Privacy Notice for Carriers and Driving Staff DHL Freight



Information about the processing of your personal data regarding your assignment(s) as a carrier or truck driver for DHL Freight

1. Controller; contact details DHL Freight GmbH Godesberger Allee 102-104 53175 Bonn

Germany

The controller for the processing of personal data for the purposes described below under section 5 a)-e) is the DHL Freight GmbH and/or the respective DHL Freight legal entity that you as a carrier have a contractual relationship with. For the processing of personal data as described under section 5 f)-h) the controller is the respective DHL Freight legal entity at the local premise.

(Hereinafter referred to as "DHL Freight" or "we")

2. Data Protection Officer of DHL Freight GmbH; contact details:

Deutsche Post AG

Global Data Protection

53250 Bonn

For all queries with regard to the processing of your personal data, please contact us at: <u>dataprotectionDGFF@dhl.com</u>.

3. Categories of personal data

DHL Freight process the following categories of personal data depended on the purposes mentioned under section 5:

- Contact data (e.g. full name, email address, mobile phone number)
- Identification data (e.g. Number of identity card/passport)
- License plate data
- (GPS) location data
- Activity status information (moving or standing still)

 Geofencing entry/exit alerts, general alerts, alerts relating to operational nonconformance

Trailer/Swap Body ID

4. Source of your personal data

DHL Freight obtains your personal data from you directly and/or from your employer and/or from telematics devices in your trailer/swap body and/or truck.

5. Purposes and legal grounds regarding the processing of your personal data

DHL Freight processes your personal data for the following purposes and on basis of the below listed legal grounds.

a. For the performance of the contract, we process the personal data of the carrier. The personal data usually includes contact details of the carrier's contact person (e.g., name, e-mail address). The legal basis is Art 6 (1) (b) GDPR.

b. Performance of transportation services and fulfillment of contracts with our customers: We need your personal data in order to perform our transportation services and to fulfill the obligations that arise as a result of the contractual agreement with our customers. In particular personal data such as license plate data and (GPS) location data is used and also be made available to DHL Freight customers to monitor shipments, to check shipment status, to plan time slots (e.g., loading time, arrival time) or to anticipate the observance of planned time slots. The availability of the afore mentioned data to DHL Freight customers is limited to the period one hour before the planned loading time and during the transport services carried out on behalf of DHL Freight. In the event that a Carrier's truck is fully chartered by DHL Freight, the duration of the processing of personal data shall be the charter period. The legal basis is Art 6 (1)(f) GDPR. DHL Freight has a legitimate interest to process your personal data in order to coordinate and secure the transportation services, for route optimization and to perform the contracts with its customers.

c. To increase the security of our transports certain transports will be monitored via GPStracking by security agents of a security organization who will receive your contact details and the respective (GPS) location data. The legal basis is Art 6 (1) (f) GDPR. DHL Freight has a legitimate interest to ensure the security of (high value) transports.

d. To optimize the algorithms used for the track & trace services. The legal basis is Art. 6 (1) (f) GDPR. DHL Freight has a legitimate interest to optimize its services offered to the customers.

e. To inform public authorities in case of (suspicion of) theft fraud or any other misconduct regarding our transports. The legal basis is Art 6 (1) (c) GDPR. The processing of your personal data is necessary for compliance with a legal obligation to which DHL Freight is subject to. Additionally, DHL Freight has a legitimate interest to provide public authorities personal data in case of (suspicion of) misconduct. The legal basis is Art 6 (1) (f) GDPR.

f. For identifying the person handing over or receiving the cargo. The personal data includes driver's name, number of identity card / passport as well the truck license plate number. The legal basis is Art 6 (1)(f) GDPR. DHL Freight has a legitimate interest to ensure the quality and safety of the transport services.

g. To request and to provide you with a "Air Waybill", a specific Identification document (ID) that you, being the truck driver, will need to access restricted and secured areas of any airport for air cargo. The legal basis is Art 6 (1) (f) GDPR. DHL Freight has a legitimate interest to provide you access to restricted and secured airport areas.

h. To prevent and register:

- Theft,
- (On purpose) damaging of properties of DHL Freight, DHL Freight customers and suppliers,

DHL Freight has implemented camera surveillance on its premises. The legal basis is Art 6 (1) (f) GDPR. DHL Freight has a legitimate interest to prevent theft and damages to property of before mentioned parties and to monitor compliance with regulations, requirements and

guidelines by utilizing a CCTV system on its premises. **Please note:** Customers of DHL Freight or their contractual parties might in some cases implement additional security measures, for example by providing their goods transported by DHL Freight with a GPS device for collecting location data. In these cases, the customer or their contractual parties is the controller of personal data processed and is obliged to inform you as well as to give you the opportunity to exercise your rights. DHL Freight will inform you about this data processing to the extent that the information was provided by the customer or their contractual parties. If you have any general questions regarding your privacy with these additional security measures, you can also contact us (please see contact details under 2).

6. Recipients of your personal data

DHL Freight does not share, sell, transfer or otherwise disseminate your personal data to third parties and will not do so in future, unless a) required by law, b) required for the purposes described above or c) you have given explicit consent to do so. For instance, and as described above, we will pass your personal data to our customers. In this context personal data as listed under 3 except for contact data may also be made available to DHL Freight's customers including via third party shipping platforms.

Service providers (processors) that process personal data on our behalf are contractually bound to DHL Freight in conformance of Art 28 GDPR to ensure protection. These service providers follow strictly our instructions regarding the processing of your personal data. DHL Freight remains responsible for the protection of your personal data and rights when your personal data is processed by service providers.

7. Transfer to third countries & Group Data Privacy Policy

Insofar as transfer to a third country is performed by DHL Freight, this is only carried out based on the DPDHL Group Data Privacy Policy, EU standard contract clauses or within the scope of the exceptions of the GDPR.

The DPDHL Group Data Privacy Policy regulates the DPDHL Group-wide standards for data processing with a special focus on transfers to DPDHL organizations in so-called third countries, meaning transfers of personal data to countries outside the EEA, which do not have an adequate level of data protection. If you are interested in learning more about the DPDHL Group Data Privacy Policy, please visit <u>https://www.dpdhl.com/en/data-protection.html</u>.

8. Data security

DHL Freight has implemented all necessary technical and organizational security

measures to protect your personal data from being lost or misused. For instance, your data is saved in a secure operating environment which is not accessible to the public.

9. Duration of storage

We delete your personal data as soon as the purpose for which we have collected and processed the personal data ceases to apply. Beyond this time period, data storage only takes place to the extent made necessary by the legislation, regulations or other legal provisions to which we are subject in the EU or by legal provisions in third-party countries if these have an appropriate level of data protection.

10. Your rights regarding the processing of your personal data

You have the following data protection rights with regard to the relevant DHL Freight legal entity:

- In accordance with Art 15 GDPR, you can request information about your personal data processed by the particular controller.
- You can request rectification in accordance with Art 16 GDPR if your data are not (or are no longer) correct.
- You can request the erasure of your personal data in accordance with Art 17 GDPR.
- In accordance with Art 18 GDPR, you have the right to request a restriction on the processing of your personal data.
- If the requirements of Art 20 (1) GDPR are met, you have the right to receive your data in a structured, commonly used and machine-readable format.
- If you have given your consent to a certain type of processing, you can withdraw this
 consent at any time with effect for the future by informing the relevant contact addresses.
- If you believe that the processing of your personal data violates data protection legislation, you have the right to lodge a complaint with the competent data protection supervisory authority in accordance with Art 77 (1) GDPR which is for DHL Freight.
- You may lodge a complaint with the supervisory authority. To find your competent data protection authority, please click here (Link: <u>http://ec.europa.eu/justice/article-</u> 29/structure/data-protection-authorities/index_en.htm)

To exercise your right, simply get in touch with us by using the contact details mentioned under section 2.

11. Information on your right to object pursuant to Article 21 GDPR

You have the right to object, on grounds relating from your particular situation, at any time to processing of your personal data, which is based on Art 6 (1)(f) GDPR (data processing for the purposes of the legitimate interests). If you file an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or unless processing serves the establishment, exercise or defense of legal claims. If you wish to make use of your right to object, please send an email to <u>dataprotectionDGFF@dhl.com</u>.

12. Changes to Privacy Notice

The content of this privacy notice is reviewed on a regular basis and adapted if necessary. This privacy notice was last updated on November 29, 2021.