

Legitimate Interest Policy Policy Statement



**DANX
Carousel**

GDPR

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1. Introduction

The DANX Carousel Group of companies (hereafter “The Group,” “We,” “Our”) is a time critical service logistics and supply chain specialist with strong positions in the UK, EU – Ireland, Benelux, Germany, Iberia, Nordics, Baltics, Poland and EEA – Norway. The Group consists of DANX, DANX ILS, UT, TBS, FOMAB, TLS Group, LPR Group, Carousel, Alltrans and Logik.

The Group is a comprehensive partner for logistics and supply chain services such as time-critical spare parts distribution, warehousing, final mile, linehaul, battery logistics, customs clearance, and more.

2. Purpose and scope

This policy outlines how the DANX Carousel Group of companies relies on the lawful basis of legitimate interests under Article 6(1)(f) of the General Data Protection Regulation (GDPR) to process personal data. It ensures that such processing is fair, necessary, and balanced against the rights and freedoms of individuals. This policy applies to all personal data processed under the legitimate interest basis across all departments and business functions within the DANX Carousel Group.

3. Definition

Under GDPR, legitimate interest allows processing when:

- The processing is necessary for the purposes of the legitimate interests pursued by the controller or a third party
- These interests are not overridden by the data subject’s rights and freedoms

4. Examples of legitimate interests

We may rely on legitimate interest for:

- Fraud prevention and network security
- Direct marketing to existing customers
- Improving services and user experience
- Internal administrative purposes
- Ensuring safety and compliance

5. Legitimate Interest Assessment (LIA)

Before processing data under this basis, we conduct a Legitimate Interest Assessment, which is documented in our internal GDPR system (Wired Relations) and includes:

- Purpose test: Is there a clear and legitimate reason for the processing?
- Necessity test: Is the processing necessary for that purpose?
- Balancing test: Do the individual’s rights override our interest?

6. Transparency

We inform individuals about our reliance on legitimate interest through:

- Our privacy notices
- Opt-out mechanisms for direct marketing
- Clear communication channels for data subject rights

7. Data subject rights

Unless our interests outweigh the data subject's rights (e.g. protecting public safety, legal rights, or compliance requirements), individuals have the right to:

- Object to processing based on legitimate interest
- Request access, rectification, withdrawal of consent, restrict or erasure of their data
- Data portability
- Lodge complaints with supervisory authorities or seek judicial remedy

This can be done via email gdpr@danxcarousel.com. Please refer to our Data Subject Rights policy and procedure for more details.

If a data subject objects, we will reassess our balancing test, stop processing unless we were able to demonstrate a stronger overriding interest and document the reassessment and decision.

8. Governance and review

This policy will be reviewed annually or as required by changes in legislation.

9. Adoption of policy

The DANX Carousel Group's GDPR Legitimate Interest Policy statement was adopted and approved by the GDPR Executive Team Sponsor on 13th November 2025.



Review and revision of Policy

This policy will be reviewed and revised annually for compliance to the policy content or as required if changes to legislation apply sooner.

Contact

If you have any questions relating to the content of this policy, please direct them to: gdpr@danxcarousel.com