

**PERSONAL DATA TRANSPARENCY POLICY AT THE DHL SUPPLY CHAIN
POLAND DIVISION (HEREINAFTER "THE POLICY")**

DHL Supply Chain Poland Division attaches great importance to the protection of your personal data and ensures that they are processed in accordance with applicable laws, in particular the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter referred to as: **"GDPR"**.

Transparency in the processing of personal data constitutes one of the fundamental principles regarding the processing of personal data and a paramount obligation arising from GDPR, which applies to three main areas: 1) **informing** data subjects of any circumstances regarding the processing of their personal data; 2) the manner of **communication** with data subjects regarding their rights under the GDPR; and 3) the way in which data controllers **facilitate the exercise of rights** for data subjects. For individuals, it should be transparent that their personal data is being collected, used, accessed, or otherwise processed, as well as how this data is utilized.

Below you will find information on the processing of personal data by companies of the DHL Supply Chain Poland division, the rights you have in connection with the processing, and how to exercise them.

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Who processes personal data and for what purposes?

1. The data controller of your personal data is one of the companies of the DHL Supply Chain Poland division: (i) DHL Exel Supply Chain (Poland) Sp. z o.o., (ii) DHL Exel Supply Chain Trade (Poland) Sp. z o.o. or (iii) DHL Supply Chain (Poland) Sp. z o.o. with its registered office in Warsaw (02-146) at ul. Komitetu Obrony Robotników 45D (hereinafter referred to as the **"Company"**).

DATA SUBJECT	PURPOSES AND LEGAL BASIS OF DATA PROCESSING
An individual with a sole proprietorship who has entered into an agreement with the Company or actions having been taken in relation to them prior to the agreement at their request (e.g., customers, suppliers, and other entities providing the Company with ongoing technical and organizational support enabling its management).	▪ the necessity for the performance of the agreement you concluded with the Company or to take actions at your request, prior to the conclusion of the agreement on the basis of Article 6(1)(b) GDPR (day-to-day contact and arrangements in connection with the performance of the agreement concluded with the Company, issuing invoices, making settlements); ▪ the necessity to fulfill legal obligations imposed on the Company, especially arising from tax law and accounting regulations,

	based on Article 6(1)(c) of the GDPR; ▪ purposes resulting from the legitimate interests pursued by the Company, especially ensuring contact with you before concluding the agreement and during the term of the agreement, as well as establishing, pursuing, or defending against potential claims based on Article 6(1)(f) of the GDPR.
The authorized representative, contact person or another person on the part of the entity that has entered into an agreement with the Company or another person involved in the performance of the agreement with the Company (e.g., employees and associates of the Company's clients, suppliers, entities providing the Company with technical and organizational support to enable the management of the Company, entities providing transportation services).	▪ purposes resulting from the legitimate interests pursued by the Company, in particular, ensuring contact with an entity that is a party to the agreement concluded with the Company (e.g. through e-mail correspondence, placing contact persons' data in the Company's IT systems), verification whether the person contacting the Company is authorized to take actions and make declarations on behalf of that entity, proper performance of the agreement concluded with the Company (day-to-day contact and arrangements in connection with the performance of the agreement concluded with the Company, issuing invoices, making settlements), and establishing, pursuing or defending against possible claims on the basis of Article 6(1)(f) of the GDPR; ▪ the necessity to fulfill the Company's legal obligations, in particular under tax law and accounting regulations on the basis of Article 6(1)(c) of the GDPR.

▪ The authorized representative, contact person or another person on the part of the entity that intends to cooperate with the Company (e.g., employees and associates of entities that participate in the tender proceedings or that apply for supplier status).	▪ purposes resulting from the legitimate interests pursued by the Company, in particular, ensuring contact with an entity seeking to conclude an agreement with the Company (e.g., through e-mail correspondence, sending documents and information in connection with the tender proceedings), verification whether the person who contacts the Company is authorized to take actions and make statements on behalf of the entity, the proper implementation of the agreement concluded with the Company (contact and arrangements in pursuit of concluding the agreement)
	and establishing, pursuing or defending against possible claims on the basis of Article 6(1)(f) of the GDPR.
Third parties on the Company's premises (e.g., guests, persons performing work on the Company's premises, couriers, drivers).	▪ purposes arising from the legitimate interests pursued by the Company, in particular in ensuring the safety of persons and property and protection against unauthorized access, controlling access to the facility, keeping a record of the movement of persons and vehicles, and pursuing or defending against possible claims (e.g., keeping a record of the movement of people and vehicles, collecting declarations of acknowledgement of security procedures and storing them, verifying the identity of people entering the premises, conducting video surveillance).
Journalists working with the Company	▪ informational, advertising and promotional purposes related to the activities of the Company and the DHL Supply Chain division resulting from the legitimate interests pursued by the Company (e.g. in connection with e-mail correspondence, placing personal data in the Company's IT systems).

Individuals applying for employment within the Company.	▪ in the case of employment based on an employment agreement – purposes necessary for the recruitment process in accordance with Article 22(1) of the Act of June 26, 1974 – Labor Code (Journal of Laws of 2018, item 917, as amended), hereinafter: the "Labour Code", and with respect to data other than those indicated in Article 22(1) of the Labour Code, on the basis of voluntary consent in accordance with Article 6(1)(a) of the GDPR. The inclusion of additional data in application documents is equivalent to expressing voluntary consent. ▪ in case of voluntary consent – for the purpose of future recruitment processes on the basis of Article 6(1)(a) of the GDPR. ▪ in the case of employment based on a civil law agreement – for the purpose necessary to undertake actions at your request before concluding the agreement in accordance with Article 6(1)(b) of the GDPR.
	▪ purposes arising from legitimate interests pursued by the Company, in particular establishing, pursuing, or defending against possible claims on the basis of Article 6(1)(f) of the GDPR.
Employees and associates	▪ purposes necessary for the employment relationship (e.g., calculation and payment of salaries) on the basis of Article 22¹ of the Labor Code in conjunction with Article 6(1)(c) of the GDPR. ▪ purposes necessary for the performance of the agreement to which you are a party, or to undertake actions at your request, prior to the conclusion of the agreement (e.g., commission contract, contract for specific work, contract for the provision of services, agreements regarding the funding of studies, training, for the use of a private car for business purposes, non-compete agreements, etc.) on the basis of Article 6(1)(b) of the GDPR;

- purposes necessary to fulfill the Company's legal obligations, in particular in the scope of labor law, social insurance, health insurance, ensuring safety and occupational health, social protection and those arising from tax regulations (e.g. referring for initial, periodic and follow-up medical examinations, calculating and paying social insurance contributions, reimbursing the cost of purchasing corrective glasses, keeping records of working time, granting leaves of absence, granting benefits from the company's social benefits fund, training in occupational health and safety, collecting union contributions or making other deductions from wages, maintaining accident records) on the basis of Article 6(1)(c) of the GDPR;
- purposes arising from the legitimate interests pursued by the Company, in particular in the scope of employee training (e.g., keeping training attendance lists, keeping training matrices), keeping records of entrusted property (e.g., keeping records of entrusted property and keeping records of the issuance/return of electronic equipment),

management of access to resources and premises (e.g., keeping records of access to the facility, granting and revoking access to IT systems), ensuring the safety of employees, protection of property (e.g., maintaining video surveillance, creating emergency plans in case of threats) and maintaining the confidentiality of information, the disclosure of which could expose the Company to harm (e.g., keeping confidentiality statements), organizing work in a way that enables full utilization of working hours and proper use of tools provided to employees (e.g., monitoring employee internet activity, email monitoring, productivity analysis), managing conflicts of interest, conducting annual evaluations, promoting employee development by encouraging involvement in the Company's activities (e.g., the Kaizen project), increasing employee motivation (e.g., awarding bonuses and prizes, organizing employee of the month contests), organizing business travel (e.g., booking and purchasing airline tickets), promoting the Company's activities (e.g., publishing DHLove and sharing employee images in DHLove), setting work schedules (e.g., preparation of schedules), protecting the interests of the Company, and for the purpose of establishing, pursuing or defending against possible claims under Article 6(1)(f) of the GDPR.

Temporary employees	the necessity to fulfill the Company's legal obligations as an employer user under the Act of July 9, 2003 on the Employment of Temporary Workers (Journal of Laws of 2018, item 594, as amended) based on Article 6(1)(c) of the GDPR. purposes resulting from the legitimate interests pursued by the Company, in particular in the scope of training (e.g., keeping training attendance lists, maintaining training matrices), keeping records of entrusted property
	(e.g., maintaining records of entrusted property and storing protocols for issuing/returning electronic equipment), managing access to resources and premises (e.g., keeping records of access to the facility, assigning and revoking access to IT systems), ensuring safety and protection of property (e.g., conducting video surveillance), maintaining confidentiality of information, the disclosure of which could harm the Company (e.g., storing confidentiality agreements), organizing work in a way that enables full utilization of working hours and proper use of tools provided to employees, managing conflicts of interest (e.g., productivity analysis), scheduling work hours (e.g., preparing schedules), protecting the Company's interests, as well as establishing, pursuing, or defending against potential claims based on Article 6(1)(f) of the GDPR.

How to contact the Company regarding matters related to personal data protection

- The Company has appointed a Data Protection Officer. The Data Protection Officer in the Company is Mr. Jędrzej Sokół, who can be contacted at iod@dhl.com.
- For all matters related to the processing of personal data, please contact us at iod@dhl.com.

To whom will personal data be disclosed?

- Recipients of your personal data may include – only when necessary and to the extent required – companies belonging to the DHL Group, as well as entities cooperating with the Company in

providing services to the Company (e.g., customers, subcontractors) and supporting the Company's business processes, especially:

- entities providing accounting, payroll, IT, and legal services to the Company;
- entities providing occupational health and safety services, especially conducting occupational health and safety training;
- entities providing property protection services to the Company;
- entities providing technical and organizational support to the Company to enable the management of the Company, including IT system providers;
- entities to which the Company provides logistics process outsourcing services.

5. Except as indicated in this Policy, personal information will not be disclosed to any third party or authority without the consent of the data subject.

How long will we process personal data?

6. If **data processing is based on your voluntarily given consent**, your personal data will be stored **until the withdrawal of consent for the processing of personal data** in specific, explicit, and legally justified purposes.
Consent to the processing of personal data may be revoked at any time. Withdrawal of consent for data processing is made by contacting iod@dhl.com. Withdrawal of consent shall not affect the legality of processing performed on the basis of consent before its withdrawal.
7. If the **processing of your data is necessary for the performance of an agreement** to which you are a party, or to undertake actions at your request, prior to the conclusion of the agreement, your personal data will be processed **for the duration of the agreement, and thereafter for the period of limitation of possible claims** arising from generally applicable legal regulations.
8. If the **processing is necessary to fulfill a legal obligation** incumbent on the Company, your personal data will be processed **for the period required by generally applicable legal regulations**.
9. If the processing is necessary for the **purposes of legitimate interests pursued by the Company or by a third party**, your personal data will be processed **for a period not exceeding the time necessary for the purposes for which the data are processed or until you object to the processing of your personal data for such purposes**, on grounds related to your particular situation, unless the Company demonstrates the existence of valid legitimate grounds for the processing, overriding your interests, rights and freedoms, or grounds for establishing, pursuing or defending claims.

Is providing personal data obligatory?

10. If personal data is processed on the basis of the consent of the data subject, the provision of personal data is voluntary. Failure to provide the data will result in the inability to provide the service, if consent is a condition for providing that service.
11. If the personal data are processed for purposes necessary for the performance of an agreement to which the data subject is a party, or to undertake actions at the request of the data subject prior to entering into the agreement, the provision of personal data is voluntary, but necessary to enter into an agreement with the Company.

12. If the processing of personal data is necessary to fulfill a legal obligation of the Company, then the provision of personal data is a statutory requirement.
13. If the personal data are processed for purposes arising from legitimate interests pursued by the Company or by a third party, the provision of personal data is voluntary, but necessary for these purposes.

What rights do you have in relation to the processing of your personal data?

14. You have the right to:
 - 14.1. Access to your personal data, which includes the right to obtain confirmation as to whether your personal data is being processed, and if this is the case, the right to obtain access to it, the information indicated in **item 21**, and to receive a copy of the personal data being processed.
 - 14.2. Rectify your personal data, including the right to demand the prompt rectification by the Company of your incorrect personal data.
 - 14.3. Delete your personal data.
 - 14.4. Restrict the processing of personal data.
 - 14.5. Transfer your data, which includes the right to receive the data and send it to another controller or to request, if technically possible, that the data be sent directly to another controller – to the extent that the data is processed on the basis of your consent and for purposes necessary for the performance of the agreement and the processing of data by automated means;
 - 14.6. object to the processing of personal data to the extent that the data is processed for purposes arising from legitimate interests pursued by the Company pursuant to Article 6(1)(f) of the GDPR, unless the Company demonstrates the existence of valid legitimate grounds for processing overriding the interests, rights and freedoms of the data subject, or grounds for establishing, pursuing or defending claims.
 - 14.7. File a complaint with the supervisory authority for data protection – the President of the Office for Personal Data Protection, if you believe that the processing of your data is in violation of the law.

PROCEDURE FOR EXERCISING THE RIGHTS OF DATA SUBJECTS

15. Every individual (hereinafter referred to as the "**Applicant**") has the right to apply to the Company to exercise the rights indicated in **item 13 of the Policy**.
16. The above requests will be carried out by the Company taking into account the provisions of the GDPR. The above means that in the cases mentioned in the provisions of GDPR, the rights indicated in **item 13 of the Policy** may not be granted to the data subject, or the request will be implemented with a fee to cover the costs of its implementation.
17. The request should be submitted in writing to iod@dhl.com, specifying which company of the DHL Supply Chain Poland Division the request concerns (DHL Exel Supply Chain (Poland) Sp. z o.o. / DHL Exel Supply Chain Trade (Poland) Sp. z o.o. / DHL Supply Chain (Poland) Sp. z o.o.).
18. If the Company fails to process the Applicant's personal data (excluding the processing of personal data for the purposes of the request itself), the Applicant will be informed and the Applicant's data obtained as a result of the request will be deleted immediately.

19. Immediately upon receipt of the request, the Company shall inform the Applicant of this fact and include information about the request in the records it maintains.
20. The Company is entitled to verify the identity of the Applicant. Failure to successfully verify the Applicant's identity for reasons for which the Applicant is responsible may mean that the Company will not process the submitted request, of which the Applicant will be promptly informed.
21. The Company shall provide the Applicant with a response to the request within one (1) month from the date of its receipt at the latest. In objectively complicated cases (i.e., requiring a large amount of work on the part of the Company), the above deadline may be extended to 2 (two) months, of which the Applicant will be promptly informed.
22. As part of fulfilling the right to access data, the Applicant is provided with their processed data, specifying the scope requested in the request, as well as the following information:
 - purpose of processing;
 - categories of personal data subject to processing;
 - information about the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;
 - if possible, the planned period of storage of personal data, and if this is not possible, how to determine this period;
 - information about automated decision-making, including profiling, and relevant information about the principles of decision-making, as well as the significance and anticipated consequences of such processing for the data subject;
 - information about the right to request the Company to rectify, delete or restrict the processing of personal data, and to object to such processing (where such right exists);
 - if the personal data was not collected from the person to whom it pertains – any available information about its source;
 - the right to file a complaint with the supervisory authority.
23. In the case of exercising the right to access data and the right to data portability, a copy of the Applicant's data is attached to the response provided to the Applicant, in commonly known and accessible machine-readable formats.
24. Please submit any complaints related to the implementation of this procedure electronically to iod@dhl.com.
 - 24.1 The complaint will be considered immediately, but no later than within 7 (in words: seven) days from the date of its delivery, of which the Applicant will be promptly informed. The Applicant is also informed of the fact that the complaint has been received. Information about the complaint is included in the records kept by the Data Protection Officer.