. Will CHAMP ever change this Privacy Policy?

We are constantly trying to improve our Websites, and we will release an updated version of this Privacy Policy from time to time. You can see when this Privacy Policy was last updated by checking the date at the top of this page. You are responsible for periodically reviewing this Privacy Policy.

## 1.12. What if I have questions about this policy?

If you have any questions or concerns regarding our privacy policies, please contact our Corporate Data Protection Officer to resolve your concerns:

Gertrud HUBERTY

2, rue Edmond Reuter

Zone d'Activites "Weiergewan"

L-5326 Contern

Luxembourg

Phone: +352 2681 6205

Email: [dpo@champ.aero](mailto:dpo@champ.aero)