PRIVACY NOTICE

DHL Express cares about your privacy.

Our mission is *excellence, simply delivered* while protecting you. This Privacy Notice describes what data we and our Deutsche Post DHL Group companies collect via our different interactions with you, why and how we use it, how long we keep it, where and how we collect it, to whom we will pass it on and which rights you have.

Scope of this Privacy Notice

This Privacy Notice applies to all users of our services, websites, applications, features or other services anywhere in the world, unless covered by a separate Privacy Notice.

This Privacy Notice applies to the following categories of individuals:

- Shippers: shippers, including their employees, or individuals who send a shipment
- Shipment receivers: any individual who receives a shipment
- Persons showing interest in us and our services or paying for them
- Business partners: business partners, including their employees
- Employment candidates: individuals that apply for a job with us

All the above subjects are referred to as “you” or “your”.

Our data protection practices are subject to applicable law in the places in which we operate. This means that we engage in the practices described in this Privacy Notice in a particular country, only if permitted by regional or local data protection laws.

Changes to this Privacy Notice

We reserve the right to change this Privacy Notice from time to time according to the changes in our services, the processing of your data or in the applicable law. We therefore recommend to visit our Privacy Notice periodically.

Who is responsible

The legal entity that acts as your data controller determines how and why your data is processed:

For DHL Express Iraq
Al-Durra Al-Hamraa Al-Lami'a Company for General Transport with limited Liability
Al-Salam Qtr. I Dist. 4081 St. 631 H. 11 ,
Baghdad, Iraq

For DHL Express Global
DHL International GmbH
Charles-de-Gaulle-Str. 20
53113 Bonn
Germany

Contact Us

Types of data we process

We only process your data which is required for a specific purpose. In some countries, additional data can be processed to comply with local laws.

Contact data

Information to contact you e.g. when we pick-up or deliver a package.

Such as: your name, phone number, address, email address

Employment candidate administration data

Information used in HR systems for candidates' data.

Such as: your application, competences, work visa

User authentication and authorization

Information to identify and verify you as a user of our systems and to verify your access to specific data e.g. On Demand Delivery application will show your pending shipments.

Such as: your login ID, password

Profile Data

Information on your DHL profile e.g. to set your delivery preferences.

Such as: your delivery preferences, order/purchase history

Contract data

Information laid down and agreed upon in contracts e.g. the contracting parties.

Such as: activity on contract, party names

Shipment data

Information enabling the pick-up and delivery of your shipment e.g. status of your shipment.

Such as: your address, shipment documents, proof of delivery

Financial data

Information used for invoicing, financial and payment processes e.g. bank account number which is used for payments.

Such as: your bank account, e-payment details

Identification data

Information used to identify you e.g. passport image to verify your identity.

Such as: your ID data, social security number, passport image

Characteristics

Information that is typical or noticeable related to you, which makes it possible to distinguish you from other persons.

Such as: your signature as a proof of delivery

Telecommunication and survey data

Information communicated via you to one of our employees or by filling in an online survey e.g. when you call our customer service.

Such as: your feedback, when applicable call recording

Why we collect your data

At DHL Express we only process your data for specific purposes and where we have a legal basis to do so. This can either be:

- The performance of a contract or when you take steps into starting a contract with us.
- To comply with a legal obligation.
- The legitimate interests pursued and to safeguard your and our rights e.g. to increase your customer satisfaction, to deliver and improve our services for you, to facilitate your communication and interaction with us, to provide you with a more efficient, simplified and cost-effective service, to better manage our relationship with you and the opportunities that are presented with it, to optimize our routes, to better protect your data and to make sure no prohibited and unacceptable items enter our network. We will make sure that these legitimate interests are balanced. When applicable, you have the right to object.
- Consent, which you may withdraw at any time.

The following are the purposes for which we process your data.

Purpose	Lawful ground for processing
For you as a customer	
To provide our products and services, including	
To pick-up and deliver your shipment	Performance of a contract
To manage your shipment in our global network	Performance of a contract
To comply with all import and export regulations	Performance of a contract Legal obligation
To identify you	Performance of a contract Legal obligation Legitimate interest Consent
To support you with the use of our tools	Performance of a contract

To allow our business partners to serve you	Performance of a contract Legitimate interest Consent
To process financial data from you	Performance of a contract
To manage our relationship with you, including	
To improve your DHL experience and our products and services e.g. events, sweepstakes, surveys	Performance of a contract Legitimate interest Consent
To keep you up to date on our products and services that may interest you	Legitimate interest Consent
To expand our products and services	Performance of a contract Legitimate interest Consent
To facilitate your visit on our website	Consent
To onboard you as a new customer	Performance of a contract Legitimate interest
To communicate with you	Performance of a contract Legitimate interest

For you as a business partner	
To deliver services to us, including	
To manage our relationship with you	Performance of a contract Legitimate Interest
For you to provide services to us	Performance of a contract Legitimate interest

For you as a candidate	
To welcome you joining us, including	
To register you as a candidate e.g. job fairs	Performance of a contract Legitimate interest
To check your eligibility	Performance of a contract Legitimate interest
To onboard you	Performance of a contract
To keep you in our recruitment reserve	Consent

For everyone	
To protect and secure your data, including	
To ensure the security of our networks and information systems	Legal obligation Legitimate interest
To protect you	Legal obligation Legitimate interest

Visiting our website

When you visit our websites, we capture your data which is necessary for us to make the website accessible to you (e.g. IP address, date and duration of your visit). Further storage in log files is performed to ensure the functionality of our websites and the security of our systems. We therefore have a legitimate interest in processing your data. We delete your data as soon as it is no longer needed to fulfill the purpose for which it was collected.

Shipment screening

Shipments are screened to verify their content, to match the detailed description, to check their value and to comply with the applicable law and our Terms of Carriage. We screen all shipments for security purposes to avoid that prohibited and unacceptable items enter our network or to detect criminal offences or misuse. We have a legitimate interest for this processing as it ensures the smooth operation and continuous improvement of our products for your benefit.

Shipment exceptions

At DHL we strive to deliver your shipment with the utmost care and without undue delay. If we cannot deliver your shipment, it will be returned to the shipper. For example, when no address can be found, it will be handled in the DHL Found Shipment Center. We may open your shipment to identify a return or delivery address. Therefore, we have a legitimate interest to process your data.

Denied Party Screening

Denied Parties are individuals or entities who have been placed on a regulatory authority denied persons list, blocked from import or export transactions, or have been sanctioned by a regulatory authority for illegal acts such as involvement in terrorism, narcotics trafficking, money laundering or weapons proliferation. Shipments to or from Denied Parties are often prohibited.

Every shipment in the DHL Express network is screened for Denied Parties. Shipments to or from potential Denied Parties may be held for further screening to verify that the shipment is not prohibited. To facilitate the quick release of the shipment we may request a copy of your identification document.

Based on DHL Express' and your legitimate interest, we will process your data and we may keep strictly necessary data for a limited period. This prevents your future shipments from being delayed due to the screening process. Nonetheless, you have the right to object, verbally or in writing.

If you have any questions on the regulations, trade sanctions and Denied Parties, please visit the websites of the relevant authorities, e.g. United Nations, European Union and US Government.

Calls and call recordings

In certain cases, DHL will call you to clarify contractual topics, to gather your feedback or for marketing purposes. The legal basis is either performance of a contract, legitimate interest or consent. For example, in some countries, calls for marketing purposes are only made with your prior consent.

If you call us or we call you, the call can be recorded for shipment related matters, training and quality assurance. We will process your call recording according to the applicable data protection and telecommunication laws. Where the call recording is subject to consent, the call will only be recorded after you give your consent. You can withdraw your consent at any time. From that moment on, all communication will no longer be recorded. In countries where the call recording is subject to legitimate interest, you may object to the recording.

Customer feedback

DHL may interact with you to capture your feedback and experience with us. Your response will help us generate improvements in delivering our products and services. In some countries we outsource this process to a business partner. Depending on your country, the processing will be based on legitimate interest or on your consent.

Customs clearance

We want to ensure that your shipment arrives as quickly as possible by facilitating the customs clearance process for you. To do this, it is necessary that you provide us with all the required documents for customs clearance. As customs varies on country level, different legal requirements can apply. For example, in certain countries, customs authorities require the social security number, the national ID or a passport copy to clear the shipment. To comply with the customs regulation and to fulfill our contractual obligations, the processing of your data is necessary. In cases where we keep your data for future shipments, you have the right to object.

Digital messaging

To facilitate the communication between us, we offer you to contact us via third party communication channels of your choice (e.g. Facebook and DHL Virtual Assistant). The systems respond with keyword-based answers or passes your request to a staff member in a live chat. This is a quick and easy way to have answers on your shipment status or on our products and services. DHL has a legitimate interest in processing your data for the facilitation of our communication. If you do not wish to make use of such a channel, you are welcome to contact our customer service. For further information on data protection practices of the communication channel providers, please visit their websites.

Cookies and similar technologies

DHL makes use of various technologies to store your user preferences or other information to make our services to you as convenient and efficient as possible. When you access our website, a Privacy Preference Center will inform you that your consent is required to the use of certain cookies, such as analytical cookies or similar technologies.

Geolocation

DHL will only collect your location directly from you. We offer you an improved user experience on our systems by integrating mapping systems (e.g. Google Maps, Microsoft Bing Maps…). This can be part of shipment tracking, location search and delivery to DHL Service Points in case you have chosen to redirect your shipment. Depending on the country, this processing can be based on legitimate interest or your consent.

Video Surveillance 'CCTV'

DHL has installed video surveillance cameras to control the access to our buildings and specific areas such as parking lots, as well as to perform oversight on our business operations. Video surveillance is used to guarantee the health and safety of our visitors, personnel, and property, as well as any monitoring of the operational processes in its facilities. Therefore, we have a legitimate interest for security and access control purposes, which is necessary for the management of DHL buildings.

Social media fan pages

We provide you our social media fan pages, such as Facebook, Instagram or LinkedIn to better manage our relationship with you and to communicate with you. Therefore, we have a legitimate interest in processing your data. For more information, please visit our Privacy Notices on our social media fan pages.

DHL Service Points

It is possible for you to send and receive packages via Service Points. These Service Points can be owned by DHL or by a third party business partner (e.g. your local newspaper shop). If you choose to operate via a Service Point, DHL will process only the minimum and strictly necessary data to perform our contractual obligations towards you. This could be the delivery of your package to your preferred Service Point or sending your packages to your intended recipient.

Payment partners

DHL offers you several payment options to facilitate your payment experience. We accept all major debit and credit cards, as well as online payment systems. Your payment data will be

processed in accordance with payment industry processing standards to provide the service you request and to fulfill our contractual obligations.

How we collect your data

We primarily collect and use your data to pick-up, transport and deliver your shipment.

We may collect your data directly or indirectly. When you actively share information with us by e.g. creating an account, contacting us or filling in a form on our website or a survey, we receive your data directly from you. When we receive your data from an external third party (e.g. shipper), we receive your data indirectly. In this case, it is the responsibility of the supplier of the data to ensure the accuracy of the data and to transfer it to us in accordance with applicable law.

Information for our business partners

We process data for you as our business partner, in order for us to manage our contracts with you or to receive services from you.

We only collect and process the data necessary for our agreed contractual purposes and will only share data in accordance with applicable data protection laws and limited to the agreed purposes.

We use your services to better serve our employees and our customers. This allows DHL to guarantee a close proximity to our customers for their pick-up and delivery, shipment data management services, partners for safety and security, audits, payment providers and IT hosting.

How long we keep your data

We will keep your data for as long as necessary to fulfill our purposes, to execute our contracts and to comply with any legal obligation. The retention period may differ per country based on applicable country laws.

To comply with applicable legal obligations, we will keep some of your data for a period up to 11 years, with variations per country as determined by applicable local laws. For example, the storage of shipment documents required for shipment processing. We determine an appropriate and reasonable retention period by considering the nature, the sensitivity and the necessity of your data.

We continuously strive to minimize the retention period of data where the purpose, the law or contracts allows us to do so. For example, in some countries data for the purpose of customer satisfaction is kept for no longer than 3 years. The data that we collect based on your consent will be processed until you withdraw your consent.

How we secure your data

DHL takes the security of your data very seriously. We have implemented various strategies, controls, policies and measures to keep your data secure. We keep our security measures under close review. We use safeguards such as firewalls, network intrusion systems and application monitoring. Where appropriate, we secure your data by using pseudonymization and encryption techniques when storing and transferring your data. We ensure that there are strict physical access controls in our buildings and certified data centers.

As a part of our security strategy, we have set up auditing programs to make sure that our systems and services comply with the DPDHL information security policy, and by extension the ISO 27001 standard.

In addition, we are taking a number of ongoing measures to reduce risk, such as (but not limited to) training our employees regularly and organizing incident simulation exercises by our Cyber Defense Center.
The goal is to have a continuous IT system operation and to prevent unauthorized access.

Will your data be passed on

DHL will only share or transfer your data in the course of carrying out the purposes outlined in this Privacy Notice, when permitted by applicable law and with appropriate safeguards.

We will transfer your data to the following category of recipients:

- DPDHL Group companies: transfer is required within the DPDHL Group to provide and improve our products and services. Transfers can also occur to manage our relationship with you, to identify you and to comply with your privacy rights
- Business partners: transfer is limited to what is required (e.g. to pick-up or deliver your package at a Service Point, in some areas to perform the pick-up and delivery or to execute customs clearance.)
- Public authorities: transfer is required by applicable law (e.g. to fulfil a legal obligation during shipment processing)

Your data is only transferred outside the European Economic Area (EEA) to other Deutsche Post DHL Group companies, third party business partners or public authorities when permitted by applicable data protection law. In such cases, we will make sure that appropriate safeguards are in place to ensure the transfer of your data (e.g. our binding corporate rules, standard contractual clauses).

The DPDHL Data Privacy Policy regulates our group-wide standards for the processing of your data.

We respect your rights

Where applicable, data protection law provides multiple rights for you to exercise:

Right to access information
You have the right to be informed on the information we hold on you.

This includes the right to ask us supplementary information about the categories of your data we are handling, for which purpose, the categories of business partners to whom the data may be send to and your other rights regarding our use of your data.

We will provide you this information within one month after your request in so far we are not affecting the rights and freedoms of another person by doing so.

Right of rectification
You have the right to request a correction of any inaccurate data about yourself.

Right to object
You have the right to challenge certain types of processing when based on legitimate interest, such as direct marketing.

Right to withdraw your consent
You have the right to withdraw your consent at any time.

Right of portability
You have the right to port your data to another controller. We will give you an export of the data you provided to us.

Right to erasure/be forgotten
You have the right, in certain circumstances, to request a deletion of your data. Where your right to be forgotten is valid, and only if necessary, minimal data about you can be kept to ensure you will not be contacted again. If you use our services again, you will be handled as a new customer.

Right to restrict processing
You have the right to request a limitation in the way your data is used.

Right related to automated decision making including profiling
You have the right to request a review of automated processing. At this moment, DHL does not apply any automated decision making with legal consequences for you. In case it will be done in the future, we will do so in accordance with the applicable law.

You can direct your request based on the above rights or any other questions about this Privacy Notice to our Data Protection Official from the country you are residing. DHL cannot handle your request without sufficient proof of your identity. Please note that the applicable data protection law may impose conditions on exercising the above rights.

Requests and complaints

We will handle all your requests with the care it deserves. If we fail to provide you a satisfying answer, please contact us.

If we fail to address your concerns, you may send a complaint to your local Data Protection Authority.

Glossary

Business partners	Third parties who provide services to us
Communication channel providers	Third parties who provide us the use of their communication channels
Controller	The data controller determines the purpose(s) and the means of the processing of personal data
Data	All personal data related to a person who can be identified or identifiable directly or indirectly
DHL Express	DHL, we, us, our
DPO	The DPO ensures that the data protection rules are respected within the company
Processor	The data processor processes personal data only on behalf of the controller
Shipment receivers	The party to whom the shipment are delivered e.g. consignee, neighbors
Shippers	The party who initiates a shipment from one location to another via us