

## GDPR Privacy Notice: PPL CZ Natural Person Data Processing Policy

We would like to assure you that PPL CZ s.r.o., a company with its registered office at K Borovému 99, Jažlovice, 251 01 Říčany, registered in the Commercial Register maintained by the Municipal Court in Prague under file number C 105858, IČ (Company Identification Number): 25194798 ("PPL CZ" or "we"), as a member of the Deutsche Post DHL Group pays utmost attention to the security of your personal data. In addition to Regulation (EU) 2016/679 ("GDPR"), we comply with the applicable legislation of the Czech Republic, binding company rules approved by the principal supervisory authorities within the EU, and we follow the standards of ISO 27001.

All data collected by PPL CZ are processed only for legitimate purposes and for a limited period of time using the maximum possible degree of security.

Protecting the personal data not only of our customers but also recipients, suppliers, partners and employees is our key concern. In connection with the GDPR, we bring you the following data processing policy. The PPL CZ Data Protection Officer ("DPO") has extensive knowledge of personal data protection and is in charge of supervising compliance with GDPR. Should you have any questions regarding the processing of your personal data, do not hesitate to contact us at the e-mail address [osobni.udaje@ppl.cz](mailto:osobni.udaje@ppl.cz).

This document provides you with information regarding the personal data that we process about our customers, including but not limited to senders and consignees of shipments, and the users of our website, whether we process data based on consent or other legal grounds, the purposes, for which we use them, whether we act as the controller or processor when processing data, to whom we may transfer personal data and which rights you have in connection with the processing of your personal data.

### Which data we process

We process the following personal data:

- a) Identification details** including but not limited to name and surname, user name and password, identity card number, IČO (company identification number) and DIČ (tax identification number), if you are an entrepreneur, and your position in the organisation if you represent a legal entity;
- b) Contact details**, i.e. personal data that allow us to contact you, including but not limited to e-mail address, phone number, mailing address, billing address;
- c) Information about services ordered** including but not limited to information about transported shipments that you or your company ordered from us, payment method including the payment account number, and information about complaints;
- d) Web behaviour information** including situations when you browse the website using our mobile application, including but not limited to services that you view, links that you click and information about the device, on which you view our web, such as the IP address and the location derived from it, device identification such as technical parameters, e.g. operating system and its versions, screen resolution, the browser used and its versions as well as data obtained from cookies and similar device identification technologies;
- e) Data associated with using the call centre or visiting our office** including but not limited to records of phone calls with the call centre, identification of the messages that you send to us, including identifiers such as IP addresses, and CCTV recordings at branches.

### Why do we process personal data and what entitles us to do so?

As part of our activities, we process personal data for various purposes and to various extents either:

- a) Without your consent** on the basis of the performance of a contract, our legitimate interest or compliance with a legal obligation, or
- b) On the basis of your consent.**

The processing that we can carry out without your consent depends on the purpose, at which the relevant processing is aimed and in what position towards us you operate – whether you are a mere visitor to our web,

whether you have concluded a contract with us or ordered a service from us. We can also process your data if you are the consignee of a shipment, the transport of which has been ordered from us, if you are already communicating with us or if you visit our branch.

## Purposes of the processing

### 1. If you order the transport of a shipment from us or enter into a contract with us

In the event that you order the transport of a shipment from us or enter into a services agreement or another agreement with us, we carry out the following processing:

#### 1.1 Processing carried out when performing a contract

If you, as a natural person, order the transport of a shipment from us, we process your personal data for the **purposes of transporting and tracking the shipment**, in the case of another contract for the purposes of performing this agreement, your **identification and contact details and details of your purchase orders**. If you order the transport of a shipment as a representative of a legal entity **for the purposes of transporting and monitoring the shipment**, in case of another agreement then for the purposes of performing such an agreement your **identification and contact details and information about services ordered**, specifically **due to our legitimate interest** consisting in concluding and performing a contract with the person you represent.

The fact that such data will be used for the purposes of transporting and monitoring the shipment or performing a contract means that they will be used mainly to:

- Allow us to communicate with you about the shipment transported, e.g. send you a shipping confirmation;
- For the purposes of paying for transport or another service or for the purposes of providing a service; in this context, we can transfer your data to our other transport partners as described in the section entitled Who processes your personal data and to whom do we transfer them?;
- In connection with a complaint;
- In connection with your other requirements that you convey to us, e.g. via our call centre.

For this purpose, we will use such personal data for the period of transporting the relevant shipment or performing the contract.

#### 1.2 Processing due to a legitimate interest

If you order shipment transport or enter into a contract with us, we will retain your **identification and contact details and information about the services ordered** due to our legitimate interest (i.e. without your consent) in order to protect our legal claims and our internal records and controls. In this regard, the protection of legal claims and control of our proper provision of our services are in our legitimate interest.

In order to protect legal claims, protect property and our internal records and controls, we process your data for the duration of the 10-year limitation period and one year thereafter with regard to the claims made at the end of the limitation period. If judicial, administrative or other proceedings are initiated, we process your personal data to the extent necessary throughout such proceedings and the remaining part of the limitation period thereafter.

In addition, we process due to our legitimate interest (i.e. without your consent) your **identification and contact details and information about the services ordered** for the purposes of sending offers by e-mail; in this regard, our legitimate interest is the promotion of our products and services. We use personal data for this purpose for a period of 6 months after the last order for transport or one month after the termination of the forwarding contract-

You have the right to object to such processing carried out due to our legitimate interest.

#### 1.3 Processing carried out to ensure compliance with legal obligations

We are also subject to some obligations set forth in laws. If we process your personal data for this reason, we are not required to obtain your consent to such processing. On this legal basis, we process your **identification and contact details and information about the services ordered** to ensure compliance with legislation including but not limited to:

- Act No. 89/2012 Sb., Civil Code,
- Act No. 634/1992 Sb., on Consumer Protection (if you order transport as a natural person),
- Act No. 235/2004 Sb., on Value Added Tax,
- Act No. 563/1991 Sb., on Accounting,
- IATA Air Cargo Rules,
- Anti-terrorism and anti-money laundering EU regulations.

For these purposes, we use personal data for a period of no more than 10 years.

## 2. If you are the consignee of the shipment, the transport of which has been ordered from us

If you are the consignee of the shipment, the transport of which has been ordered from us, we process your **identification and contact details**:

- Due to our legitimate interest for the purposes of transporting and tracking the shipment, including the disclosure of information on our website and the Track and Trace system and communication with you regarding the shipment and the delivery thereof, where the performance of a contract with our customer is in our legitimate interest;
- Due to our legitimate interest to obtain information, on the basis of which we will be able to improve our services in the future, or information used to generate our internal statistics and reports; in this regard, it is our legitimate interest to improve our services for our customers;
- To ensure compliance with legal obligations, in particular under Act No. 235/2004 Sb., on Value Added Tax, and Act No. 563/1991 Sb., on Accounting;
- To protect legal claims and our internal records and controls; in this regard, our legitimate interests include the protection of legal claims and control of the proper performance of our services.

For the transport, the conclusion and performance of a contract with our customer, we use your personal data for the time necessary to transport the shipment. Upon the expiry of the above period, we will continue to retain the data due to our legitimate interest for the purposes of protecting legal claims, protecting property and our internal records and controls, specifically for the duration of the 10-year limitation period and one year thereafter with regard to the claims made at the end of the limitation period. If judicial, administrative or other proceedings are initiated, we process your personal data to the extent necessary throughout such proceedings and the remaining part of the limitation period thereafter. In this regard, our legitimate interests are the protection of legal claims and control of the proper provision of our services. We use personal data for a period of 10 years to ensure compliance with our legal obligations.

You have the right to object to the processing due to a legitimate interest.

## 3. Whenever you visit our website

### 3.1 Use of cookies and other technologies

Whenever you visit our website, we store small files known as cookies on your device and subsequently read them from the device. A cookie is a small file of letters and numbers that we store in your internet browser or your computer's hard drive. Some cookies allow us to make a connection between your activities while browsing our website from the moment you open the window of the web browser until the moment you close it. These cookies are deleted at the moment when you close the web browser window. Other cookies remain on the device for a set period of time and are activated every time you visit the website that created the specific cookie. We not only store the cookies in your device but we also read the cookies that were stored on your device by our website. Further below, we will only refer to it as storing.

Some cookies are stored on your device directly by our website. These cookies help us:

- Identify you when switching between the individual pages on our website and during repeat visits, e.g. to store information about the version of our website that we should display to you if the website offers multiple versions at the given moment;
- Make a record of your prior consent as referred to in this document.

Such cookies and other files are needed to ensure the functioning of our website. If you block such cookies in your browser, our website may not work correctly and we may not be able to provide our services.

In addition, on your devices:

- We store cookies from our website that allow us:
  - To monitor traffic on our website, its individual pages, generate statistics and reports, and measure the effectiveness of advertising;
  - To display various versions of our website to you when testing new features;
  - We allow third parties to store cookies that can be used:
    - To collect data regarding your behaviour on our website and other websites;
    - To display customised offers and targeted advertising as part of advertising networks on websites other than our website.

For the purposes of displaying customised offers and targeted ads as part of advertising networks and social media on websites other than our website, we transfer data regarding your behaviour on the web to advertising networks and social media. However, we do not transfer your identification details to such partners. A list of social media and advertising networks that we use is available in the section entitled Who processes your personal data and to whom do we transfer them?

If you do not disable the use of third-party cookies and the transfer of your data to advertising networks and social media in your browser and stay on our website or click the "I agree" button, which is part of the notice, your consent to the use of such cookies and the transfer of your data to advertising networks and social media will be deemed to have been granted. You can revoke your consent at any time by disabling this feature in your browser. A full list of cookies is available at the PPL website in the Privacy & Cookies section.

### 3.2 Use of personal data of website visitors

Whenever you visit the website [www.ppl.cz](http://www.ppl.cz), we process **data regarding your behaviour on the website** due to our legitimate interest (i.e. without your consent) for the purposes of:

- Obtaining information, on the basis of which we will be able to improve the website for you in the future; in this regard, our legitimate interest is to improve our services for you;
- Generating statistics and reports, including but not limited to monitoring the traffic on our website, its individual pages and measuring ad effectiveness; in this regard, our legitimate interest is to measure the effectiveness of our website and the cost of advertising.

We do not obtain web behaviour data only from the cookies. They are also supplemented by the following data:

IP address of your device (address of your device that you use to communicate with other devices connected to the Internet);

- operating system, its versions and language settings of your device;
- browser that you use on your device, its versions and language settings;
- website address (URL) from which you come on our website.

For these purposes, we use personal data for a period of 14 months. You have the right to object to such processing.

### 4. If you communicate with us via various channels

If you communicate with us via various channels, including but not limited to the call centre, e-mail and social media, we will process **your identification and contact details and records of previous communication, including call recordings**, due to our legitimate interest (i.e. without your consent) for the purposes of:

- Handling your requests; if you ordered the transport of a shipment from us or entered into another contract with us and your request concerns such a contract, we can carry out such processing as part of the performance of the contract with you;
- Keeping records of your requests to be able to monitor the proper and timely compliance therewith;
- Proving that we have received and handled your request, e.g. if you use this channel to order some products or make a claim;
- Analysing such data to improve the quality of our services.

For these purposes, we retain personal data for a period of 3 months. You have the right to object to the processing due to our legitimate interest.

## 5. Whenever you visit our branch:

Whenever you visit our branch or its surroundings, we will process **CCTV recordings**, on which you may be captured, due to our legitimate interest (i.e. without your consent) to protect our and your property and persons present in the store and its surroundings, which is, at the same time, our legitimate interest.

For this purpose, we retain personal data for a period of 1 month. You have the right to object to such processing.

## 6. If you grant us your consent:

If you are not using our services yet (you have not signed a forwarding contract with us and have not ordered the transport of a shipment from us) and you grant us your consent while providing your data, we can use your **identification and contact details** to send offers by e-mail, text message, or communicate our offers to you by phone or using other electronic means, or we can send them to you by mail.

Your consent is fully voluntary and you can revoke it at any time. To revoke your consent, contact us in the manner described in the section entitled How can the individual rights be exercised? If you revoke your consent, it will not affect the lawfulness of the processing until such revocation.

## Who processes and to whom do we transfer your personal data?

We process the aforementioned personal data as the **controller**. This means that we determine the purposes defined above for which we collect your personal data, specify the means of processing and are responsible for the proper application.

We may also transfer your personal data to other entities that act as the **controller**, specifically:

- If you are the recipient of a service ordered from us, to our partners who are involved in such performance as stipulated in section If you are the recipient of a service ordered from us, specifically to the partners transporting and delivering the shipments, e.g. our partners abroad in case of international transport;
- When ensuring compliance with our legal obligations, we may transfer some personal data to administrative authorities and state authorities if requested to do so.
  - With your consent to advertising networks and social media as described in section Use of cookies and other technologies, transfer of data to advertising networks and social media, specifically:
    - Google Ireland Limited (registration number: 368047), with its registered office at Gordon House, Barrow Street, Dublin 4, Ireland; the privacy policy of this company is available at: <https://policies.google.com/technologies/ads>

We also transfer personal data within the DPDHL Group. Data are transferred within the group mainly with regards to products and services that include international transport and are essential to the performance of such a service or product. This includes but is not limited to the transfer of contact or identification details to other companies within the Deutsche Post DHL Group that provide forwarding services to PPL CZ in the destination, to comply with a contractual obligation or due to a legitimate interest for the administrative needs of the group as well as the potential transfer to processors in the group for the purposes of delivering a shipment. In addition, this may involve processing due a legitimate interest or compliance with a legal obligation, the purposes of which include but are not limited to ensuring security. All companies are bound by so-called binding corporate rules approved by the principal supervisory authorities within the EU, and therefore provide sufficient guarantees to protect the personal data.

To process personal data, we also use the services of other processors who process personal data only as instructed by us for the purposes described in the section entitled Why do we process personal data and what entitles us to do so? Such **processors** include but are not limited to:

- a) Our partners that provide transport under our brand;
- b) Cloud services providers and other suppliers of technologies, support and related services for our internal processes;
- c) Marketing tools operators and marketing agencies;
- d) Providers of tools used to manage and record phone calls;

- e) Providers of text message, e-mail and other communication tools in the event that they process personal data to mediate our communication with you;
- f) Security monitoring providers, in particular those managing our CCTV system;
- g) Attorneys, tax consultants, auditors, collection agencies.

**A list of specific processors of personal data that we use is available in the List of processors posted on the PPL CZ website.**

All our processors are also bound by the binding rules entitled DPDHL Supplier Code of Conduct.

### **From which resources do we obtain personal data?**

We mostly process personal data that you provide to us when ordering services or communicating with us. In the event that you are the recipient of the shipment that we are transporting, we obtain your data from the person who ordered such transport. In addition, we obtain personal data directly from you by monitoring your behaviour on our website. In some cases, PPL CZ is entitled to obtain personal data from public registers and this includes but is not limited to the situations when PPL CZ exercises its legitimate interests, in particular the interest to act prudently.

### **Transfer of data outside the EU**

When transferring data to the recipients described in the section entitled Who processes and to whom do we transfer your personal data?, we can also transfer your data to third countries outside the European Economic Area that do not ensure the adequate level of data protection. We will carry out any such transfers only if the relevant recipient agrees to comply with the standard contractual clauses issued by the European Commission that are available at <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32010D0087> or the DPDHL binding corporate rules approved by the principal supervisory authorities within the EU, more information is available at [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/binding-corporate-rules\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/binding-corporate-rules_en).

### **What rights do you have in the processing of personal data?**

Similarly to us having rights and obligations in the processing of your personal data, you also have certain rights in the processing of your personal data. These rights include:

#### **1. Right of access**

Simply put, you have the right to know which data we process about you, for what purpose, for how long, where we obtain your personal data, to whom we transfer them, who, except for us, processes personal data and what other rights associated with the processing of your personal data you have. You can find all the above in this document "PPL CZ Natural Person Data Processing Policy". If you are not certain which personal data we process about you, you can ask us to confirm whether personal data that concern you are or are not processed by us, and if so, you have the right of access to such personal data. As part of your right of access, you can request a copy of your personal data processed, the first copy of which is provided free of charge and additional copies are subject to a fee.

#### **2. Right to rectification**

Making mistakes is human. If you find out that the personal data that we process about you are inaccurate or incomplete, you have the right to have them rectified or completed, as the case may be, without undue delay.

#### **3. Right of erasure**

In certain situations, you have the right to request that we erase your personal data. We will erase your personal data without undue delay if any of the following conditions is fulfilled:

- We no longer need the personal data for the purposes for which we processed them;

- You revoke your consent to the processing of personal data, if these are data, the processing of which requires your consent, and we do not have another reason for any further processing of the data;
- You exercise your right to object to the processing (see section [Right to object to processing](#)) when it comes to personal data that we process due to our legitimate interests, and we determine that we no longer have any such legitimate interests that would justify such processing; or
- You believe that the processing of personal data carried out by us is no longer in compliance with generally binding legislation.

However, keep in mind that if one of the conditions is met, it does not mean that we will erase all your personal data immediately. This right shall not apply in the event that the processing of your personal data continues to be necessary to comply with our legal obligations or to establish, exercise or defend our legal claims (see section [Why do we process personal data and what entitles us to do so?](#)).

#### 4. Right to limitation on processing

In certain situations, in addition to the right of erasure, you can exercise the right of limitation on processing of personal data. This right allows you to request in certain situations that your personal data be flagged and such data not be subject to any further processing operations - however, not forever in this case (as in case of the right of erasure), but instead for a limited period of time. We have to limit the processing of personal data when:

- You challenge the accuracy of personal data until we agree on which data are correct;
- We process your personal data without a sufficient legal basis (e.g. beyond what we have to process), but you prioritise their limitation over erasing such data (e.g. if you expect that you would provide such data to us in the future anyway);
- We no longer need your personal data for the aforementioned purposes of processing, but you require them for the establishment, exercise or defence of your legal claims; or
- You object to the processing. The right to object is described in more detail below in the chapter [Right to object to processing](#). For the duration of the investigation of the legitimacy of your objection, we are required to limit the processing of your personal data.

#### 5. Right to portability

You have the right to obtain all your personal data from us that you provided to us and we process on the basis of your consent (see section [If you grant us your consent](#)) and on the basis of performing a contract. We will provide your personal data to you in a structured, commonly used and machine-readable format. In order to be able to easily transfer data at your request, this can only include data that we process in our electronic databases using automated means.

#### 6. Right to object to processing

You have the right to object to the processing of personal data which occurs due to our legitimate interest (see section [Why do we process personal data and what entitles us to do so?](#)). When it comes to marketing activities, we will stop processing your personal data without any further action; in other cases, we will do so if we do not have serious legitimate reasons for continuing to process them.

#### 7. Right to lodge a complaint

The exercise of rights in the manner described above does not affect your right to lodge a complaint with the relevant supervisory authority. You can exercise this right mainly if you believe that we process your personal data without authorisation or in violation of generally binding legislation. You can lodge a complaint against the processing of personal data by us with the Office for Personal Data Protection with its registered office at Pplk. Sochora 27, 170 00 Prague 7.

### How can the individual rights be exercised?

In all matters associated with the processing of your personal data, whether it is a question, exercising a right, lodging a complaint or anything else, you can send a message to [osobni.udaje@ppl.cz](mailto:osobni.udaje@ppl.cz). Our data protection officer (DPO) is available to you at the above address.

We will handle your request without undue delay, but no later than within one month. In exceptional cases, in particular due to the complexity of your request, we are entitled to extend this time limit by another two months. We will, of course, inform you about any such extension and its justification.

Form for GDPR requests is [here](#).

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