

Privacy Policy for Processing Natural Persons' Personal Data in PPL CZ

We would like to assure you that PPL CZ s.r.o., registered office: K Borovému 99, Jažlovice, 251 01 Říčany, entered in the Commercial Register maintained by the Municipal Court in Prague under file number C 105858, business ID number: 25194798 (hereinafter "PPL CZ" or "we"), part of the Deutsche Post DHL group, pays the utmost attention to the security of your personal data. In addition to Regulation (EU) 2016/679 (hereinafter the "GDPR"), we are governed by the applicable laws of the Czech Republic and binding corporate rules approved by leading supervisory authorities in the EU; we also follow the ISO 27001 standards.

All data collected by PPL CZ is processed only for reasoned purposes, for a limited period of time and using the maximum possible level of security.

Protecting the personal data not only of our customers, but also of our recipients, suppliers, partners and, of course, employees, is a priority for us. In connection with the GDPR, we provide you with our privacy policy below. The PPL CZ Data Protection Officer (DPO) has extensive knowledge of personal data protection and is responsible for overseeing compliance with the GDPR. If you have any questions about the processing of your personal data, please do not hesitate to contact us at osobni.udaje@ppl.cz.

In this document, you will find information about what personal data we process about our customers, in particular senders and recipients of shipments, and users of our website, whether we process data based on consent or other legal grounds, for what purposes we use them, whether we act as a controller or processor in the processing, to whom we may transfer personal data and what rights you have in connection with the processing of your personal data.

Who is the controller of your personal data?

The controller of your personal data is PPL CZ s.r.o., registered office: K Borovému 99, Jažlovice, 251 01 Říčany, entered in the Commercial Register maintained by the Municipal Court in Prague under file number C 105858, business ID number: 25194798 (hereinafter "PPL CZ" or "we")

What data do we process?

We process the following personal data:

- a) identification data**, which means, in particular, your first and last names, user name and password, FB Messenger ID, app ID, ID card number, business ID number and tax ID number if you are an entrepreneur, and your position in the organisation, if you represent a legal entity;
- b) contact data**, which means personal data that enables us to contact you, in particular your e-mail address, telephone number, delivery address and billing address;
- c) service order data**, which are, in particular, data about the shipments you or your company order from us, the method of payment, including the payment account number, and data about complaints;
- d) data for the app's functionality** (in particular, login details, payment information, system interaction data, IP address and mobile phone IMEI);
- e) data about your behaviour in the app**, in particular the information you view, the links you click on and the device you use, the device's identification, its technical parameters such as operating system and

version, screen resolution, display technologies used and their version, as well as data obtained from cookies and similar technologies to identify the device;

f) data related to your use of the call centre or a visit to our premises, which includes, in particular, records of telephone calls with the call centre, identification of messages you send us, including identifiers such as IP addresses, and recordings from CCTV systems in our branches.

g) economic, in particular billing, payment card information, data about cash on delivery, payment amounts, bank account numbers.

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

In the course of our business, we process personal data for different purposes and to different extents, either:

- a) **without your consent** based on the performance of a contract, our legitimate interest or the performance of a legal duty; or
- b) **based on your consent**.

What processing we may carry out without your consent depends on the purpose of the processing and your position vis-à-vis us – whether you are a user of our app, a visitor to our website, have a contract with us or order a service from us. We may also process your data if you are the addressee of a shipment whose transport is ordered from us, if you communicate with us or if you visit our premises.

Purposes of processing

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

If you order transport of a shipment from us or enter into a service or other contract with us, we carry out the following processing:

1.1 Processing based on performance of a contract

If you order transport of a shipment from us as a natural person, we process your personal data for the purpose of **transporting and tracking the shipment** and, in the case of another contract, for the purpose of performing that contract, meaning we process your **identification and contact data and data about your orders**.

If you order a shipment from us as a representative of a legal entity, we process your **identification and contact data and data about the services ordered for the purpose of transporting and tracking the shipment** and, in the case of another contract, for the purpose of performing that contract, **based on our legitimate interest** in concluding and performing the contract with the entity you represent.

The fact that we use this data for the purpose of transporting and tracking a shipment or performance of a contract means that we use it, in particular:

- to communicate with you about a shipment, for example, to send you a confirmation; □ for the purpose of payment for transport or other service or for the performance of a service; in this context, we may also transfer your data to our other transport partners, as described in the section [Who processes your personal data and to whom do we transfer it?](#)
- in connection with a complaint;
- in connection with other requests that you contact us with, for example, via the call centre.

For this purpose, we use personal data for the duration of the transport of the relevant shipment or the performance of the contract.

1.2 Processing based on legitimate interest

If you order a shipment from us or enter into a contract with us, we will retain your **identification, contact and service order data** based on our legitimate interest (without your consent) for the purpose of protecting legal claims and our internal records and controls. Our legitimate interests here are the protection of legal claims and controls on the proper provision of our services.

In order to protect legal claims, protect our assets and our internal records and controls, we process your data for the duration of the 10-year limitation period and one year thereafter with respect to claims made at the end of the limitation period. In the event of the initiation of judicial, administrative or other proceedings, we process your personal data to the extent necessary for the duration of such proceedings and for the remainder of the limitation period after the conclusion of such proceedings.

Furthermore, we process your **identification, contact and service order data** for the purpose of sending you offers by e-mail based on our legitimate interest (i.e. without your consent); our legitimate interest here is the promotion of our products and services. For this purpose, we use personal data for a period of 6 months from the last transport order or one month from the termination of a forwarding contract.

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

1.3 Processing based on performance of legal duties

We also have to fulfil certain statutory duties. If we process your personal data for this reason, we do not need to obtain your consent to such processing. On this legal basis, we process your **identification, contact and service order data** in order to comply with the following regulations, in particular:

- Act No. 89/2012 Coll., the Civil Code;
- Act No. 634/1992 Coll., on consumer protection (if you order transport as a natural person);
- Act No. 235/2004 Coll., on value added tax;
- Act No. 563/1991 Coll., on accounts;
- IATA rules for air transport;
- EU regulations against supporting terrorism and money laundering.

We use personal data for these purposes for a maximum period of 10 years.

2. If you use our app

2.1 Processing based on performance of contract

By creating a user account in the mojePPL app, you enter into a business relationship with us. Based on this fact, we will process your personal data to the extent necessary to offer you all user functions as described in the information on the app's use and operation. The app's purpose is to increase user comfort and provide fast and up-to-date information about the status of your shipments, along with the simplest possible administration of sending and delivery. The personal data you provide is processed for the duration of a user account's existence. You can administer your personal data directly in the app.

2.2 Processing based on consent

If you use our app, you may receive advertising or advertising messages. Granting consent for marketing purposes allows us to show you relevant and targeted advertising. Your personal information may be shared with some of our partners. Advertising messages may also contain directly unrelated advertising messages. You have the right to withdraw your consent at any time. We process personal data provided based on consent only for the period of validly granted consent.

2.3 Processing based on controller's legitimate interest

Due to our bilateral business relationship, we may process your personal data in connection with the direct marketing of similar and related services or to obtain feedback in order to improve the app's operation or the services provided to you. In this context, you may receive information about similar services or products we offer. You have the right to object to this processing. In such case, we will restrict or stop further processing of your personal data.

3. If you are the addressee of a shipment whose transport is ordered from us

If you are the addressee of a shipment whose transport is ordered from us, we process your **identification and contact data**:

- based on our legitimate interest for the purpose of transporting and tracking the shipment, including making the information available on our website and in the Track and Trace system and communicating with you about the shipment and its delivery, where our legitimate interest is the performance of a contract with our customer;
- based on our legitimate interest in obtaining information based on which we can improve our services in the future or information for the creation of our internal statistics and reports; our legitimate interest here is to improve our services for our customers;
- for the purpose of performing legal duties, in particular those resulting from Act No. 235/2004 Coll., on value added tax, and Act No. 563/1991 Coll., on accounting;
- for the purpose of protecting legal claims and our internal records and controls; our legitimate interests here are to protect legal claims and controls on the proper provision of our services.

For the preparation, conclusion and performance of a contract with our customer, we use your personal data for the time necessary to make a shipment. After this period, we will continue to retain the data based on our legitimate interest for the purpose of protecting legal claims, protecting our assets and our internal records and controls, for the duration of the 10-year limitation period and one year thereafter with regard to claims made at the end of the limitation period. In the event of the initiation of judicial, administrative or other proceedings, we process your personal data to the extent necessary for the duration of such proceedings and for the remainder of the limitation period after the conclusion of such proceedings.

Our legitimate interests here are the protection of legal claims and controls on the proper provision of our services. For the purpose of performing legal duties, we use personal data for a period of 10 years.

You have the right to object to processing based on our legitimate interest.

4. If you visit our website

4.1 Use of cookies and other technologies

When you visit our website, we store and then read small files such as cookies on your device. A cookie is a small file of letters and numbers that we store in your web browser or on your computer's hard drive. Some cookies allow us to link your activities when browsing our website from the moment you open your browser window until the moment you close it. These cookies are deleted the moment you close your browser window. Others remain on your device for a set period of time and are activated each time you visit the website that created the cookie. We not only store cookies on your device, but also read the cookies that our website has placed on your device. Hereafter in this document, we will refer only to storage for simplicity.

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

- to identify you when you navigate between the pages of our website and on return visits, for example they save which version of our website to show you if the website offers more than one version at any given time;
- to note that you have granted us your consent in accordance with this document.

Such cookies and other files are necessary for our website's functioning. If you block these cookies in your browser, our website may not function properly and we may not be able to provide you with our services.

In addition, on your device: □ we store cookies from our

website that allow us to:

- track traffic to our website and its individual pages, create statistics and reports, and measure the effectiveness of advertising;
- show you different versions of our website when we are testing new functionalities; ○ allow the storage of cookies for third parties, which they can then use:
 - collect data about your behaviour on our website and other websites;
 - display customised offers and targeted advertising in advertising networks on websites other than our website.

For the purpose of displaying customised offers and targeted advertising as a part of advertising and social networks on websites other than our website, we also transfer data about your behaviour on the website to advertising and social networks. However, we do not transfer your identification data to such partners. For a list of the social and advertising networks we use, see [Who processes your personal data and to whom do we transfer it?](#)

If you do not turn off the use of third-party cookies and the transfer of your data to advertising and social networks in your browser and remain on our website or click on the "I understand" button included in the notification, we will assume that you agree to the use of these cookies and the transfer of your data to advertising and social networks. You can withdraw your consent at any time by switching off this function in your browser. A full list of cookies is available on the PPL website under Privacy & Cookies.

4.2 Use of website visitors' personal data

If you visit the website www.ppl.cz, we process **data about your behaviour on the website** based on our legitimate interest (i.e. without your consent) in order to:

- obtain information that will enable us to improve the website for you in the future; our legitimate interest here is to improve our services for you;

- generate statistics and reports, in particular tracking traffic to our website, its individual pages and measuring the effectiveness of advertising; our legitimate interest here is to measure the effectiveness of our website and advertising expenditure;

We do not obtain data about your behaviour on the website only from cookies. We also supplement them with data about: your device's IP address (the address of the device that you use to communicate with other devices on the internet);

- your device's operating system, its version and language settings;
- the browser you are using on your device, its version and language settings;
- the address of the website (URL) from which you are accessing our website.

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

5. If you communicate with us through various channels

If you communicate with us through various channels, in particular through the call centre, e-mail and social media, we will process **your identification and contact data and records of communications, including call recordings**, based on our legitimate interest (i.e. without your consent) for the purpose of:

- processing your request; if you have ordered transport of a shipment from us or entered into another contract with us and your request relates to this contract, we may carry out this processing based on the performance of the contract with you;
- keeping a record of your requests so that we can check that we are meeting them properly and on time;
- proving that we have received and dealt with your request, for example, if you order goods from us or make a complaint;
- analysing them to improve the quality of our services.

For these purposes, we store personal data for 3 months. You have the right to object to processing based on our legitimate interest.

6. If you visit our premises:

If you visit a branch or its surrounding area, we will process a **recording from our CCTV system**, on which you may be captured, based on our legitimate interest (i.e. without your consent) in order to protect our and your property and persons in and around the store, which is also our legitimate interest.

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

7. If you give us your consent:

If you are not already using our services (you do not have a forwarding contract with us or have not ordered transport of a shipment from us) and you grant us your consent when you provide your data, we may use your **identification and contact data** to send you offers by e-mail and text message, communicate our offers to you by telephone or other electronic means, or we may send them to you by mail.

Your consent is quite voluntary and you can rescind it at any time. To rescind your consent, please contact us as described in the section How can I exercise individual rights? Rescinding of consent does not affect the lawfulness of processing up to the time of such rescinding.

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

All of the aforementioned personal data are processed by us, as the **controller**. This means that we determine the purposes defined above for which we collect your personal data, determine the means of processing and are responsible for their proper implementation.

We may also transfer your personal data to other entities that are in the role of **controller**, specifically: □ if you are the addressee of a service that is ordered from us, to our partners who are involved in such performance, as stated in the section If you are the addressee of a service that is ordered from us, specifically to partners who provide transport and delivery of shipments, e.g. our partners abroad for international transport;

□ in the performance of our legal duties to hand over certain personal data to administrative authorities and state authorities, if we are called on to do so.

- based on your consent to advertising and social networks, as described in the section Use of cookies and other technologies, transfer of data to advertising and social networks, specifically:
 - Google Ireland Limited (registration number: 368047), registered office: Gordon House, Barrow Street, Dublin 4, Ireland; its privacy policy is available here: <https://policies.google.com/technologies/ads>

We also transfer personal data within the DPDHL group. Intra-group data transfer occurs, in particular, in the case of products or services whose subject is international transport and without which the service or product cannot be delivered. This includes, in particular, the transfer of contact or identification data to other companies in the Deutsche Post DHL Group that perform forwarding services for PPL CZ at the destination, based on the performance of a contractual duty or based on a legitimate interest for the group's administrative needs and, where applicable, to processors in the group for the purpose of delivering a shipment. It may also be processing in a legitimate interest or to perform statutory duties, in particular to ensure security. All companies are bound by binding corporate rules approved by leading supervisory authorities in the EU, thus providing sufficient safeguards for the protection of personal data.

We also use other processors' services to process personal data and they only process personal data on our instructions and for the purposes described in Why do we process personal data and what entitles us to do so? Such **processors** are, in particular:

- a) our partners providing transport under our brand;
- b) cloud service providers and other suppliers of technology, support and related services for our internal processes;
- c) operators of marketing tools and marketing agencies;
- d) providers of tools for managing and recording telephone calls;
- e) providers of text message, e-mail and other communication tools, where they process personal data to facilitate our communications with you;
- f) security monitoring providers, especially those managing our CCTV system;
- g) attorneys, tax advisors, auditors and collection agencies.

For a list of the specific personal data processors we use, please see the List of Processors on the PPL CZ website.

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

From what sources do we obtain personal data?

In most cases, we process personal data that you provide to us when ordering services or communicating with us. If you are the recipient of a shipment that we transport, we obtain your data from the person who ordered the transport. We also collect personal data directly from you by tracking your behaviour on our website. In some cases, PPL CZ is entitled to obtain personal data from public registers, in particular in situations where PPL CZ is acting in its legitimate interests, in particular the interest to act prudently.

Transfer of data outside the EU

As part of the transfer of data to the recipients stated in the section Who processes your personal data and to whom do we transfer it? we may also transfer your data to third countries outside the European Economic Area that do not ensure an adequate level of personal data protection. We will only make any such transfers if the relevant recipient undertakes to comply with one of the standard contractual clauses issued by the European Commission and available at <http://eur-lex.europa.eu/legalcontent/en/TXT/?uri=CELEX%3A32010D0087> or the binding corporate rules of DPDHL approved by leading supervisory authorities in the EU, for more information see https://ec.europa.eu/info/law/law-topic/dataprotection/data-transfers-outside-eu/binding-corporate-rules_en.

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

Just as we have rights and duties when processing your personal data, you also have certain rights concerning the processing of your personal data. These rights include:

1. Right of access

Simply put, you have the right to know what data we process about you, for what purpose, for how long, where we obtain your personal data, to whom we transfer it, who processes it in addition to us and what other rights you have in relation to the processing of your personal data. You can find all this in this document "Privacy Policy for Processing Natural Persons' Personal Data in PPL CZ Mobile App." However, if you are unsure which personal data we process about you, you can ask us to confirm whether or not personal data relating to you is being processed by us and, if so, you have the right to access that personal data. As part of your right of access, you can ask us for a copy of the personal data we process, and we will provide you with the first copy free of charge and subsequent copies for a fee.

2. Right to rectification

To err is human. If you find that the personal data we are processing about you is inaccurate or incomplete, you have the right to have it corrected or completed without undue delay.

3. Right to erasure

In some cases, you have the right to have us erase your personal data. We will erase your personal data without undue delay if one of the following reasons is met:

- we no longer need your personal data for the purposes for which we processed them;
- you rescind your consent to the processing of your personal data, where the data is data for which your consent is necessary and we have no other reason to continue to process the data;
- you exercise your right to object to processing (see the section [Right to object to processing](#)) for personal data that we process based on our legitimate interests and we find that we no longer have any such legitimate interests that would justify such processing; or
- you believe that the processing of personal data by us has ceased to comply with generally binding regulations.

But please note that even if it is for one of these reasons, it does not mean that we will immediately erase all your personal data. This right does not apply if the processing of your personal data is still necessary for the performance of a legal duty we are under or for the establishment, exercise or defence of our legal claims (see the section [Why do we process personal data and what entitles us to do so?](#)).

4. Right to restrict processing In some cases, in addition to the right to erasure, you can exercise a right to restrict processing of personal data. This right allows you, in certain cases, to request that your personal data be marked and not be subject to any further processing operations – but in this case not forever (as in the case of the right to erasure), but for a limited period of time. We must restrict the processing of personal data when:

- you dispute the accuracy of the personal data, before we agree what data are correct;
- we process your personal data without a sufficient legal basis (e.g. beyond what we need to process), but you prefer to restrict such data instead of erasing it (e.g. if you expect to provide us with such data in the future anyway);
- we no longer need your personal data for the aforementioned processing purposes, but you require it for the establishment, exercise or defence of your legal claims; or
- you object to processing. The right to object is described in more detail below in the section [Right to object to processing](#). For the period of time that we are investigating whether your objection is justified, we are obliged to restrict the processing of your personal data.

5. Right to portability

You have the right to obtain from us all your personal data that you yourself provided to us and that we process based on your consent (see the section [If you give us your consent](#)) and based on the performance of a contract. We will provide you with your personal data in a structured, commonly used and machine-readable format. In order to be able to easily transfer the data at your request, it can only be data that we process automatically in our electronic databases.

6. Right to object to processing

You have the right to object to the processing of personal data based on our legitimate interest (see the section [Why do we process personal data and what entitles us to do so?](#)). In the case of marketing activities, we will stop processing your personal data without further action; otherwise, we will do so unless we have compelling legitimate grounds for continuing such processing.

7. Right to file a complaint

Exercising your rights in the above manner is without prejudice to your right to file a complaint with the relevant supervisory authority. You can exercise this right, in particular, if you believe that we are processing your personal data unlawfully or in violation of generally binding legal regulations. You can file a complaint against our processing of personal data with the Office for Personal Data Protection, which is located at Pplk. Sochora 27, 170 00 Prague 7

How can I exercise individual rights?

For all matters relating to the processing of your personal data, whether it is an enquiry, exercising a right, making a complaint or anything else, you can contact osobni.udaje@ppl.cz. In addition, our Data Protection Officer (DPO) is available to you at this address.

We will process your request without undue delay, but within one month at most. In exceptional cases, in particular if your request is complex, we are entitled to extend this period by a further two months. We will of course inform you of any such extension and the reasons for it.

The form for GDPR requests is available [here](#). Download the DPDHL Data Privacy Policy [here](#).

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