

Personal Data Protection Policy

(Valid as of 5th July 2025)

1. Introduction and Scope

This Personal Data Protection Policy ("Policy") outlines the data handling practices of I've Sent It ("we", "our", "us"), a UK-based company, in relation to the collection, processing, storage, transfer, and protection of personal data. This Policy applies to all users of our services, website, and platform globally, including where personal data is stored on or accessed from servers located in the United Kingdom, Germany (Frankfurt), United States (Ohio), and Australia.

We are committed to ensuring that our data practices comply with the United Kingdom General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the European Union General Data Protection Regulation (EU GDPR), and, where applicable, the Australian Privacy Act 1988 and Australian Privacy Principles (APPs).

Our services are not marketed to residents of the United States and are not intended to fall under the scope of any United States state privacy laws, including the California Consumer Privacy Act (CCPA). Any access from the United States is incidental and not indicative of targeted operations.

2. Data We Collect

2.1. Data Provided Voluntarily:

2.1.1. Account Registration: Name, email address, password, and, where applicable, payment-related information (processed via third-party providers).

2.1.2. File Transfers: Content of files and folders uploaded via our services.

2.1.3. Customer Support: Data provided in correspondence with our support teams.

2.2. Data Collected Automatically:

2.2.1. Device and Usage Data: IP address, browser type, operating system, referral source, usage statistics, and interactions.

2.2.2. GeoWall Protection: Location data used to enforce geographical access restrictions.

2.2.3. Cookies and Trackers: For essential operations and, with consent, for analytics and performance enhancement.

2.3. Data from Third Parties:

2.3.1. Authentication Providers: Limited profile data from third-party login systems (e.g., Google, Apple).

2.3.2. Payment Processors: Transaction metadata from third-party payment platforms. We do not store credit card or financial details.

3. Legal Basis for Processing

Our processing of personal data is grounded in one or more of the following legal bases:

3.1. Performance of Contract: To deliver file transfer services.

3.2. Legitimate Interests: Ensuring platform integrity, fraud prevention, and service improvement.

3.3. Legal Obligations: Compliance with regulatory and statutory duties.

3.4. Consent: Where required, such as for marketing communications and non-essential cookies.

4. Use of Personal Data

We use personal data strictly for purposes aligned with this Policy, including:

4.1. Providing, operating, and maintaining our file transfer platform.

4.2. Enforcing geographical restrictions via GeoWall.

4.3. Detecting and mitigating security threats and unauthorised access.

4.4. Fulfilling legal and regulatory requirements.

4.5. Communicating service-related updates.

4.6. Conducting lawful marketing (with consent).

5. Data Sharing and Disclosure

We do not sell personal data. We may disclose personal data to:

5.1. Service Providers: Cloud infrastructure, analytics, customer support, IT security providers and any such similar providers under appropriate contractual safeguards.

5.2. Legal Authorities: Where disclosure is legally mandated.

5.3. Business Transfers: In the event of a merger, acquisition, or sale of assets.

We disclaim liability for the data practices of third-party service providers, although we take reasonable steps to ensure their compliance with data protection standards.

6. Cross-Border Data Transfers

Data may be transferred between and processed on servers located in the UK, Germany, United States (Ohio), and Australia. These transfers are made in accordance with:

6.1. UK to US Transfers: Personal data transferred from the United Kingdom to the United States is safeguarded by the UK International Data Transfer Agreement

(IDTA) or the UK Addendum to the EU Standard Contractual Clauses (SCCs), where applicable.

6.2. EU to US Transfers: Transfers from the European Union to the United States are conducted under the EU Standard Contractual Clauses (SCCs) and supplemented by a Transfer Impact Assessment (TIA), or under the EU-US Data Privacy Framework (DPF), where the US recipient is certified.

6.3. UK to EU Transfers: Transfers between the UK and the EU are permitted under the UK's Adequacy Decision for the European Union and do not require additional safeguards.

6.4. Australia Transfers: Transfers to or from our Australia-based infrastructure are conducted in compliance with the Australian Privacy Act 1988 and the Australian Privacy Principles (APPs), particularly APP 8. Where personal data is transferred from Australia to other jurisdictions, we take reasonable steps to ensure that overseas recipients do not breach the APPs, including by selecting service providers with appropriate privacy and security safeguards.

We implement contractual and technical measures to ensure an adequate level of protection for international transfers. By using our services, users acknowledge and consent to these cross-border transfers.

7. Data Retention

7.1. Account Information: Retained until account closure or deletion request.

7.2. File Data: Retained for the duration of the transfer window, then securely deleted.

7.3. Log and Security Data: Retained for fraud prevention, operational monitoring, and compliance.

7.4. Legal Retention: Certain data may be retained as mandated by applicable laws.

8. Data Security

We employ a robust security framework that includes:

8.1. GeoWall-based location enforcement.

8.2. Role-based access controls.

8.3. Data encryption in transit and at rest.

8.4. Regular vulnerability assessments and penetration testing.

8.5. An established data breach response plan.

9. Data Subject Rights

Subject to applicable law, users have the following rights:

9.1. Access to their personal data.

9.2. Rectification of inaccuracies.

9.3. Erasure of data ("right to be forgotten").

9.4. Restriction of or objection to processing.

9.5. Portability of data.

9.6. Withdrawal of consent (where processing is based on consent).

Australian users may request access to and correction of their personal data under the Australian Privacy Principles. Requests should be directed to the contact details below.

10. Children's Data

Our services are not intended for individuals under the age of 13. We do not knowingly collect data from minors. If such data is inadvertently collected, it will be deleted upon identification.

11. Limitation of Liability

To the fullest extent permitted by law, we disclaim liability for:

11.1. Service interruptions or downtime.

11.2. Cybersecurity breaches despite reasonable safeguards.

11.3. User-uploaded content, including unlawful or infringing material.

11.4. Access restrictions enforced by GeoWall.

11.5. Acts or omissions of third-party service providers.

Users agree to indemnify and hold harmless Ive Sent It from any claims arising from misuse of the services or violation of this Policy.

12. Global Access, Limited Legal Scope

12.1. Ive Sent It provides services accessible globally; however, we do not actively market or promote our services for specific jurisdictions outside the United Kingdom, European Union, and Australia.

12.2. Access from other territories, including but not limited to the United States, Canada, China, or other jurisdictions with their own data protection regimes, is considered incidental and does not imply that we submit to the jurisdiction or substantive legal obligations of those territories.

12.3. Users accessing our services from outside our core operating regions do so at their own initiative and are responsible for ensuring that their use complies with applicable local laws. We make no representations or warranties that our services comply with laws outside of the regions expressly contemplated in this Policy.

13. Policy Updates

We may amend this Policy to reflect legal, technical, or operational changes. Material changes will be communicated via email or website notifications. Continued use of our services constitutes acceptance of the updated Policy.

14. Contact and Complaints

For inquiries or to exercise data rights, contact us at legal@ivesentit.com. You can also alternatively write a letter to Ive Sent It Ltd, 30 Bankside Court Stationfields, Kidlington, Oxford, Oxfordshire, United Kingdom, OX5 1JE.