

PostMyGold

WEBSITE PRIVACY POLICY

Post My Gold (Coupco)

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1. Objective

The objective of this Privacy Policy is to establish a clear, transparent, and legally compliant framework for the collection, processing, storage, and protection of personal data by Coupco (trading as "Post My Gold") via its website, www.postmygold.com.

This policy ensures that Post My Gold meets its legal obligations under UK data protection laws, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025. It aims to protect the privacy rights of our customers, website visitors, and business contacts while maintaining trust and legal compliance in all our operations.

2. Scope

This policy applies to:

- All personal data processed by Post My Gold through its website (www.postmygold.com), customer communication channels, valuation systems, and payout mechanisms.
- All website visitors, prospective customers requesting gold-selling kits, current customers transacting with us, and individuals contacting our customer support.
- All employees, contractors, third-party software providers, and processors acting on behalf of Post My Gold.

3. Definitions

For the purposes of this policy, the following terms are defined in accordance with UK data protection legislation:

- **"Data Controller"**: The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing

of personal data. For this policy, the Data Controller is Coupco.

- **"Data Subject"**: Any living individual whose personal data is collected and processed by Post My Gold (specifically, our website users and transacting customers).
- **"Personal Data"**: Any information relating to an identified or identifiable natural person. This includes names, addresses, emails, bank account details, and online identifiers.
- **"Processing"**: Any operation or set of operations performed on personal data, such as collection, recording, organisation, structuring, storage, adaptation, retrieval, consultation, use, disclosure, or erasure.
- **"Processor"**: A third party that processes personal data on behalf of the Data Controller under strict contractual instructions (e.g., email platforms, web hosts).

4. Policy Statement

4.1 Who We Are (Data Controller Contact Details)

Coupco (operating as Post My Gold) is the Data Controller responsible for your personal data.

- **Registered Entity Name:** Coupco
- **Website:** www.postmygold.com
- **Contact Email:** info@postmygold.com

If you have any questions about this Privacy Policy, your data rights, or how we protect your personal information, please contact us using the email address above.

4.2 What Personal Data We Collect

We collect, store, and process various types of personal data depending on your interaction with our website. This data is categorized as follows:

1. **Identity and Contact Data:** Includes your first name, last name, title, physical address (for sending gold-collection kits and return deliveries), telephone number, and email address.
2. **Financial and Transaction Data:** Includes bank account details (for transferring payouts for your gold), purchase/sale history, gold kit identification numbers, and valuation details. We do *not* store credit/debit card details; any digital payments are handled securely by PCI-compliant payment processors.
3. **Technical and Usage Data:** Includes your internet protocol (IP) address, browser type and version, time zone setting, location data, operating system, platform, and information about how you navigate and interact with our website.
4. **Marketing and Communications Data:** Includes your preferences in receiving service updates and marketing communications from us, as well as records of your consents where appropriate.

We do not collect any Special Category Data (such as race, religion, health data, genetic or

biometric data) or information regarding criminal convictions.

4.3 How We Collect Your Personal Data

We collect personal data through the following methods:

- **Direct Interactions:** You provide your Identity, Contact, and Financial Data by filling in forms on our website (e.g., requesting a gold pack, creating an account), corresponding with us by email or phone, or submitting queries and complaints.
- **Automated Technologies:** As you interact with our website, we automatically collect Technical and Usage Data through cookies, server logs, and similar tracking technologies. Please refer to our Cookie Policy on our website for more details.
- **Third Parties:** We may receive technical and analytics data from providers such as Google Analytics, and marketing interaction data from our integrated communication platforms.

4.4 Legal Bases for Processing Your Data

Under UK data protection law, we must identify an appropriate lawful basis for every processing activity. We rely on the following bases:

Purpose / Processing Activity	Categories of Personal Data	Lawful Basis for Processing
To provide services and goods, including processing gold-selling kits, valuations, and executing bank transfers/payouts.	Identity, Contact, Financial, Transaction	Contract: Necessary to perform the contract to purchase your precious metals.
To deal with queries, complaints, claims, or customer service issues.	Identity, Contact, Financial, Transaction, Correspondence	Contract / Legitimate Interests: Necessary to resolve client disputes and maintain high standards of service.
To comply with legal requirements, including anti-money laundering regulations, tax obligations, and assisting law enforcement (e.g., prevention of stolen goods trade).	Identity, Contact, Financial, Transaction	Legal Obligation: Compliance with UK financial and trade regulations.

<p>To send service updates and marketing communications (via systems like MailerLite).</p>	<p>Identity, Contact, Marketing Preferences</p>	<p>Consent: Where you have explicitly opted in to receive promotional materials. (You may withdraw consent at any time).</p>
<p>To optimise website functionality, manage systems, and perform data analysis.</p>	<p>Technical, Usage</p>	<p>Legitimate Interests: Necessary to keep our website secure, functional, and aligned with user needs.</p>

4.5 Sharing Your Personal Data

We do not sell, rent, or trade your personal data. We only share personal data with selected third parties to fulfill our contractual and legal requirements:

- **Delivery and Courier Services (e.g., Royal Mail):** To dispatch gold collection packs and return valuable items.
- **Financial and Fraud Investigation Authorities:** Under legal obligations to prevent fraud, money laundering, and the trade of unauthorised items.
- **External Auditors or Inspectors:** To verify legal, financial, and regulatory compliance.
- **IT and System Administrators:** Third parties who provide database hosting, website maintenance, and secure transaction systems.
- **Marketing Providers:** We use **MailerLite** to manage our online marketing database and dispatch service communications.

4.6 International Data Transfers

When we transfer personal data outside the United Kingdom, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- **Adequacy Regulations / Data Bridge:** We transfer data to third-party processors (such as **MailerLite** based in the USA) who comply with recognized UK-US Data Bridge frameworks or are located in countries officially deemed by the UK government to offer an adequate level of protection for personal data.
- **Standard Contractual Clauses (SCCs):** Where adequacy regulations do not apply, we utilize UK International Data Transfer Agreements (IDTAs) or approved SCCs to guarantee data protection.

4.7 Data Security

We have put in place robust security measures to prevent your personal data from being accidentally lost, used, accessed in an unauthorised way, altered, or disclosed.

- Access to your personal data is strictly limited to authorized employees, agents, and

contractors who have a business "need to know." They operate under strict contractual confidentiality agreements.

- We employ industry-standard encryption protocols (SSL/TLS) for data transmitted through our website.
- We have established protocols to handle any suspected personal data breach and will notify you and the Information Commissioner's Office (ICO) where we are legally required to do so.

4.8 Data Retention

We will only retain your personal information for as long as necessary to fulfill the purposes for which we collected it, including satisfying any legal, accounting, or reporting requirements.

- **Customer Transaction & Financial Records:** We retain financial transactions and identity verifications for **6 years** following the end of the tax year in which the transaction occurred, in compliance with UK tax and anti-money laundering legislation.
- **Marketing Database Records:** We retain your contact information for marketing purposes until you withdraw your consent or unsubscribe.
- **General Website Queries:** Non-transactional communications and queries are retained for **12 months** before secure deletion.

4.9 Your Legal Rights

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

- **Right of Access (Subject Access Request):** You have the right to request copies of your personal data from us. Under the Data (Use and Access) Act 2025, if your request is deemed complex or repetitive, we may apply proportionality rules to limit the scope or reasonably extend the response window.
- **Right to Rectification:** You can request that we correct or complete any inaccurate or incomplete personal information we hold about you.
- **Right to Erasure ("Right to be Forgotten"):** You can ask us to delete your personal data. Note that we may not always be able to comply with this request due to legal and financial retention requirements, which we will explain to you if applicable.
- **Right to Restrict Processing:** You have the right to ask us to limit how we use your personal information.
- **Right to Object:** You can object to us processing your data where we are relying on a legitimate interest or using your data for direct marketing.
- **Right to Data Portability:** You can request the transfer of your personal data to you or a third party in a structured, machine-readable format.
- **Right to Withdraw Consent:** Where we rely on your consent to process your data, you can withdraw it at any time.

To exercise any of these rights, please contact us at info@postmygold.com. We do not charge a fee to access your data, but we reserve the right to charge a reasonable fee or refuse to comply if your request is manifestly unfounded, repetitive, or excessive.

4.10 How to Complain

If you have any concerns or complaints regarding how we handle your personal data, please contact us directly so we can resolve the issue:

- **Email:** info@postmygold.com

If you remain unsatisfied after contacting us, you have the right to lodge a complaint with the UK supervisory authority:

- **Supervisory Authority:** Information Commissioner's Office (ICO)
- **Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- **Helpline:** 0303 123 1113
- **Website:** www.ico.org.uk/make-a-complaint

5. Responsibilities

- **Board of Directors / Owners of Coupco:** Hold ultimate responsibility for ensuring that Post My Gold complies with its legal obligations under UK data protection legislation.
- **Data Compliance Lead:** Responsible for reviewing this policy annually, organising staff training, handling Subject Access Requests (SARs), and acting as the primary point of contact for the ICO.
- **All Employees / Contractors:** Responsible for processing customer and transaction data in strict accordance with this policy and ensuring secure device practices.