

## Privacy Policy

### Introduction

Pick and Pack Express Ltd are a UK based order fulfilment services and warehousing company. Our registered company number is 06617386.

Pick and Pack Express Ltd takes the privacy of your information very seriously. This Privacy Policy applies to our use of any data collected by us or provided by you, in relation to your use of the website and also if you enter into a negotiation, contract or employment with us.

Pick and Pack Express Ltd act as both data controllers and data processors for purposes of the General Data Protection Regulation 2016 and Data Protection Act 2018 and are responsible for the manner the data you provide us with is processed.

We are registered with the Information Commissioner's Office.

This privacy policy should be read alongside, and in addition to, our Terms and Conditions.

### What personal data do we process?

We may collect the following information about you:

- name;
- date of birth;
- postal address;
- e-mail address;
- telephone number;
- bank details;
- National Insurance number;
- passport details for right to work verification;
- driving licence number and details;
- information gathered using cookies in your web browser; (see Cookie Policy)
- Some general healthcare records kept for safety reasons during pandemic. (see additional policy)

### Lawful reasons to using your personal data

There are several reasons we may collect and use your personal data which the law on data protection allows us to, including:

- **Contractual obligations**

In order for us to fulfil our contractual obligations to you we will need to use your personal data

*For example, if we have to deliver to your address.*

- **Consent**

We will always request your consent when we collect and process your personal data for certain purposes

*For example, if you consent to receive our marketing newsletters.*

- **Legal or regulatory obligation**

*For example, we will need to pass and process your personal data to law enforcement if there is any involvement in fraud or criminal activity*

- **Legitimate Interests**

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience.

*For example, we may send you promotional offers based on your previous business dealings with us*

- **Vital interest**

We may need to protect the vital interests of you or another person

## **How do we collect your personal data?**

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

- New account customer forms
- New starter forms
- Service enquiries via the website, on email or by phone
- Meeting at an event and exchanging business cards
- Engaging with us on social media
- When you have given a third party permission to share information with us. e.g. East Midlands Chambers of Commerce, Which Warehouse

## **Protecting your personal data**

Protecting the confidentiality and integrity of your personal data is a responsibility that we always take seriously. We use appropriate technical and organisational measures to keep personal data secure against unauthorised or unlawful processing, and against accidental loss, destruction or damage. For example

- All Pick and Pack Express Ltd employees have received training in GDPR and how to handle your personal data
- Access to your personal data is restricted to the relevant employees that are required to process your data
- Where hard copies are created, these are securely kept.
- According to each department's process and procedure, your personal data will be periodically reviewed and securely deleted if required
- Internal systems and networks are regularly tested

### **How long will we keep your personal data for?**

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

For example, invoices will be kept for 7 years for legal obligations.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

For any further enquiries please contact the Company for details of our Retention Policy.

### **Who will we share your personal data with?**

We only share your data with other parties where strictly necessary. We may disclose your information to third parties:

- Where necessary to fulfil our obligations associated with any contract entered into between you and us
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or terms and conditions of supply and other agreements
- To protect the rights, property, or safety of Pick and Pack Express Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction
- Our accountants
- East Midlands Chambers of Commerce to facilitate overseas trade
- 3<sup>rd</sup> party industry partners only with your consent

We will never sell, trade, or rent your personal information with other companies.

### **International Transfers**

The data that we collect from you will usually be stored inside the UK or the European Economic Area (EEA).

However, if you live or work outside of the UK or the EEA, we may need to transfer your personal data outside of the UK or the EEA to correspond with you.

For international deliveries we may also need to transfer certain details to our overseas representatives.

The service providers we use are listed below with their Privacy Policies.

Kuehne + Nagel [https://uk.kuehne-nagel.com/en\\_gb/footer-links/privacy-policy/](https://uk.kuehne-nagel.com/en_gb/footer-links/privacy-policy/)

Fedex <https://www.fedex.com/en-gb/privacy-policy.html>

DHL <https://www.dhl.com/global-en/home/footer/global-privacy-notice.html>

If we transfer data outside the UK or the EEA where our service providers host, process, or store data outside the UK or the EEA, the Company will ensure that all our service providers are compliant with the relevant laws.

### Your legal rights over your personal data

You have the rights under the data protection laws in relation to your personal data including:

- **Request access to your personal data** (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or out of date data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no business or legal reason for us continuing to process it.
- **Object to processing of your personal data** where we are relying on a Legitimate Interest (or those of a third party) and there is something about your situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Please email us at [contact@pickandpackexpress.co.uk](mailto:contact@pickandpackexpress.co.uk) to request a Data Subject Access Request if you wish to exercise any of these rights.

- No fee in most cases – 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 fee if your request is clearly unfounded, repetitive or excessive. There is the possibility that we will refuse to comply with your request in these circumstances.
- What we may need from you – to protect your personal data we will ask you to verify your identity before proceeding with your request 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.
- If you have authorised a third party to submit a request on your behalf, we will request proof that they have your permission to do so.
- Time limit to respond - We will respond to all legitimate requests within 1 month from the date of receipt of your request. Occasionally it may take us longer if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated. where you are sending us a request via post rather than email, we recommend you send it via recorded delivery to guarantee safe delivery.

## Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our **Privacy Officer**.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Privacy Officer**: Craig Furber

**Phone:** 01530 837 202

**Email:** [contact@pickandpackexpress.co.uk](mailto:contact@pickandpackexpress.co.uk)

Due to the decision of the UK to leave the EU on the 31<sup>st</sup> December 2020, the way your data is transferred from the UK to other countries may change to ensure continuing compliance with data protection regulations but it will not change the security of your data. We may therefore update this Privacy Policy from time to time and we advise that you regularly check this page to ensure you are happy with the changes; we will however notify you of any significant changes.

