

TradeGate Privacy Notice

This privacy notice sets out how InPost Response processes and safeguards your personal data. This notice applies to our services, our customer [portal](#) (TradeGate), B2B electronic marketing communications and service emails (“Services”).

InPost Response are committed to ensuring that your privacy is protected. This notice explains the types of personal data we process, the categories of data subjects to whom data belongs and how and why we process your personal data. The integrity of your personal data is paramount importance to our business, and we are committed to keeping it secure.

WHO WE ARE

InPost Response Limited is a company registered in the United Kingdom with registration number 01471252. Our registered address is at Moray House, 23-35 Great Titchfield Street, London, W1W 7PA, United Kingdom. For the purposes of data protection law, we will be a Controller of your personal data. This means we make decisions about how and why your personal data is processed and have a duty to maintain the integrity and security of your data and ensure your privacy rights are protected.

TYPES OF PERSONAL DATA

TradeGate is an online customer portal that allows travel agents and home workers to order, vie and download brochures. The portal serves as a centralised database accessible to registered travel agents. Depending on our relationship with you, we may collect various types of personal data in order for us to deliver our services. This includes:

Information provided by you:

- Full Name;
- Company name;
- Job title;
- ABTA or IATA numbers;
- Business email address, phone number and company/branch address;
- Information you provide relating to an enquiry or message you send to us;
- Account data where you have an account on our customer portal (such as TradeGate). This includes your username, delivery preferences, orders placed and pending deliveries, brochures downloaded, search queries and order history;
- B2B marketing data such as unsubscribes, resubscribes and any other marketing instructions;
- Any information included by you when taking part in a customer survey; and
- Entry into any B2B prize draws facilitated by InPost Response.

Information provided by other means:

If you post on one of our social media pages, we may read and/or respond to your post and we may collect personal information such as your full name (as appears on the social media post), the nature and content of the post and which country and city it came from.

Information we collect automatically:

- (Where non-essential cookies are accepted) **Technical Data:** Information about the device you are using to access our website, including the Internet Protocol (IP) address used to connect your device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- (Where non-essential cookies are accepted) **Analytical Data:** Information about your visit to our website and portal, including services you viewed or searched for; page response times, download errors, length and frequency of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs);
- Any phone number used to call our agent helpline.

HOW WE USE YOUR INFORMATION

We process your personal data for specific purposes only, and only where we have identified an appropriate lawful basis to do so. These lawful bases, set by the UK General Data Protection Regulations (“UK GDPR”) and the Data Protection Act 2018, include but are not limited to:

- **Contractual Necessity:** Where the processing is necessary for the performance of a contract which we have entered into with your business. This also includes data processed during the negotiation of a contract that we intend to enter into.
- **Consent:** Where you, the data subject, has freely given your consent to the processing of your personal data. InPost Response will rely on consent as our lawful basis only in limited circumstances, such as our use of non-essential cookies and tracking technologies.
- **Legal Obligation:** Where the processing is necessary for us to comply with a legal obligation to which our business is subject;
- **Legitimate Interests:** Where the processing is necessary for the purposes of the legitimate interests pursued by InPost Response, or those of a third party, except where such interests are overridden by the interests, rights and freedoms of the data subject.

In any event, we will only use your information for the purpose or purposes for which it was originally collected, and where there is a legitimate basis for doing so.

We may use your personal information in the following ways:

- To provide you with the information, products and services that you/your business requests from us;
- To create and facilitate your access to our customer portal, TradeGate;
- To provide you with information about our services, and the services of our third-party tour operator partners, that we believe may be of interest and relevance to your business and industry, based on services you have requested in the past, unless you have opted out of marketing communications;
- Where you choose to enter a prize draw or competition hosted by InPost Response, we will process your name, email address, ABTA number and any other information required for entry to facilitate and record your prize draw or competition entry.

- To manage our relationship with you, for example, to send you service updates and to notify you about material changes to our services, our terms and conditions, this privacy notice, our cookie notice and access to our customer portal;
- To ensure that content from our site is presented in the most effective manner for you and the device you are using;
- To administer our site and internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes as further explained below;
- To detect and prevent fraud and related activities, and protect our business' interests;
- We may record inbound and outbound calls to our customer service line for training and quality assurance purposes.
- To collect evidence and supported documentation for the purposes of defending legal claims;
- To deploy cookies and similar tracking technologies on your device which are essential to deliver our online services. We rely on the functionality of these essential cookies to make our website and portal function as intended, therefore these cookies cannot be 'rejected';
- Where agreed, to deploy cookies and similar tracking technologies that are non-essential to our services and may support our marketing and analytical efforts. For example, to serve targeted advertising and content recommendations based on your usage of our services or by determining your approximate location on a country and city level;
- To measure or understand the effectiveness of our communication (both on and offline)

COOKIES

Our website may use "cookies" and other tracking technologies to enhance your experience and enable certain website functionality. To learn about the cookies we use, please visit our Cookie Policy.

SHARING PERSONAL DATA

We may share your personal information as strictly necessary to provide our products and services to you.

We may share your information with analytics, communications and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information to third parties in certain circumstances, such as:

- Where necessary, we may share your name and delivery address with our delivery partners to ensure your requested items are delivered as instructed;
- Where we use third party IT tools and services to store our customer data (e.g. CRM systems, databases, email marketing platforms). These third parties are only permitted to process shared personal data under our strict instructions and in line with applicable data protection laws.
- Where we sell or buy any company or business/assets or enter into a joint venture, we may need to disclose your personal information to the prospective seller or buyer of such business or assets or to our business partner in a joint venture business;
- Where sub-contractors are engaged to perform services to be provided under a contract between you or a party you represent and InPost Response;

- Where we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and/or other agreements;
- To protect the rights, property, or safety of InPost Response, our customers, or others. This includes company insurers and company appointed solicitors as required and necessary to defend legal claims impacting the business.

LEGITIMATE INTERESTS

We may commonly rely on legitimate interests as a lawful basis to process your personal information, provided that your interests do not override our own. This also includes where we are pursuing the legitimate interests of a third party.

Examples of processing conducted in pursuit of our legitimate interests (or the interests of a third party) include:

- to understand how our website and other services are used;
- to administer and protect our business and web presence (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting);
- to manage our relationship with you, including sending you service messages, notifications of material changes to terms and notices, to reset your account password, to respond to any comment or query submitted by you;
- To issue customer surveys and gather responses;
- To improve and develop our service user experience;
- To engage with you on social media; and
- To deliver B2B electronic marketing communications to you about our services, and services of our third-party partners, that are of interest to you and your industry. You can unsubscribe from B2B marketing communications at any time. More information below.

STORAGE OF PERSONAL DATA

In line with the storage principle laid down by the UK GDPR, InPost Response are committed to retaining store personal data for the shortest duration possible to achieve our purposes. We regularly review the information we are holding and delete that which is no longer necessary.

TRANSFERRING PERSONAL DATA

The personal data that we hold about you may be processed in or transferred to a destination outside the UK in limited circumstances. For example, your data may be processed by our trusted suppliers acting as data processors where they operate outside of the UK. Whenever we transfer your personal data out of the UK, adequate protections are afforded to it by ensuring that at least one of these appropriate safeguards are in place:

- Where the destination country has been granted an adequacy decision from the UK Government, or the destination country offers adequate or exceeding levels of protection for Personal Data as the UK, such as EU member states or members of the European Economic Area.
- Where we transfer personal data to certain service providers located in other countries, (i) we will assess whether that country offers protections for personal data which are essentially equivalent to those offered in the UK; and (ii) we will use specific contractual

terms to give personal data appropriate safeguards (e.g., UK International Data Transfer Agreement).

For further information regarding the transfers of your personal information outside of the UK, please contact us at datateam@inpost.co.uk.

SECURITY OF PERSONAL DATA

The security of your personal data is of vital importance to our business. We have embedded technical and organisational security measures into our business practices and infrastructure to protect the personal data we process. Our controls are in place to protect your personal data from unauthorised access or disclosure, improper use, alteration, unlawful or accidental destruction or loss and theft.

We ensure that your personal information is transmitted securely using secure server technology to ensure that your personal and transactional data is protected to the highest standards. InPost Response stores personal data in secure on-premises data centres. Where we have given you (or where you have chosen) a password which enables you to access our customer portal (TradeGate), you are responsible for keeping this password confidential. We ask you not to share a password with anyone and to inform us without delay if you believe that your password has been compromised.

Any party, including InPost Response's employees, contractors and third-party suppliers in their capacity as data processors, are subject to confidentiality provisions in contractual agreements, as well as various company policies, procedures, and controls, and will only process personal data under our strict instructions. Access to personal data stored on our systems is strictly limited to individuals (employees, contractors, suppliers) who undoubtedly require access to perform their duties in delivering the services.

B2B MARKETING

We may send electronic marketing communications to you as a business-to-business contact, including travel agents, under the lawful basis of legitimate interests. This includes promotional content about our services and relevant third-party offers from our tour operator partners. We carefully consider the impact of our marketing activities and ensure they are relevant and proportionate. You have the right to unsubscribe ("opt out") of B2B marketing communications at any time. If you wish to opt out, you can do so by clicking the "unsubscribe" link in the footer of any marketing email we send, or by contacting us directly using the details below. We will process your request promptly and ensure that you no longer receive marketing messages unless you choose to re-subscribe in the future.

Our website may, from time to time, contain links to third party websites. If you follow a link to any of these websites, please note that InPost Response has no control over third party websites, which will have their own privacy and cookie policies. We do not accept any responsibility or liability for these policies. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Notice. Please check these policies before you submit any personal data to the websites in question.

YOUR RIGHTS

Under UK Data Protection Laws, you have the following rights over the way InPost Response uses your information:

- **Right to object:** you have the right to object to your data being processed in certain circumstances, for example, for B2B marketing purposes;
- **Right to erasure:** also known as the “right to be forgotten”, enables you to request deletion or removal of your personal data where there is no necessary reason for us to continue to process it. However, this is not an absolute right, and we may not be able to comply with your request for legal reasons, which will be explained to you at the time of your request, where applicable.
- **Right to restrict processing:** the right to restrict how your personal information is used or request suppression of your data in certain circumstances;
- **Right to data portability:** allows individuals to obtain and reuse their personal data for their own purposes across different services.
- **Rights related to automated individual decision-making and profiling:** You have the right not to be subject to a decision based solely on automated processing, including profiling.
- **Withdraw consent:** Where we are relying on your consent to process your personal data, you have the right to withdraw consent at any time. This does not apply to processing activities that do not require consent, nor does it impact the lawfulness of processing carried out before you withdraw consent.
- **Right to rectification:** the right to have inaccurate data rectified or completed if incomplete.
- **Right of access (Subject Access Request):** the right to receive confirmation as to whether or not we are processing your personal data and, if we do, to obtain a copy of it (subject to exemptions).

If you wish to exercise any of your rights, you can do this at any time by emailing us at datateam@inpost.co.uk, by calling us on 01233 515 072 or by writing to our Data Protection Officer at InPost Response Ltd, Verdant, 2 Redheughs Rigg, South Gyle, Edinburgh EH12 9DQ.

Please note that before we can begin to fulfil a data subject rights request, we may need to request certain information from you to help us verify your identity or the authority of any third party acting on your behalf. This is a protective measure to ensure that your personal data is not disclosed to any third party without your approval. Please note that any ID submitted will solely be processed for the purposes of verifying your identity. We may ask you to provide other details to assist us in fulfilling your request, such as clarification on the particulars of your request.

If you believe that our processing of your personal information is contrary to data protection law, please contact us using the details below in the first instance. You are also entitled to lodge a complaint with the Information Commissioner’s Office, the UK supervisory authority for data protection issues. Details of how to do this may be found at www.ico.org.uk.

CHANGES TO THIS PRIVACY NOTICE

We may update this notice from time-to-time to ensure that it accurately reflects our data processing activities or changes to data protection laws and regulation. Any new version of this Privacy Notice will be considered to be valid at the time of posting on our [website](#). Please check this page regularly for any updates or changes.

CONTACTS

If you have any questions about our privacy notice or how we use your personal information, please contact us datateam@inpost.co.uk or alternatively send a signed letter addressed to:

FAO: Data Protection Officer

InPost Response Limited,

Verdant, 2 Redheughs Rigg,

South Gyle, Edinburgh, EH12 9DQ, United Kingdom

This notice was last updated in June 2025.