

# Privacy & Data Protection Policy

Including GDPR Compliance

Version 1.4 | April 2026

## 1. About This Policy

This Privacy Policy explains how P.D.Q. Freight Limited ("we", "us", "our") collects, uses, stores, and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

We are committed to handling your personal data responsibly and transparently. We only collect what we genuinely need, we do not use your data for marketing, and we do not sell your data to any third party.

<b>Business name</b>	P.D.Q. Freight Limited
<b>Registered address</b>	Unit 4, Courtyard 1, Challenge Road, Ashford, TW15 1AX
<b>Data Controller</b>	Chris Allaway
<b>Contact email</b>	info@pdq.uk.com
<b>ICO Registration No.</b>	ZA162641

## 2. What Data We Collect

As a physical services business handling customs formalities, we collect and process only the personal data that is necessary to deliver our services and meet our legal obligations. This includes:

### 2.1 Client Contact Information

- Full name
- Business name (where applicable)
- Email address
- Telephone number
- Postal address

### 2.2 Customs & Regulatory Data

To process customs declarations and comply with HMRC and border agency requirements, we may also collect:

- EORI number (Economic Operator Registration and Identification)
- VAT registration number
- Goods descriptions and commodity codes
- Importer/exporter details as required on customs declarations
- Any other information legally required to complete customs formalities

Processing this data is a legal requirement. Without it, we cannot legally complete customs declarations on your behalf.

### 2.3 Payment Information

We use a third-party payment processor to handle transactions. We do not store full card details ourselves. Payment records (amounts, dates, references) are retained for accounting and tax purposes.

### 2.4 Email Communications

We communicate with clients and suppliers by email using Microsoft 365 (Outlook). Email correspondence may contain personal data such as names, contact details, customs information, and transaction details. These emails are stored on Microsoft's servers as part of our Microsoft 365 subscription. Microsoft acts as a data processor on our behalf and is bound by a data processing agreement with us. Details of Microsoft's data handling practices can be found in the Microsoft Privacy Statement at [privacy.microsoft.com](https://privacy.microsoft.com).

We retain business email correspondence for 6 years, in line with our other business records, after which emails containing personal data are deleted or archived securely.

## 3. Why We Process Your Data (Lawful Basis)

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Under UK GDPR, we must have a lawful basis for processing personal data. We rely on the following:

Lawful Basis	Purpose	Data Used
Contract performance	Providing our services, processing bookings, and managing client accounts	Name, contact details, customs data
Legal obligation	Submitting customs declarations; retaining financial records for HMRC	EORI, VAT no., goods data, payment records
Legitimate interests	Scheduling appointments, issuing invoices, and communicating about services already provided	Name, contact details, email correspondence

We do not use your data for marketing, profiling, or any purpose beyond those listed above.

## 4. Who We Share Your Data With

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We do not sell or rent your data to any third party. We share data only where necessary to deliver our services or meet legal requirements:

<b>Payment Processor</b>	To securely process card and online payments on our behalf. Your payment data is handled under their own privacy and PCI DSS compliance frameworks.
<b>Booking / Scheduling Software</b>	To manage appointments and service bookings. Only the data required to create and manage a booking is shared.
<b>Accounting Software</b>	To issue invoices and maintain financial records. This data is retained for the period required by HMRC (currently 6 years).
<b>Microsoft 365 (Outlook)</b>	Our email platform. Business email correspondence, including personal data contained within emails, is stored on Microsoft's servers. Microsoft operates under a data processing agreement and is compliant with UK GDPR. See <a href="https://privacy.microsoft.com">privacy.microsoft.com</a> for details.
<b>HMRC &amp; Border Agencies</b>	We are legally required to submit customs declaration data to HMRC, the UK Border Force, and equivalent agencies in relevant countries.
<b>Professional Advisors</b>	Our accountant or legal advisors may have incidental access to client data in the course of their professional duties. They are bound by confidentiality obligations.

All third-party providers we use are required to handle personal data securely and in compliance with UK GDPR.

## 5. How Long We Keep Your Data

We retain data only for as long as necessary to fulfil the purposes for which it was collected, including meeting our legal and regulatory obligations. Given the nature of our business — handling customs declarations, HMRC-regulated transactions, and long-term client relationships — we apply the following retention periods:

<b>Client contact records</b>	Duration of the business relationship, plus 10 years after the last transaction. Justified by the long-term nature of freight and customs client relationships and the potential for returning business or late-arising disputes.
<b>Customs declaration records</b>	7 years from the date of the declaration. HMRC holds powers to investigate customs matters beyond the standard 4–6 year window in cases of suspected fraud or irregularity; 7 years provides a reasonable buffer against such investigations.
<b>Financial / payment records</b>	6 years from the end of the relevant financial year. This period is set by HMRC and cannot be reduced; there is no regulatory basis for extending beyond this for financial records alone.
<b>Booking / scheduling records</b>	5 years from the date of the appointment or service. Retained as evidence of service delivery and to support any dispute or contractual claim that may arise.
<b>Email correspondence</b>	7 years from the date of the email, aligned with our customs declaration retention period. Emails frequently contain customs data, instructions, and transaction details that may be relevant to regulatory or legal matters.

After these periods, data is securely deleted or anonymised.

We may retain data beyond these periods where there is a specific and documented legitimate reason to do so, for example:

- Where a legal dispute or contractual claim is ongoing or reasonably anticipated (data may be retained for the duration of the dispute plus the relevant limitation period, typically 6 years under the Limitation Act 1980)
- Where HMRC or a border agency has opened or indicated an investigation into a customs matter
- Where we are required to do so by a court order or regulatory authority

In all such cases, retention beyond our standard periods is documented, reviewed regularly, and limited to what is strictly necessary for the specific purpose.

## 6. How We Protect Your Data

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We take reasonable technical and organisational measures to protect your personal data against accidental loss, unauthorised access, disclosure, or misuse. These include:

- Limiting access to personal data to those who need it to perform their role
- Using password-protected and encrypted systems where personal data is stored
- Using reputable, GDPR-compliant third-party software providers
- Ensuring physical records (where held) are kept securely
- Securing email accounts with strong passwords and, where available, multi-factor authentication

## 7. International Data Transfers

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Some of the third-party tools we use (such as Microsoft 365, payment processors, or accounting software) may process data outside the UK. Where this occurs, we ensure that appropriate safeguards are in place, such as the UK International Data Transfer Agreement (IDTA) or transfers to countries with an adequacy decision from the UK government.

Microsoft processes data in accordance with the UK GDPR and maintains appropriate transfer mechanisms for any data processed outside the UK or EEA. Further details are available at [privacy.microsoft.com](https://privacy.microsoft.com).

## 8. Your Rights

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

<b>Right of access</b>	You can request a copy of the personal data we hold about you (Subject Access Request).
<b>Right to rectification</b>	You can ask us to correct inaccurate or incomplete data.

<b>Right to erasure</b>	You can ask us to delete your data, subject to our legal retention obligations.
<b>Right to restriction</b>	You can ask us to limit how we use your data in certain circumstances.
<b>Right to data portability</b>	Where processing is based on your consent or a contract, you may request your data in a portable format.
<b>Right to object</b>	You can object to processing based on legitimate interests.
<b>Right to withdraw consent</b>	Where we rely on consent, you may withdraw it at any time (this does not affect prior processing).

To exercise any of these rights, please contact us using the details in Section 1. We will respond within one calendar month. There is no charge for making a request.

If you are unhappy with how we have handled your data, you have the right to complain to the Information Commissioner's Office (ICO):

- Website: [www.ico.org.uk](http://www.ico.org.uk)
- Helpline: 0303 123 1113

## 9. Cookies & Online Services

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We do not operate an online trading platform. We do not collect data through a website or use tracking cookies. If we have a basic informational website, it does not collect personal data beyond standard server logs, which are not used to identify individuals.

Our use of Microsoft 365 (including Outlook and any associated Microsoft services) is subject to Microsoft's own cookie and tracking policies when accessed via a web browser. These are governed by Microsoft's privacy statement at [privacy.microsoft.com](http://privacy.microsoft.com) and are not within our control.

## 10. Changes to This Policy

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We may update this policy from time to time to reflect changes in law or our practices. The current version will always be available on request. The version date at the top of this document indicates when it was last reviewed.

## 11. Contact Us

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If you have any questions about this policy or how we handle your data, please contact:

<b>Name</b>	Chris Allaway
<b>Business</b>	P.D.Q. Freight Limited
<b>Address</b>	Unit 4, Courtyard 1, Challenge Road, Ashford, TW15 1AX

<b>Email</b>	info@pdq.uk.com
<b>Telephone</b>	+44 (0) 1784 243695

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*This document should be reviewed annually or whenever there is a material change to your data processing activities.*