

Stannp Privacy and Cookies Policy

This is the Privacy & Cookies Policy (the "**Policy**") of Stannp Ltd; a company registered in England and Wales with company registration number 9086822 and with registered office at Unit 12 Taw Trade Park, Braunton Road, Barnstaple, Devon, England, EX31 1JZ (hereafter "**Stannp**", "**we**" or "**us**"). This Policy describes the ways in which Stannp collects and uses information about you when you use its website at stannp.com (the "**Website**") and/or use its service (the "**Platform**").

Stannp may change this Policy at any time and whilst it will tell you about what it feels are key changes to the Policy, please check it regularly to keep up-to-date. If you do not wish to accept the new Policy you should stop using the Service. If you continue to use the Service after the changes, your continued use of the Service shows us your agreement to be bound by the new Policy.

This Policy was last updated 13th March 2026.

1. ICO Registration and EU Representative

For the purposes of data protection legislation, Stannp is a **Data Controller** in relation to our own business operations, and a **Data Processor** when handling customer data through our Platform services. We are registered with the Information Commissioner's Office ("**ICO**") under registration number ZA134992.

If you are an EU Data Subject you can contact our EU Representative, Rune Peterson, at eurep@fifthsquare.eu. Our EU Representative complies with our obligations under GDPR Article 27 and is established in the Republic of Ireland. Please note that our EU Representative is a Third Party. They will process your personal data in accordance with this Privacy Policy.

2. Information We Collect and Use as a Data Controller

We collect and process the following information from you via the Platform:

Category of Data	What information do we collect?	When do we collect this?	How do we use this information?	Our reasons
Account and Contact Information	<ul style="list-style-type: none"> • First name • Last name • Email address • Address • Phone number • Company • Job title 	If you choose to sign up to the Platform and use the Service.	To create your account and allow you to access and use the Service thereafter.	<p>Contractual necessity: We require details of your full name, email address, address and company to create and administer your account, including to send you personalised system notifications, identify you at sign-in, for billing and other account administration purposes.</p> <p>Consent: You may elect to provide us details of your phone number, including if you wish to set up a two-step authentication verified by SMS for</p>

Document Name:	P-109	Version No:	3	Date:	13 th March 2026	Review Date:	13 th March 2027
-----------------------	-------	--------------------	---	--------------	-----------------------------	---------------------	-----------------------------



				<p>your account or if you sign up to our SMS delivery service.</p> <p>You may also elect to provide details of your job title to enable us to send you more personalised notifications, including for us to provide communications adapted to your role in your company.</p>
Account and Contact Information	<ul style="list-style-type: none"> • First name • Last name • Email address • Address • Phone number • Company • Job title 	If you choose to sign up to the Platform and use the Service.	To create your account and allow you to access and use the Service thereafter.	<p>Contractual necessity: We require details of your full name, email address, address and company to create and administer your account, including to send you personalised system notifications, identify you at sign-in, for billing and other account administration purposes.</p> <p>Consent: You may elect to provide us details of your phone number, including if you wish to set up a two-step authentication verified by SMS for your account or if you sign up to our SMS delivery service.</p> <p>You may also elect to provide details of your job title to enable us to send you more personalised notifications, including for us to provide communications adapted to your role in your company.</p>
Payment Information	<ul style="list-style-type: none"> • First name • Last name • Credit card details • Address 	When you top up your balance on your account or set up a subscription	To collect our fees	<p>Contractual necessity: We require these details to be able to collect our fees in relation to the Service provided to you.</p>
Payment Processing	<ul style="list-style-type: none"> • Payment card data • Billing address 	When you top up your balance or set up a subscription	To process payments securely via our payment gateway (Opayo / Elavon)	<p>Contractual necessity: Payment card data is transmitted to Opayo, our PCI DSS-certified payment processor, to fulfil your payment. We do not store full card details on our systems.</p>
Marketing and Communication Preferences	<ul style="list-style-type: none"> • First name • Last name • Email address • Address • Phone number 	If you choose to subscribe to marketing communications (whether by email, SMS or post (as applicable)) from Stannp or if we are otherwise permitted to	To send you marketing communications about our upcoming activities as well as other news and features relating to Stannp, including about	<p>Consent: We only send you marketing communications by either email, SMS or post (as you elect) where you have consented to receiving them, or if we are otherwise permitted to send them to you by law (e.g., by virtue of the soft opt-in). You can unsubscribe at any time by clicking the unsubscribe button in any marketing message sent to you or alternatively by toggling off the contact settings in the "how we can</p>

Document Name:	P-109	Version No:	3	Date:	13 th March 2026	Review Date:	13 th March 2027
-----------------------	-------	--------------------	---	--------------	-----------------------------	---------------------	-----------------------------



		send them to you by law.	services available from Stannp and its affiliates.	contact you" section of your account settings.
Marketing and Communication Preferences	Email address and name	When you register an account on the Platform	To send you relevant marketing communications about our services.	Legitimate interests: We have a legitimate interest in promoting our services to existing customers and reaching new prospective customers through marketing activities. The data used is limited in scope and your rights and freedoms are not outweighed by us using this data for this purpose. You have the right to object at any time by updating your marketing preferences within your account settings or by contacting privacy@stannp.com .
Information from Third Party Sources	<ul style="list-style-type: none"> • First name • Last name • Email address • Address • Phone number • Company • Job title 	Information from third party sources.	To send you marketing communications which we believe would be of interest to you.	Legitimate Interest: We will only send marketing communications where we believe we have a legitimate interest such as improving our services, growing our business and informing our marketing strategy. Consent: You can unsubscribe at any time by emailing privacy@stannp.com
Surveys and Feedback	Any personal data you may provide when answering our surveys.	If you choose to reply to one of our surveys.	To conduct research about our customers' opinion of the current Service or of potential new services that may be offered.	Consent (or in the case of any special category data, explicit consent): You do not have to respond to such surveys. If you do elect to answer a survey, the information is used to allow us to understand better who uses our Platform and Service and assists us in making improvements to our Services.
Non-essential Cookie Data	The information collected via those cookies/technologies which are not necessary cookies, as set out in paragraph 7 below.	If you choose to allow these cookies (other than necessary cookies) to be placed then Stannp will place those cookies and therefore collect the information provided via them accordingly.	To assess visitor numbers to our Platform and how users interact with our Platform and the Service, as well as for other maintenance and support purposes.	Consent: We only place non-necessary cookies if you consent to these when first visiting our Website or Platform.
Necessary Cookie Data	Information collected by our use of necessary cookies	When you use our Website or Platform	To carry out administrative tasks and to help us improve	Legitimate interests: This personal data allows us to provide and improve the services that we offer you. The items of personal data collected are

Document Name:	P-109	Version No:	3	Date:	13 th March 2026	Review Date:	13 th March 2027
-----------------------	-------	--------------------	---	--------------	-----------------------------	---------------------	-----------------------------



	and similar technologies		the functionalities and features of the Website and Platform.	limited to "technical" type data and your rights and freedoms are not outweighed by us collecting this data from you.
Technical and Usage Information	<ul style="list-style-type: none"> • IP address • Browser type and version • Device information • Operating system • Time zone settings 	When you visit or use our Website or Platform	To ensure Platform functionality, maintain security, and analyse usage patterns	Legitimate interests: This technical data allows us to provide and improve the Platform services that we offer you. The items of personal data collected are limited to "technical" type data and your rights and freedoms are not outweighed by us collecting this data from you.
Website Analytics Data	<ul style="list-style-type: none"> • Pages visited • Features used • Time spent on Platform • Click patterns • User journey data 	When you use our Platform and interact with features	To improve our Platform functionality and user experience	Legitimate interests: We have a legitimate interest in understanding how users interact with our Platform to identify popular features, optimize user journeys, and develop better functionality for all users.
Customer Support Information	<ul style="list-style-type: none"> • Support ticket content • Issue descriptions • Resolution communications • Technical problem details 	When you contact our customer support team	To resolve your technical issues and improve our services based on common problems	Contractual necessity: We require this information to provide customer support as part of our service obligations to you. Legitimate interests: We use anonymized support data to identify common issues and improve our Platform for all users.
Preferences and Settings	<ul style="list-style-type: none"> • Language preferences • Notification settings • Dashboard configuration • Marketing channel preferences 	When you configure your account settings or provide preferences	To deliver personalized service according to your preferences	Contractual necessity: We require these preferences to deliver services according to your chosen settings. Consent: For marketing preferences and optional customizations that you choose to enable.

Document Name:	P-109	Version No:	3	Date:	13 th March 2026	Review Date:	13 th March 2027
-----------------------	-------	--------------------	---	--------------	-----------------------------	---------------------	-----------------------------



3. Data We Process on Your Instructions (as a Data Processor)

When you use our Platform to send mailings to your recipients, you are the data controller, and we act as your data processor. We process the following data solely on your instructions:

Category of Data	What information do we process?	When do we process this?	How do we use this information?	Legal Basis
Recipient Data	<ul style="list-style-type: none"> Names Postal addresses Email addresses Phone numbers Any other recipient identifiers you provide 	When you upload mailing lists or enter recipient details for campaigns	To fulfil your mailing campaigns by: <ul style="list-style-type: none"> Printing and sending physical mail Sending electronic communications Address verification and formatting Generating proofs and previews 	<p>Your Instruction: As data processor, we process this data solely on your instruction as the data controller. You are responsible for ensuring you have appropriate legal basis (consent, legitimate interest, etc.) for processing your recipients' data.</p> <p>Contractual necessity: address validation is required to fulfil your mailing campaigns and ensure delivery to valid UK addresses.</p>
Campaign Content	<ul style="list-style-type: none"> Letter content Marketing materials Personalization fields Images and graphics Variable data elements 	When you create or upload campaign materials	To produce and deliver your mailings: <ul style="list-style-type: none"> Merge variable data Print materials Apply postage Track delivery status 	<p>Your Instruction: We process this content as directed by you to execute your campaigns. You retain all responsibility for content compliance with applicable laws.</p>
Customer-Uploaded Databases	<ul style="list-style-type: none"> CRM exports Suppression lists Custom data fields 	When you import data files or connect via API	To: <ul style="list-style-type: none"> Store for future campaigns Apply suppressions Assist with address verification 	<p>Your Instruction: Stored and processed per your retention settings. You control deletion and are responsible for data accuracy and lawful basis.</p>
Campaign Analytics	<ul style="list-style-type: none"> Delivery confirmations Response tracking (if enabled) QR code scans (if used) 	During and after campaign execution	To provide you with: <ul style="list-style-type: none"> Delivery reports Campaign performance metrics 	<p>Your Instruction: Analytics generated from your campaign data to help you measure effectiveness. You determine how this data is used for future targeting.</p>

Important Notes for Customers:

- As the data controller, **you** are responsible for:
 - Ensuring you have a lawful basis for processing all recipient data
 - Responding to data subject rights requests from your recipients
 - Maintaining accuracy of uploaded data
 - Complying with data protection laws including GDPR, PECR, and the CAP Code
 - Providing appropriate privacy notices to your recipients

Document Name:	P-109	Version No:	3	Date:	13 th March 2026	Review Date:	13 th March 2027
-----------------------	-------	--------------------	---	--------------	-----------------------------	---------------------	-----------------------------

- We process this data solely on your instructions and do not use it for our own purposes
- You can configure retention periods in your account settings
- We act as your data processor under the terms set out in our Terms of Service (Clause 11)

4. Data Processing for Our Customers

When you use our Platform to send mailings to your customers, **you are the data controller**, and **we act as your data processor**. In this capacity:

- We process personal data solely on your instructions
- You are responsible for ensuring you have appropriate legal basis and consent from your recipients
- You remain responsible for handling data subject rights requests from your customers
- We assist you with compliance obligations as outlined in our Terms of Service

5. Data Services

If you use our optional data services to access third-party data for campaign targeting, this is governed by a separate Data Services Agreement.

Key points:

- You are the data controller for any data accessed
- We act as data processor, providing technical access only
- You are responsible for ensuring lawful basis and compliance with GDPR, PECR and the CAP Code
- Full terms are in your Data Services Agreement

6. Sharing Your Information with Third Parties

We share data with carefully selected subprocessors as detailed in our [subprocessor list](#), which is updated regularly.

We may also share your information:

- Group companies:** With any group companies or affiliates for business purposes
- Anonymised insights:** We may share anonymised, aggregated data with third parties for analytics and performance measurement (this data cannot identify you)
- As set out in our Terms of Service:** Including business transfers, regulatory requirements, and law enforcement requests as detailed in our Terms of Service

7. Links to Third-Party Websites and Third-Party Adverts

Stannp is not responsible for the privacy policies and practices of other sites even if you access them via the Website, Platform and/or as part of your use of the Service. You should check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

Document Name:	P-109	Version No:	3	Date:	13 th March 2026	Review Date:	13 th March 2027
----------------	-------	-------------	---	-------	-----------------------------	--------------	-----------------------------

8. Security

Stannp has implemented technology and policies to safeguard your privacy from unauthorised access and improper use. Personal data is secured on computer servers in a controlled, secure environment, protected from unauthorised access, use or disclosure. When personal information (such as a credit card number) is transmitted to other websites, it is protected through the use of encryption, such as Secure Socket Layer (SSL) protocol.

We maintain appropriate technical and organisational measures to protect personal data, including:

- Encryption of data in transit and at rest
- Regular security assessments and penetration testing
- Access controls and authentication mechanisms
- Staff training on data protection
- Incident response procedures

Payment Card Security: We do not directly store or process full payment card numbers on our systems. All payment transactions are handled securely by PCI DSS-compliant payment processors. These processors are contractually required to maintain strict safeguards in accordance with the Payment Card Industry Data Security Standard (PCI DSS) to protect your financial information.

9. Storage and Data Retention

We store personal data of our UK and EEA-based customers within the EEA. We do not currently transfer such data outside the EEA.

We retain your data for no longer than is reasonable in line with the purposes for which it was originally collected. The default retention period for sensitive assets will be 3 years.

Where we transfer personal data outside the UK or EEA, we will ensure appropriate safeguards are in place, including:

- reliance on an adequacy decision (where the recipient country is recognised as providing an adequate level of protection);
- use of the EU Commission's Standard Contractual Clauses; and/or
- use of the UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU SCCs.

Any user with an account can request their personal data to be removed at any time, however please note that any personal data appearing on sales invoices will be retained by Stannp for at least 7 years for legal compliance.

10. Cookies and Similar Technologies

10.1 What are Cookies?

Cookies are small text files that are placed on your device when you use the Website or Platform. Session cookies enable you to move from page to page within the Website and Platform and any information you enter will be

Document Name:	P-109	Version No:	3	Date:	13 th March 2026	Review Date:	13 th March 2027
----------------	-------	-------------	---	-------	-----------------------------	--------------	-----------------------------

remembered but is deleted when you close the page or after a short time. Persistent cookies allow us to remember your preferences and settings when you use the Website or Platform in the future.

10.2 Types of Cookies We Use

Strictly Necessary Cookies

These cookies are essential for Platform operation and include:

- Authentication tokens to keep you logged in
- Dashboard configuration preferences
- Security and fraud prevention
- Load balancing and platform functionality

Analytics Cookies (with your consent)

These cookies help us understand and improve our services through:

- Understanding how visitors use our site
- Tracking if advertising or referral links were effective
- Analysing user behaviour to improve Platform functionality

Marketing Cookies (with your consent)

These cookies are used for marketing purposes including:

- Advertising optimisation
- Marketing campaign effectiveness
- Showing relevant advertisements

10.3 Managing Your Cookie Preferences

You can control cookie settings through our cookie consent banner when you first visit our website, your account settings if you're a logged-in user, or directly through your browser settings. If you do not want cookies to be served on your device, you can disable them through these settings; however, please note that disabling necessary cookies may prevent you from accessing some Platform features.

10.4 Third Party Cookies

Third party advertisers may place or read cookies on your browser when you use our website or Platform. This Policy applies only to Stannp's use of cookies and does not cover third party cookies. For more information about managing cookies, visit www.aboutcookies.org or www.allaboutcookies.org.

Document Name:	P-109	Version No:	3	Date:	13 th March 2026	Review Date:	13 th March 2027
----------------	-------	-------------	---	-------	-----------------------------	--------------	-----------------------------

11. Your Rights

Under data protection law, you have several rights regarding your personal data:

- **Access:** You can request a copy of the personal data we hold about you.
- **Rectification:** You can ask us to correct any inaccurate or incomplete personal data.
- **Erasure:** You can request deletion of your personal data in certain circumstances.
- **Restriction:** You can ask us to restrict processing of your personal data in certain situations.
- **Portability:** Where technically feasible and legally required, you can request your data in a portable format.
- **Objection:** You can object to processing based on legitimate interests or for direct marketing.
- **Automated Decision-Making:** We do not currently use automated decision-making or profiling that produces legal or similarly significant effects.
- **Withdrawing Consent:** Where we process data based on consent, you can withdraw this at any time.

You can exercise any of the rights listed above by contacting us at privacy@stannp.com. If you have an account, you may also be able to update or delete some of your information directly through your account settings.

We will respond to your request without undue delay and in any event within one month of receiving it. Where a request is complex or numerous, we may extend this period by up to a further two months. If this is necessary, we will notify you within the first month and explain why the extension is needed.

We may need to request specific information from you to help us confirm your identity before we can process your request. This is a security measure to ensure that personal data is not disclosed to anyone who has no right to receive it.

Exercising your rights is free of charge. However, if your request is manifestly unfounded, excessive or repetitive, we may charge a reasonable fee or refuse to act on the request.

12. Children's Privacy

Our services are intended for business use, and we do not knowingly collect personal data from children under 16. If we become aware that we have collected personal data from a child under 16, we will take steps to delete it promptly. If you believe we have collected data from a child, please contact us immediately.

13. Data Breach Notification

In the event of a personal data breach affecting data we process on your behalf as data controller, we will notify you without undue delay and within 72 hours of becoming aware of the breach. We will provide: -

- Description of the nature of the breach
- Categories and approximate numbers of data subjects affected
- Root cause of the breach
- Measures taken or proposed to address the breach

Document Name:	P-109	Version No:	3	Date:	13 th March 2026	Review Date:	13 th March 2027
----------------	-------	-------------	---	-------	-----------------------------	--------------	-----------------------------



Stannp.com

The Direct Mail Platform



14. Contact Information

If at any time you would like to contact Stannp about your views on this Policy or any enquiry relating to your personal information, you can do so by:

- **Email:** privacy@stannp.com
- **Post:** Unit 12, Taw Trade Park, Braunton Road, Barnstaple, Devon, EX31 1JZ

You also have the right to make a complaint to the ICO by contacting [them](#) at any time.

Document Name:	P-109	Version No:	3	Date:	13 th March 2026	Review Date:	13 th March 2027
-----------------------	-------	--------------------	---	--------------	-----------------------------	---------------------	-----------------------------

www.stannp.com

