

# Privacy policy General Logistics Systems Spain, S.A

General Logistics Systems Spain, S.A. (GLS Spain) is a subsidiary of General Logistics Systems BV. GLS Spain performs reliable and high quality parcel services

GLS takes data privacy seriously. For that reason personal data is collected solely according to the applicable statutory regulations. The latest version of this privacy policy can be found on our website www.gls-group.eu.

In the framework of action of the General Regulation of Data Protection (RGPD), we inform you of our policy regarding the treatment of personal data.
GLS Spain processes only your personal data in order to provide your services and always does so with extreme care. The purpose of this policy is to describe the way in which GLS Spain handles your data.

If you have any questions or comments regarding the processing of personal data, you can contact our Data Protection Officer:

Controller of Personal Data processing:

General Logistics Systems Spain S.A. Calle del Ing Torres Quevedo, 1, San Blas-Canillejas, 28022 Madrid

You can also contact us through the email address: <a href="mailto:protecciondatos@gls-spain.com">protecciondatos@gls-spain.com</a>

You will find additional information on the GLS website regarding the protection of personal data. You can contact us at the indicated address.

Likewise, you can consult any question related to data protection on the website of the Spanish Agency for Data Protection:

https://www.agpd.es/portalwebAGPD/index-ides-idphp.php

#### Personal data

Personal data comprises particulars on personal or factual circumstances of a specific or determinable individual. This includes for instance information such as name, address, telephone number and date of birth. Information that cannot be linked to a specific or determinable individual such as favoured web pages or the number of users on a page - is not considered as personal data.

Personal data is considered: any information that allows the direct or indirect identification of a natural person. Personal data include details about personal or factual circumstances of a specific or determinable individual. This includes, for example, information such as name, address, telephone number. Information that can not be linked to a specific or determinable individual, such as preferred web pages or the number of users on a page, is not considered as personal data. They can also be considered personal data, including information such as the workplace and the profession, as long as it is linked to a natural person. Information that can not be linked to an identified or identifiable natural person, such as the most visited web pages or the number of users on a page, is not considered personal information.

# Personal data Processing

It corresponds to a processing of personal data any operation or set of operations carried out or not using automated processes and applied to data or personal data sets, such as collection, registration, organization, structuring, preservation, adaptation or modification, extraction, consultation, use, communication by transmission, diffusion or any other form of provision, reconciliation or interconnection, limitation, deletion or destruction;

As part of our business, we are obliged to process your personal data. Please note that we always limit ourselves to the data strictly necessary for the implementation of our package delivery mission, such as name, name, address, telephone number, email address or the completion of our legal obligations

#### Transfer of your data to third parties

Your personal data may be transferred to third parties, but only to ensure the proper functioning of our services or to comply with our legal obligations. More precisely, they can be transferred:

• Companies with which GLS Spain cooperates in the course of its activities (for example, subcontractors, service providers, etc.);



# Security of personal data

GLS Spain is a company that provides postal services to the public or contributes to the provision of said services, respectively.

With respect to postal services, GLS Spain is obliged to access postal privacy and is subject to the regulations of the Organic Law on Data Protection, the Royal Decree of the LOPD 1720/2007 and the General Regulation of Data Protection (GDPR) 2016/679 of April 27. All employees of GLS Spain have committed themselves by signing to comply with the secrecy of the data.

Through technical and organizational security measures, GLS Spain makes every effort to protect personal data against loss or misuse. Personal data is processed only on systems that are protected by adequate security measures. We will modify our security and privacy protection measures to the extent necessary in the light of technical progress. We will also update our privacy policy if necessary.

# Rights of the interested subject

As part of the General Data Protection Regulation, you have certain rights with respect to your personal data and its processing. To exercise these rights, you can contact us. Below is a brief description of your rights.

The rights of the person whose personal data are processed are the following:

- Right of access and data copy: recovery of stored data;
- Right to rectify data: correct data;
- Right to delete data (right to be forgotten): definitive deletion of data, except legitimate interest that justifies conservation;
- Right to limitation of treatment: treatment may be limited for certain reasons;
- Right to data portability: transfer data to a third party.

In the case of such requests, you must prove your identity to enforce your rights.

# II. Consignee consignment and data:

Transfer and processing To carry out parcel services and, therefore, to fulfill the contracts with its customers, GLS Spain needs the data of the recipient (name, address, postal code, city, country, optionally phone number and email address) electronic). The data of the recipient transferred to GLS Spain, as well as the documentation of the interface (scans of the plots in different places) and the proof of delivery (POD) are processed and recorded by GLS Spain. GLS Spain uses personal consignment and consignee data only for the fulfillment of its contractual obligations. Any subsequent use is not allowed.

#### Responsibility:

Compliance with the applicable legal regulations on data privacy is an original duty of GLS Spain. Additional services such as FlexDeliveryService and ShopDeliveryService use the recipient's email address or telephone number to inform them of the status of package delivery. We received the telephone number and / or email address of the consignor who ordered these additional services. The shipper is also responsible for the proper collection of this data and especially the recipient's consent to the transfer of their email address and / or phone number to us. If you have questions about this procedure, contact your contractual partner (the shipper). You can revoke your consent also against us.

#### Information and data transmission:

In general, only the sender and recipient of a package are entitled to receive information about the package. GLS Spain provides package information to third parties (for example, government authorities) only on the basis of legal regulations.

# Retention and deletion

Proof of delivery, consignment and data of the recipient are kept in accordance with the rules of legal retention. The archived data is recorded on storage media accessible only to authorized personnel. After the legal hold period expires, the data is deleted.

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#### III. To transmit

Information by email:

If you wish to contact us by unencrypted email, please note that the confidentiality of the information transmitted can not be guaranteed. Unencrypted emails can be read by unauthorized third parties.

Collection, Processing and Use of personal data on the GLS website

(1)

Each time a user accesses a GLS website, data is recorded in a log file. The following data is temporarily recorded:

- Date and time of request
- IP address or DNS name of the requesting computer
- Requested page (URL)
- HTTP answer code
- Client operating system and version
- Browser and version

(2)

To use the websites of GLS it may be necessary for the servers of GLS to set cookies. These cookies are used for the technical administration of the website. Every visitor can configure his/her browser to refuse cookies. In this case no data will be saved on the visitor's computer. It may be that you cannot use all functions of the website to the full extend when cookies are disabled.

(3)

The GLS website is divided into open and closed area. The closed area partly serves to fulfil the contract between the customer and GLS and is only accessible after login with an individual user name and password.

Among other functionalities the open area provides a contact form, Track and Trace functionality and the Parcel Shop search. Personal data entered in the contact form such as name, street, postcode, place, etc. is required for processing your enquiry and will not be passed on to third parties.

(4)

The stored data from (1) is anonymously analysed for statistical purposes. Statistical reports are used to evaluate the usage of the GLS websites. In particular, the order in which the pages are visited and the path taken between pages is shown. This is intended to give GLS an indication as to how the usability of the website can be further improved.

(5)

The GLS website uses Google Analytics, a web analysis service of Google Inc. ("Google"). Google Analytics uses so called "cookies", i.e. text files that are saved on your computer, allowing an analysis of how you use the web site. The information about your use of this web site, generated by the cookie (incl. your IP address), is transmitted to a Google server in the USA and saved there. If IP anonymisation is activated on this website, your IP address is shortened before transmission in member states of the European Union or other contractual states of the agreement on the European Economic Area. Only in exceptional cases the full IP address is transmitted to a Google server in the USA and shortened there. Google will use this information in order to analyse your use of the website, to compile reports about the website activities for the website operator and to perform further services that are connected with the website use and the internet use. Moreover, Google will transmit this information to a third party when indicated, as far as this is legally mandatory or as far as a third party is processing this data on behalf of Google. Google will in no case connect your IP address with other data of Google. You can avoid the installation of cookies by adjusting the according settings of your browser software; however we would like to point out that in this case you might not be able to use all functions of this web site to the full extent. Furthermore you can block the registration of the data created by the Cookie (incl. your IP address) and related to your use of this website and the processing of this data by Google by downloading and installing the browser plugin available under http://tools.google.com/dlpage/gaoptout?hl=en.

The GLS website uses the Google Analytics extension "ga('set', 'anonymizelp', true);". This ensures anonymised registration of IP addresses ("IP masking").

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Collection, Processing and Use of personal data in Progressive Web App (PWA) and App My GLS

The personal data processing already mentioned in the previous sections for the transport of goods and in relation to cookies are applicable to the PWA and App My GLS.

Only the personal data strictly necessary to comply with the delivery of the packages and provide the information required by the users will be processed. Said data includes name, address, country, telephone number (to inform you about the delivery status of the package and access your profile), email address, identity document and, when the user requests to know the nearest ParcelShop, the geolocation of the device.

GLS Spain provides package information to third parties (for example, government authorities or collaborating carriers) solely on the basis of legal regulations or for the execution of the transport contract. Outside of these assumptions, they will not be transferred to third parties and the personal data will be eliminated in accordance

with the legally established deadlines.

You can contact General Logistics Systems Spain S.A (Data Controller) at Calle del Ing Torres Quevedo, 1, San Blas-Canillejas, 28022 Madrid. Spain, or to the email address protecciondatos@gls-spain.com

Likewise, you can consult any question related to data protection on the website of the Spanish Data Protection Authority:

www.aepd.es/es