

X2X COURIER

PRIVACY POLICY

How we use personal information when we collect, carry and deliver

Document ref.	Version	Effective date	Last updated
X2X-PRIV-001	1.0	8 September 2026	8 September 2026

This Privacy Policy explains how X2X Courier collects, uses, stores and shares personal information. It is written for our customers, senders, recipients, website visitors and anyone who contacts us. It sits alongside our internal Data Protection Policy. If you work for us, the staff privacy notice given at induction applies to your employment or engagement data.

1. Who we are

X2X Courier is a courier and last-mile delivery business. For the purposes of UK data protection law we are:

- **X2X Courier** (registered name and company number to be inserted), with its main operating address at [insert depot / registered office address].

In this notice, “we”, “us” and “our” mean X2X Courier.

Depending on the job, we may be:

- **A controller:** when we decide why and how to use information — for example our own customer accounts, website enquiries, CCTV at our depot, and our own claims files.
- **A processor:** when a business customer gives us sender and recipient details so that we can collect and deliver a consignment on their instructions. In that case the customer is usually the controller, and their privacy notice also applies.

Our Data Protection Lead is the person to contact about this notice:

- Email: privacy@x2xcourier.example (replace with your live address)
- Post: Data Protection Lead, X2X Courier, [address]
- Telephone: [insert number]

2. The information we collect

The information we hold depends on how you deal with us.

2.1 If you send or receive a parcel

- Name, delivery or collection address, and organisation name if it is a business address.
- Telephone number and email address, where they are provided for tracking, access or failed-delivery contact.
- Delivery instructions (for example a safe place, neighbour, access code or “leave with reception”).
- Consignment details: tracking number, service type, weight or size band, and any handling flags the customer has applied.

- Proof of delivery: a signature, a time-stamped scan, and sometimes a photograph of the parcel at the drop point.
- Records of attempts, delays, returns, claims and complaints.

2.2 If you are a business or account customer

- Account and contract details, contact names, billing address and payment records.
- Service queries, quotes and correspondence.
- Credit, anti-fraud or due-diligence information where we need it to open or keep an account.

2.3 If you use our website or contact us

- Name, email, phone number and the content of your message when you request a quote or complain.
- Technical data such as IP address, device type, browser and pages viewed, and cookie identifiers as described in section 10.

2.4 If you visit a depot

- CCTV images, vehicle registration if captured on camera, and visitor sign-in details.

We do not routinely need special category data (such as health information) to deliver a parcel. If a delivery instruction includes health or access information (for example that someone has limited mobility), we use it only to complete that delivery.

3. Where the information comes from

- Directly from you, when you open an account, book a collection, complete a contact form or speak to us.
- From the business or person who booked the delivery — most recipient details come this way.
- From our scanners, routing software, vehicles and handheld devices as the consignment moves through the network.
- From subcontracted drivers or partner carriers who help us complete a job.
- From publicly available sources or credit-reference tools if we are setting up a trade account.
- From cookies and similar technologies on our website, where you have allowed them.

4. Why we use personal information

We only use personal information when we have a lawful basis under UK GDPR.

What we do	Why	Lawful basis
Collect, sort, transport and deliver consignments	To perform the delivery service you or your sender booked	Contract. Where we act for a business customer, we process on their instructions.
Contact you about a delivery	Access problems, failed attempts, collections and tracking updates	Contract and/or legitimate interests in completing the delivery
Take a signature or proof-of-delivery photo	Show the item was delivered and handle queries or claims	Contract and legitimate interests
Run customer accounts and take payment	Quote, invoice, collect debts and keep tax records	Contract; legal obligation; legitimate interests

Investigate loss, damage, complaints and fraud	Protect the network, customers and our business	Legitimate interests; legal claims
Operate depot CCTV	Security of people, parcels and vehicles	Legitimate interests
Improve routing and service quality	Fewer failed deliveries and more reliable transit times	Legitimate interests. We use aggregated data where we can.
Send service messages	Tracking links, delivery windows and account notices	Contract and legitimate interests
Send marketing to customers	Tell you about similar services	Consent, or the PECR soft opt-in for existing customers, with an opt-out in every message
Meet the law	Tax, accounting, law enforcement and regulatory requests	Legal obligation

Where we rely on legitimate interests, we have considered your rights and will not use this basis for processing that is unfair or unduly intrusive. You can object — see section 8.

5. Proof of delivery photographs

If a photograph is taken it is to show where the parcel was left, not to create a picture of you or your home. Our couriers are instructed to:

- photograph the parcel and the immediate drop point only;
- avoid faces, children, house interiors and documents wherever they can;
- not post images on social media or send them to a personal phone.

If you would rather not have a photograph taken, tell the courier. We can usually take a signature or use another agreed method instead, unless the customer who booked the job requires a photo under their contract with us.

6. Who we share information with

We do not sell personal information. We share it only where we need to for the purposes above:

- **The customer who booked the job:** so they can track the consignment and receive proof of delivery.
- **Couriers and partner carriers:** limited to the details they need to collect or deliver that job.
- **IT and software providers:** scanning, routing, tracking portals, email, payments and cloud hosting, under written contracts.
- **Insurers, loss adjusters and professional advisers:** when we handle a claim or dispute.
- **Police, courts and regulators:** when the law requires it or we must protect rights, property or safety.
- **A buyer of the business:** if we sell or restructure the company, under suitable safeguards.

If a neighbour or nominated person takes a parcel on your behalf, they will see that an item was addressed to your property. We only use that option where it has been authorised or is part of the service the customer booked.

7. How long we keep information

We keep personal information only as long as we need it for the purpose, including claims, accounting and legal duties. Typical periods are:

Information	Typical period	Why we keep it
Tracking history, scans, signature and POD photo	13 months after delivery	Queries and the usual claims window
Customer account and invoices	6 years after the relevant accounting year	Tax and legal claims
Complaint, loss and damage files	6 years after the file is closed (longer if a claim is active)	Legal claims
Depot CCTV with no incident	30 days	Security
Website enquiry with no account	12 months after last contact	Follow-up and service improvement
Marketing opt-out / suppression	Until you ask us to remove it, or it is no longer needed	So we do not contact you again

When the period ends we delete, anonymise or securely destroy the information. A customer contract may set a different period for data we hold as their processor.

8. Your rights

Under UK GDPR you have the right to:

- **Access:** ask for a copy of the personal information we hold about you.
- **Rectification:** ask us to correct inaccurate details, such as an address or phone number.
- **Erasure:** ask us to delete information where we no longer need it or we should not have it. We may refuse if we must keep it for a claim, account or legal duty.
- **Restriction:** ask us to limit how we use information while a challenge is sorted out.
- **Portability:** where the law allows, receive data you gave us in a reusable format.
- **Object:** object to processing based on legitimate interests. You can always object to direct marketing and we will stop.
- **Withdraw consent:** where we rely on consent, you can withdraw it at any time. This does not affect processing already carried out.

We will respond within one month, or let you know if we need more time for a complex request. We may need to check your identity. If we hold the data only as a processor for a business customer, we will pass your request to that customer and follow their instructions as the contract requires.

To use these rights, contact the Data Protection Lead using the details in section 1.

9. International transfers

Some of our suppliers host or support systems outside the United Kingdom. Where personal information is transferred to a country that the UK has not found adequate, we use an approved safeguard such as the UK International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, together with a transfer risk assessment where required.

10. Cookies and our website

Our website may use:

- Strictly necessary cookies, so the site works and stays secure.
- Analytics cookies, to understand how the site is used, only if you allow them.
- Preference or marketing cookies, only if you allow them.

When you first visit we will ask for your choice, except for cookies that are strictly necessary. You can change your mind through the cookie banner or your browser settings. Blocking some cookies may affect parts of the site.

11. Marketing

We may send existing customers information about similar services by email or SMS where PECR allows it, and we will always include a simple way to opt out. We will not send electronic marketing to individuals who have not bought from us unless they have consented. You can opt out at any time by using the link in the message or by contacting us. Service messages about a live delivery are not marketing and we need to send those to complete the job.

12. Children

Our services are not aimed at children. Parcels are sometimes delivered to households where children live. We do not knowingly collect children's data to market to them. Couriers must not photograph children. Age-restricted items will only be handed over in line with the customer's instructions and the law.

13. How we look after information

We use technical and organisational measures appropriate to the risk. These include access controls on scanning and office systems, instructions to couriers about manifests and handheld devices, contracts with our processors, and staff training. No method of transmission or storage is completely secure. Please keep tracking links and collection PINs to yourself.

14. Automated decisions

We use routing and scanning systems to plan work and record events. We do not make solely automated decisions about you that have a legal or similarly significant effect without a human being able to review them.

15. How to complain

If you are unhappy with how we have used your information, please contact the Data Protection Lead first so that we can put it right.

You also have the right to complain to the UK regulator:

- Information Commissioner's Office (ICO) — ico.org.uk
- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- Telephone: 0303 123 1113

16. Changes to this notice

We will update this Privacy Policy when our services, systems or the law change. The current version will be published on our website and is available on request. The "last updated" date is at the top of this document. If we make a change that significantly affects you, we will take reasonable steps to tell you.

17. Document control

This is the public-facing notice. Internal handling rules are set out in X2X-DPP-001 Data Protection Policy.

Version	Date	Author	Summary of change
1.0	8 Sep 2026	Data Protection Lead	First issued public privacy policy for X2X Courier.

If any part of this notice conflicts with current law, the law takes precedence. Please replace the placeholder company details, address, telephone number and email before you publish this notice.