PRIVACY NOTICE

Our mission is *Excellence, simply delivered,* while respecting your privacy. This Privacy Notice describes what data we and our 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 (e.g. neighbour)
- All parties involved in the logistics process (e.g. buyer, seller)
- 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
- Visitors

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

Our data protection practices are subject to applicable laws in the places in which we operate.

Changes to this Privacy Notice

We reserve the right to change this Privacy Notice at any time according to the changes in our services, the processing of your data or in applicable laws. We therefore recommend visiting 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 Kazakhstan

DHL International Kazakhstan LLP
Dostyk Ave. 43
050000, Almaty
Kazakhstan
Contact Us

For DHL Express globally

DHL International GmbH
Charles-de-Gaulle-Str. 20
53113 Bonn
Germany
Contact Us

Types of data we process

We only process your data for specific purposes. In some countries, additional data is processed to comply with applicable local laws.

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

Contact data

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

Such as: your full name, phone number(s), address, email address

Contract data

Information laid down and agreed upon in contracts.

Such as: activity on contract, party names

Employment candidate administration data

Information used in HR systems for candidates' data.

Such as: your application, competences, work visa

Financial data

Information used for invoicing, financial and payment processes.

Such as: your bank account, e-payment details

Identification data

Information used to verify your identity.

Such as: your government ID, tax ID, social security number, passport image and other identifiers

Image data

Information recorded on e.g. CCTV and other surveillance devices for protection purposes or pictures captured during an event

Such as: your video image, your picture

Profile Data

Information on your DHL profile.

Such as: your delivery preferences, order/purchase history

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, waybill number

Telecommunication and survey data

Information you provide to us e.g. when you call our customer service or by filling in an online survey

Such as: your feedback, when applicable call recording

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. to change your delivery address.

Such as: your login ID, password, IP address

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 under applicable law. 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 increase compliance and ensure safety and security, 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 and if applicable in your jurisdiction, the lawful ground for processing:

For you as a customer	
To provide our products and services, including	
Purpose	**Lawful ground for processing**
To process your data prior to entering a contract e.g. quote	Performance of a contract Consent
To provide you our products and services e.g. shipment insurance	Performance of a contract Legitimate interest Consent

To pick-up and deliver your shipment	Performance of a contract Legitimate interest
To manage your shipment in our global network	Performance of a contract Legitimate interest
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 and facilitate the use of our IT systems and services	Performance of a contract Legitimate interest
To allow our business partners to serve you	Performance of a contract Legitimate interest Consent
To process financial data from you including facilitating the billing process	Performance of a contract
To comply with applicable legal requirements and our policies	Legal obligation Legitimate interest
To manage our relationship with you, including	
To provide you with customer support	Performance of a contract Legitimate interest Consent
To establish and manage your DHL account	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 improve your DHL experience and our products and services e.g. events, sweepstakes, surveys	Performance of a contract Legitimate interest Consent
To optimize our internal processes	Legitimate interest Consent
To expand our products and services	Performance of a contract Legitimate interest Consent
To facilitate your visit on our websites and applications	Legitimate interest Consent
To onboard you as a new customer	Performance of a contract Legitimate interest Consent
To communicate with you	Performance of a contract Legitimate interest Consent

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 Consent
To check your eligibility and suitability for employment	Performance of a contract Legitimate interest Consent
To onboard you	Performance of a contract Legitimate interest Consent
To keep you in our recruitment reserve	Consent

For everyone	
To protect and secure your data, including	
To ensure the security and safety of our premises, facilities, and networks and information systems	Performance of a contract Legal obligation Legitimate interest
To protect you	Legal obligation Legitimate interest
To exercise your data subject rights	Legal obligation Legitimate Interest

Your data might be processed in any of the cases below:

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 values your feedback and aims to interact with you to capture your experience with us. Analysing your feedback will help us improve delivering our products and services and provide the best possible customer service. We may contact you through various communication channels, including phone calls, emails or via the DHL website/app you are using. Additionally, we may collect the feedback you provide publicly on review platforms. This allows us to gain valuable insights into your experiences and preferences, further enabling us to refine our offerings. In some countries, we outsource this process to a trusted business partner. Depending on your country, the processing may be based on legitimate interest or on your consent.

Customer identity verification

To ensure the utmost security and protect you from potentially fraudulent activities, DHL may require proof of identity. For instance, during your onboarding as a new customer, we may request a valid identification document to verify your identity. Similarly, when you drop off a shipment at our service points, an ID check may be conducted. Additionally, as part of the delivery process, the courier may request the PIN/QR code you received and ask for your name as it appears on your ID to authenticate you as the intended receiver. These measures are in place to prevent unauthorized access to your shipment and maintain the integrity of the delivery process. Depending on your country, the processing is based on your legitimate interest or on your consent when you choose to provide us with your ID.

Customs clearance

We want to ensure that your shipment arrives as quickly as possible by facilitating the customs clearance process for you, either by ourselves or by subcontracting a legally accredited customs agents/brokers in accordance with applicable law. 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 fulfil 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.

Denied Party Screening

Denied Parties are individuals or entities, including their affiliates or ultimate beneficial owners, who have been placed on a regulatory authority denied persons list, blocked from import or export transactions. They may have been sanctioned by a regulatory authority for illegal acts such as involvement in terrorism, narcotics trafficking, money laundering or weapons proliferation. Doing business with Denied Parties is often prohibited.

Our mission is to ensure that we do not carry any shipment from or to a Denied Party or, deliver any item which breaches the country-based sanctions.

Every shipment in the DHL Express network is screened to identify any potential involvement with Denied Parties. Shipments that potentially involve Denied Parties may be held for further screening to verify that the shipment is not prohibited and that you are not on a Denied Party list. To comply with sanctions list regulations and to facilitate the quick release of the shipment, we may request a copy of your identification document.

The screening process is based on our legitimate interest and the fulfillment of a legal obligation under the EU sanctions lists as well as other lists such as those of the UN and the US OFAC.

Our legitimate interests include the necessity to identify individuals listed on sanctions lists, avoid business relationships with such individuals, comply with applicable sanctions regimes, and prevent any sanctions against DHL Express for violations of these regimes. Additionally, it is in our interest and your benefit to ensure a successful delivery of your shipment.

We keep strictly necessary data for a limited period to prevent your future shipments from being delayed due to the screening process. You have the right to object to this processing, either verbally or in writing.

For more information on these regulations, trade sanctions and Denied Parties, please visit the websites of the relevant authorities, e.g. United Nations, European Union and US Government.

Digital messaging

To facilitate the communication between us, we offer you to contact us via various (third party) communication channels (e.g. Facebook, 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 third-party communication channel providers, please visit their websites.

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.

Machine-learning and Artificial Intelligence (AI)

As part of our ongoing efforts to enhance our services and optimize our operations, we utilize machine-learning or artificial intelligence (AI) technologies in various aspects of our business. For instance, we may, amongst other things, automate customer interactions through chatbots to handle common inquiries and customer support, analyse customer feedback to measure satisfaction and respond appropriately, forecast sales, demand, and other key business metrics, monitor that our business practices adhere to regulatory requirements and obligations, identify unusual patterns and highlight potential fraud or misuse, optimize delivery routes and logistics operations, improve communication and process language in written text and speech-to-text applications.

DHL will base the use of data in such technologies on its legitimate interest or, where appropriate, will ask for your consent and operates its AI implementations in accordance with applicable laws and regulations. Where possible, we avoid using your data in AI systems.

Sales and marketing communications

DHL may send you sales, marketing and other communication. This may include information about DHL products and services, features, marketing material, promotions, sweepstakes, surveys, news, updates and events. We may do so through various communication channels, including email, text message or other channels depending on your preference. At all times, you can unsubscribe or opt-out of receiving such communication. Please note that you may continue to receive transactional and account-related communication.

Service points and lockers

DHL provides convenient options for sending and receiving shipments through both attended and unattended 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 fulfil our contractual obligations to you. This could be the delivery of your shipment to your preferred service point or sending your shipments to your selected recipient. Additionally, lockers provide you with an easy, secure and automated way to manage your shipment. You may also use the locker mobile app to receive notifications about your shipment. The processing of your data for these purposes is either based on the fulfilment of the contract or our legitimate interest to successfully pick-up or deliver your shipment.

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. Unless otherwise required by law, we may open your shipment to identify a return or delivery address. Therefore, we have a legitimate interest to process your data.

Shipment notifications

To provide you with timely updates regarding the status of your shipment, DHL offers shipment notifications through different channels. You have the flexibility to choose your preferred method of communication, including email, SMS, and other messaging platforms (e.g. WhatsApp). If you wish to opt out of receiving these notifications, you can easily manage your preferences by disabling the respective channels in your account settings. Alternatively, you can reach out to our customer service for assistance.

Shipment receivers

DHL receives your data from the shipper. We process your data to fulfil our contractual obligations with the shipper and ensure the successful delivery of your shipment. Therefore, we will contact you to provide information on your shipment, including notifications on its status, estimated delivery times and options for preferred delivery. If you choose an alternative delivery option (e.g. delivery to your neighbour), it is your responsibility to provide us accurate data and ensure that any such person is aware and will accept the delivery on your behalf. As part of our commitment to deliver your shipment securely and efficiently, DHL has a legitimate interest in processing such data to facilitate this process.

Shipment screening

Shipments are screened to verify their content, to match the detailed description, to check their value and to comply with applicable law and our Terms of Carriage. We screen all shipments for safety, security and compliance 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.

Social media fan pages and review platforms

We provide you various social media fan pages, such as Facebook, Instagram or LinkedIn to strengthen our relationship and facilitate the communication with you. In addition, we appreciate and value your feedback, which you may leave on review platforms, such as Trustpilot or Google Review. We collect information from your interactions with these pages and platforms, such as the posts you like and the feedback you provide. This enables us to enhance future interactions, address any concerns, and continuously improve our services.

Our social media presence is made available by the respective operators of the social media platform in according with their terms and conditions. DHL is responsible for the content that we post and for our interaction with you on these pages. The operator of the social media platform is responsible for all data protection topics involving your user profile, to which we have no access. To the extent that it concerns the processing of your data as part of page insights, both DHL and the platform operator are jointly responsible.

Therefore, we have a legitimate interest in processing your data.

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 help guarantee the health and safety of our visitors, personnel, and property, as well as any monitoring of the operational processes in our facilities. Therefore, we have a legitimate interest for security and access control purposes, which is necessary for the management of DHL buildings.

Websites including Cookies

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. Strictly necessary cookies or other technologies ensure the correct operation of our websites/mobile apps. DHL has a legitimate interest to do so. These cookies cannot be deactivated and will be deleted or disabled automatically either upon termination of the browser session or after a defined period. Additionally, DHL makes use of various technologies to store your user preferences or other information to make our services 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.

How we collect your data

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 laws.

Information for our business partners

As our valued business partner, we process your data to effectively manage our contracts or receive your services. 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 assist our employees and our customers. This way, DHL can e.g. ensure that our customers receive a quality service for the pick-up and delivery of their shipments. We also choose reliable partners for e.g. safety and security, auditing, payments and IT providers.

How long we keep your data

We will keep your data for as long as necessary to fulfil our purposes, to execute our contracts and to comply with any legal obligations. The retention periods may vary per country based on applicable laws.

We determine an appropriate and reasonable retention period by considering the nature, the sensitivity and the necessity of your data as well as our legal and contractual obligations.

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 collected for the purpose of customer satisfaction is kept for a maximum of one year. Data collected based on your consent will be processed until you withdraw your consent or until we no longer require the data for the purposes for which it was collected.

How we secure your data

DHL takes the security of your data very seriously. We have implemented various strategies, controls, policies and other measures to keep your data secure. We keep our security measures under close review. We use safeguards such as firewalls, network intrusion detection 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 DHL information security policy, and by extension, the ISO 27001 standard.

In addition, we are continuously taking measures to reduce risk, such as (but not limited to) training our employees regularly and organizing incident simulation exercises by our Cyber Defense Center.

Will your data be passed on

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

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

- DHL Group companies: transfer is required within the DHL 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 shipment at a Service Point, in some areas to perform the pick-up and delivery, to facilitate payment transactions, to collect the outstanding payment via a debt collecting agency, or to optimize our products and services for you.)
- Public authorities: transfer is required or permitted by applicable laws or required for safety and security purposes (e.g. to fulfil a legal obligation or a legitimate interest during shipment processing)

Your data is only transferred outside your jurisdiction to other DHL Group companies, third party business partners or public authorities when permitted by applicable data protection laws. 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 DHL Group 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 to exercise:

Right to access information

You have the right to access and 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 the timeframe required by applicable data protection laws, 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 rights above or any other questions about this Privacy Notice to our DPO 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 rights above.

Requests and complaints

We will handle all your requests with the care it deserves. If you have any questions about the manner in which we or our business partners treat your data or 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

Applicable law	All applicable laws, regulations and other legal requirements in any jurisdiction relating to the protection of personal data including the Regulation (EU) 2016/679 'GDPR'
Business partners	Third parties who provide services to us
Communication channel providers	Third parties who provide communication channels
Controller	The data controller determines the purpose(s) and the means of the processing of personal data
Customer	All individuals receiving our products and services e.g. receiver
Data	All personal data related to a person who can be identified or is identifiable directly or indirectly
DHL Express	DHL, we, us, our
DPO	The DPO ensures that the data protection rules are respected within the company
Processing	Any operation performed on personal data, by automated means or not, such as collection, storage, usage, destruction and so on
Processor	The data processor processes personal data only on behalf of the controller
Shipment receivers	The party to whom the shipment is delivered e.g. consignee, neighbours
Shippers	The party who initiates a shipment with us