

# Data Privacy Notice

Posted: 03rd May 2018

Effective: 25th May 2018

This is privacy notice of UK Postbox Limited.

We respect your privacy and are determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data when you visit our website and sign-up to our service. We'll also tell you about your privacy rights and how the data protection law protects you.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

1. WHO WE ARE AND IMPORTANT INFORMATION
2. THE PERSONAL DATA WE COLLECT ABOUT YOU
3. HOW WE COLLECT YOUR PERSONAL DATA
4. HOW WE USE YOUR PERSONAL DATA
5. WHO WE SHARE YOUR PERSONAL DATA WITH
6. INTERNATIONAL TRANSFERS
7. DATA SECURITY
8. DATA RETENTION
9. YOUR LEGAL RIGHTS
10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES
11. QUERIES, REQUESTS OR CONCERNS

## 1. Who we are and Important Information

### **What is the purpose of this privacy notice?**

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you sign-up to our service.

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

### **Data controller(s)**

UK Postbox Limited is the controller and responsible for your personal data (collectively referred to as UK Postbox, "we", "us" or "our" in this privacy notice. Our contact details are 13 Freeland Park, Wareham Road, Poole, Dorset BH16 6FH, UK, customer.services@ukpostbox.com, +44 203 397 0812. For all data matters contact our Data Protection Officer at compliance@ukpostbox.com.

UK Postbox Limited is the controller and responsible for this website.

### **Third-party links outside of our control**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2. What Personal Data do we ask for or collect about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the [Information Commissioners Office](#).

When you sign-up to our service, we will ask you for your Personal Data which we have grouped together follows: -

#### **Identity Data |**

First Name, Last Name, Date of Birth, Username, Photo ID documentation

#### **Contact Data |**

Home Address, Billing Address, Telephone Numbers and Email Addresses, Proof of Address documentation

We may also use and share **Aggregated Data via Cookies** such as statistical or demographic data which is derived from your personal data but is not considered personal data in law as it does not directly or indirectly reveal your identity. An example of this is we may aggregate your usage data to calculate the percentage of users accessing a particular part of our service or website.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we normally collect any information about criminal convictions and offences.

### **If you fail to provide personal data**

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 3. How we ask for or Collect your Personal Data

We use different methods to collect data from and about you including through:

- **Directly |** When completing a Contact Form on our website, or by filling out a Sign-up Form to subscribe to our Services or when corresponding with us an email.
- **Information we receive from other sources |** We may receive information about you from Identity Verification Agencies to verify your personal data you have already provided to us as required by law in accordance with The Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017 and London Local Authorities Act 2007 Section 75
- **Information we receive during the course or providing service |** We may receive information such as inbound / outbound tracking numbers of items, various mail forwarding addresses, envelope contents, parcel contents and sender's sender's information of your items.

## 4. How do we use your Personal Data?

We will only use your personal data supplied to us when the law allows us to.

- **Performance of Contract |** this means processing your data where it is necessary for the performance of a contract / service or to take steps at your request before entering into such a contract.
- **Consent |** this means providing consent for us to:
  - use your personal data that you supplied to us on our Sign-up form so that we can verify your identity under Anti-Money Laundering legislation.
  - use your personal supplied on a contact form in order for us to provide a service quotation and/or information on requested service
  - receive any marketing information from us.
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

## PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact our Data Protection Officer at [compliance@ukpostbox.com](mailto:compliance@ukpostbox.com) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To verify your Identity with Identification Verification Agencies	(a) Identity (b) Contact	Performance of a contract with you. Legal or regulatory obligation

To provide you with our Online Post Office Service without our Platform	(a) Identity (b) Contact	Performance of a contract with you
Where applicable, providing your personal data to Approved service partners who operate part of our service at selected locations under contracts that we enter into	(a) Identity (b) Contact	Performance of a contract with you
Service   Sending e-mail notifications for items received, top-ups, invoices/statements, service update emails, changes to terms and conditions and policy	Email Address	Performance of a contract with you
Service   Forwarding client's physical mail and parcel items.	Forwarding and Shipping Address	Performance of a contract with you
Service   Processing Postal Items	Tracking Numbers, Senders Information, Envelope Contents and Parcel Contents	Performance of a contract with you
Providing Information or a Quote for Service	Contact	Taking steps before Performing a Contract

## **Marketing**

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not opted out of receiving that marketing

### **Third-party marketing**

We will get your express opt-in consent before we share your personal data with any company outside the UK Postbox for marketing purposes.

### **Opting out**

You can ask us to stop sending you marketing messages at any time by contacting our Data Protection Officer at [compliance@ukpostbox.com](mailto:compliance@ukpostbox.com)

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of providing our Service to you, Product or Service Experience or other transactions.

### **Cookies**

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookie Policy](#).

### **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Data Protection Officer at [compliance@ukpostbox.com](mailto:compliance@ukpostbox.com).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 5. Who we share your Personal Data with

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

External Third Parties, for example: -

- **Approved Service Partners** | Individuals data may be shared with approved service partners who operate part of our service at selected locations under contracts that we enter into

- **Identity verification Agencies and Credit References Agencies** | HM Revenue & Customs, regulators and other authorities acting as Processors based based in the UK require certain reporting on our business activities.
- **Identity verification Agencies and Credit References Agencies** | For the purposes of verifying your identity and credit score for the purposes of providing service under a contract
- **Third Party Providers** | acting as Processors based in the United Kingdom who provide IT and system administration services.
- **Professional advisers** | acting as Processors including lawyers, bankers, auditors and insurers based in the United Kingdom] who provide consultancy, banking, legal, accounting and insurance services.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International Transfers

We may transfer data outside of the EEA.

## 7. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## 8. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Details of retention periods for different aspects of your personal data (in the table in section 4, above). are available by contacting our Data Protection Officer at [compliance@ukpostbox.com](mailto:compliance@ukpostbox.com)

By law we have to keep basic information about our customers (including contact, identify and financial details for five years after a contract has ended for the purposes of Anti-Money Laundering and six years for the purposes of HMRC / Tax.

In some circumstances you can ask us to delete your data: see **Your legal rights** below for further information.

## 9. Your Legal Rights

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact our Data Protection Officer at [compliance@ukpostbox.com](mailto:compliance@ukpostbox.com)

### **No fee required – with some exceptions**

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

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We will respond to all legitimate requests within 30 days. . Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Changes to this Notice and your duty to inform us of any changes

[This version was last updated on 25 April 2018 and is GDPR compliant. Previous version of this Policy can be obtained by contacting Data Protection Officer at [compliance@ukpostbox.com](mailto:compliance@ukpostbox.com) Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

## 11. Queries, Requests or Concerns

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Protection Officer at [compliance@ukpostbox.com](mailto:compliance@ukpostbox.com).

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the [Information Commissioners Office](https://ico.org.uk/global/contact-us/email/) on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England, UK

UK Postbox Ltd, 13 Freeland Park, Wareham Road, Lytchett Matravers, Poole, Dorset, BH16 6FH, United Kingdom

Registered in England and Wales Company Number: 06723381

Our MLR registration no is 12729809

We are registered with the Information Commissioners (ICO) and our registration no is ZA038907.

