

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. It also explains your rights in relation to your personal information and how to contact us or supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal information about you. When we do so we are subject to the [General Data Protection Regulation](#), which applies across the European Union (including in the United Kingdom) and we are responsible as ‘controller’ of that personal information for the purposes of those laws.

## Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Parcel Safe Place Limited
Personal information	Any information relating to an identified or identifiable individual

## Personal information we collect about you

We may collect and use the following personal information about you:

- your name and contact information, including email address, residential address, telephone number and IP address;
- your delivery history;
- Camera / CCTV images;

This personal information is required to provide the services to you.

## How your personal information is collected

We collect most of this personal information directly from you—in person, by telephone, email and/or via our website and apps. However, we may also collect information:

- from the property management company that is responsible for the property where your Parcel Room is situated;
- from cookies on our website - for more information on our use of cookies, please see our cookies policy; and
- via our IT systems, e.g.:
  - the Parcel Room door entry system; or
  - CCTV and access control systems.

Please note, that your property management company is solely responsible for the legality, reliability, integrity, accuracy and quality of any personal data that is provided by them to us. Accordingly, for more information on your property management company data processing please review their privacy policy.

## How and why we use your personal information

Under data protection law, we can only use your personal information if we have a proper reason for doing so, e.g.:

- to comply with our legal and regulatory obligations;
- for the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use (process) your personal information for and our reasons for doing so:

<b>What we use your personal information for</b>	<b>Our reasons</b>
To provide our services to you	For the performance of our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or the theft of packages from the Parcel Room	For our legitimate interests or those of a third party, i.e. to minimise fraud/theft that could be damaging for us and for you
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business, e.g. in relation to customer base, services or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for us and for you  To comply with our legal and regulatory obligations
Updating customer records	For the performance of our contract with you or to take steps at your request before entering into a contract  To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party, e.g. making sure that we can keep in

What we use your personal information for	Our reasons
	touch with our customers about deliveries to a Parcel Room and new services
Statutory returns	To comply with our legal and regulatory obligations
Marketing our services to: —existing and former customers; and  —third parties who have previously expressed an interest in our services.	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former customers

### Who we share your personal information with

We may share your personal information with your property management company when required to address any questions from them regarding access to the Parcel room or with our third party CCTV monitoring company.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

We may also need to share some personal information with other parties, such as potential buyers of some or all of our business or during a re-structuring. Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

### Where your personal information is held

Information may be held at our offices or on our Amazon Web Servers.

### How long your personal information will be kept

We will keep your personal information while you have an account with us or we are providing services to you. Thereafter, we will keep your personal information for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

If you would like to request deletion of your personal information, please contact us using the details in the '**How to contact us**' section below.

## Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal information (the right of access)
Rectification	The right to require us to correct any mistakes in your personal information
To be forgotten	The right to require us to delete your personal information in certain situations
Restriction of processing	The right to require us to restrict processing of your personal information in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party in certain situations
To object	The right to object:  —at any time to your personal information being processed for direct marketing (including profiling);  —in certain other situations to our continued processing of your personal information, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email us — see below: '**How to contact us**'; and
- let us have enough information to identify you (e.g. your full name, address and customer or matter reference number)
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

- let us know what right you want to exercise and the information to which your request relates.

### Keeping your personal information secure

We have appropriate security measures to prevent personal information from being accidentally lost, or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

### How to complain

We hope that we can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

### Changes to this privacy policy

This privacy notice was last updated in February 2023.

We may change this privacy notice from time to time, when we do we will inform you via notice included on the Parcel Room door entry system.

### How to contact us

Please contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details	Our Data Protection Officer's contact details
<a href="mailto:support@parcelsafepalace.com">support@parcelsafepalace.com</a>	<a href="mailto:ben@parcelsafepalace.com">ben@parcelsafepalace.com</a>

### Do you need extra help?

If you would like this notice in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).