

PRIVACY POLICY

regarding data processing in the GLS APPLICATION

The purpose of this policy is to allow the Controller to provide information on personal data processing in connection with the processing activities specified in the GLS APPLICATION (GLS APP).

1. CONTROLLER'S DETAILS

Name: General Logistics Systems Czech Republic s.r.o.

Registered office: Průmyslová 5619/1, 586 01 Jihlava

E-mail: info@glc-czech.com

Data Protection Officer's contact details: dataprotection@glc-czech.com

2. DEFINITIONS:

GTU: the General Terms of Use of the GLS Application regulating rights and obligations in order to use the Account (or to complete the registration).

GTC: the Controller's General Terms and Conditions for Providing Postal Services, available at the link below: <https://glc-group.com/CZ/en/gtc/>

Parcel: a consignment, i.e., the item taken over by GLS CZ for the provision of services under the contract concluded between the Principal and GLS CZ.

User: the person who, by registering in the GLS Application, creates an Account in the Application, through which services can be used.

GDPR: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons 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) (Text relevant for the EEA)

Postal service: a postal service, which qualifies as such pursuant to Act No. 29/2000 Coll., on Postal Services and on Amendment to Certain Acts, as amended (Act on Postal Services) the details of which are set out in the GBC.

3. DATA PROCESSING ACTIVITIES

3.1. REGISTRATION

Purpose of data processing: Since the creation of an Account and the conclusion of the related contract is indispensable for the use of the GLS APP, the purpose of data processing is to perform obligations under such a contract.

Legal basis of data processing: The performance of contractual obligations (legal basis under Article 6(1)(b) of the GDPR), which is necessary for ensuring compliance with the General Terms of Use accepted by the Data Subject or for taking the steps required prior to registration in the GLS APP.

Scope of personal data processed:

Mandatory personal data which shall be provided:

- User's first name and surname,
- The user's email address
- and password,

Optional data which can be provided during registration:

- Delivery address,
- Secondary and Tertiary email addresses,
- phone number(s),
- bank account number

Duration of data storage:

The personal data will be retained for the duration of the Account and will be deleted when the Account is deleted.

However, after the parcel is ordered, the parcel data will be stored in the Controller's software for the period and purpose and on the legal basis specified in the Controller's Privacy Policy available on <https://glc-group.com/GROUP/en/dataprotection/glsczechrepublic-additional/> (hereinafter Privacy Policy).

Data processor:

Supercharge Kft. (1075 Budapest, Károly körút 9. 3. em)

GLS General Logistics Systems Hungary Kft. (2351 Alsónémedi, GLS Európa u. 2.)

Data processing activities: processing of data in connection with registration, possible data modification or data erasure (if carried out by the Controller and not by the Data Subject)

3.2. PARCEL DELIVERY

In the GLS APP, the User will display the data relating to the parcel delivered within the framework of the Controller's postal service, and will have the opportunity to have control over the parcel via the options and features defined in the GLS APP.

The scope as well as other conditions for the processing of personal data are defined in the Privacy Policy.

3.3. COMPLAINT HANDLING

Purpose of data processing: complaint management, complaint approval, parcel identification,

Legal basis of data processing: Performance of a legal obligation pursuant to Act No. 29/2000 Coll., on Postal Services;

Scope of personal data processed: addressee's name, phone number, e-mail address, consignment destination address, sender's name, phone number, e-mail address, home address, name of person actually taking delivery, his/her phone number, e-mail address, consignment pick-up address, personal identity card number, bank account number.

Duration of data storage: 3 years after the complaint has been filed.

Further conditions for the processing of personal data are set out in the Privacy Policy.

3.4. DATA PROCESSING RELATED TO QUESTIONS NOT QUALIFYING AS COMPLAINTS SUBMITTED TO THE CUSTOMER SERVICE

Purpose of data processing: communication with the customer,

Legal basis of data processing: Performance of a legal obligation pursuant to Act No. 29/2000 Coll., on Postal Services;

Scope of personal data processed: addressee's name, phone number, e-mail address, consignment destination address, sender's name, phone number, e-mail address, home address, name of person actually taking delivery, his/her phone number, e-mail address, consignment pick-up address, personal identity card number, bank account number

Duration of data storage: 1 year

Further conditions for the processing of personal data are set out in the Privacy Policy.

3.5. GENERAL MARKETING (ADVERTISING) MESSAGES, CAMPAIGNS, CUSTOMER SATISFACTION SURVEYS

Purpose of data processing: promotion and recommendation of GLS APP services

Source of data: collected from the Data Subject.

Legal basis of data processing: This is necessary for the purposes of the legitimate interests pursued by the Data Controller (Article 6(1)(f) of the GDPR), where data processing is necessary to present and promote the Controller's services, to understand the views and expectations of the Data Subject, and to improve its services based on this information.

Scope of personal data processed: Data Subject's name, email address, phone number (if provided).

For customer satisfaction measurement, the data provided by the Data Subject in the framework of satisfaction surveys.

In the case of campaigns, information is provided in an ad hoc manner and specific to the campaign.

Duration of data storage: until the Data Subject objects or the Account is deleted.

The balancing test shall be made available by the controller at the request of the Data Subject.

Method of objection: In the GLS APP or by email to dataprotection@glc-czech.com.

3.6. SENDING TAILORED, CUSTOMIZED MARKETING MESSAGES, ADVERTISEMENTS, INFORMATION ABOUT OFFERS AND INVITATIONS TO PERSONALISED PROFILING CAMPAIGNS

Purpose of data processing: to reach and address the Data Subject with personalised offers.

Legal basis of data processing: voluntary consent of the Data Subject pursuant to Article 6(1)(a) of the GDPR. The profiling is based on the Data Subject's explicit consent (Article 22(2)(c) GDPR), which he/she provides in a separate checkbox when subscribing in the app. Source of data: data collected from the Data Subject and data obtained through profiling (the profile is created by the Controller).

Scope of personal data processed: the Data Subject's in-app purchase and service usage patterns (including cash on delivery payment patterns).

Duration of data storage: until the Data Subject withdraws his/her consent, otherwise until he/she participates in the loyalty programme.

The Data Subject may change/withdrawn his/her consent by email to dataprotection@glc-czech.com. (effective after the case has been processed).

Data processor:

GLS General Logistics Systems Hungary Kft. (2351 Alsónémedi, GLS Európa u. 2.) Mito Next Zrt., Bloomreach, Antavo

The relevant details are set out in Annex 3 of the Postal Service Privacy Policy

3.7. LOCATION-BASED DATA PROCESSING

Purpose of data processing: to display a nearby GLS ParcelLocker or GLS ParcelShop or other service based on the Data Subject's momentary location;

Legal basis of data processing: The Data Subject's consent (Article 6(1)(a) of the GDPR) The Data Subject may enable location tracking and the use of location-based services based on location tracking (e.g. nearby GLS ParcelLocker search) via their phone. The Data Subject can revoke/modify this permission in the settings of the phone. The revocation/modification may also vary by platform and version.

Scope of data processed: Location, name, email address and phone number of the Data Subject.

Source of data: Location data received via the Data Subject's device.

4. DATA SUBJECTS' RIGHTS

4.1. RIGHT OF ACCESS (RIGHT TO BE INFORMED)

Data Subjects have a right to receive information from the Controller whether their personal data is being processed. If data is being processed, the Data Subject may request information from the Controller about the following:

- a) purpose of data processing,
- b) the categories of personal data concerned,
- c) the addressees or categories of addressees, as defined in the GDPR, to whom or which the personal data have been or will be disclosed, including addressees in third countries or international organisations,
- d) where applicable, the intended duration of the storage of the personal data or, where this is not possible, the criteria for determining that duration,
- e) the Data Subject's right to obtain from the Controller the rectification, erasure or restriction of the processing of their personal data and to object to the processing of such personal data,

- f) the conditions and possibility of lodging a complaint with a supervisory authority,
- g) where the personal data is not collected from the Data Subject, any available information as to their source,
- h) information about the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject.

The controller shall provide a copy of the personal data undergoing processing free of charge once per year to the Data Subject, at the request of the Data Subject. For any further copies requested by the Data Subject, the Controller may request reimbursement of costs (in the case of paper-based information: HUF 10/sheet). If the Data Subject has submitted the request electronically, the controller shall provide this data – unless otherwise instructed by the Data Subject – in electronic form to the Data Subject.

4.2. RIGHT TO RECTIFICATION

The Data Subject shall have the right to obtain from the Controller, without undue delay, the rectification of inaccurate personal data concerning him/her. Taking into account the purposes of data processing, the Data Subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

4.3. RIGHT TO ERASURE, RIGHT TO BE FORGOTTEN

The Data Subject may request the Controller to erase his or her personal data in the following cases:

- a) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed,
- b) if the processing is based on the Data Subject's consent, the Data Subject withdraws this consent, provided that the data processing has no other legal basis,
- c) the Data Subject objects to the data processing, if the rules of erasure exist in respect of this objection,
- d) the personal data has been unlawfully processed,
- e) the personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject,
- f) the personal data has been collected in relation to the offer of information society services referred to in Article 8(1) of the Decree.

The Controller is not obliged to erase the personal data if the data processing is required:

- a) for exercising the right of freedom of expression and information,
- b) for ensuring compliance with a legal obligation which requires data processing by Union or Member State law to which the Controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller,

- c) on the basis of public interest concerning public health,
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes insofar as the right referred to in paragraph (1) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

4.4. RIGHT TO RESTRICTION OF DATA PROCESSING

The Data Subject shall have the right to obtain from the Controller restriction of data processing where one of the following applies:

- a) the accuracy of the personal data is contested by the Data Subject, in which case the restriction applies to a period enabling the Controller to verify the accuracy of the personal data,
- b) the data processing is unlawful, and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead,
- c) the Controller no longer needs the personal data for the purposes of the data processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims; or
- d) the Data Subject has objected to processing; in this case, the restriction applies pending the verification whether the legitimate grounds of the controller override those of the Data Subject.

4.5. RIGHT TO OBJECT

Objection in connection with the following legal bases of data processing

If the legal basis for data processing is

- (1) the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or
- (2) the enforcement of legitimate interests pursued by the controller or by a third party, the Data Subject has a right to object to the data processing. In this case, the controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or which concern the establishment, exercise or defence of legal claims.

Objection to data processing for direct marketing purposes

Where personal data is processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing.

In this case, the controller may no longer process the personal data concerning the Data Subject.

4.6. RIGHT TO WITHDRAWAL OF CONSENT

If the data processing is based on the Data Subject's consent, the Data Subject shall have the right to withdraw their consent at any time. The withdrawal of consent shall not affect the lawfulness of data processing based on consent prior to its withdrawal. If the Data Subject has given consent in the GLS APP, they can withdraw it via the GLS APP or, in the case of using location services, in the settings of the phone unless otherwise specified herein.

4.7. ENFORCEMENT OF RIGHTS

Request for information, rectification, blocking, erasure, objection or the withdrawal of consent may be submitted any time using the following contact information:

- in writing: General Logistics Systems Czech Republic s.r.o., registered office at Průmyslová 5619/1, 586 01 Jihlava
- by e-mail to the e-mail address: dataprotection@glc-czech.com.

The Data Subject may erase or modify the personal data stored in their own Account in the GLS APP. The right to object can also be exercised within the GLS APP.

Submitting a complaint

If the Data Subject considers that the processing of personal data related to them infringes the provisions of this Notice or the GDPR, the Data Subject has the right to lodge a complaint against such data processing. The complaint may be lodged with the Controller or the Authority, at the discretion of the Data Subject.

The Controller accepts complaints about data processing here:

- in writing: General Logistics Systems Czech Republic, registered office at Průmyslová 5619/1, 586 01 Jihlava
- by e-mail: to the e-mail address: dataprotection@glc-czech.com.

The deadline for investigating a complaint sent to the Controller to another contact address starts from the date of receipt at the above address.

A complaint can be lodged with the Personal Data Protection Office (<https://www.uoou.cz/>): ÚŘAD PRO OCHRANU OSOBNÍCH ÚDAJŮ, registered office at Pplk. Sochora 27, 170 00 Praha 7, Česká republika.

5. OTHER DATA CONTROLLERS

When downloading the GLS APP, Apple Inc. (App Store) and Google Inc. (Google Play) are individual data controllers.

For detailed information about Google's data processing activities, please visit: <https://business.safety.google/privacy/>

When registering with Facebook/Google/Apple account, Meta/Google Inc. and Apple are individual data controllers. General Logistics Systems Czech Republic. will have access only the username (email

address) of the Customer used for the login (stored) by the relevant service provider.

6. AMENDMENT OF THIS POLICY

The Controller has the right to unilaterally amend this Privacy Notice, and the User must confirm acceptance of such amended notice after accessing the Account for the first time after the disclosure of the amended Privacy Policy.