Privacy Notice

D.M.G. Ventures Ltd (trading as ParcelPlanet) | Last updated: September 2026

This Privacy Notice explains how D.M.G. Ventures Ltd (trading as ParcelPlanet) collects, uses, and protects your personal data when you visit our website, contact us, or engage with our services. We are committed to handling your data lawfully, transparently, and in accordance with the General Data Protection Regulation (GDPR) and Irish data protection law.

1. Who We Are

The data controller for your personal data is:

D.M.G. Ventures Ltd (trading as ParcelPlanet), registered in Ireland

Email: customerservice@parcelplanet.com | Data protection queries: dataprotection@parcelplanet.com | Website: www.parcelplanet.com

If you have any questions about how we use your personal data, or wish to exercise any of your rights, please contact us at the address above.

2. What Personal Data We Collect

The personal data we collect depends on how you interact with us. This may include:

- **Contact and enquiry data —** name, email address, phone number, company name, and any information you provide when you contact us or request a quote
- **Client relationship data —** contact details of individuals at client companies with whom we have or are forming a business relationship
- **Website usage data —** IP address, browser type, pages visited, and other technical information collected automatically when you use our website
- **Communication data —** records of emails, phone calls, and other communications between you and ParcelPlanet
- **Customer service interaction data —** queries, messages, and any personal data you provide when contacting us via our AI-assisted customer service tool

A note on fulfilment data: When ParcelPlanet processes orders on behalf of our clients, we handle delivery data (such as customer names and addresses) in our capacity as a data processor acting on our clients' instructions. In this capacity, our clients are the data controllers and their own privacy notices apply to their customers. This Privacy Notice covers our role as a data controller only.

3. Why We Process Your Data and the Legal Basis

We process personal data only where we have a lawful basis to do so under Article 6 of the GDPR. The sections below set out each purpose, the data involved, the legal basis, and how long we keep it.

3.1 Responding to enquiries and providing support

- **Data collected:** name, email, phone number, company, and any information you provide
- **Legal basis:** Legitimate interests — to communicate with you and respond to your request
- **Retention:** 5 years from the date of your enquiry

3.2 Providing our logistics and fulfilment services

- **Data collected:** client contact details, contractual information, billing details
- **Legal basis:** Contract — necessary for the performance of our service agreement with you or your company

- **Retention:** Duration of the contract plus 6 years after termination

3.3 Fulfilling legal and financial obligations

- **Data collected:** name, company, invoicing and financial records
- **Legal basis:** Legal obligation — compliance with Irish tax, accounting, and commercial law
- **Retention:** 6 years in accordance with Irish Revenue requirements

3.4 Marketing communications

- **Data collected:** name, business email address, company name, job title and professional information
- **Legal basis:** Consent where you have actively opted in to receive marketing communications from us; or Legitimate Interests where we contact business representatives about services that may be relevant to their organisation in a professional capacity. Before relying on that basis, we assess and balance our legitimate business interests against the rights and freedoms of the individuals concerned.
- **Retention:** until you unsubscribe, object to processing, withdraw your consent (where applicable), or we determine that the information is no longer relevant for the purpose for which it was collected

You may opt out of receiving marketing communications at any time by using the unsubscribe link included in our emails, contacting us directly, or exercising your right to object to processing based on legitimate interests. We will promptly honour all valid opt-out requests.

3.5 Website analytics and cookies

- **Data collected:** IP address, browser type, pages visited, device information
- **Legal basis:** Consent (for non-essential cookies); Legitimate interests (for strictly necessary cookies)
- **Retention:** per our Cookie Policy

Please refer to our Cookie Policy for full details of cookies used on our website.

3.6 AI-assisted operations

ParcelPlanet uses an AI-assisted operations platform, provided by ARRX Ltd, to run and report on its business operations. Our business records are held on that platform — the processes we follow, the tasks and decisions that arise from them, our operational reporting, and the applications we use to run controls such as service level measurement, courier billing verification and regulatory documentation. We also use AI assistance in drafting and analysing internal communications and operational data.

Whose data this section covers.

This section concerns the personal data we hold as a data controller — principally the contact details of individuals at client, supplier and carrier companies, the login details of client users, and records relating to our own staff.

The names, addresses, telephone numbers and email addresses of our clients' own customers are a separate matter. That data is held in our warehouse management system, where we act as a processor on our clients' instructions and their own privacy notices apply. The operations platform is not a second home for it: the warehouse system remains the system of record, and the platform's applications do not keep their own copy. Where order information is shown to a client, the response from the warehouse system is held in a short-lived cache — a few minutes, with an expiry on each entry — and is then discarded. It is not retained as a record.

Free-text fields, such as a request a client raises with us or a note added to it, may occasionally contain a customer's details where the person writing has chosen to include them. We ask that such details are not included where they are not needed; any that are received are handled in accordance with this notice and are deleted with the record they sit in.

- **Data collected:** business and operational records held in our own systems, which may include the contact details of individuals at client, supplier and carrier companies; the content of communications with them; order and shipment references; and records of work allocated to our own staff.

- **Legal basis:** Legitimate interests — operating, controlling and improving our business efficiently, and maintaining an auditable record of the work we do. We have assessed our interests against the rights and freedoms of the individuals concerned, taking into account that the data is ordinary business contact and operational information rather than sensitive data, that access is restricted, and that an audit record of automated work exists precisely to protect the people it concerns. Where the processing is necessary to perform a contract with you or your company, Article 6(1)(b) applies instead.
- **Retention:** business and operational records are retained for the term of our agreement with the platform provider and are then returned to us or deleted. Records of AI processing, including prompts, outputs and audit records, are retained for 12 months, or deleted with the record they relate to if sooner. Application and access logs are retained for 30 days. Cached responses from our warehouse system expire within minutes and are not retained. Our own retention periods in this notice and in our Data Retention Policy apply to the underlying records wherever we hold them.

How the automation is controlled.

Some of this processing runs automatically on a schedule. Those automations read from our own business systems and produce operational output — a figure, an exception list, a draft. Where an automated process would result in a message being sent to a person outside ParcelPlanet, a member of our team approves that message before it is sent. No decision about an individual is made, or materially influenced, by automated means, and every automated run is recorded in an audit trail.

This platform operates under a Data Processing Agreement that prohibits the use of our data to train or improve AI models. The platform itself stores and organises our records and runs the automations; the artificial intelligence is supplied by Anthropic PBC (United States), which we connect on our own account and under our own agreement with Anthropic. Anthropic processes data under European Commission Standard Contractual Clauses and, where applicable, the UK International Data Transfer Addendum, does not use content to train its models, and does not retain content for its own purposes beyond limited security and abuse monitoring. The platform's own records are held on cloud infrastructure whose primary database is located in the United States, under the same Standard Contractual Clauses and Addendum, with encryption in transit and at rest.

3.7 AI-assisted customer service

- **Data collected:** the content of your query or message, any personal data you provide during the interaction (such as order reference numbers or contact details), and interaction metadata (date, time, and query type).
- **Legal basis:** Contract performance (Article 6(1)(b) GDPR) — processing is necessary to deliver the customer service you have requested as part of our service offering; and Legitimate interests — to provide efficient and responsive customer service.
- **Retention:** Interaction content is processed by Attune (ARRX Ltd) and stored on Google Cloud infrastructure for up to 12 months, then deleted. The primary database is located in the United States (Google Cloud's nam5 multi-region), and that transfer is made under European Commission Standard Contractual Clauses and, where applicable, the UK International Data Transfer Addendum, with encryption in transit and at rest. Content submitted to OpenAI (Attune's model provider) is not retained by OpenAI for its own purposes; OpenAI may hold API content for up to 30 days for abuse monitoring only, then deleted.

ParcelPlanet uses an AI-powered customer service assistant provided by Attune (ARRX Ltd, Bath, UK), operating under a Data Processing Agreement that prohibits the use of your data for AI model training. You will be informed at the start of every interaction that you are communicating with an AI assistant.

The assistant operates in two modes. In information mode, the agent drafts a response which a member of our team reviews and sends on our behalf. In action mode, for a defined set of low-risk, factual query categories (such as order status confirmations and standard delivery queries) where Attune's confidence threshold is met, a reply is sent automatically on our behalf without prior human review. ParcelPlanet has assessed these interactions against Article 22 GDPR and considers that they do not normally produce legal or similarly significant effects on individuals. We nonetheless maintain the following safeguards: you are informed at the outset that you are communicating with an AI agent; you may request escalation to a human agent at any time; and any query that does not match a defined category, or falls below the confidence threshold, is automatically transferred to a member of our team.

4. Who We Share Your Data With

We share personal data only where necessary and with appropriate safeguards in place. Recipients may include:

- **IT and software providers —** including our Warehouse Management System (WMS), CRM, and accounting platforms, which process data on our behalf under Data Processing Agreements
- **AI tool providers —** we use approved AI-assisted tools for both internal operational purposes and customer service. Our customer-facing AI assistant, and the AI-assisted operations platform on which we run our business records and controls, are both provided by ARRX Ltd (Bath, UK). ARRX's sub-processors include Google Cloud (hosting, database and storage for both services, with the primary databases located in the United States under EU Standard Contractual Clauses and the UK Addendum) and Cloudflare (USA and UK, under the same safeguards) for the runtime and storage of applications built for us. Large language model processing for the operations platform is carried out by Anthropic PBC (United States), and for the customer service assistant by OpenAI (United States), in each case operating under EU Standard Contractual Clauses and, where applicable, the UK International Data Transfer Addendum. Anthropic is connected on our own account and under our own agreement with Anthropic. All AI tool providers operate under Data Processing Agreements and do not use our data for AI model training. A current list of these providers is available on request.
- **Logistics and carrier partners —** carrier and shipping providers involved in the fulfilment of orders on behalf of our clients
- **Professional advisers —** legal, accountancy, and other professional services where necessary
- **Public authorities —** where required by law, court order, or regulatory obligation

We do not sell your personal data to third parties.

5. International Data Transfers

Some of our technology providers are based outside the European Economic Area (EEA). Where personal data is transferred to countries not recognised as providing an adequate level of data protection, we ensure appropriate safeguards are in place, including:

- Standard Contractual Clauses (SCCs) approved by the European Commission for EU data
- UK International Data Transfer Agreements or Addenda for UK data

Details of the transfer mechanisms in place for specific providers are available on request by contacting us at the address in Section 1.

6. How We Protect Your Data

We implement appropriate technical and organisational measures to protect your personal data against unauthorised access, loss, or disclosure. These include:

- Encryption of data in transit and at rest
- Access controls restricting data to authorised personnel only
- Regular security assessments and audits
- Data Processing Agreements with all third-party processors
- Staff training on data protection obligations

No method of electronic transmission or storage is completely secure. While we take every reasonable precaution, we cannot guarantee absolute security.

7. How Long We Keep Your Data

We retain personal data only for as long as necessary for the purpose for which it was collected, or as required by law. Key retention periods are set out in Section 3 above and in our Data Retention Policy, which is available on our website.

When data is no longer required, it is securely deleted or anonymised in accordance with our data disposal procedures.

8. Your Rights

Under GDPR, you have the following rights in relation to your personal data:

- **Right of access —** to request a copy of the personal data we hold about you
- **Right to rectification —** to ask us to correct inaccurate or incomplete data
- **Right to erasure —** to ask us to delete your data where there is no longer a lawful basis for us to hold it
- **Right to restriction —** to ask us to restrict how we use your data in certain circumstances
- **Right to data portability —** to receive your data in a structured, commonly used, machine-readable format where processing is based on consent or contract
- **Right to object —** to object to processing based on legitimate interests, including direct marketing
- **Right not to be subject to automated decision-making —** our AI-assisted customer service tool operates in two modes depending on the nature of your query. In some cases, a member of our team reviews the AI's response before it is sent. For a defined set of low-risk, factual query types (such as order status confirmations and standard delivery queries), responses may be sent automatically without prior human review where our AI provider's confidence threshold is met. ParcelPlanet has assessed these interactions against Article 22 GDPR and considers that they do not normally produce legal or similarly significant effects. You may request human review of any response, object to automated processing, or escalate to a member of our team at any time. Separately, the AI-assisted processing we carry out internally (Section 3.6) produces operational output only: it makes no decision about any individual, and anything sent to a person outside ParcelPlanet is approved by a member of our team first.
- **Right to withdraw consent —** where processing is based on your consent, you may withdraw it at any time without affecting the lawfulness of prior processing

To exercise any of these rights, please email dataprotection@parcelplanet.com, or contact us using any of the details in Section 1. We will respond within 30 days. There is no charge for making a request.

9. Right to Complain

If you are unhappy with how we have handled your personal data, you have the right to lodge a complaint with the Irish Data Protection Commission (DPC):

Data Protection Commission, 21 Fitzwilliam Square South, Dublin 2, D02 RD28 | Tel: +353 (0)76 110 4800 | www.dataprotection.ie

If you are based in the UK, you may also contact the Information Commissioner's Office (ICO) at www.ico.org.uk.

We would, however, appreciate the opportunity to address your concerns before you contact the DPC or ICO. Please contact us first using the details in Section 1.

10. Updates to This Privacy Notice

We may update this Privacy Notice from time to time to reflect changes in our practices or legal requirements. When we make material changes, we will update the date at the top of this notice. We encourage you to review this notice periodically.

Your continued use of our website following any update constitutes your acknowledgement of the revised notice.