INFORMATION ABOUT PERSONAL DATA PROCESSING "SUPPLIERS"

PREAMBLE

This personal data processing policy is specifically tailored to all the company's suppliers and their employees, or subcontractors and their employees (hereinafter as "**Disclosure**"). The Disclosure provides the basic and important details as to how the company processes your personal data, the manner in which you can contact the company and other key information.

When processing personal data, the company conforms to Directive (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons and in connection with the processing of personal data and on the free movement of such data and on the repeal of Directive 95/46/EC (general data protection regulation (hereinafter as "GDPR" and Act No. 18/2018 Coll. on Personal Data Protection and on amendment of certain acts and other valid legislation applicable to personal data protection ("Personal Data Protection Act").

In relation to the processing of your personal data, the company has prepared for you (hereinafter as "data subject") this Disclosure concerning the protection of personal data according to Article 13 GDPR.

I. IDENTIFICATION AND CONTACT DETAILS FOR THE CONTROLLER:

The **controller** of the processed personal data is:

Business name: DHL Freight Slovakia, s.r.o. with registered office at Galvániho 17/B, 82104 Bratislava

Company ID No.: 53 186 931

Registered in the Commercial Register at Bratislava III Municipal Court, Section: Sro, File number: 147969/B

(hereinafter as "company" or "controller")

GDPR OFFICER

You may contact the officer using the following contact details:

- email address: skfreight.dpo@dhl.com,
- mailing address: Galvániho 17/B, 82104 Bratislava

Please specify "GDPR" on the envelope when addressing any requests in writing to the company's registered office.

II. <u>PURPOSES AND LEGAL BASIS FOR PROCESSING PERSONAL DATA AND PERSONAL DATA</u> RETENTION PERIOD

The company processes your personal data in the necessary scope, while most processing is justified in that such personal data is required in connection with the provision of a service resulting from a business relationship in which personal data is necessary.

If the legal basis for processing personal data is a **contract** for any of the purposes of processing, the provision of such personal data constitutes a contractual requirement for performance within the meaning of the contract in question. In case of failure to provide these personal data, it is not possible to enter into a contractual relationship, or to subsequently perform any such contract. Both the controller and the supplier have the obligation to provide the relevant personal data for natural persons under a concluded agreement if failure to provide such personal data could prevent the proper and timely performance of the contract.

If the legal basis for processing personal data is a **law**, provision of this personal data is a statutory requirement. If such personal data is not provided, the company will be unable to comply with relevant obligations under relevant general legal regulations.

The company processes your personal data for the following purposes specified in the table below:

¹ **Supplier** for the purposes of this Disclosure includes any of the contracting partners of the company who has concluded a valid business agreement with the Company or an Order, or any other form of contract as permitted under Act No. 513/1991 Coll., the Commercial Code, Act No. 40/1964 Coll., the Civil Code, or another unnamed contract within the meaning of the law (hereinafter as "**Supplier**").

INFORMATION ABOUT PERSONAL DATA PROCESSING ACCORDING TO ART. 13 & 14 GDPR

No.	PURPOSE OF PROCESSING	LEGAL BASIS FOR THE PROCESSING ACTIVITY	CATEGORIES OF DATA SUBJECTS	PERIOD TO DELETE PERSONAL DATA	CATEGORIES OF RECIPIENTS
1	BUSINESS COMMUNICATION (Note: preparation and implementation of the controller's business activities, record keeping of contracts and business contacts, fulfilment of contracts)	- processing, in accordance with Article 6 (1)(b) GDPR, is necessary for the performance of a contract to which a natural person is a party - processing, in accordance with Article 6 (1)(f) GDPR, is necessary on the basis of the legitimate interest on the part of the controller under §78 (3) of the Personal Data Protection Act Legitimate interest: The company has a legitimate interest in processing the personal data of natural persons acting on behalf of its suppliers to ensure the valid conclusion of a contract (i.e. the conclusion of a contract with persons authorised to act on behalf of a company that is a supplier of the company), its proper and effective fulfilment (i.e. especially communication with the relevant employees on the company's supplier. Personal data is stated directly in orders, contracts or obtained in connection with the fulfilment of contracts.	 Employees and members of the controller's statutory bodies, Employees and members of the supplier's statutory bodies, other cooperating persons and other subjects in business communication 	- during the duration of the contractual relationship, max. 5 years after the termination of the business relationship	 a court, law enforcement authorities, executors, lawyers, banks and payment institutions, entities contractually cooperating with the controller (e.g. legal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), other entities to which the controller provides personal data resulting from legislative regulations
2	ACCOUNTING AGENDA	 processing, in accordance with Article 6 (1)(c) GDPR, is necessary to fulfil the controller's statutory obligations under Act No. 431/2002 Coll. on Accounting, as amended, Act No. 222/2004 Coll. on Value Added Tax, as amended, Act No. 40/1964 Coll., the Commercial Code, as amended, Act No. 311/2001 Coll., the Labour Code, as amended, Act No. 595/2003 Coll. on Income Tax, as amended, Act No. 283/2002 Coll. on Travel Reimbursement, as amended, other legal regulations related to such purpose. 	 Employees and members of the controller's statutory bodies, Employees and members of the supplier's statutory bodies, other cooperating persons and other subjects which are part of accounting records 	- 10 years following the year to which they relate	 Financial Administration of the Slovak Republic, Tax Office, Social Insurance Administration, law enforcement authorities, a court, executors, lawyers, banks and payment institutions, entities contractually cooperating with the controller (e.g. legal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), other entities to which the controller provides personal data resulting from legislative regulations

3.	GROUP OF ENTERPRISES AGENDA (Note: personal data processing for internal administrative purposes within a group of enterprises)	- processing, in accordance with Article 6 (1)(f) GDPR, is necessary on the basis of the controller's legitimate interest . Legitimate interest : The company is interested in processing the personal data of its suppliers and supplier employees, primarily for internal administrative purposes to facilitate and streamline internal cooperation and processes with companies forming the operator's group of enterprises (for more information, see Recital 48 GDPR).	 employees of suppliers, the controller's employees, other cooperating persons and other entities found in the documentation for the group of enterprises 	- for the duration of membership in the group of enterprises	 members of the DHL group of enterprises, entities contractually cooperating with the controller (e.g. legal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), other entities to which the controller provides personal data resulting from legislative regulations
4.	LEGAL AGENDA (Note: resolution of the controller's litigious and non-litigious agenda, e.g. lawsuits, alternative resolution of consumer disputes, executions, collection of claims, submission of claims for bankruptcy and restructuring, etc.)	 processing, in accordance with Article 6 (1)(c) GDPR, is necessary to fulfil the controller's statutory obligations under: Act No. 160/2015 Coll. on the Code of Civil Litigation, Act No. 420/2004 Coll. on Mediation, as amended, Act No. 244/2002 Coll. on Arbitration Proceedings, Act No. 301/2005 Coll., the Criminal Code, as amended, Act No. 7/2005 Coll. on Bankruptcy and Restructuring and on amendment of certain acts, Act No. 162/2015 Coll., the Code of Judicial Procedure, Act No. 233/1995 Coll. on Court-Appointed Executors and Enforcement Activities (Execution Regulations) and on amendments of other acts, Act No. 391/2018 Coll. on Alternative Dispute Resolution for Consumer Disputes and on amendment of certain acts, as amended, Act No. 74/1967 Coll. on Administrative Procedure (Code of Administrative Procedure) as amended, Act No. 372/1990 Coll. on Offences, as amended, other legal regulations related to such purpose. 	 participants in litigious and non-litigious proceedings, debtor or bankrupt party in bankruptcy or restructuring proceedings, obliged party in enforcement proceedings, witnesses, injured party in criminal proceedings, employees and suppliers' employees 	- 10 years after the legal end of the relevant procedure	 a court, law enforcement authorities, Slovak Trade Inspection Authority, lawyer, executor, and entities contractually cooperating with the controller (e.g. legal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), other entities to which the controller provides personal data resulting from legislative regulations
5.	IT AGENDA (Note: provision of security and technical support of information and network systems)	- processing, in accordance with Article 6 (1)(f) GDPR, is necessary on the basis of legitimate interest Legitimate interest : The company has a legitimate interest in processing personal data for the purpose of the IT agenda, which is a necessary means for the efficient processing of personal data, in particular the security of the network and network devices, the control and prevention of unauthorised access and the prevention of data theft. With the current state of technology, it is expected and necessary that controllers when managing information systems implement solutions through which it is possible to effectively manage information systems, respond to current developments and maintain the security of information systems at a constantly high level.	 the controller's employees, employees of the supplier providing support in the systems, other cooperating entities and other entities in IT systems 	- for the duration of the concluded contractual cooperation	- entities contractually cooperating with the controller (e.g. legal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), - other entities to which the controller provides personal data resulting from legislative regulations

6.	DAMAGE RECORDS, PROTECTION AGAINST CLAIMS FOR DAMAGE COMPENSATION	- processing, in accordance with Article 6 (1)(f) GDPR, is necessary on the basis of legitimate interest Legitimate interest : The company has a legitimate interest in processing personal data for the purpose of resolving any damages caused by contracted suppliers, their damages, or the use of protection against claims for damages by third parties. Such processing is obvious and predictable on the part of data subjects.	 the controller's employees, supplier employees, other cooperating persons and other entities (e.g. drivers, etc.) 	- 10 years following the year to which they relate	 law enforcement authorities, a court, executors, lawyers, banks and payment institutions, insurance agencies, entities contractually cooperating with the controller (e.g. legal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), other entities to which the controller provides personal data resulting from legislative regulations
7.	PROVISION AND PUBLICATION OF PERSONAL DATA OF EMPLOYEES TO THIRD PARTIES IN CONNECTION WITH THE PERFORMANCE OF WORK DUTIES	 processing, in accordance with Article 6 (1)(f) GDPR, is necessary on the basis of the controller's legitimate interest: under § 78 (3) of the Personal Data Protection Act Legitimate interest: The company has a legitimate interest in processing personal data for the purpose of achieving a clearly and definitely defined goal in advance, which is primarily the achievement of proper and efficient performance of work duties by employees and also to control the performance of work duties by employees on the part of the controller. By providing and publishing personal data of employees in connection with the performance of their work duties, the controller ensures that the data subjects and third parties are informed about whom they can turn to with their possible requests, suggestions, questions, etc. 	 the controller's employees, supplier employees 	- until the end of the year in which the employment law or similar legal relationship was terminated	- entities contractually cooperating with the operator (e.g. legal services, postal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), - other entities to which the controller provides personal data resulting from legislative regulations
8.	INTERNAL ADMINISTRATION OF SUPPLIERS	- processing, in accordance with Article 6 (1)(f) GDPR, is necessary on the basis of the controller's legitimate interest Legitimate interest : The company has a legitimate interest in processing the personal data of the supplier's employees, or other cooperating persons with whom it communicates during the provision of services and closely cooperates with these persons, primarily for the purpose of facilitating and streamlining mutual cooperation with these companies, or their persons.	 the controller's employees, supplier employees, other cooperating persons and other entities (e.g. drivers, etc.) 	- for the duration of the concluded contractual relationship	 members of the DHL group of enterprises, entities contractually cooperating with the controller (e.g. legal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), other entities to which the controller provides personal data resulting from legislative regulations

9.	EXERCISE OF THE RIGHTS OF DATA SUBJECTS UNDER GDPR	 processing, in accordance with Article 6 (1)(c) GDPR, is necessary to fulfil the controller's statutory obligations under: of the Regulation and Act No. 18/2018 Coll. on Personal Data Protection and on amendment of certain acts 	- natural persons exercising the rights of data subjects	- 5 years following the year in which the request was processed	- entities contractually cooperating with the controller (e.g. legal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), - other entities to which the controller provides personal data resulting from legislative regulations
10.	MAINTENANCE OF RECORDS OF INSURANCE EVENTS	- processing, in accordance with Article 6 (1)(f) GDPR, is necessary on the basis of the controller's legitimate interest Legitimate interest: The company has a legitimate interest in processing the personal data of the supplier's employees and natural persons in connection with the investigation, documentation and liquidation, or to otherwise resolve damage or insurance events, in which the employee or the injured person is the person entitled to provide insurance compensation or payment of a recourse claim. The goal is to fulfil the obligation to compensate for the damage caused, to contribute and assist in the application of the claims of the injured party, to prevent the occurrence of damage and to take measures and carry out activities aimed at protecting its property, business name and good reputation.	the controller's employees,supplier employees,injured persons	- for a period of 5 years following the conclusion of the contractual relationship	 insurance institutions, entities contractually cooperating with the controller (e.g. legal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), other entities to which the controller provides personal data resulting from legislative regulations
11.	GPS MONITORING AND LOCALISATION OF SUPPLIERS (Note: monitoring and localisation is carried out for the purpose of optimising the activity and tracking the transport and performance of suppliers according to contractual documentation)	- processing, in accordance with Article 6 (1)(f) GDPR, is necessary on the basis of the controller's legitimate interest Legitimate interest: The company has a legitimate interest in processing personal data for the purpose of ensuring and controlling the proper fulfilment of the contractual obligations of its suppliers (transport companies). GPS localization also serves as a means of providing assistance to its suppliers (e.g. in case of cargo loss, etc.) GPS monitoring is an effective tool for monitoring and fulfilling obligations. There is no other way to achieve this purpose, which would be equally effective and less invasive and disruptive in relation to the persons concerned.	 the controller's employees, supplier employees other cooperating persons and other entities (e.g. drivers, etc.) 	- for the duration of the concluded contractual relationship	- members of the DHL group of enterprises, - a GPS monitoring company, - entities contractually cooperating with the controller (e.g. legal services, debt collection, IT support, external auditors, professional consultants and advisors who are bound by a legal or contractual obligation of confidentiality, etc.), - other entities to which the controller provides personal data resulting from legislative regulations

Note: The above-mentioned purposes of personal data processing were excluded from the records of the controller's processing activities.

III. <u>PROFILING AND AUTOMATED PROCESSING OF PERSONAL DATA AND TRANSFER</u> <u>TO THIRD COUNTRIES</u>

The controller does not perform automated individual decision-making or profiling with the data subject's personal data, which would have legal effects for the data subject or would significantly affect the data subject in terms of their rights and freedoms.

Your personal data is transferred to a third country - INDIA. Personal data is processed on the territory of the Slovak Republic and in India by entities belonging to the controller's group of companies.

The transfer to this country is carried out on the basis of concluded standard contractual clauses. The standard contractual clauses specify the transfer conditions, the rights and obligations of both contractual parties, and adopted security, personnel and organisational measures.

IV. SOURCES OF PERSONAL DATA

The controller obtains personal data from the following sources:

4.1 DIRECTLY FROM A DATA SUBJECT

If a data subject concludes a business contract with the controller or an order for the purposes of fulfilling a contract or order, or providing services resulting from the concluded contract or order.

4.2 INDIRECTLY VIA SUPPLIERS

The controller obtains personal data from its suppliers with whom it has concluded any form of cooperation agreement or other unnamed contract and a personal data protection contract or contract on the conditions for personal data processing. Suppliers provide the controller with the personal data of data subjects for the purposes of providing services.

V. PERSONAL DATA

The personal data that the controller processes about you are the following:

- **5.1 Identification and contact data**: in particular title, first name, last name, address, date of birth, social security number, identity document information, bank account, telephone number, email address, delivery address, vehicle information and vehicle location. Your identification data is part of the contract you conclude with us for the purpose of ordering a service or other contractual (business) relationship. We collect personal data to the extent required by legal regulations, such as the Civil Code, the Commercial Code and others.
- **5.2** Transaction data: data on payments received and sent.
- **5.3 Data from communication and interaction**: these data include e.g. data from business communications, as well as data from mutual contact through the respective contact points.

VI. RIGHTS OF DATA SUBJECTS

The rights of data subjects may be designated as the basis of legal protection for personal data under GDPR and the Personal Data Protection Act.

As a data subject, you have the following rights:

Right to access personal data [Article 15 GDPR]

You have the right to receive a confirmation from the company containing information about whether we are processing your personal data. In the event that we process your personal data, you have the right to obtain access to this personal data, within the scope of: purpose of processing, category of personal data,

recipients of personal data, period of processing of personal data and information about the source from which we obtained your personal data. Furthermore, you have the right to receive a copy of your personal data, but it is necessary that you explicitly state this in your request. Should you require additional copies, we have the right to charge a reasonable fee for the said service for issuing additional copies. However, the rights of third parties, including other persons who have provided personal data to the company, cannot be limited by this, and the company cannot make other people's personal data available to you.

Right to correction or addition [Article 16 GDPR]

Based on a request, you have the right to correct your incorrect personal data or to complete incomplete personal data that we keep about you. By using this right in a correct way, you will help keep your personal data correct and up-to-date.

Right to erasure ('right to be forgotten') [Article 17 GDPR]

You have the right to request, without undue delay, the deletion of your personal data only if one of the following reasons is met:

- the personal data *are no longer necessary in relation to the purposes* for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based according to Article 6 (1)(a) GDPR or Article 9 (2)(a) GDPR, and where there is no other legal ground for the processing;
- the data subject objects to the processing of personal data according to Article 21 (1) GDPR (i.e. objection to a legitimate or public interest pursued by the company) and there are no legitimate reasons for processing or the data subject objects to processing pursuant to Article 21 (2) GDPR (i.e. direct marketing);
- the personal data have been unlawfully processed;
- the personal data have to be erased to *comply with* α *legal obligation* in EU or Member State law to which the controller is subject;

The company does not have the obligation to delete your personal data in the following instances:

- to exercise the right of freedom of expression and information;
- to comply with a legal obligation which requires processing under EU or Member State law to which the company is subject or to perform a task carried out in the public interest or to in the exercise of official authority vested in the company;
- for reasons of *public interest in the area of public health* in accordance with Article 9 (2)(h) and (1) of the Regulation and Article 9 (3) GDPR;
- for archiving purposes in the public interest, scientific or historical research purposes or statistical
 purposes in accordance with Article 89 (1) GDPR as far as the right referred to in Article 17 (1)
 GDPR is likely to render impossible or seriously impair the achievement of the objectives of that
 processing, or
- to establish, exercise or defend legal claims.

Right to limit processing [Article 18 GDPR]

You have the right, based on a request to block your personal data, to limit their processing (i.e. limit the processing of your personal data to the exclusive storage of personal data, we cannot perform other activities with them during blocking), but only in the following cases:

- restriction of the processing of your personal data at the time of verification of their correctness;
- if your personal data is processed unlawfully and at the same time you request, instead of deleting your personal data, only a limitation of their processing (only storage);
- you need your personal data to establish, exercise or defend legal claims;
- you objected to the processing according to Article 21 (1) GDPR (i.e. legitimate or public interest), until verification of whether legitimate reasons on the part of the company outweigh your legitimate reasons.

In the event that the processing of personal data is restricted, the company may continue to store or process your personal data:

• to establish, exercise, or defend legal claims,

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- to protect the rights of another natural person or legal entity,
- for reasons of important public interest of the European Union or a Member State,
- only with the consent of the data subject.

If a situation were to arise that would lead to the cancellation of the limitation of personal data processing, the company will inform the data subject about this fact in advance.

Right to object [Article 21 GDPR]

You have the right to object to the processing of your personal data at any time, if the legal basis for the processing of personal data is a legitimate interest (Article 6 (1)(f) GDPR), by sending a written request electronically to the e-mail address **skfreight.dpo@dhl.com**, by post or by submitting a written request in person at the company headquarters.

After receiving the objection, we will dispose of your personal data, with the exception of the following two situations:

- the company demonstrates necessary legitimate reasons for processing that outweigh your interests, rights and freedoms, or
- the company proves that it needs your personal data to establish, exercise or defend legal claims;
- if your personal data is also used by the company for other purposes, about which we have specifically informed you, with the exceptions provided by the relevant special laws, against which you have submitted your objections.

Your objections do not affect the processing of your personal data before the delivery of your objections.

Right to lodge a complaint with the supervisory authority [Article 77 GDPR]

If you believe that there has been a violation of your rights to personal data or a violation of the rules for processing your data, you have the right to file a complaint with the competent supervisory authority, which is:

Office for Personal Data Protection of the Slovak Republic

Hraničná 4826/12 820 07 Bratislava 27

phone: +421/2/32313214; email: statny.dozor@pdp.gov.sk,

Exercising your rights [Article 12 GDPR]

The company will provide information regarding the processing of personal data only on the basis of the request of the person concerned in the exercise of his rights, provided that the person concerned <u>is</u> <u>demonstrably able to identify it</u>. Without successful verification of your identification, the company is not obliged to provide any information regarding the processing of personal data. The company thus prevents unauthorised access to your personal data and the violation of your rights by an unauthorised person.

You can exercise your personal data rights in the following ways:

- in person at the company's headquarters or at the company's branches,
- in writing, or by sending a request by post.

The application must contain all the necessary information and attachments necessary to process your application and assess your claims regarding personal data processing. If your application is incomplete, we will contact you to complete the application.

The company has a deadline of one month to process your request from the date of receipt of the request. If necessary, the specified period can be extended by another two months, taking into account the complexity of the application and the number of applications received. The company informs the applicant of each such extension within one month of receiving the application along with the reasons for missing

the deadline. In that case, the applicant will be informed about the extension of the deadline in the form they chose for the delivery of the answer to their application.

VII. FINAL PROVISIONS

The company reserves the right to any update of this Disclosure according to changes in the applicable legislation. At the same time, we assure you that we treat the personal data of data subjects with the greatest care and respect, in accordance with applicable legal regulations and using available technical protection.

If you have any questions regarding the protection of personal data that you did not find an answer to in this Disclosure, please contact the person at the email address **skfreight.dpo@dhl.com**.

The supplier declares that he has familiarized himself with this Disclosure and undertakes to familiarise all data subjects whose personal data is provided to the controller with this Disclosure when they are involved in cooperation with the operator (e.g. members of the statutory body, employees, etc.)

The supplier declares that all data subjects have been informed of the Disclosure, whereby the controller has fulfilled its obligation to inform data subjects according to the GDPR and the Personal Data Protection Act.

This document will be updated regularly. The Disclosure is valid and entered into force on **21 November 2023**.