

Privacy Notice - Trackable Products and Systems

Isle of Man Post Office - Controller

Isle of Man Post Office (IOMPO) is a controller for all personal data processed by the IOMPO, staff or other appointed Officers for the purposes of the General Data Protection Regulation (Isle of Man) Order 2018. The contact details for the IOMPO are Isle of Man Post Office, Postal Headquarters, Spring Valley Industrial Estate, Douglas, Isle of Man IM2 IAA.

In addition to the information set out in the IOMPO privacy notice, we may also collect the following information for sender and recipient:

- Name including prefix
- Full address
- Email address
- Phone numbers
- Signatures
- GPS for delivery point
- Tracking details including tracking number and tracked events
- Age verification where sender requires, generally relating to products that can only be given to
 persons 18 years of age or over. No data held other than acknowledgment on tracking system that
 person is 18 years or over.
- Photographs are taken at the point of delivery where requested by the sender but the inclusion in the photographs of personal data including customer images is avoided

How we will use the information we collect about you

IOMPO will use your information to:

- Take necessary steps to make sure your mail is delivered or returned to the sender
- To process collections and deliveries for account customers.
- Maintain a record of the transaction
- Processing payments and refunds for our services
- Providing delivery updates to the sender and the person the item was sent to, as part of our track and trace services.
- If you have accepted a parcel on behalf of someone else (such as your neighbour). This may include using your data to give your details to the sender and the person the item was sent to, to let them know you have the item, and allow the delivery to be properly tracked within the postal service
- Providing proof of postage or delivery
- Help prevent and detect crime including fraud, money laundering, identity theft or other criminal offences

This may include checks of publicly available information but in some cases, where it is necessary and relevant, the information you provide may be disclosed or shared with other organisations. This will only be done where there is a Compliance with legal obligation, a Contractual necessity, or processing for a new purposes or consent for us to do so.

- We will do this to allow us to undertake marketing to new and existing customers.
- Verify the information and documentation you have provided is correct
- Help prevent and detect crime including fraud, money laundering, identity theft or other criminal offences.

How we will share the information we collect about you

Third parties we may share your data with include, for example:

- Police or law enforcement agencies where there is a legal requirement to do so
- Courts on production of a valid court order
- Fraud prevention agencies

- When mailing items containing goods to outside of the UK, data is shared with Royal Mail, who then share this data with the CDS (Customs Declaration Service) and the recipient country of each item
- We share your personal data with our customers when we provide them with services which involve you. For example, if a customer has arranged for an item to be sent to you, we will give them delivery updates and proof that it has been delivered. This proof may confirm where we delivered the item and show any signature the person who received the item gave us.
- If you buy postage through an online shopping platform such as eBay or Amazon, or if we deliver items you have bought from them, we may share your personal data with them to provide updates on an item's location and proof of delivery.

Information obtained or disclosed by third parties will not be used for any other purpose other than to verify the information and documentation provided is correct

Protecting your information

Isle of Man Post Office will:

- keep your information safe and secure in compliance with its information security policy
- maintain security of the systems which hold personal data in line with ISO27001 standard
- only use and disclose your information as detailed above, where necessary
- only permit authorised staff to view your data
- retain the information for no longer than is necessary and your information will be permanently deleted once the timeframes set out below have been reached.

Transfer of information outside the EEA

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- We will share your personal data with overseas postal authorities and carriers. If you are sending a
 letter or parcel overseas or receiving an item from overseas, we will provide the information required
 for customs and tax purposes or for security screening. This information will normally include:
 - o the sender's name and address
 - o the name and address, plus phone number if given of the recipient, and
 - o details of the item's contents.
- IOMPO has signed up to Data Sharing agreements with worldwide postal administrators through the Universal Postal Union.
- the country that we send the data to might be approved by the European Commission or a relevant data protection authority;
- the recipient might have signed up to a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect your personal data.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

More information

You can find out more information including:

- Looking at the Isle of Man Post Office Privacy Notices at www.iompost.com/privacy-notices/
- Asking to see your information or making a complaint if you feel that your information is not being handled correctly

Your rights

Right of access to personal information

Isle of Man Post Office will provide any individual with access to their personal data upon request, unless, and to the extent necessary, that the right of access is restricted. Further details can be found on the IOMPO Privacy Notices webpage or by contacting the IOMPO Data Protection Officer.

Other rights

If we do hold information about you, you can ask us to correct any mistakes. You also have the right, subject to any statutory limitations, to object to processing, to erasure or restriction of processing, and to data portability. No automated decisions, or profiling, are undertaken by the Isle of Man Post Office.

To make any request relating to your data held by IOMPO please contact the Data Protection Officer;

By post: Isle of Man Post Office, Postal Headquarters, Spring Valley Industrial Estate, Douglas, Isle

of Man IM2 IAA

By email: dpo@iompost.com
By telephone: 01624 698485

If you are not satisfied with the response you receive, you may also complain to the Information Commissioner, whose details can be found on www.inforights.im, or the relevant supervisory authority. You may have a right to other remedies.

How long do we keep your personal data for?

We only keep your data for as long as we need to use it or as long as specified by the sender. This will depend on the product or service we are providing. There may also be legal requirements for us to keep your data for a certain length of time.

Will this privacy notice change?

This privacy notice may change. We will not reduce your rights under this privacy notice without your consent. If any significant change is made to this privacy notice, we will provide a prominent notice on this website so that you can review the updated privacy notice.

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