



Data Processing Agreement (External)

Version: July 11th 2025 v3

Effective Date: Updated from original review

Organisation: Pick Pack Direct Ltd (PPd)

Company Number: 11816835

Registered Office: Suite 1 North Court, David Street Bridgend Industrial Estate CF31 3TP

1. Purpose

PPd provides ecommerce, warehousing, distribution, product listing and customer service functions for clients selling via online marketplaces.

PPd processes personal information only as required to fulfil contractual obligations and operational duties.

2. Definitions

- Personal Information: Any data relating to an identified or identifiable natural person (data subject).
- Processing: Any operation performed on personal information including collecting, storing, using, transferring, altering or deleting.

3. Duration

This agreement remains in force until replaced or updated. Processing continues only for as long as necessary to fulfil contractual purpose or legal requirements.

4. Processing Activities

4.1 PPd acts as a Data Processor or Sub-Processor depending on client structure.

4.2 PPd processes personal information strictly in accordance with written contractual instructions.

4.3 Information processed may include customer names, delivery addresses, telephone numbers and email addresses.

4.4 Processing is carried out in compliance with all applicable UK data protection laws.

4.5 All PPd personnel are contractually bound to keep data secure and confidential.

4.6 When lawfully requested, PPd will delete or return all personal information once processing is complete, unless retention is required by law.

5. Disclosure

5.1 PPd does not disclose personal information except when:

- Required to fulfil contractual obligations (for example, providing details to delivery partners).
- Required by law or regulatory authority.

5.2 If PPd receives a request for disclosure from law enforcement or any authority, PPd will notify the data source unless legally prohibited.

5.3 If PPd receives a data subject request (access, erasure, objection, etc.), PPd will notify the data source unless prohibited by law.

6. Security Measures

PPd maintains appropriate technical and organisational measures to protect personal information from accidental or unlawful access, loss, destruction or disclosure.

Security measures include encryption, restricted access controls and industry-standard operational safeguards.

7. Breach Notification

If PPd becomes aware of a security incident affecting personal information, PPd will:

1. Notify the data source without undue delay.
2. Investigate and provide relevant details as they become available.
3. Take immediate steps to contain, mitigate and prevent further incidents.

8. Subcontractors

PPd does not market using personal information.

Data is shared only with authorised delivery partners (Royal Mail or approved couriers). These partners must maintain privacy policies that meet or exceed PPd standards.

9. International Transfers

PPd only transfers personal information outside the UK or EU where:

- Adequate safeguards such as Standard Contractual Clauses are in place.
- Regular reviews and checks are performed to maintain compliance.