

# **Privacy Policy**

## I. General

#### 1. Identity and contact details of the organization and the Data Protection Manager

General Logistics Systems Belgium NV GLS Belgium Distribution NV Humaniteitslaan 233 1620 Drogenbos, Belgium

General Logistics Systems Belgium NV - Branch of Luxembourg 24, Zae op Zaemer 4959 Bascharage, Luxembourg info@gls-belgium.com

Hereinafter "GLS Belgium"

You can contact the Data Protection Manager via the e-mail address

<u>dataprotection@gls-belgium.com</u> or by letter at the above address. If you are contacting us via non-encrypted e-mail, please note that confidentiality of the information transmitted cannot be guaranteed. Unauthorized third parties may possibly read non-encrypted e-mails.

#### 2. Personal data

By personal data, we mean all data that can provide information about an identifiable natural person. Some examples are name, address, telephone number and e-mail address. Information that cannot be linked to a specific or identifiable person - such as your favourite web pages or the number of users on a web page - is not considered personal data.

## 3. Applicable legislation and confidentiality obligation

All GLS entities located within the EU countries are subject to the guidelines of the General Data Protection Regulation (GDPR) and other relevant national data protection legislation. As a postal service provider, GLS Belgium and its employees respect the confidential nature of the shipment.

## 4. Protection of personal data

Through technical and organizational security measures, GLS entities do their best to protect personal data against loss or misuse. Personal data is only processed in systems that are protected by appropriate security measures. GLS will, if necessary, adapt the security and data protection measures to technological progress.



## II. Details of shipment and recipient

#### 1. Categories of data, purposes of personal data processing and legal basis

To perform parcel and freight activities and to comply with contractual obligations, in particular the delivery of parcels and pallets, the payment of services, the handling of complaints, etc., GLS Belgium requires data from the sender (address and additional contact details, payment information) and other relevant contractual data according to the services ordered by the sender as well as the data of the recipient (name, address, zip code, city, country, optional telephone number and e-mail address).

The details of the addressee that were transferred to GLS entities as well as the interface documentation (scans of the parcels / pallets at different locations) and the proof of delivery (POD) can be processed and registered by different GLS branches. GLS uses the personal data regarding the shipment and the recipient solely for the fulfilment of its contractual obligations. Any other use is not permitted.

In certain circumstances, we may process data based on consent or based on a legitimate interest (in particular with regard to the following purposes: solvency check, compliance program).

#### 2. Responsibility

Complying with applicable data protection legislation is a duty of every GLS entity. The transfer of data from a sender to a GLS entity is not considered data processing on behalf of others. Additional services such as "**FlexDeliveryService**", "**ShopDeliveryService**" and **"GLS One**" (www.gls-one.be), require the e-mail address or telephone number of the addressee to inform him / her about the status of the delivery of the parcel/pallet. GLS entities receive the telephone number and / or e-mail address via the sender who ordered these additional services. The sender is responsible for correctly obtaining this data and in particular, the approval of the addressee to transfer his e-mail address and / or telephone number to GLS.

## 3. Sharing of data and recipients

In general, only the sender and the recipient of a parcel / pallet are entitled to receive information about a parcel / pallet. GLS provides information about the parcel / pallet to third parties (e.g. government agencies) only based on legal regulations.

GLS entities will not sell or communicate personal data to a third party. However, there are certain circumstances where GLS may share personal data without additional notice to you. Parties that may receive your data are:

• GLS branches and contracting parties in other EU countries or outside the EU for delivering parcels / pallets from the sender to the recipient.

• Affiliated or unaffiliated third parties that provide services for or on behalf of GLS, in particular IT Service providers, through a contract. GLS Belgium has concluded appropriate data protection agreements with these parties.



• Other persons or organizations as permitted by applicable law or regulation.

• Police forces and law enforcement officers for respecting national security requirements or as part of a legal process to protect our property or because of an investigation related to a breach of GLS rules and policies, unauthorized access to or use of GLS material or any other illegal activity.

#### 4. Retention and deletion of data

GLS Belgium processes personal data as long as this is required for the purposes for which we use it. We will determine how long we keep the data based on the following requirements:

• Operational requirements: the length of time that the information is needed to provide the services.

• Legal requirements: GLS Belgium is legally obliged to keep certain files for a certain duration.

Archived data is registered on databases that are only accessible to authorized personnel. After the statutory retention period has expired, the data will be deleted.

#### III. Use of the GLS website

#### 1. Logging IP addresses

Each time a user visits a GLS web page; his or her data is stored in a log file. The following specific data is stored temporarily:

- IP address of the computer used
- Domain name
- Day and time of the consultation
- HTTP response code
- Visited pages (URL)
- Operating system, with version number
- Browser, with version number
- Screen resolution

The stored data is summarized anonymously for statistical purposes. These statistics serve to evaluate the use of the GLS website by visitors. In particular, the statistics show the order in which the pages were visited as well as the way the user browses from page to page. GLS uses this information to make further improvements to the method of use and application of the website.

#### 2. Cookies

In order to be able to visit the GLS web pages, it may be necessary for the GLS servers or the servers of third parties (e.g. YouTube) to set cookies. These cookies are used by the technical administrator of the website. Every visitor to a webpage can set his / her browser to refuse cookies. In this case no data is written on the user's computer. The data stored in the cookies is not sent to GLS. If cookies are refused, you may not be able to use all functions of the website. For the use of cookies we refer to our Cookies policy.



## 3. Website Analytics (Piano)

GLS uses the website analytics tool Piano from Applied Technologies Internet SAS, 85 avenue Président JF Kennedy, 33700 Merignac, France on our websites. GLS uses Piano to analyse your use of the website in order to compile reports on the activities on our websites and improve the user-experience.

With Piano, interactions of website visitors are recorded and systematically evaluated by use of cookies and specific visitor-IDs. The data collected using Piano is anonymised or pseudonymised as soon as possible. The IP address is shortened and login and device IDs are converted into a pseudonymous key. This generally rules out the possibility of a direct personal reference. In particular, it is no longer possible to assign the data to the website visitor's computer or end device.

GLS processes the following data when using Piano:

- Visitor ID
- IP-Address
- Audience information: number of visitors, visits, page views, events, bounce rate, geolocation (country, continent, region, subregion, language).
- the referrer URL (the previously visited website), including search engines and social media sites as well as campaign parameters;
- the URL visited with the associated page title and optional information about the page content;
- Technology details: devices, browsers, operating systems.
- How you navigate and interact with our website from entry page to the end of the visit: Displayed pages, click action, navigation, downloads, scroll-behaviour;
- How you search on our website: search results displayed to you and results you click on;
- How you get in contact with us: start of filling out our contact form, progress and submission. Please note that GLS does not analyse the content of the contact form.
- If you register for an account on our website we also track if you are logged in or out.

GLS deletes this data after 25 months. The legal basis for the data processing is your consent in accordance with Art. 6 (1) a) GDPR. You can withdraw your consent at any time with effect for the future by adjusting your preferences in our consent banner.

#### 4. MyGLS / YourGLS / GLS-ONE

GLS makes an important difference between open and closed web zones when using the GLS websites. Functions within the open zone can be used without prior registration. The closed zone is part of the implementation of an agreement between the customer and GLS and can only be visited via a login file provided by GLS.

In the open zone, the user finds functions such as an email contact form, the "Track & Trace" function and the ParcelShop search function. The data that must be entered in a request via e- mail, e.g.: name, address, zip code, municipality, etc., are necessary for us to be able to process your request. GLS will not forward, sell or otherwise provide your personal data to third parties, except when this is necessary for the performance of the services described above.

## IV. Rights of those involved

#### 1. The rights of the person concerned

You have the right to be informed and to gain access to your processed personal data (Right to information and Right to access in accordance with Article 15 of GDPR obtain rectification of incorrect personal data. (Right to rectification in accordance with Art. 16 GDPR) obtain the erasure of your personal data (Right to data erasure in accordance with Art. 17 GDPR) limit the processing (Right to



limit the processing in accordance with Art. 18 GDPR) to receive your personal data transferred to us (Right to transferability of data in accordance with Art. 20 of the GDPR) for reasons related to his specific situation or to fulfil a task in the public interest, to object to the processing of personal data concerning him (Right of objection in accordance with Art. 21) on condition that the necessary legal requirements are met.

## 2. Withdrawal of permission

If your consent has been requested for the processing of your personal data, you have the right to withdraw this consent at any time in the future, without questioning the legality of the processing based on the consent to the withdrawal.

#### 3. Exercise your rights

If you, as a data subject, wish to exercise your rights or to withdraw an explicit consent, please send a message to the Data Protection Manager of GLS Belgium (see contact details). Please state in this message which right you wish to exercise so that GLS Belgium can take the further necessary steps to respect your rights. Please note that we can request proof of identification to protect your information against unauthorized access.

#### 4. Right to make a complaint

You have the right to submit a complaint to the data protection authority if you believe that your rights have been violated.

In Belgium:	Data Protection Authority Drukpersstraat 35 1000 Brussels contact@apd-gba.be Tel. (+32) (0)2 274 48 00
In Luxembourg:	National Commission for Data Protection 15, Boulevard du Jazz 4370 Belvaux GD Luxembourg Tel. (+352) 26 10 60-1

#### V. Updates to this data protection information

GLS Belgium may, in its sole discretion, update this information by publishing a modified version on this website. This information was last updated on 1 March 2025.