

# UNISEND EESTI OÜ

## PRIVACY NOTICE TO CUSTOMERS

This Privacy Notice was last updated on 25-04-2025

### I. GENERAL PROVISIONS

1. This Privacy Notice provides basic information about the processing of your personal data<sup>1</sup> when you use the services of Unisend Eesti OÜ and the my.unisend.ee parcel self-service system (hereinafter – the Self-Service).
2. Information about the processing of personal data can also be provided in service provision contracts, other documents related to the services provided or activities carried out, and on the website [unisend.ee](https://unisend.ee).
3. Read about the cookies used on our websites in the Cookie Usage Rules, which are published at [unisend.ee](https://unisend.ee) and [my.unisend.ee](https://my.unisend.ee).
4. **PLEASE NOTE**, that the Privacy Notice can be changed, supplemented, updated at any time. We will inform you about the major corrections made in a separate message on the website [unisend.ee](https://unisend.ee) and/or in other ways. If you continue to use our services after the changes made, we will consider that you confirm that you got acquainted with the changes, additions, updates made. We invite you to review the Privacy Notice regularly.

### II. CONTACT INFORMATION

5. Controller of personal data – Unisend Eesti OÜ, legal entity code 16870306, address Vesivärava tn 50-301, 10152, Tallinn, Eesti, e-mail [info@unisend.ee](mailto:info@unisend.ee) (hereinafter – the Company),
6. For personal data processing issues and for the exercise of your rights (Privacy Notice section “VII. Your Rights”) or other requests regarding the processing of your personal data, please contact us by e-mail [dataprotection@unisend.ee](mailto:dataprotection@unisend.ee).

### III. SERVICES AND RELATED PROCESSING OF PERSONAL DATA

PURPOSE	LEGAL BASIS	EXAMPLES OF PROCESSED PERSONAL DATA	TERM
<b>Provision of parcel delivery and storage services (by placing an order at the parcel locker)</b>			
Provision of parcel delivery and storage services	Execution of the contract and fulfillment of the legal requirements applicable to the service provider	Name and surname of the sender and receiver of the parcel, registration number of the parcel, phone number, e-mail address (when provided by the sender); Service billing information: the last four digits of the payment card.	18 months after the last action with the parcel
<b>Provision of parcel delivery and storage services (when creating an order at my.unisend.ee self-service)</b>			
Registration in the Self-Service	Execution of the contract	Name, surname, address (e.g. country, city, street, postal code), phone number, e-mail address, password of the customer creating a self-service account.	During the validity of the account and 18 months after the account is closed.

<sup>1</sup> Personal data processing is a term used in personal data protection that refers to actions with personal data. The GDPR defines this term as follows: “data processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction”.

Self-service account administration	Execution of the contract	General settings for the provision of services in the Self-Service (e.g. selection of a specific sender as the main sender); Notifications and personal data provided in them (if provided).	During the validity of the account and 18 months after the account is closed
Provision of parcel delivery and storage services to the Self-Service customers	Execution of the contract and fulfillment of the legal requirements applicable to the service provider	Personal data contained in the address book (senders, personal data – name, surname, address, postal code, phone number, e-mail address), address directories; Sending history (orders of prepared parcels, labels of formed parcels, order numbers, order submission, execution, delivery data, as well as information about the parcel (number, size, type), as well as ordered service, additionally ordered service, list of parcels); VAT invoices for paid parcel orders and the information contained in them, including the personal identification number, if the customer needs it in the VAT invoice and therefore the customer provides it themselves; Other data that the Self-Service customer has entered into their account;	18 months from the creation of the parcel in the Self-Service. Self-service displays the data of the last 6 months. The labels of the formed parcels are stored in the Self-Service until the parcel is accepted
Provision of parcel delivery and storage services in the Self-service to a customer without an account (providing services without registration)	Execution of the contract and fulfillment of the legal requirements applicable to the service provider	Name, surname, phone number, e-mail address of the sender who does not have an account in the Self-Service; Receiver's name, city, parcel locker, phone number and/or e-mail address;	18 months after the parcel was created in the Self-Service

**WE DRAW YOUR ATTENTION TO THE FACT** that according to the Rules of Use of the Self-Service, when you submit a service order in the Self-Service, you confirm that the aforementioned rules become a contract concluded between you and the Company and are a binding legal document for the parties. Accordingly, the table above and elsewhere in this Privacy Notice indicate which personal data is processed on the basis of the execution of the contract. If you do not provide personal data, which must be processed on the basis of the execution of the contract, we will not be able to provide you with services through the Self-Service.

#### **Conclusion and execution of contracts with business customers**

Conclusion and execution of contracts with business customers	Execution of the contract	Name, surname, personal identification number, address, business license/individual activity certificate number, phone number, e-mail address, bank account number of the company's customer – natural person; Name, surname, position, personal identification number or date of birth of the company's customer – the representative of the legal entity (in cases where the authorization to	10 years after the moment of termination of the contract
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		represent the legal entity is provided);	
<b>Direct marketing</b>			
Direct marketing (e.g. advertisement, request for opinions about services, newsletters, etc.)	Consent	Name, e-mail address, phone number, time and date of giving consent, fact, date and time of withdrawal of consent	The period of validity of the consent (i. e. the period of validity of the Self-Service Account or 60 months from the date of consent if consent was given not in the Self-Service (e.g. when subscribing to the newsletter on the Company's websites, etc.) or another period specified in the consent itself, unless the consent is withdrawn earlier – then until the moment of consent withdrawal), and for the purposes of ensuring accountability and handling disputes – 18 months after the expiration of the consent.
<p><b>CONSENT TO AND WITHDRAWAL OF DIRECT MARKETING</b></p> <p>You have the right to withhold consent to direct marketing without suffering any adverse consequences, and once you have consented, you can adjust your consent (withdraw or re-consent) by changing the consent settings in your Self-Service.</p> <p>You can also withdraw your consent to direct marketing in a direct marketing e-mail sent by the Company by clicking the “Unsubscribe” link in the e-mail.</p> <p><b>PLEASE NOTE</b> that, regardless of whether you have given consent for direct marketing, the Company may in certain cases send you a message directly related to the provision of services and this will not be considered direct marketing. For example, notification of major disruptions in the provision of services (delayed delivery of parcels, etc.), changes to the rules of provision of services (new rules for packaging parcels, etc.).</p>			
<b>Image data processing</b>			
Health and property protection of the company, employees, customers, partners and third parties and prevention of illegal acts	Legitimate interest in protecting persons and property	Image data of natural persons who used the company’s parcel self-service terminals	No longer than 60 calendar days

<b>Processing a request, claim, inquiry or other application</b> (including those submitted by e-mail, social networks, through our website, through the virtual assistant)			
For the purpose of examining and responding to a request, claim, inquiry or other application	The legal basis depends on the content, in some cases it is a legitimate interest to answer the questions asked, in other cases it is the fulfillment of legal requirements (e.g. when we are obliged to investigate claims regarding the provision of services) or the execution of a contract that includes pre-contractual relations (e.g. when you request submit a proposal for the conclusion of the contract)	Name, surname, address, e-mail address and other data you provided in your request, claim, inquiry or other application, as well as the company's response to you	Depending on the content of the request, but no longer than 3 years from the submission of the company's response
<b>Recording of the conversation when calling the Contact Center</b>			
Quality assurance of services	Legitimate interest in ensuring the quality of services	Caller's voice, phone number, selected conversation topic, conversation recording, call date, duration and personal data provided during the call, evaluation of the conversation after the conversation	6 months
<b>Additional relevant information:</b> we inform you about the recording of the conversation before the conversation and provide information related to the processing of personal data.			
<b>Defense of the company's rights and legitimate interests</b>			
Defense of the company's rights and legitimate interests (e.g. filing a lawsuit, debt collection, etc.)	Legitimate interest to protect the rights and interests of the Company	Personal data specified in a procedural or other document for the protection of rights and legitimate interests: name, surname, personal identification number/date of birth, address, contact data (e.g. e-mail address/phone number, in cases where it is known), circumstances related to a specific procedural document	Until the decision of the responsible authority is fully implemented

7. **The Company does not process special categories of personal data of customers or other data subjects described in this Privacy Notice** that reveal racial or ethnic origin, political views, religious or philosophical beliefs, membership in trade unions, health data or data about sex life or sexual orientation.
8. We remind you not to send exclusively private, personal information unrelated to the provision of the Company's services and ongoing activities to the Company's employees by e-mail, because in certain cases, for example, in order to ensure the continuity of the Company's activities after termination of employment, automatic temporary electronic forwarding of letters to another employee may be carried out.

#### IV. SOURCES OF YOUR PERSONAL DATA

9. When providing services, the company usually receives personal data directly from the customer (for example, when the customer provides personal data using the company's services, self-service, calling the company by phone and other methods).
10. **PLEASE NOTE** that when providing parcel delivery services, the Company receives the personal data of the receiver of the parcel from the sender of the parcel. These data are necessary for the proper provision of the service. In addition to these specific cases, the Company may also receive personal data from other entities, such as the Company's customers (natural persons and legal entities, including other service providers who use the Company's network), to whom the Company provides services.
11. Personal data (e-mail and username) can also be provided by *Google* and/or *Facebook*, if the Self-Service customer chooses to connect to the Self-Service through a *Google* and/or *Facebook* account.
12. When it is necessary for the services provided by the Company or for the Company's operations, the Company may receive data from registers or databases (for example, to check the accuracy of the data, to update the data).
13. The Company may receive personal data from other data controllers, such as payment service providers, state institutions and bodies (for example, law enforcement institutions, tax administration, financial market, postal service providers, customs of the Republic of Lithuania, bailiffs, notaries), as well as courts and non-judicial dispute resolution institutions.
14. The list of data sources in this section is not exhaustive.

## **V. RECEIVERS OF YOUR PERSONAL DATA AND PLACE OF DATA PROCESSING**

15. Using services provided by third parties, for the proper provision of which it is necessary to provide access to the customer's personal data, the Company may transfer your personal data in accordance with the requirements of the responsible authorities to:
- 15.1. Parcel collection and delivery service providers,
  - 15.2. Providers of databases and their administration services, providers of data centers, hosting and cloud services,
  - 15.3. Providers of direct marketing, customer opinion surveys, online activity analytics services, online advertising service providers (e.g. Google, Facebook – in cases where you agree to use advertising (marketing) cookies of these organizations, to the extent provided in the cookie bar), market research or business analytics services providers,
  - 15.4. Contact center/customer service providers,
  - 15.5. Service providers providing accounting services,
  - 15.6. Service providers providing legal and/or audit services,
  - 15.7. Debt collection service providers,
  - 15.8. Companies of the Lietuvos paštas Group,
  - 15.9. Payment service providers, if you seek to pay for services provided by the company (e.g. you use the Company's Self-Service);
  - 15.10. State institutions and authorities performing the functions assigned to them by legal acts (for example, law enforcement institutions, tax administration institutions, customs, bailiffs, notaries, etc.), as well as courts and institutions for handling out-of-court disputes;
  - 15.11. As well as to other persons who help the Company fulfill your orders.
16. Usually, we process personal data within the territory of the European Economic Area, but in certain cases it may be processed and transferred outside of it (e.g. Google, Facebook – in cases where you agree to use advertising (marketing) cookies of these organizations, to the extent specified in the cookie bar, or when administering a Facebook social network account), when the protection measures provided for in legislation are implemented, for example, a contract has been concluded that includes standard conditions adopted by the EU Commission, or the data is processed in a country that is not part of the EEA, but a sufficient level of personal data protection is ensured by the decision of the EU Commission.

## **VI. PERSONAL DATA PROCESSING TERM**

17. The Privacy Notice contains basic information about personal data processed by the Company and the terms of their processing.

18. The Company defines and determines the period of personal data processing taking into account the requirements of legal acts, the nature of the contracts concluded with the customer, the Company's legitimate interest, including, but not limited to, the interest in processing personal data due to a possible claim, lawsuit or other claim statement, as well as taking into account other legal grounds.
19. **PLEASE NOTE** that personal data may be stored for longer than specified in the Privacy Notice only when:
  - 19.1. There are reasonable suspicions of an illegal act, which is the subject of an investigation;
  - 19.2. Your data is necessary for the proper examination, resolution and, if necessary, submission and execution of a dispute, claim;
  - 19.3. It is necessary for backup copies and other purposes related to the operation and maintenance of information systems or similar;
  - 19.4. It is necessary in the presence of other grounds, conditions or cases provided for in legal acts.

## **VII. YOUR RIGHTS**

20. You have the following rights:
  - 20.1. To receive information about the processing of your personal data;
  - 20.2. To get acquainted with your personal data processed by the Company;
  - 20.3. To require the Company to correct incorrect, inaccurate or incomplete personal data about you;
  - 20.4. To restrict the processing of your personal data;
  - 20.5. To require the Company to delete your personal data;
  - 20.6. To require the Company to transfer your personal data;
  - 20.7. To withdraw your consent, without affecting the processing of your personal data carried out before the withdrawal of the consent;
  - 20.8. To object to the processing of your personal data if they are processed on the basis of legitimate interest, except in cases where there are legitimate reasons for such processing or in order to assert, fulfill or defend legal claims;
  - 20.9. To submit a complaint to the Estonian supervisory authority – Andmekaitse Inspektsioon (more information on the Internet at <https://www.aki.ee> or at the address Tatari 39, Tallinn 10134, Estonia or by e-mail at [info@aki.ee](mailto:info@aki.ee)). Before submitting a complaint to the supervisory authority, we recommend that you contact the Company using the contacts specified in the "Contact Information" section of this notice in order to find a suitable solution to your issue.

## **VIII. EXERCISE OF YOUR RIGHTS**

21. You can submit a request for the exercise of the above-mentioned rights:
  - 21.1. By sending a request signed with an electronic signature to the e-mail address [dataprotection@unisend.ee](mailto:dataprotection@unisend.ee).
  - 21.2. By mail, together with a notarized copy of your personal identity document, by sending to the address of the Company's registered office, specified in the "Contact Information" section of this notice.
22. After receiving your request, we may ask you to clarify it, provide additional information so that we can properly identify you and provide you with an answer, or determine another method of identification suitable for your case.
23. The Company has the right to refuse to provide the information requested by you, if the request is unfounded, disproportionate, as well as in other cases established by legal acts.
24. We will provide the answer to your request no later than within 1 (one) month from the date of receipt of the request that meets the content requirements. In exceptional cases, we can extend this deadline for another 2 (two) months, after notifying you and indicating specific circumstances.

## **IX. DATA SECURITY AND RECOMMENDATIONS FOR YOU**

25. We implement the necessary technical and organizational security measures to ensure that the information provided by customers is properly protected against loss, unauthorized use, unauthorized access, disclosure or alteration.
26. **PLEASE NOTE** the following minimum personal data protection measures that you can also use:
  - 26.1. Regularly install security updates on your device;

- 26.2. Install and use constantly updated anti-virus software on your device;
- 26.3. Do not disclose login data to the Self-Service to third parties;
- 26.4. Use a strong password for connecting to the Self-Service (for example, the password must consist of at least 8 characters, using upper and lower case letters, numbers and not using easily predictable words or numbers) and change it at least every 6 months;
- 26.5. Avoid using the same password on different websites/platforms/systems.