Data Handling Policy

This data handling policy was revised on 21/01/2022

We work hard to protect your information when using our services, ensuring that you are always in control.

The following document outlines the Data Handling Policy when using MyParcel.com services, including our Website, Platform and integrated Apps.

Data Handling Statement

This data handling statement gives you an overview of the processing of your personal data in the context of the use of the offers and online services in connection with the Websites on MyParcel.com (the "Website"). This data handling statement also informs you about your rights under the EU Data Protection Regulation ("GDPR") and the means to control your personal data and protect your privacy. Personal data is defined as all information that makes it possible to identify you as a person.

The entity responsible for data processing within the framework of the Website is MyParcel.com BV, Barbarije 9, 2132 TP Hoofddorp, The Netherlands, Phone: +44 1375 807 208, info@myparcel.com, Chamber of commerce 63190133 (hereinafter "MyParcel.com" or "we"), and as such we are governed by Dutch Law. If you have any questions regarding this data protection declaration or data processing within the framework of the Website, you can also contact our company data protection officer at the address or e-mail address given above, who can be reached at the above address as well as at info@myparcel.com

Please note:

You are not legally or contractually obliged to provide us with the personal data specified in this data handling statement. If you conclude a contract with us (e.g. because you instruct us to provide services), the transmission of the contractual information provided by you to us is, however, a basic prerequisite for not only the conclusion but also the performance of this contract. Furthermore, you may not use the Website or use it only to a limited extent if you do not provide us with certain data or if you object to the use of this data.

Information that MyParcel.com collects:

MyParcel.com offers several services to help you run your business, including a dedicated platform to host your own Admin and Client Portals. As part of running these services, we collect, store and process data essential to the operation of these platforms. This Policy explains what information is collected, processed, why and how we use it.

All of the personal data that we collect, when you use our services, is directly provided by you and your clients, hereafter referred to as users, once they have been registered to use our services and products.

We undertake to only collect the data that is strictly necessary for the provision of the requested services.

For some of our services (list) we are considered to be data controllers and for other services (list) we are considered to be data processors.

Please note that if you have used a third party provider or integrator to connect with MyParcel.com for your online store, service or integration - it is the sole responsibility of the applicable service provider that is responsible for data processing using the MyParcel.com platform. In this case, MyParcel.com will only act as an order processor. This means that according to contractual agreement and our client's instruction, MyParcel.com will process all data as the client's technical service provider without its own decision making authority with regard to the processing of personal data by our client. In this respect, please refer to the data protection information and or policies of your service provider for more information.

When you visit our website and access our online services, we detect and store your browser language and geolocation in order to customise your experience according to your country and preferred language. Our servers also passively record a summary of the information sent by your browser for statistical, security and legal purposes: your IP address, the time and date of your visit, your browser version and platform, and the web page that referred you to our website.

Your browser may also be used to store and retrieve your current session data, with the help of a session cookie and you can view more information on Cookies in our Privacy and Cookie Policy.

Data we process when providing the MyParcel.com platform to our customers

Due to the nature of our business, we only collect and process data on behalf of you, our customers. When you sign up as a client and a Client and Admin Portal, with their respective accounts are created and assigned to you, it is done so on your behalf. You are always fully in control of your data, including personal information, for example; your users, contacts, customers and their customers. We only ever process the information submitted on your behalf and you always retain ownership and full control of this data.

Please note that if you have used a third party provider or integrator to connect with MyParcel.com for your online store, service or integration - it is the sole responsibility of the applicable service provider that is responsible for data processing using the MyParcel.com platform. In this case, MyParcel.com will only act as an order processor. This means that according to contractual agreement and our client's instruction, MyParcel.com will process all data as the client's technical service provider without its own decision making authority with regard to the processing of personal data by our client. In this respect, please refer to the data protection information and or policies of your service provider for more information.

The purposes for which we process your data:

We have informed you, in the text above for which purposes we process your data in individual cases. In addition, we may process your data for other purposes. This includes, for example, passing on your personal data to third parties if we are legally obliged to do so, but also the assertion of legal claims on our part or the defence against legal disputes. The legal basis in these cases is either a legal obligation (Art. 6 (1) lit. c) GDPR) or our legitimate interests.

We use your Account data in order to provide access to shipping services that you request and as such, we transfer your data to the various shipping providers for services that you have requested. We also use your account and contact data to fulfil your requests and for billing and account management purposes. This may include, for example, passing on your personal data to third parties if we are legally obliged to do so, but also the assertion of legal claims on our part or the defence against legal disputes. The legal basis in these cases is either a legal obligation (Art. 6 (1) lit. c) GDPR) or our legitimate interests.

We may also use your personal account data and information for marketing and communication purposes (Our marketing messages are always sent to you with an opportunity to opt out from further communication at any time).

If you have expressed interest in working with MyParcel.com or otherwise have asked to be introduced or put in touch with one of our partners or affiliates, then we may transfer your name, email address, telephone number and company name to our contact in your country or region, for the purpose of contacting you to offer their assistance or services, with your permission.

Data transference: To whom and which countries is your data transferred

The transfer of your user data is dependent on the MyParcel.com service request and the region where the request has taken place and the region to which the request must be delivered.

Your personal data will only be passed on to third parties if this is necessary for the provision of the Website, the MyParcel.com platform and associated integrations. The data recipients also include the third-party providers mentioned in our privacy and cookie policy and the carriers listed on our Website.

All third-party providers have made contractual agreements with us to process data exclusively within the scope of our instructions and these are known as data processing agreements.

For some specific services MyParcel.com may use data processors located outside of the EU. Some of your personal data may therefore be transferred to them for the strict purposes of their services. In such cases and in accordance with the regulations in force, MyParcel.com requires its data processors to provide the necessary safeguards to ensure regulated, secure transfers.

We host your data on AWS. Although the servers of AWS are located in Eschborner Landstrasse 100, Frankfurt am Main 60489, Germany, your data can also be legally transmitted to the USA (Amazon Web Services INC, 410 Terry Avenue North Seattle WA 98109, USA ("AWS"), which is a country outside the EEA (sometimes referred to as a "Third Country"). Some of our other service providers will also legally transfer data to a Third Country. In all cases, when dealing with suppliers, we require that all providers guarantee an appropriate level of data protection for all data recipients equal or equivalent to the EU Privacy Shield, or that the so-called EU standard contract clauses are included within our contracts with these providers in order to guarantee the secure processing and appropriate level of protection for your data.

Data retention: How long we keep your personal data

There are different retention periods that apply to how long data is stored, this is also dependent on the type/s of service that we provide.

In considering the length of time of a retention period for your personal data and your user data, we look at the purpose or purposes that we hold the information for when deciding whether (and for how long) to retain it.

In the case that we no longer need your personal data, then we securely delete information that is no longer needed.

In the case that we are unable to delete your personal data within a given period of time, we update, archive or securely delete information if it goes out of date.

We process and store your encrypted, personal data, to the extent necessary to fulfil our contractual or legal obligations. Therefore, we store your data for as long as our contractual relationship with you exists. After termination, we store your data only to the extent and for as long as this is legally required. If data is no longer required to fulfil legal obligations (e.g. under tax or commercial law), it is deleted regularly unless further processing is necessary to preserve evidence or defend against legal claims against us.

We will only retain such data as long as necessary for the purpose for which it was collected, as laid out in this policy, including any legal retention period, or as long as necessary to carry out a legitimate and reasonable promotion of our products and services.

MyParcel.com undertakes not to retain your personal data any longer than is necessary for the provision of the service or for compliance with the retention periods arising from the applicable limitation periods.

Managing your data; accessing, updating and deleting your personal information

You have the right to access and update your personal data that you have previously provided to us. You can do this at any time by contacting your account manager, or writing using the address below, or by emailing us at info@myparcel.com.

If you wish to permanently delete your account, or personal information for a legitimate purpose, you will need to request to do this in writing. You can contact us at the following address:

MyParcel.com Barabarije 9 2132 TP Hoofddorp The Netherlands

We will take all reasonable steps to permanently delete your personal information, except when we are required to keep it for legal reasons (typically, for administration, billing and tax reporting reasons).

You can also manage the data held on your Admin and Client platforms, such as your client information and create reports based on shipping information, for your clients at any time using your administration credentials. At any time you can export a complete record of your shipping profile, via our reporting tool, in order to transfer it, or to manage your own backups/archive. In such cases, you are responsible for processing this data in compliance with all privacy regulations.

You may also request the deletion of your entire account including your Admin and lenient portals, at any time, by contacting us in writing at the above address.

Data Storage

All data collected by MyParcel.com is stored in Frankfurt, Germany. Our systems are hosted by Amazon Web Services within the eu-central-1 region. Our application servers and databases run within its own virtual private network, which is not directly accessible without permission.

Customer data is stored in a dedicated database - no sharing of data between clients.

Data access control rules implement complete isolation between customer databases running on the same cluster, no access is possible from one database to another.

Data Transmission

Web traffic communication between your browser, account and carriers is encrypted, where applicable. It is our preference to utilise encrypted traffic over unencrypted, where possible.

Outgoing internet traffic from our application servers is routed through an internet gateway; in this respect, no application server makes a direct connection with the internet. For outgoing connections, we automatically prioritise encrypted over unencrypted connections.

Application Server Access and Authentication

Our application and database services are strictly controlled and are not accessible directly via the internet. A pre-selected group of engineers has access to a VPN which provides access to our application servers. Two-factor authentication (2FA) is required on all accounts, strong passwords, which are changed periodically are enforced and the connection is automatically closed after a brief period of inactivity.

Communication with the application servers is only possible, once logged in to the VPN, over SSH. We use key-based authentication, keys are issued on a per employee basis and managed via a centralised system and automatically deployed. Once revoked the keys are automatically removed from our application servers.

Automatic security checks

At MyParcel.com we practice continuous integration. With each change to our Platform/s and associated web services we run extensive automatic tests on our code base. We do not accept any changes unless all tests are passed.

Employee Access & Authorisation

We use various administrative systems which allow our employees to help our clients whenever necessary. Authentication for MyParcel.com employees who are granted such access is protected via a single sign-on with **our central system**. We enforce 2FA and strong passwords on all accounts.

Password Security

Customer passwords are protected with industry-standard PBKDF2+SHA512 encryption (salted + stretched for thousands of rounds). MyParcel.com staff does not have access to your password, and cannot retrieve it for you, the only option if you lose or forget it is to reset your passwords.

Login credentials are always transmitted securely over HTTPS. As of 2020, MyParcel.com administrators have the option to configure the rate limiting and cooldown duration for repeated login attempts, and automatic system sign outs with your permission. You will need to request changes such as this in writing using the following details;

Post: MyParcel.com BV, Barbarije 9, 2132 TP Hoofddorp, The Netherlands

Email: info@myparcel.com

As of 2020, we have a built-in setting for enforcing a minimum user password length and strength.

Staff Access

MyParcel.com admin employees may access your account in relation to support queries raised by you. For this, they use their own special and unique staff credentials, not your password which they have no way of knowing or gaining access to. This special and unique staff access improves efficiency and security, they can reproduce problems and we can audit and control staff actions separately. Our Helpdesk staff strives to respect your privacy as much as possible, and only access files and settings needed to diagnose and resolve your issueMyParcel.come employees will never ask you to share your password details, under any circumstance. Should a MyParcel.com employee or representative ask you to share your password, please get in touch with us via email on info@myparcel.com.

System Security

All MyParcel.com servers are running hardened Linux distributions with up-to-date security patches. Installations are ad-hoc and minimal to limit the number of services that could contain vulnerabilities (no PHP/MySQL stack for example).

Only a few trusted MyParcel.com engineers have clearance to remotely manage the servers - and access is only possible using an encrypted personal SSH keypair, from a computer with full-disk encryption.

Physical Security

MyParcel.com cloud servers are hosted in trusted data centres in various regions of the world EU & the USA, and the companies that we use must exceed our physical security criteria:

Restricted perimeter, physically accessed by authorised data centre, employees only.

Physical access control with security badges or biometrical security.

Security cameras monitoring the data centre locations 24/7.

Security personnel on site 24/7

Contacting us

If you have any questions regarding this Data handling policy, or if you should have an enquiry about your personal data - then please reach out to us via post or email using the contact details;

Post: MyParcel.com BV, Barbarije 9, 2132 TP Hoofddorp, The Netherlands

Phone: +44 1375 807 208 Email: <u>info@myparcel.com</u>