# **Privacy Notice**

This is the privacy notice of Any Courier Limited, company number 13217556 ('we', 'our', or 'us').

Our registered business address is at 69 High Street, Southgate, London, N14 6LD.

# Introduction

This notice sets out our privacy policy regarding personal data about you that we collect, store, transfer, use or otherwise act on. It tells you about your privacy rights and how the law protects you.

In the context of the law and this notice, 'personal data' is information that clearly identifies you as an individual person or which could be used to identify you as such if combined with other information. Acting in any way on personal data is referred to as 'processing'.

This notice applies to everyone who uses our services, including visitors to our website, members and transport providers.

Except as set out below, we do not share, or sell, or disclose your personal data to any third party.

#### Personal data we process

# 1. How we obtain personal data

We obtain information about you:

- directly from you;
- from third party databases and service providers; and
- as a result of monitoring how you use our website or our services.

# 2. Types of personal data we collect directly

When you use our website and our services, for example, when you create an account, we ask for, and you provide to us, personal data that we need in order to provide those services to you. This may include:

- personal identifiers, such your first and last names;
- contact information, such as your email address, your telephone number and postal addresses that you use for billing;
- payment information, such as a debit or credit card number and expiry date or bank account details;
- information about your relationship with a transportation services business you own, operate or for which you work; and
- information about transportation services you seek, including items that you wish to be transported and postal addresses for pick up and delivery of items.

# 3. Types of personal data we collect from third parties

We may confirm some of the information you provide to us directly using data from other sources.

For example, if you are a transportation services provider then we may ask you to provide personal data to a background checking service to confirm your identity and your suitability to provide services to other members. The results of such checks may be reported to us.

# 4. Types of personal data we collect from your use of our services

By using our website and our services, we process:

- information you contribute to our website, including jobs sought and reviews;
- technical information about the hardware and the software you use to access our website and use our services, including your Internet Protocol (IP) address, your browser type and version and your device's operating system;

- usage information, including the frequency you use our services, the pages of our website that you visit, whether you receive messages from us and whether you reply to those messages;
- transaction information that includes the details of the services you buy and payments made for those services; and
- your preferences to receive marketing from us; how you wish to communicate with us; and responses and actions in relation to your use of our services.

# 5. Our use of aggregated information

We may aggregate anonymous information such as statistical or demographic data for any purpose. Anonymous information is that which does not identify you as an individual person. Aggregated information may be derived from your personal data but is not considered as such in law because it does not reveal your identity.

For example, we may aggregate usage information to assess whether certain functionality of our website could be improved.

If we combine or connect aggregated information with your personal data so that it can identify you in any way, we treat the combined information as personal data, and it will be used in accordance with this privacy notice.

#### 6. If you do not provide personal data we need

Where we need to collect 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 that contract.

In that case, we may have to stop providing a service to you. If so, we will notify you of this at the time.

# The bases on which we process information about you

The law requires us to determine under which of six defined bases we process different categories of your personal data, and to notify you of the basis for each category.

If a basis on which we process your personal data is no longer relevant then we shall immediately stop processing your data.

If the basis changes then if required by law we shall notify you of the change and of any new basis under which we have determined that we can continue to process your information.

# 7. Information we process because we have a contractual obligation with you

When you create an account on our website, use our services or otherwise agree to our terms and conditions, a contract is formed between you and us.

In order to carry out our contractual obligations to you we must process information you give us. Some of this information may be personal data.

For example, we may use it in order to:

- verify your identity for security purposes when you use our services; and
- provide our services to you.

We process this information on the basis there is a contract between us, or that you have requested we use the information before we enter into a legal contract.

We shall continue to process this information until the contract between us ends or is terminated by either party under the terms of the contract.

# 8. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website without being signed in or when you ask us to provide you more information about our business and/or our services, you provide your consent to us to process information that may be personal data.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, we ask you to agree to our use of non-essential cookies when you access our website.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by instructing us. However, if you do so, you may not be able to use our website or our services further.

We aim to obtain and keep your consent to process your information. However, while we take your consent into account in decisions about whether or not to process your personal data, the withdrawal of your consent does not necessarily prevent us from continuing to process it. The law may allow us to continue to process your personal data, provided that there is another basis on which we may do so. For example, we may have a legal obligation to do so.

# 9. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means;
- whether processing (or not processing) might cause you harm; and
- whether you would expect us to process your personal data, and whether you would, in the round, consider it reasonable to do so.

For example, we may process your data on this basis for the purposes of:

- improving our services for you;
- record-keeping for the proper and necessary administration of our business;
- responding to unsolicited communication from you to which we believe you would expect a response;
- preventing fraudulent use of our services;
- exercising our legal rights, including to detect and prevent fraud and to protect our intellectual property;

- insuring against or obtaining professional advice that is required to manage business risk; and
- protecting your interests where we believe we have a duty to do so.

# 10. Information we process because we have a legal obligation

Sometimes we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal data.

#### How and when we process your personal data

#### 11. Information you provide

Our website allows you to post information with a view to that information being read, copied, downloaded, or used by other people.

For example, if you leave a review or post a public message on our website, we reasonably assume that you consent for the message to be seen by others. We may include personal identifiers such as your name with your message, and your message may contain information that is personal data.

In giving personal data, it is up to you to satisfy yourself about the privacy level of every person who might use it.

Once your information enters the public domain, we have no control over what any individual third party may do with it. We accept no responsibility for their actions at any time.

Provided your request is reasonable and there is no legal basis for us to retain it, then at our discretion we may agree to your request to delete personal data that you have posted. You can make a request by contacting us.

#### 12. Payment information

We have designed our systems so that wherever possible, payment information is neither taken by us nor transferred to us either through our website or otherwise. We do this so that our employees and contractors never have access to it.

At the point of payment, you are transferred to a secure page on the website of our payment service provider. That page may be branded to look like a page on our website, but it is not controlled by us.

There may be some circumstances where you provide payment information to us directly, such as when you wish to pay by an alternative means that our payment service provider cannot accept. In these circumstances, we keep your payment information only for so long as to process the transaction.

#### 13. Third party advertising on our website

Third parties may advertise on our website. In doing so, those parties, their agents or other companies working for them may use technology that automatically collects information about you when their advertisement is displayed on our website.

They may also use other technology such as cookies or JavaScript to personalise the content of, and to measure the performance of their adverts.

We do not have control over these technologies or the data that these parties obtain. Accordingly, this privacy notice does not cover the information practices of these third parties.

# Use of information we collect through automated systems

#### 14. Cookies

Cookies are small text files that are placed on your computer's hard drive by your web browser when you visit a website that uses them. They allow information gathered on one web page to be stored until it is needed for use at a later date. They are commonly used to provide you with a personalised experience while you browse a website, for example, allowing your preferences to be remembered.

They can also provide core functionality such as security, network management, and accessibility; record how you interact with the website so that the owner can understand how to improve the experience of other visitors; and serve you advertisements that are relevant to your browsing history.

Some cookies may last for a defined period of time, such as one visit (known as a session), one day or until you close your browser. Others last indefinitely until you delete them.

Your web browser should allow you to delete any cookie you choose. It should also allow you to prevent or limit their use. Your web browser may support a plug-in or add-on that helps you manage which cookies you wish to allow to operate.

The law requires you to give explicit consent for use of any cookies that are not strictly necessary for the operation of a website.

When you first visit our website, we ask you whether you wish us to use cookies. If you choose not to accept them, we shall not use them for your visit except to record that you have not consented to their use for any other purpose.

If you choose not to use cookies or you prevent their use through your browser settings, you may not be able to use all the functionality of our website.

We use cookies in the following ways:

- to track how you use our website;
- to record whether you have seen specific messages we display on our website; and
- to keep you signed in to our website.

#### 15. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

#### **Other matters**

#### 16. Your rights

The law requires us to tell you about your rights and our obligations to you in regard to the processing and control of your personal data.

We do this now, by requesting that you read the information provided at http://www.knowyourprivacyrights.org

#### 17. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

#### 18. Data may be processed outside the UK

Our websites are hosted in the United Kingdom.

We may also use outsourced services in countries outside the UK from time to time in other aspects of our business.

Accordingly data obtained within the UK or any other country could be processed outside the UK.

Where we use the services of a processor outside the UK, we safeguard your personal information by ensuring that the processor complies with the same obligations as we must under UK law. Such obligations are included in the contracts between us and the processor.

# 19. Control over your own information

It is important that the personal data we hold about you is accurate and up to date. Please inform us if your personal data changes.

At any time you may review or update personally identifiable information that we hold about you, by signing in to your account on our website.

To obtain a copy of any information that is not provided on our website you should contact us to make that request.

When we receive any request to access, edit or delete personal data we first take reasonable steps to verify your identity before granting you access or otherwise taking any action. This is important to safeguard your information.

Please be aware that we are not obliged by law to provide you with all personal data we hold about you, and that if we do provide you with information, the law allows us to charge for such provision if doing so incurs costs for us. After receiving your request, we will tell you when we expect to provide you with the information, and whether we require any fee for providing it to you.

If you wish us to remove personally identifiable information from our website, you should contact us to make your request.

This may limit the service we can provide to you.

We remind you that we are not obliged by law to delete your personal data or to stop processing it simply because you do not consent to us doing so. While having your consent is an important consideration as to whether to process it, if there is another legitimate basis on which we may process it, we may do so on that basis.

# 20. Communicating with us

When you contact us, whether by telephone, through our website or by email, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our business.

We may keep personally identifiable information associated with your message, such as your name and email address so as to be able to track our communications with you to provide a high quality service.

# 21. Complaining

If you are not happy with our privacy policy, or if you have any complaint, then you should tell us.

When we receive a complaint, we record the information you have given to us on the basis of consent. We use that information to resolve your complaint.

If your complaint reasonably requires us to notify some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.

If you are in any way dissatisfied about how we process your personal data, you have a right to lodge a complaint with the Information Commissioner's Office (ICO). This can be done at https://ico.org.uk/make-a-complaint/. We would, however, appreciate the opportunity to talk to you about your concern before you approach the ICO.

# 22. Retention period

Except as otherwise mentioned in this privacy notice, we keep your personal data only for as long as required by us:

- to provide you with the services you have requested;
- to comply with other law, including for the period demanded by our tax authorities; and
- to support a claim or defence in court.

#### 23. Compliance with the law

Our privacy policy complies with the law in the United Kingdom, specifically with the Data Protection Act 2018 (the 'Act') accordingly incorporating the EU General Data Protection Regulation ('GDPR') and the Privacy and Electronic Communications Regulations ('PECR').

# 24. Review of this privacy policy

We shall update this privacy notice from time to time as necessary.