Privacy Policy

A. Terminology

- 1. Provider (Parcelspot): arranges the Transport Service with the Carrier in respect of the Consignment.
- 2. Client (Client / Clients): physical or legal entity ordering services with the Provider.
- 3. **Consignment**: the goods that form the subject matter of the Transport Service as ordered by the Client through the Ordering System.
- 4. **Carrier**: entity different from the Provider, specialized in external transport or is a courier company, which physically transports the Consignment and is mediated by the Provider.
- 5. **Sender**: actual person handing over a Consignment to the Carrier.
- 6. **Recipient**: person / entity designated as such on the transport waybill or label, for whom the Consignment is intended.
- 7. **Ordering System (Parcelspot.com)**: online reservation service allowing comparison and booking of Transport Services provided by the Provider's Carriers, consignment management and payments for services by the Client. Used to record data related to content, weight, dimensions, value of Consignments and address data, based on which, it calculates the cost of shipping, which is binding to the Provider.
- 8. **Transport Service**: service provided by the Carrier. This means receiving, shipping and delivering the Consignment.

B. Basic Provisions

- 1. PARCELSPOT LTD. (hereinafter: "the Provider"), company registration number 648570, incorporated in The Republic of Ireland, is a controller of personal data in accordance with Article 4 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data (hereinafter: "GDPR").
- 2. The contact details of the Provider are as follows.

Email:

info@parcelspot.com

Telephone:

+27 (10) 001-4220

3. The Provider has not appointed a data protection officer.

C. Sources and Categories of Processed Personal Data

- 1. The Provider processes the Personal Data that a Client has provided, or the Personal Data that the Provider has received by obtaining Consignment information and performing other operations that are Transport Service related, or by any website registrations.
- 2. In particular:
 - 1. First and last name and personal identification number / passport number (in the case of the Client / Sender / Recipient being a natural person / individual).
 - 2. Company registered name, registration number and contact person details (in the case of the Client / Sender / Recipient being an incorporated entity).
 - 3. VAT number.
 - 4. Contact details.
 - 5. Address.
 - 6. Email address.
 - 7. Phone number.
 - 8. Bank connection (bank account number).

(referred to herein as "Personal Data").

D. Legal Reasons and Purposes of the Personal Data Processing

- 1. The lawful reasons for processing Personal Data are as follows.
 - 1. Performance of the contract between the Client and the Provider;
 - 2. The legitimate interest of the Provider in the provision of direct marketing (in particular, for sending commercial communication and newsletters).

- 2. The purposes of processing Personal Data are as follows.
 - 1. Processing orders or claims procedures and exercising the rights and obligations arising from the contractual relationship between the Provider and its Clients and the Personal Data required for the successful execution of such agreements include, but are not limited to, names and addresses and contact details. The provision of Personal Data is a necessary requirement for the conclusion and performance of the contract between the Client and the Provider. Without the provision of Personal Data, it is not possible for the Provider to conclude or fulfil the contract successfully.
 - 2. Monitoring Client satisfaction with the Provider's product offering and service and implementing changes based on the feedback and suggestions received from Clients via email surveys.
 - 3. Sending commercial communications and other marketing activities in the form of news, newsletters, discount vouchers, competitions, marketing materials, invitations to professional seminars and events in the framework of electronic communication.
 - 4. Marketing analyses.
 - 5. Remarketing / retargeting in advertising networks.
 - 6. Personalised campaigns based on previous orders requested from the Provider.
 - 7. Creating customer accounts for Clients.
 - 8. General communication and solicitation on behalf of the Provider.

E. Data Retention Period

- 1. The Provider retains Personal Data for the period necessary to exercise the rights and obligations arising from the contractual relationship between the Client and the Provider and the application of claims from their contractual relationship (for a period of fifteen [15] years after the termination of the contractual relationship).
- 2. The Client consents to the processing of Personal Data by the Provider for the purposes set out above for no longer than five (5) years from the last contract. Consent can be withdrawn at any time by sending an email to info@parcelspot.com.
- 3. When the Personal Data retention period ends, the Provider clears the Personal Data from its systems.

F. Provider's Subcontractors

- 1. Personal data processing is carried out by the Provider, however, the Personal Data may be processed by the Provider's following service providers (hereinafter referred to as "Subcontractors"):
 - 1. Carriers involved in the delivery of Consignments.
 - 2. Payment processing subcontractors who ensure that payments are processed as per contract via Web application services and other services in connection with the Provider's activities.
 - 3. Drop-off points and their operators, whose services are necessary for the provision of the required services.
 - 4. Secure sales channels, marketing and email services.
 - 5. Subcontractors who provide feedback and survey inquiries where consent has been given.
- 2. These are primarily: various Courier Service Providers, SendGrid, Inc., Facebook Inc., Google LLC (including, but not limited to, Google AdWords, Google Analytics, Google Disk), Amazon Web Services, Inc., ComVision Sp. z oo, tawk.to Inc., Hotjar Limited, The Rocket Science Group, Daktela s.r.o. and other Providers of software processing, services and applications, which are currently not used by the Provider.
- 3. The Provider intends to transfer Personal Data to a third country (to a non-EU country) or an international organisation. Recipients of Personal Data in third-party countries are Providers of mailing and cloud services and / or the Provider's related group entities. If the Consignment is in a place of delivery outside the EU, the Client consents to the transfer of Personal Data to the necessary third-parties outside the EU.

G. Client's Rights

- 1. Under the conditions set out in the GDPR, Clients have the right to:
 - 1. Access their Personal Data.
 - 2. Rectify their Personal Data or restrict processing.
 - 3. Erase Personal Data.
 - 4. Object to the processing of Personal Data.
 - 5. Decide on data portability.
 - 6. Withdraw consent either in writing or electronically as detailed in clause E.2.
- 2. In case of doubt about the Provider's compliance with the obligations related to the processing of Personal Data, please contact the Provider immediately.

H. Personal Information Security Terms

- 1. The Provider declares that it has taken all reasonable technical, administrative and physical security measures to protect the security of the Personal Data.
- 2. The Provider declares that the Personal Data shall be accessible only by the persons authorised by them. Employees, contractors and agents who have access to Personal Data are required to keep this information confidential and may not use it for purposes other than those set out above or to deal with requests sent to the Provider by Clients.
- 3. All reasonable technical, administrative and physical security measures have been implemented to protect Personal Data.

I. Final Provisions

- 1. By submitting an order from the Provider's Ordering System, Clients acknowledge that they are familiar with the terms of the Privacy Policy and that they accept it in its entirety.
- 2. The rights and obligations of the parties to the processing of Personal Data of the Recipients and the Senders of Consignments are governed by this <u>Personal Data Protection Agreement</u>, which is annexed to the Provider's <u>Terms and Conditions</u>.
- 3. If any provision of the terms or part thereof is deemed void for any reason, it shall be deemed to have been omitted for that purpose. This does not affect the validity of the remaining parts of the terms.
- 4. The Provider shall be entitled to amend these terms at any time and without notice.