

## Information on personal data processing

General Logistics Systems Czech Republic, Company ID: 26087961, with its registered office at Průmyslová 1, 586 01 Jihlava, registered in the Commercial Register kept by the Regional Court in Brno under file no. C 66184 (hereinafter referred to as “GLS CZ”), as the personal data controller, hereby informs about the manner and scope of personal data processing by this company, including the scope of the data subject's rights related to the processing of their personal data.

GLS CZ processes personal data in accordance with European Union legislation, in particular in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and in accordance with relevant national legislation (hereinafter referred to as the “Personal Data Protection Legislation”).

### Purpose and scope of personal data processing:

GLS CZ processes only accurate personal data obtained in accordance with the Personal Data Protection Legislation; and GLS CZ collects and processes this personal data only for the specified purpose, to the extent specified below, for the duration of the contractual relationship, or for the time strictly necessary.

GLS CZ processes personal data in general for the following purposes:

- performance of the contract and provision of services;
- ensuring operational activities;
- accounting and tax purposes;
- debt recovery;
- compliance with a legal obligation;
- direct marketing (information and product campaigns);
- asset preservation.

GLS CZ then processes personal data of different data subjects for different purposes and to different extent in order to achieve the purpose for which they are processed.

Categories of persons whose personal data is processed:

#### 1. Principal, sender, recipient, addressee

The purpose of processing personal data of these subjects is to fulfill a legal obligation (e.g., related to bookkeeping) and to perform contractual obligations properly (e.g., related to the delivery of a consignment) and for reasons of legitimate interests of GLS CZ (e.g., related to complaint proceedings, court claims, etc.) and also for reasons of legitimate interests of third parties (transmission of reports on delivery of consignments to the contracting party, on collection of cash on delivery, of

attachments to invoices, when these documents contain personal data of the principal, consignor, consignee or addressee supplied with consignment information as a part of the delivery process). In certain cases, if required by the consignee or the addressee, the purpose of the processing may be settlement of customs obligations, when the reason for processing of such data is in particular the proper performance of the contract for the provision of customs clearance.

GLS CZ processes personal data in this category to the following extent: name, surname, title, identification number, VAT identification number, e-mail, telephone, contact person, place of business (registered office), delivery address, consignment information (weight, acceptance, delivery, cash on delivery, additional services, etc.) including the information on the person who took over the consignment (surname and signature) and in case of customs clearance also ID card or travel document number and the country of issue of the ID card or travel document, birth identification number, IP address.

For details and further information in this category of persons, see:

<https://gls-group.com/EU/en/data-protection/gls-czechrepublic>

## **2. Suppliers of services and goods, persons who bill GLS CZ and persons are billed by GLS CZ and their agents**

The purpose of processing personal data of these subjects is the fulfillment of a legal obligation (e.g., in connection with bookkeeping) and also for the proper performance of contractual obligations and for the purposes of the legitimate interests of GLS CZ, e.g., in connection with complaint proceedings, court claims or in the context of business negotiations (business communication, business offer).

GLS CZ processes personal data in this category to the following extent: name, surname, title, identification number, tax identification number, e-mail, telephone, contact person, place of business (registered office), delivery address, bank account number, IP address.

## **3. Employees, agency employees or employees of other employers**

The purpose of processing personal data of these subjects is the performance of a legal obligation, e.g., in connection with management of human resources, payroll agenda, obligations for health and safety at work, for the purpose of the legitimate interests of GLS CZ in the form of asset protection and, if necessary, acting in the performance of work tasks.

Personal data in this category is processed by GLS CZ mainly to the following extent: name, surname, title, place of residence, date of birth, birth registrations number, e-mail, telephone, camera recordings, IP records, the photo of an employee for the identification card (employee ID card).

Further information is provided to employees in a separate document.

#### **4. Addressees of commercial communication**

The purpose of processing personal data of these subjects is the legitimate interest of GLS CZ in the form of offering services or other commercial communication, or for the purpose of providing other important information.

Personal data in this category is processed by GLS CZ to the following extent: name, surname, title, place of residence, e-mail, telephone number within the internal system.

#### **5. Unclassified natural persons who are monitored by the camera system on the premises of GLS CZ**

The purpose of processing personal data is the continuous protection of the assets of GLS CZ and the property of business partners, customers, addressees of GLS CZ against theft, as well as against other illegal or criminal activities, in particular for the purpose of preventing theft, damage or destruction of objects of higher value on the premises at Jihlava, Průmyslová 5619/1. The lawfulness of processing personal data using the camera system is necessary for the purposes of the legitimate interests of GLS CZ or a third party (business partners, customers, addressees).

Personal data in this category is processed by GLS CZ to the following extent: capturing the images of persons.

#### **6. Couriers delivering parcels (subcontractors, employees or other subcontractors of these subcontractors)**

The purpose of processing personal data of these subjects is justified by the legitimate interests of GLS CZ in the form of quality control of the shipping and transport services provided by couriers, in particular, but not exclusively, for the purpose of determining the courier's tour, including its stops, in order to prevent non-respect of business tours and data collection within complaints or other comments from recipients of consignments (addressees).

Personal data in this category is processed by GLS CZ to the following extent: name, surname, title, job classification, qualification to perform work (driving license groups), vehicle data and data from the GPS coordinates of the position and movement of the vehicle.

#### **7. Persons who fill in the contact form**

The purpose of processing personal data of these subjects is the legitimate interests of GLS CZ in the form of quality control of the shipping and transport services provided and the legitimate interests of the person who raises a question, comment, statement or objection **to** couriers via the form so that the request made via the form shall be dealt with.

Personal data in this category is processed by GLS CZ to the extent necessary, usually as follows: name, surname, address, country, contact person, telephone number, e-mail, IP address.

### **Personal data sources:**

In particular, GLS CZ collects personal data directly from the data subject as part of the negotiation of the conclusion of the contract, or from third parties, as well as from contractual partners (clients) in connection with the forwarding services provided by GLS CZ. GLS CZ may also obtain personal data through the chat service if the person provides such personal data as part of the chat communication. GLS CZ may also obtain personal data via web forms.

GLS CZ also obtains personal data from public records and other public sources on the Internet (e.g., [firmy.cz](http://firmy.cz)) in order to search for new (potential) clients.

GLS CZ also receives personal data from the camera system. Data subjects are always informed about the location of CCTV systems by information boards and pictograms when entering such a space. Recordings from camera systems are archived for the necessary time and are not further processed outside of the stated purpose.

GLS CZ informs data subjects when the provision of personal data is necessary for the provision of a specific service and when, on the contrary, it is voluntary, but the provision of such personal data will facilitate mutual communication between the data subject and GLS CZ and also significantly streamline the provision of services.

In order to increase the quality of services, objectivity, verifiability and security, GLS CZ monitors and records communication with data subjects (especially telephone calls to the customer line).

### **Personal data security**

GLS CZ ensures the security of personal data depending on the assessment of specific risks.

GLS CZ has taken measures to prevent unauthorized or accidental access to personal data, their modification, destruction or loss, unauthorized transfers, processing, as well as other misuse.

If it results from the nature of the personal data carrier, personal data is stored on special servers, and these servers are located in a special room that serves only for the purpose of server placement. The room is then properly locked and secured.

The camera system as such is operated within a closed circuit, i.e., the data cannot be accessed via the Internet. The camera system is protected by antivirus protection.

Access to personal data is only allowed to authorized persons who are authorized to work with personal data.

Employees are trained in the handling of personal data and are subject to an internal control system.

Subjects that enter into contractual relationships with GLS CZ are properly instructed about the nature of personal data and, if they handle personal data, they are further contractually obliged to process personal data in accordance with the legislation.

## Processors and recipients of personal data

The priority of GLS CZ is not to provide personal data to any other party for other purposes that would not be related to the provision of forwarding services.

However, in addition to GLS CZ and its employees, personal data may also be transferred to other persons in order to ensure the purposes described above:

1) subjects exercising their authority – personal data is provided for the purpose of fulfilling legal obligations by GLS CZ;

2) law enforcement and a body responsible for administrative proceedings or other agencies that enforce the law to protect national security interests or as part of a legal process designed to protect property or in support of an investigation of a violation of GLS rules and policies, unauthorized access to or use of GLS equipment, or other illegal activity;

3) data processors – subjects that have a contractual relationship with GLS CZ under which they provide services to GLS CZ and process personal data for the purpose of providing these services on the basis of an agreement on personal data processing; these are in particular the following subjects:

a. GLS subsidiaries and subcontractors in other EU countries or outside the EU for the purpose of performing the contract (delivery of the parcel from the sender to the addressee);

b. affiliated or unaffiliated third parties which are in a contractual relationship to perform services for GLS CZ or on behalf of GLS CZ (processors), in particular operators of regional depots, and third parties with which GLS CZ has concluded relevant data protection agreements;

c. other persons or organizations that have the right to personal data under applicable legislation;

4) other controllers – personal data is provided for the purpose of fulfilling contractual obligations, e.g., insurance companies, banks, telephone operators, in certain cases also the principal or the sender (e.g., information on the process of the consignment delivery is assigned to the addressee and this summary information, including personal data, is returned to the principal or the ordering party).

Personal data is transferred abroad only for the purpose of providing forwarding and shipping services (delivery of consignments), for the purpose of archiving, for the purpose of creating statistics and for the purpose of fulfilling legal obligations (international sanctions, embargoes, etc.).

## Rights of data subjects

The data subject shall have the right

- to be informed about and have access to their processed personal data (the right to be informed and the right of access pursuant to Art. 15 GDPR),

- to achieve the correction of inaccurate personal data (the right to rectification pursuant to Art. 16 GDPR),
- to achieve the deletion of their personal data (the right to erasure pursuant to Art. 17 GDPR),
- to restrict processing (the right to restriction of processing pursuant to Art. 18 GDPR),
- to obtain your personal data provided to us (the right to data portability pursuant to Art. 20 GDPR),
- to object, on grounds relating to their specific situation, to processing of personal data based on legitimate interests or the performance of a task in the public interest (the right to object pursuant to Art. 21).

The above rights may be exercised provided that the legal conditions are met.

In the event that the personal data has been processed on the basis of consent, we inform the data subject that they have the right to withdraw this consent at any time, without affecting the lawfulness of the processing of personal data prior to the consent withdrawal.

### **Exercise of data subjects' rights**

If the data subject is interested in exercising their right or withdrawing their explicit consent, they shall send a request (inquiry) to GLS CZ directly to the Data Protection Manager, formulating the subject of their request (inquiry), in particular, e.g., which right they want to exercise so that GLS CZ can take the necessary steps to respect them.

It is pointed out that if the contact with GLS CZ is performed via unencrypted e-mail, confidentiality of the transmitted information is not guaranteed and unencrypted e-mails may be read by unauthorized third parties.

The request (inquiry) can be delivered to GLS CZ in the following ways:

- in writing to the address of the registered office
- by email to [dataprotection@glc-czech.com](mailto:dataprotection@glc-czech.com)

In the event that we are to disclose any information regarding the processing of personal data of a specific person, we are entitled to request confirmation of the identity of the data subject executing the request (inquiry) in order to verify the legitimacy of the request for GLS CZ. This way we also protect your privacy.

The data subject has the right to lodge a complaint with the Office for Personal Data Protection if they believe that their rights have been violated ( <https://uou.gov.cz/en>): the OFFICE FOR PERSONAL DATA PROTECTION, with its registered office at Pplk. Sochora 27, 170 00 Prague 7, Czech Republic.

In Jihlava, on 1<sup>st</sup> November 2022