# **UDS PRIVACY POLICY**

We Universal Delivery Solutions Ltd (UDS) are committed to protecting your privacy and promise to collect, process and use your data safely and securely when you use the UDS App or website. Our Privacy Policy tells you how we do this and what your rights are. Any personal data processed in line with our Privacy Policy is controlled by us, as the data controller.

**Transparency** –We will always tell you what data we're collecting about you and how we use it. We only share your data with trusted partners and will never sell your data.

**Secure –** We are committed to always follow industry best practices to ensure your data is stored safely and securely. We protect the confidentiality, accuracy and availability of the information we collect about you.

**Control** – We will always give you control over the marketing you receive from us. You can choose the types of messages you receive and whether you want to stop receiving marketing communications by calling or emailing us at info@udsww.com

## INFORMATION WE COLLECT ABOUT YOU

- Personal and contact information when you open a UDS account online (or update that information in your account), including your name, address, email address, telephone number(s), UDS account username, VAT numbers and possible deferment account numbers. We do not ask for and would never require your social media username(s), date of birth, gender and security question answers, for example town of birth and mother's maiden name. We may collect some of that contact information when you interact with us including via our Customer Care Team.
- Details (and copies) of your communications and interactions with us via our Customer Care Team or otherwise, including by email, telephone (voice recordings), post and online via webchat, the feedback button or on UDS Ltd social media channels.
- Copies of documents you provide to prove your identity (including user name and passwords) when you are making a
  booking, or where there is a legal reason to request this from you. Transaction details including payments from you for UDS
  invoices, payments to and from you (update of delivery or proof of delivery), details of your UDS address book contains
  sending and collection addresses along with Email and telephone Numbers of which are necessary when collecting or
  delivering your consignments efficiently.
- Your financial information including your bank account details (which are sent to BACS) when paying by direct debit, and payment card information (which is sent to WorldPay) when you make a purchase or load your UDS account.
- Information about how you use our app (Not currently available) or website, and which websites you came to and website you came from such as common Search engines.

- Technical information about your device or browser when you use our app or website, including geolocation data to determine what country you are accessing our website or app from, your internet protocol (IP) address, device ID, browser type and version and time zone setting, which may in some circumstances be personal data this is taken from Google Analytics and not the responsibility of UDS.
- We may also receive personal data directly from you or from various third parties and public sources, including from social media channels (if you interact with us through those channels), or other third parties including from credit reference agencies.

# HOW WE USE YOUR DATA

-	HOW WE USE YOUR PERSONAL DATA	WHY WE USE YOUR PERSONAL DATA
REGISTRATION	WE COLLECT FINANCIAL INFORMATION IF YOU REGISTER PAYMENT CARD INFORMATION TO YOUR	NECESSARY FOR THE PERFORMANCE OF A CONTRACT WITH YOU. BOOKING COLLECTIONS AND DELIVERIES. NECESSARY FOR COMPLIANCE WITH A LEGAL OBLIGATION AND COMPLIANCE WITH HMRC TO EXECUTE THE SERVICE EFFICIENTLY.
ELIGIBILITY	FOR EXAMPLE, WHEN YOU SET UP YOUR ACCOUNT WE HAVE AN AUTOMATED PROCESS IN PLACE TO VERIFY THAT THE DETAILS YOU PROVIDE ARE CORRECT AND TO VERIFY ARE A UK OR ISLE OF MAN RESIDENT WHEN IMPORTING TO THE UK. DEFERMENT ACCOUNTS AND VAT NUMBER	NECESSARY FOR COMPLIANCE WITH A LEGAL OBLIGATION AND COMPLIANCE WITH HMRC TO EXECUTE THE SERVICE EFFICIENTLY.
VERIFICATION	WE MAY REQUIRE COPIES OF DOCUMENTS TO VERIFY THE IDENTITY OF THE PRODUCTS YOU SEND WHERE WE ARE REQUIRED BY LAW TO PROVIDE ASSISTANCE OR IN ORDER TO COMPLY	NECESSARY FOR COMPLIANCE WITH A LEGAL OBLIGATION AND COMPLIANCE WITH LOCAL AUTHORITIES.

	WITH ANY REQUEST YOU MAY MAKE REGARDING A UDS ACCOUNT.	
MAKING A BOOKING	WE USE THE PERSONAL AND CONTACT INFORMATION PROVIDED BY YOU AND THE TRANSACTION DETAILS ABOUT YOUR PURCHASES, TO PROVIDE OUR LOGISTICS SERVICES AND OTHER SERVICES TO YOU INCLUDING AIR FREIGHT, CARGO, TRAIN RAIL AND SEA FREIGHT.	NECESSARY FOR THE PERFORMANCE OF A CONTRACT WITH YOU. WE MAY SHARE THIS WITH REGULATED PARTNERS SUCH AS DHL, TNT, MAERSK ETC.
MANAGING YOUR ACCOUNT	WE USE YOUR BUSINESS AND CONTACT INFORMATION, FINANCIAL INFORMATION, AND TRANSACTION DETAILS ABOUT YOUR UDS PURCHASES, TO MANAGE YOUR UDS ACCOUNT, TO CONTACT YOU IF YOU HAVE ANY ISSUES, NEED UPDATES OR REQUIRE URGENT CONTACT IN ORDER TO COMPLETE THE DELIVERY EFFICIENTLY.	NECESSARY FOR THE PERFORMANCE OF A CONTRACT WITH YOU.
COMMUNICATING WITH YOU	WE USE THE PERSONAL AND CONTACT INFORMATION PROVIDED BY YOU, COPIES OF YOUR COMMUNICATIONS WITH US AND, IN SOME CIRCUMSTANCES, TRANSACTION DETAILS, TO MANAGE OUR RELATIONSHIP WITH YOU. FOR EXAMPLE: TO NOTIFY YOU ABOUT CHANGES TO OUR ACCOUNT TERMS OR PRIVACY POLICY TO COMMUNICATE WITH YOU IN RESPONSE TO ANY QUERY, REQUEST OR COMPLAINT YOU MAY HAVE INCLUDING BY EMAIL AND TELEPHONE AND IN WEB CHAT WHETHER RELATING TO ANY DELIVERIES THAT YOU HAVE FROM US OR OTHERWISE.	NECESSARY FOR THE PERFORMANCE OF A CONTRACT WITH YOU. NECESSARY TO COMPLY WITH A LEGAL OBLIGATION. NECESSARY FOR OUR LEGITIMATE INTERESTS (TO KEEP OUR RECORDS UPDATED AND TO STUDY HOW CUSTOMERS USE OUR SERVICE).

STAFF TRAINING	WE USE COPIES OF YOUR COMMUNICATIONS WITH US VIA OUR CRM SYSTEM (INCLUDING VOICE RECORDINGS IN SOME CASES) IN ORDER TO TRAIN OUR STAFF.	NECESSARY FOR OUR LEGITIMATE INTERESTS (TO ENSURE THAT WE ARE ABLE TO PROVIDE THE BEST SERVICE TO YOU).
ONLINE BILLING AND INVOICE INFORMATION	BILLING IS ACCESSIBLE FROM YOUR LOGIN ACCOUNT. THESE ARE THERE TO GIVE YOU FULL TRANSPARENCY OF HISTORIC BOOKINGS, AIR WAY BILLS AND DELIVERY'S. ALL YOUR HISTORIC INVOICES ARE ALSO LOCATED IN YOUR ACCOUNT AND PROTECTED BY YOUR UNIQUE LOGIN AND PASSWORD	WE DO NOT USE THIS DATA AND IT IS THERE PURELY FOR THE USE OF YOU THE CUSTOMER.
MARKET RESEARCH	WE MAY USE THE PERSONAL AND CONTACT INFORMATION YOU HAVE PROVIDED TO ASK YOU TO TAKE PART IN MARKET RESEARCH OR A SURVEY. WE ALSO USE THE RESULTS OF ANY SURVEYS OR MARKET RESEARCH THAT YOU UNDERTAKE TO IMPROVE OUR SERVICE, OUR APP, OR OUR WEBSITE.	NECESSARY FOR OUR LEGITIMATE INTERESTS (TO ASSESS AND IMPROVE OUR SERVICE AND BUSINESS).
TECHNICAL ISSUES	IF YOU CONTACT US ABOUT AN ISSUE, WE MAY USE TECHNICAL INFORMATION, AND PERSONAL AND CONTACT INFORMATION TO ADMINISTER AND PROTECT OUR BUSINESS AND THIS WEBSITE (INCLUDING TROUBLESHOOTING, DATA ANALYSIS, TESTING, SYSTEM MAINTENANCE, SUPPORT, REPORTING AND HOSTING OF DATA).	NECESSARY FOR OUR LEGITIMATE INTERESTS (FOR RUNNING THE UDS, THE PROVISION OF ADMINISTRATION AND IT SERVICES, SECURITY AND FRAUD PREVENTION). NECESSARY TO COMPLY WITH A LEGAL OBLIGATION.
EXPERIENCE	WE USE INFORMATION ABOUT YOUR USE OF OUR APP OR WEBSITE, TOGETHER WITH TECHNICAL INFORMATION ABOUT YOUR DEVICE AND (IN SOME CIRCUMSTANCES) YOUR PERSONAL AND CONTACT	NECESSARY FOR OUR LEGITIMATE INTERESTS (TO ENSURE THAT YOU ARE SHOWN RELEVANT CONTENT BASED ON

			YOUR USE OF OUR APP OR WEBSITE AND UDS LTD BOOKINGS YOU HAVE MADE).
	ADDRESS BOOK		SOMETIMES THESE DETAILS HAVE TO BE UPDATED AND WE CONTACT THE NECESSARY PARTY IN ORDER TO MAKE YOUR DELIVERY EFFICIENTLY.
	ADVERTISING EFFECTIVENESS	WEBSITE AND, IN SOME CIRCUMSTANCES, CONTACT INFORMATION ABOUT YOU, TO MEASURE OR UNDERSTAND THE EFFECTIVENESS OF THE	NECESSARY FOR OUR LEGITIMATE INTERESTS (TO DETERMINE HOW EFFECTIVE ADVERTISING IS IN ORDER TO IMPROVE ADVERTISING, ITS RELEVANCE AND IN ORDER TO FULFIL CONTRACTS WE HAVE WITH OUR MARKETING DEPARTMENT).
A	ANALYTICS	APP OR WEBSITE AND TECHNICAL INFORMATION, INCLUDING ABOUT YOUR DEVICE OR WHERE YOU	NECESSARY FOR OUR LEGITIMATE INTERESTS (TO MEASURE THE INTERACTIONS WITH OUR WEBSITE, TO DEFINE TYPES OF CUSTOMERS OF UDS SERVICES, TO KEEP OUR WEBSITE UPDATED AND RELEVANT, TO DEVELOP OUR BUSINESS AND TO INFORM OUR MARKETING STRATEGY).

	USER RELATIONSHIPS, BEHAVIOUR PROFILING AND EXPERIENCES.	
ACCOUNT HOLDERS	IF YOU BOOK WITH A UDS AIR WAY BILL, WE MAY USE YOUR PERSONAL AND CONTACT INFORMATION TO CONTACT YOU TO ARRANGE SUPPORT SHOULD A PROBLEM ARISE.	NECESSARY FOR OUR LEGITIMATE INTERESTS (TO DEVELOP OUR SERVICE AND TO MANAGE OUR LOGISTICS TEAM AND SERVICES).
PUBLICITY	WE MAY USE YOUR PERSONAL AND LIMITED CONTACT INFORMATION IN ANY PUBLICITY MATERIALS PROVIDED THAT YOU HAVE GIVEN YOUR CONSENT.	ONLY WITH YOUR CONSENT.
REGULATORY COMPLIANCE	WE MAY USE YOUR PERSONAL AND CONTACT INFORMATION, FINANCIAL INFORMATION, INFORMATION ABOUT ANY TRANSACTION BETWEEN YOU AND US, INFORMATION ABOUT YOUR USE OF THE APP OR WEBSITE, OR TECHNICAL INFORMATION, TO ENABLE US TO COMPLY WITH OUR LEGAL AND REGULATORY OBLIGATIONS. THESE INCLUDE REPORTING AGGREGATED DATA TO THE HMRC, FOR PROTECTION MEASURES, AND TO ALLOW US TO PROVIDE ANY INFORMATION TO THE HMRC AS WE ARE REQUIRED TO.	NECESSARY TO COMPLY WITH A LEGAL OBLIGATION.
FRAUD PREVENTION	WE MAY USE YOUR PERSONAL AND CONTACT INFORMATION, FINANCIAL INFORMATION, INFORMATION ABOUT ANY TRANSACTION BETWEEN YOU AND US, INFORMATION ABOUT YOUR USE OF THE APP OR WEBSITE, OR TECHNICAL INFORMATION, IN ORDER TO UNDERTAKE ANALYSIS FOR THE PURPOSES OF	NECESSARY TO COMPLY WITH A LEGAL OBLIGATION. NECESSARY FOR OUR LEGITIMATE INTERESTS (TO ENSURE THAT TRANSACTIONS AND INTERACTIONS WITH US ARE NOT FRAUDULENT).

	IDENTIFYING AND DEALING WITH ANY FRAUD OR FRAUDULENT ACTIVITY.	
QUERIES	WE MAY USE YOUR PERSONAL AND CONTACT INFORMATION, FINANCIAL INFORMATION, INFORMATION ABOUT ANY TRANSACTION BETWEEN YOU AND US, INFORMATION ABOUT YOUR USE OF THE APP OR WEBSITE, OR TECHNICAL INFORMATION FOR THE PURPOSE OF DEALING WITH ANY REQUEST, COMPLAINT OR QUERY FROM YOU.	NECESSARY TO COMPLY WITH A LEGAL OBLIGATION. NECESSARY FOR OUR LEGITIMATE INTERESTS (TO RESPOND TO YOU AND TO DEAL WITH ANY REQUEST YOU MAY HAVE).

We use your personal data to create aggregated data sets. You are not identifiable from that aggregated data and it is not considered personal data. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

## DO WE USE YOUR PERSONAL DATA FOR DIRECT MARKETING

We send you marketing communications through a number of different channels and via our advertising partners such as MailChimp and exhibitions we may have met you at. You will receive direct marketing by email if you have opened a UDS account through our website and have either consented to receive such email marketing during account registration, and/or have not asked us to stop sending direct marketing by email to you.

## HOW TO OPT OUT OF DIRECT MARKETING

You can opt out from receiving direct marketing communications and notifications from us at any time. There are several ways you can do this:

- To stop receiving marketing by email, either
- click 'unsubscribe' in any email communication we send you or
- login to your UDS account, visit Email preference, and untick all of the email categories.
- To stop receiving push notifications on your mobile device, switch off the relevant option in the 'Settings' section of your device.
- To stop receiving push notifications in your browser, switch off the relevant options in the 'Settings' section of your browser. See our help page for further information on how to do this in various browsers.
- Write to us

#### PERSONALISATION

We want to give you the best possible experience when you send with UDS Ltd and when we communicate with you. To do this we want to understand our customers, what countries you send from and to and how you use our app or website.

We use this information to offer you promotions that are most likely to interest you and to personalise our communications and content to make them relevant. We will never sell on or offer your data to a third party in mass,

# HOW CAN I STOP MY PERSONAL DATA BEING USED FOR DIRECT MARKETING?

We will never sell your personal data to personalise marketing to you. If you choose not to receive personalised direct marketing, you will continue to receive marketing communications and notifications from us, however they will not be personalised to you. To stop all direct marketing (including both marketing communications/notifications and personalisation) you must opt out of both. Please note that our systems may take up to 72 hours to update after changing your preferences. However, the marketing we will be sending you will be relative to you and we would expect it to be beneficial to you to know what's new in the logistics industry, such as Rail from Asia to UK and the possibility of Sea freight taking much longer due to Fuel emissions, restrictions and regulations. Just saying!.

# SHARING YOUR INFORMATION WITH OUR MARKETING PARTNERS

We may share your data with our marketing department. We will not share or include this with third party advertisers, advertising networks and agencies to provide targeted advertising or to exclude you from our targeted advertising. We will NOT share your data with social media providers, including Facebook for custom audiences (for information on to opt out of Facebook custom audiences see the information provided by Facebook in its Help Centre (www.facebook.com/help/1415256572060999).

You can also opt out from cookies and other technology being used for marketing purposes. Please go to Manage your cookies for information on how to do this please contact your internal IT team.

# HOW WE SHARE YOUR DATA WITH THIRD PARTIES

We sometimes share the data we collect from you with the following trusted third parties:

- Banks and payment providers to set up a direct debit on your account, to pay Credit Notes or refunds to you and to
  obtain payment of any amounts due to us.
- Our IT system providers in order to provide software to set up your player account, to communicate with you via webchat and other communications providers and to provide our systems to us, including for the purposes of hosting, support and software licensing.
- Marketing service providers to allow us to send email communications (including, for example, push notifications and inapp messages)
- Online survey companies and market research agencies to undertake surveys (including for example, our website satisfaction survey) and other market research and to analyse the results.

- Digital analytics companies for the purposes of website analytics and reporting in respect of our analytics and marketing such as Google.
- Professional advisers including lawyers, bankers, auditors and insurers for the purposes of providing consultancy, banking, legal, insurance and accounting services.
- The HMRC for legal and regulatory purposes as required under our licence to operate at UDS.
- Police or other such regulatory authority as part of an investigation or otherwise for legal or regulatory purposes.
- Dispute Resolution agencies for the purposes of dealing with any complaints.
- Credit reference agencies for the purpose of checking the details that you have provided us with are correct and to comply with our regulatory obligations.
- Security companies for the purposes of security, including prevention and detection methods, for the protection of UDS.
- Auditors to audit our systems and transactions for the purposes of ensuring efficiency, or regulatory or contractual compliance.
- UK law enforcement agencies and third party security companies for the purposes of ensuring that we comply with the law and have adequate security measures in place.
- We will disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request. We do this in order to protect our rights, property or safety or of our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### HOW WE PROTECT YOUR PERSONAL DATA

We have put various measures in place to protect your personal data:

- We are independently certified to a number of industry recognised standards, including ISO27001 which helps us maintain the highest levels of security across our entire business.
- We are a founding member of the UDS CD Express and therefore comply with, and are regularly audited on, the "ATOL" Security Control Standards for our Courier processes.
- Our online security controls maintain confidentiality at all times, specifically for secure card payments. We are certified to the payment card data security standards (PCI-DSS) and never store card details.
- Our entire site is accessed using https rather than http, meaning that all information that is sent and received is encrypted for additional security. You can see this in the address bar of your browser.

- As described in this Privacy Policy, we may in some instances disclose your personal data to third parties. Where we do,
  we require that third party to have appropriate technical and organisational measures in place to protect your personal
  data; however in some instances we may be compelled by law to disclose your personal data to a third party, and have
  limited control over how it is protected by that party.
- Our website and app are regularly audited by an independent auditor to ensure we maintain our security accreditations. Your personal data may be processed outside the European Economic Area (EEA) including by staff operating outside the EEA who work for us or for one of our third parties mentioned. That includes to overseas Logistics partners for the purposes of providing relevant collections and deliveries to you, for the purposes of processing any payments that you may make to us, communicating with consignees and consignors delivering dynamic content to web browsers and mobile applications or for the purposes of reporting and tracking web and mobile application performance.
  Where your personal data is transferred outside of the EEA, we require that appropriate safeguards are in place. To find out more about the appropriate safeguards that we have in place, please contact us.

#### HOW LONG WE KEEP YOUR DATA FOR

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. At the end of that retention period, your data will either be deleted or anonymised (so that it can no longer be associated with you) for research or statistical purposes. 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. In some circumstances you may be entitled to ask us to delete your data: see 'Your rights' below for further information

# YOU HAVE THE RIGHT

- To ask us not to use your personal data for direct marketing. To do so, visit your Email preferences and Personalisation settings when receiving emails. See further information on how to do this above.
- To ask us not to process your personal data where it is processed on the basis of legitimate interests, if there are no compelling reasons for that processing;
- To request from us access to personal information held about you (see below);
- To ask for the information we hold about you to be rectified if it is inaccurate or incomplete;
- To ask that we stop any consent-based processing of your personal data after you withdraw that consent;
- To ask, in certain circumstances, to delete the personal data we hold about you;

- To ask, in certain circumstances, for the processing of that information to be restricted; and
- To ask, in certain circumstances, for data portability.
- To log into your account and Delete/edit addresses from the address book. (www.udsww.com)

## **CONTACT US**

If you have any questions about our Privacy Policy, including any requests to exercise your rights, please contact the Data Protection Officer using the details set out below: By post to:

Data Protection Officer
Monica Chawla
Universal Delivery Solutions Ltd.
Unit 8 Airlinks Industrial Estate
Spitfire Way
Heston, Middlesex
TW5 9NR

By email to: info@udsww.com

In order to request a copy of the personal data that UDS holds about you, please send your request in writing to the Data Protection Officer at the above address. To enable us to verify your identity and process your request, you must include all of the following information and documentation with your request:

- Your full name;
- The email address registered to your account;
- A description of the data that you are requesting, including a date range;
- A copy of your current and valid photo ID (e.g. passport photo page);
- Proof of your address in the form of a photocopy of a utilities or service provider bill; and
- The date of the request.

If you are unhappy with our processing of your personal data, you have the right to complain to the Information Commissioner's Office (ICO) at any time. The ICO's contact details are available here: https://ico.org.uk/concerns/. We would, however, appreciate the chance to deal with any concerns before you approach the ICO, so please contact the Data Protection Officer by email in the first instance.

#### COOKIES

We use cookies and similar technologies to recognise you, your browser and your device. We also allow carefully selected third parties to use cookies, pixels and ad tags while you are browsing our website and using our app. These

collect information about your browsing habits and usage and allow us to show you relative information while you are browsing our website and other sites on the internet. All of our advertising cookies used are described in the cookie list below. There are four main types of cookies and technology. Here's how and why we use them:

# STRICTLY NECESSARY COOKIES

These are cookies that are required for the operation of our website and app. Without these cookies, you will not be able to use some functionality on our website and app, such as signing into your account.

## PERFORMANCE COOKIES

These cookies collect information about how you use our website or app and help us improve the way our website and app work by making it easier for you to navigate to and complete various tasks.

### **FUNCTIONALITY COOKIES**

These cookies allow us to identify whether you are logged into your UDS account and to remember choices you make and your preferences, in order to improve your experience of our website and app. Below is a list of our main partners that may place cookies, pixels or other similar technology on your browser or device when visiting our website and app:

# MANAGE YOUR COOKIES

For more information about cookies, how to opt out and the steps you can take to protect your privacy on the internet, go to http://www.youronlinechoices.com/uk/ – the guide to online behavioral advertising and privacy. This website is operated by the Internet Advertising Bureau, the industry body for online advertising. On here you'll find information about how behavioral advertising works, how to opt out, further information about cookies and the steps you can take to protect your privacy on the internet. If you'd prefer to restrict, block or delete cookies from our website, you can do so in your browser settings. If you choose to disable cookies, then please note that this may limit the way you use our Website. For example, you may have to re-enter information that would have ordinarily been stored as a cookie.

#### HOW TO CONTROL COOKIES ON YOUR DESKTOP

Internet Explorer cookies information
Safari cookies information
Chrome cookies information
Firefox cookies information
Opera cookies information

#### HOW TO CONTROL COOKIES ON YOUR MOBILE DEVICE:

Apple iOS Safari Android Chrome