# myGLS Application PRIVACY POLICY

1. PERSONAL DATA CONTROLLER AND DATA PROTECTION OFFICER

The Personal Data Controller is

General Logistics Systems Poland Sp. z o.o. with its registered office at Tęczowa 10, Głuchowo, 62-052 Komorniki.

(hereinafter referred to as: "GLS Poland")

In order to clarify issues related to the processing of personal data, we encourage you to contact the Controller's designated Data Protection Officer, via a dedicated e-mail address: dataprotection@gls-poland.com.

It is also possible to contact GLS Poland through a letter sent by traditional mail to the address:

GLS Poland,

ul. Tęczowa 10, Głuchowo,

62-052 Komorniki

with annotation "Inspektor Ochrony Danych" (Data Protection Officer)

2. GENERAL INFORMATION

**Personal data**

Personal data is any information regarding an identified or identifiable natural persons. This type of data includes, among other things, first name, surname, address, phone number and e-mail address.

Information that cannot be linked to a specific or identifiable person (such as statistical data) is not considered personal data.

**Applicable personal data protection law and confidentiality obligation**

All GLS Group companies located in the European Union are subject to the provisions of 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 (hereinafter: "GDPR") and other relevant national data protection laws.

GLS Poland provides postal and transportation services, by which it is obliged to respect the secrecy of correspondence and ensure the security of shipments, in accordance with the provisions of the Postal Law and the Transport Law.

**Application** - software owned by GLS Poland in the form of a mobile application made available free of charge to Service Recipients for use;

**Logged-In User** – a Service Recipient who is a natural person, including a sole proprietor, who has an Account and uses the Services provided through the Application.

**Recipient** – an entity designated by the Logged-In User (sender), including a sole proprietor, to whom the Parcel is to be delivered at the place of delivery.

**Address Book** – a functionality of the Application that enables the Logged-In User to save and reuse Recipient data for the purpose of sending Parcels.

Other definitions are described in detail in the Application Terms and Conditions available in .pdf format at: https://gls-group.com/PL/en/meet-mygls and for Users logged into the Application in the panel Account – Others: "Privacy Policy".

Providing personal data is voluntary; however, it is necessary in order to use individual Services and functionalities of the Application. Failure to provide the data marked in the Application as mandatory will, in particular, make it impossible to create an Account, send a Parcel, or make a payment.

The Application is not intended for persons under the age of 16.

## 3. INFORMATION SECURITY

At GLS Poland, the security of our Customers' personal data is a priority. With advanced technological measures and strict organizational procedures, we provide comprehensive protection of your data from unauthorized access, loss or misuse.

Our commitment to personal data protection is based on best market practices and full compliance with applicable laws, including the GDPR. Each personal data protection request is carefully recorded, analyzed and resolved with the utmost attention to detail.

The Application provides, among other things:

**Confidentiality, integrity and availability of data**

We ensure confidentiality through access control, integrity through change monitoring, and availability through redundant systems. The Application architecture also guarantees resilience to threats.

**Data encryption**

Personal data is encrypted according to the latest cryptographic standards both during transmission ("data in transit"), using HTTPS with TLS, and storage ("data at rest") on servers with encryption and physical isolation.

**Identification and authentication**

We use strong passwords with strong cryptographic algorithms and monitor login session activity to detect suspicious activity.

**Data restoration**

Disaster Recovery and Business Continuity procedures have been implemented, enabling rapid recovery of data and system functionality after a failure.

**Physical security of servers**

Data is stored in locations with access control, monitoring and 24/7 security.

**Event logging**

We record all key system activities, enabling us to analyze incidents and identify security breaches.

**Data minimization**

We process data only to the extent necessary to provide services, in accordance with the minimization principle.

**Security tests and audits**

We systematically carry out audits, penetration tests and assessments of the effectiveness of technical and organizational security measures.

**IT security management**

We provide software updates, up-to-date system security policies, and certifications and audits for compliance with the best security standards.

## 4. CATEGORIES OF PERSONAL DATA AND THE PURPOSES OF THEIR PROCESSING

Information regarding the processing of personal data in the Application has been grouped according to the categories of data subjects: Logged-In Users and Parcel Recipients.

**Data of Logged-In Users**

GLS Poland as a data controller processes the following categories of Logged-In Users' data:

- First name,
- Surname,
- Parcel delivery address,
- Parcel Sender address,
- E-mail address,
- Phone number,
- Phone model,
- Town/city, country, the date and time of the current device on which the Logged-In User is using the Application,
- Location of the device on which the Logged-in User is using the Application,
- Transaction data related to the sending of a Parcel: transaction amount, transaction identifier (ID), payment status, and the history of shipments and payments.
- IP address of the device on which the Logged-In User uses the Application,
- Data required for issuing an invoice: company name, tax identification number (NIP), and business address (in the case of Logged-In Users who are sole proprietors), including data retrieved from the GUS register.

**The personal data of Logged-In Users is processed for the following purposes:**

- enabling the receipt of information about Parcels and Shipments in terms of their current status and history of status changes,
- enabling the creation and use of a Logged-In User account; detailed information on the scope of services provided to Logged-In Users is provided in the Application Terms and Conditions,

- fulfilling legal obligations by GLS Poland (e.g. tax and accounting obligations, including the issuance and retention of invoices, as well as obligations arising under the Postal Law and the Transport Law),
- providing commercial information about GLS Poland products and services, electronically in the form of e-mail, SMS and push messages – depending on the consents given by the Logged-In User,
- ensuring contact with GLS Poland in all matters concerning the use of the Application,
- ensuring the secure use of the Application,
- analytical and statistical purposes,
- analysing how users use the Application in order to improve its performance and user experience.

The legal basis for processing personal data for the above purposes is:

- the necessity of processing for the performance of the agreement for the provision of Services and the agreement for the provision of courier services concluded through the Application (Article 6(1)(b) of the GDPR);
- compliance with a legal obligation to which GLS Poland is subject, in particular obligations arising from tax and accounting regulations, the Postal Law and the Transport Law (Article 6(1)(c) of the GDPR);
- the consent of the Logged-In User, with regard to commercial information and personalised analytics (Article 6(1)(a) of the GDPR);
- the legitimate interests pursued by GLS Poland (Article 6(1)(f) of the GDPR), consisting in ensuring the security of the Application and the Account, handling User enquiries and requests, conducting analyses and statistics for the purpose of improving the Application, and establishing, pursuing and defending claims.

In order to continuously improve our application and adapt it to the needs of Logged-In Users, we use the Matomo analytics tool. It helps us understand which features are most popular and how users navigate the application.

The Matomo tool may collect the following data:

- User ID (Visitor ID): Always anonymised by truncation.
- IP address: Always anonymised by truncation.
- Activity in the application: Screens visited, clicks, navigation, interactions with features.
- Technical data: Device type and model, operating system, application version.
- Geolocation (approximate): Country, region, device language.

The collected data is anonymised or pseudonymised as quickly as possible – ID addresses are shortened and login and device identifiers are replaced with pseudonymous keys. This means that it is not possible to directly link the data to a specific person. In particular, it is not possible to assign this data to the user's computer or end device.

The legal basis for processing data in a personalized manner is the voluntary consent provided by the Logged-In User (in accordance with Article 6(1)(a) of the GDPR).

A Logged-In User can withdraw their consent at any time in their account settings in the application. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

This data is stored for a maximum of 25 months, after which it is automatically deleted.

In connection with the use of the Application, GLS Poland communicates with Logged-In Users by sending messages to the Application User's inbox and push notifications if the Logged-In User has activated such type of notifications. Through them, GLS Poland provides the User with information about:

- confirmation of shipment and delivery of the parcel,
- parcel status,
- payment status for the sending of a Parcel, including the possibility of retrying a payment,
- Application operation, updates, technical interruptions,
- amendments to the Regulations and Privacy Policy,
- new products and services.

In order to receive push notifications, the Logged-In User must activate them in the inbox by going to the My Account panel in the bottom menu and then the Notifications panel.

Marketing contacts are made only after the Logged-In User has given the appropriate consent for the given communication channel (SMS, e-mail, push). This consent applies to the selected communication channel, which means that if the Logged-In User provides more than one email address in the Application, marketing messages may be sent to each of them. The rules for withdrawing granted consents are described below.

**Data of persons who have not created an Account**

Use of the Application requires the creation of an Account. Before an Account is created, GLS Poland processes only the telephone number provided during registration (for the purpose of sending a verification code, Article 6(1)(b) of the GDPR) and technical data relating to the device that is necessary for the proper functioning of the Application (Article 6(1)(f) of the GDPR).

**Data of Parcel Recipients (Third-Party Data)**

In connection with the provision of the Parcel sending service through the Application, GLS Poland also processes the personal data of Recipients entered by the Logged-In User in the Parcel sending form or saved by the Logged-In User in the Address Book. Such data includes the Recipient's first name, surname, delivery address, phone number and e-mail address. Where a Parcel is sent to another Member State of the European Union, the delivery address also includes the country of delivery.

The source of the Recipient's data is the Logged-In User (the sender of the Parcel). GLS Poland becomes the controller of such data upon obtaining it and processes it for the purposes of entering into and performing the contract for the acceptance, transportation and delivery of the Parcel, including communication with the Recipient regarding the Parcel status and available collection options, as well as telephone or SMS contact by a GLS Poland courier for the purpose of delivering the Parcel or arranging a change to the place or date of delivery (Article 6(1)(f) of the GDPR – the legitimate interest of GLS Poland consisting in the proper delivery of the Parcel).

GLS Poland fulfils the information obligation towards Recipients referred to in Article 14 of the GDPR during the first communication addressed to the Recipient in connection with the Parcel, depending on the scope of data provided by the Sender, by e-mail, SMS message or notification in the Application, including a reference to the Privacy Policy.

Where a Parcel is sent to another Member State of the European Union, the delivery of the Parcel and communication with the Recipient (including notifications concerning the delivery status and scheduled delivery date) are handled by the GLS Group company responsible for delivery in the country of destination, which processes the Recipient's data as a separate data controller.

5. DATA SUBJECT RIGHTS

**The person whose data is processed has the right to:**

- receive information and access the data that concerns them (the data subject's right of access under Article 15 of the GDPR),
- rectify their personal data that is incorrect and to update the data (right to rectify data, Article 16 of the GDPR),
- request the deletion of their personal data (the right to erasure, under Article 17 of the GDPR),
- request the cessation of processing (right to restrict processing, under Article 18 of the GDPR),
- request the transfer of data to another controller (right to data portability, under Article 20 of the GDPR),
- object to the processing of their personal data (right to object, under Article 21 of the GDPR).

**Fulfillment of natural persons' rights under the GDPR**

To make a request for the realization of one of the above-mentioned rights, send a message to the Data Protection Officer at GLS Poland. Indicate which right the message concerns so that GLS Poland can take the necessary steps to implement the request.

You can also send a letter by regular mail to the Data Protection Officer at GLS Poland.

Please note that, in connection with the application, for the purpose of identifying a person, GLS Poland may ask for additional proof of identity to protect against unauthorized access to data.

**Withdrawal of consent**

If the basis for data processing is a person's consent, that person has the right to withdraw consent at any time.

The consent of the Logged-In User to the processing of their personal data for the purpose of providing commercial information and analysing their use of the Application is given by the User performing the appropriate action in the application. The Logged-In User can then independently manage the consents given, including withdrawing them, on their profile in the Application by going to: My Account/General/Contracts and Regulations and moving the slider next to the appropriate options.

**Filing a complaint regarding improper processing of personal data**

The data subject also has the right to file a complaint with the supervisory authority. In Poland, such an authority is the Personal Data Protection Office.

**Profiling and Automated Decision-Making**

The personal data of Logged-In Users and Recipients is not used for decision-making based solely on automated processing, including profiling, which would produce legal effects concerning them or similarly significantly affect them.

6. SHARING DATA

**GLS Poland may share personal data with:**

- GLS subsidiaries,
- entities that are under contract to provide services to GLS Poland or on behalf of GLS Poland (Processors), in particular IT service providers,
- entities operating GLS Points and operators of Parcel Lockers where the Parcel is sent or collected, as well as to GLS Poland's subcontractors involved in the transportation and delivery of Parcels (transport partners), to the extent necessary for the acceptance, transportation, delivery or handover of the Parcel;
- other persons or organizations under applicable legal provisions,
- the payment service provider – mElements S.A., with its registered office in Warsaw, at ul. Prosta 18, 00-850 Warsaw (PayNow service) – to the extent necessary for processing payments for the sending of a Parcel, in particular: e-mail address, transaction amount and transaction identifier. mElements S.A. processes such data as an independent controller in accordance with its own privacy policy.

The Logged-In user can also decide to share their data with another user of the application, using the option of sharing shipments with trusted recipients of their choice.

7. TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

As a rule, GLS Poland does not transfer the personal data of Logged-In Users, Non-Logged Users or Recipients outside the European Economic Area (EEA). Where the transfer of personal data to a third country (outside the EEA) proves necessary, such transfer will take place only where an adequate level of data protection is ensured, in particular on the basis of an adequacy decision issued by the European Commission or by applying the standard contractual clauses approved by the European Commission (Article 46(2)(c) of the GDPR). Data subjects will be informed accordingly.

Parcels may only be sent using the Application within the territory of Poland and to those Member States of the European Union listed in the Application. Consequently, the data of Senders and Recipients of Parcels sent using the Application are not transferred outside the European Economic Area (EEA).

8. RETENTION PERIOD AND DELETION OF DATA

**GLS Poland processes personal data only for such time as is necessary to fulfill the purpose** for which they were collected. The data storage period is determined based on the following requirements:

- operational requirements – the period during which the information is necessary to achieve the objectives,
- legal requirements – the period of time when GLS Poland is obliged to keep data to comply with regulations,
- legitimate interests of GLS Poland – the period in which the data is processed for the purpose of their implementation, in particular for the purpose of determining and asserting potential claims, in connection with the performance of the contract – for no

longer than the limitation periods applicable to claims arising under generally applicable laws.

In particular, data relating to the sending of a Parcel, including the Recipient's data contained in the shipment documentation, are retained for the period necessary for the performance of the agreement and subsequently until the expiry of the limitation periods for claims arising under the Postal Law and the Transport Law. Invoices and accounting documents, including payment documentation, are retained for a period of 5 years, calculated from the end of the calendar year in which the tax payment deadline expired.

Archived data is available only to authorized employees. After the expiration of the data retention period, the data is permanently deleted.

If the User has not used the Application for more than 12 months, the account will automatically be deleted.

The Logged-In User can also delete their account in the Application themselves by using the "delete account" button. After deletion of the account, the User's personal data will be deleted within a maximum of 3 months. Deletion of the Account (including automatic deletion following a period of inactivity) does not apply to data whose further retention is required by law, in particular documentation relating to payments.

Uninstalling the Application does not automatically delete the account, after reinstalling the Application the account is active if 12 months have not passed since the uninstallation.

Personal data of Recipients saved by the Logged-In User in the Address Book is retained until it is deleted by the Logged-In User or until the Account is deleted.

## 9. CHANGES TO THE PRIVACY POLICY

The current version of the Privacy Policy is available in .pdf format at: https://gls-group.com/PL/en/meet-mygls and for Users logged into the Application in the panel Account – Others: "Privacy Policy".

The Data Controller reserves the right to amend the provisions of the Privacy Policy at any time. The Data Controller will notify all Logged-In Users of the change in the Privacy Policy by PUSH notification from the Application, by SMS or by e-mail, depending on the extent of data provided and consents given by the User in question.