

## **COMPREHENSIVE PRIVACY NOTICE**

## 1. IDENTITY AND ADDRESS OF LEGAL RESPONSIBLE.

This Privacy Notice (henceforth "*Notice*") sets the terms and conditions under which DHL Express México, S.A. de C.V., commercially known as "DHL", henceforth referred to with the latest; with address located on: Avenida Fuerza Aérea Mexicana #540, Colonia Federal, Alcaldía Venustiano Carranza, Mexico City, Mexico, Z.P. 15700, in character of Responsible, will treat as person in charge any personal data received, to protect privacy and the right to informational self determination, in compliance with the Federal Law for the Protection of Personal Data held by individuals (the "LFPDPPP" from its Spanish initials), its Regulations and the Privacy Notice Guidelines issued by the Ministry of Economy (henceforth "*Provisions*").

## 2. DEFINITIONS.

For the purposes of this Notice, definitions for "Personal Data", "Sensitive Personal Data", "Days", "Treatment", "Data Holder", "Responsible", "Administrator", "Transfer", "ARCO Rights" - "Right of Access", "Right of Rectification", "Right of Cancellation", "Right of Objection"; "Cookies", "Web Beacons", along with any other term provided in the Notice shall take the same meaning as in the Provisions.

## 3. PERSONAL DATA COLLECTION AND TREATMENT.

DHL collects and processes personal data from customers, prospective providers, providers, third parties, prospective employees and employees, outlined below:

## i) General data

Full name and, if applicable, signature, date and place of birth, nationality, gender, marital status, full address, either private or work; telephone number, either private or work; cellphone number either private or work; email address, private or work; picture and video recording; Unique Population Registry Key (CURP in Spanish) (if applicable) and immigration status (if applicable).

#### ii) Data on academic background, professional training and professional qualifications

Data on education background, academic performance, along with any other information about academic/professional courses, programs or certifications.

#### *iii) Employment data*

Work history, salary, working conditions and benefits, sick leaves, labor disputes and employment references.

#### iv) Data to access DHL's online services

User keyword and number, managed by yourself in our websites, to access our online services.



## v) Tax and Social security data

Keyword and Folio number from the Federal Taxpayer Registry, along with its tax residence, tax regime, affiliation number to the Mexican Social Security Institute (IMSS) (if applicable); INFONAVIT credit number (if applicable), FONACOT credit number (if applicable); AFORE affiliation number (if applicable); tax returns, withholding taxes, credits and tax disputes.

### vi) Data linked to form of payment

Holder name, bank account number, IBAN/CLABE number, bank of origin.

### vii) Financial and property data

Information about income, bank account information to receive payment of wages and allowances, credit bureau special report, socioeconomic study (if hired).

### viii) Sensitive personal data

Information related to health status, medical history, union affiliation and criminal record, current or past legal proceedings.

*ix)* Personal data collected by Automatic Data Collection Tools on DHL's website (cookies, web beacons, links embedded on emails). Browser type, language, session ID for the website, passwords to access the website, access time, IP address, operating system or access device, interaction with our emails and website.

### x) Personal data from open-source resources and received via authorized transfer

Information coming from public records, directories, social network and other legal sources available in the market, along with personal data shared to us by third parties holding previous authorization.

## xi) Personal data coming from social networks

DHL can collect and process personal data and personal information shared by you on social networks (such as Facebook®, Twitter®, Linkedin® and others), particularly the one shared on DHL's official pages on those social networks, including information shared by you as "public", according to their terms and conditions of use and their privacy declarations.

## xii) Personal data from third parties for referrals

Identification and contact information, including name, work telephone number and/or cellphone number, to request professional and/or commercial references from you.

#### xiii) Personal data from family members and/or other economically dependent person

Identification and contact information from family members, economically dependent persons or beneficiaries; such as name and last name, telephone number and/or email address.

Personal data described in the aforementioned paragraphs of this section are collected by: *i*) voluntary and direct disclosure through our printed forms; *ii*) voluntary disclosure of information and personal data through face to face or telephone interviews with our authorized personnel; *iii*) along with voluntary and direct disclosure of your information through dialog boxes in our website; or by the use of emails, and *iv*) using open source resources and any other sources in the market.

Noteworthy that personal data described in the preceding paragraphs may comprise of several documents in digital or printed format, such as copies of: birth certificate of the individual or economically dependent person(s), valid official ID (voter identification card, passport, military service card; migration document or driving license), marriage certificate, if applicable, tax returns, withholding tax receipt, Certificate of Registration of Federal Taxpayer Registry, Registration Certificate of Unique Population Registry, bank statement, proof of residency - receipt of payment of water supply, receipt of payment of property taxation,



receipt of payment of electricity services; academic certificates, proof of social security; account number of the pension fund manager (AFORE), if applicable; DC-3 proof of work skills form issued by the Ministry of Labor and Social Security; resume; criminal background and letters of employment reference.

# 4. <u>OBJECTIVES</u>.

DHL will process your personal data with the purpose of conducting activities and arrangements to fulfill obligations caused by and resulting from any commercial and/or legal relationship that we might enter into with you, that are considered by us as <u>primary objectives</u>, including:

## A) Customers

i) To manage access to our facilities;

- ii) To manage access to our website;
- iii) To request, procure, change or return services;
- *iv)* To request, hire, change or cancel products;
- v) To register you in our customer data base;

*vi*) To assign a customer number to you;

vii) To manage payment of services and/or products;

*viii)* To manage invoices and electronic tax receipts;

*ix)* To request a quote, information about services and/or products;

x) To request the delivery, repair or execution of performance bond of services and/or products;

xi) To request the provision of services or the execution of the performance bond;

xii) To process payment of services and/or products with credit or debit cards;

xiii) To incorporate your dossier;

xiv) To perform video surveillance for security use; and

xv) To maintain physical, electronic and processing backups of personal data, to comply with legal and administrative requirements for Civil, Commercial, Administrative and Tax matters.

*xvi*) Market studies;

xvii) Invitation to events;

xviii) Bids;

*xix*) Promotions;

*xx*) Changes or new products or services;

*xxi*) Quality in service or products

## **B)** Prospective providers

i) To validate provider's data (capacity, commercial references, financial soundness);

*ii)* To validate information provided;

iii) To confirm and assess technical and economic proposals, and

*iv)* To manage the selection process.

## **C)** Providers

*i*) To perform identity clearance and verification of information provided;

*ii)* To incorporate the dossier;

*iii)* To create an online profile;

*iv)* To manage the commercial relationship including selection and procurement processes, along with purchase orders and/or procurement requests; to manage payment of invoices and/or receipts for professional fees; to withhold corresponding taxes;



v) To manage and administer bank account numbers, credits or debits, to process payment of services and/or products.

vi) To validate that the Provider has real and/or personal ownership of the property they market to DHL (in the case of property Providers);

*vii)* To formalize a transaction by entering into conducive binders for sale-purchase, trading, commodatum, leasing, subleasing, etc. of properties

*viii)* To maintain physical, electronic and processing backups of personal data, to comply with legal and administrative requirements for Civil, Commercial, Administrative and Tax matters.

## D) Prospective providers, Providers, Visitors and Third parties

*i)To perform identity clearance.* 

## E) Prospective employees

*i*)To manage access to our facilities;

*ii)* To validate their identity and contact information;

*iii)*To perform personal data checks and to verify the information provided, and also to request and give employment references whether through third parties or Human Resources Department;

iv) To manage the screening and recruitment process, and

*v*) Video surveillance for security use and loss control.

## F) Employees

i) To manage access to our facilities;

*ii)* To manage the screening and recruitment process;

*iii)* To perform personal data checks and to verify the information provided, and also to request and give employment references, to perform socioeconomic studies and statistical reports, whether through third parties or the Human Resources Department;

*iv)* To enter into an individual employment contract, if applicable, a non-disclosure agreement and other contracts that may be required by current legislation and by DHL's operational requirements;

v) To manage your personal data to allow DHL's operational processes;

vi) To comply with the individual employment contract, the collective bargaining agreement (if applicable) and any related documents;

*vii)* To manage the payment of invoices, professional fees receipts, along with compensations, taxes and contributions and any other employment benefits;

*viii)* To manage and administrate bank account numbers - credit or debit - for payroll payments through wire transfers to their bank account;

*ix)* To manage social security benefits; if applicable, to hire major medical expense insurance, life insurance, auto insurance, savings fund plan, and food vouchers;

x) To manage formalities provided by Labor, Tax, Social Security and Migratory regulations, to comply with all duties related to employees, including affiliation to IMSS, INFONATIV and/or SAR; payment of employer contributions to the IMSS, INFONAVIT and SAR, tax withholdings and payment of taxes and quotas, record preservation; along with other paperwork whether at local and federal level involving, amongst other institutions, the Federal Institute for Access to Public Information and Data Protection (IFAI in Spanish), the Ministry of Labor and Social Security (STPS in Spanish), the Ministry of the Treasury (SHCP in Spanish), the Tax Administration Service (SAT in Spanish), the National Institute for Migration (INM in Spanish), the Public Education Secretary (SEP



in Spanish), the Federal Office for the Defense of Workers (PROFEDET in Spanish), the National Housing Fund for Workers (INFONAVIT in Spanish), the Mexican Social Security Institute (IMSS in Spanish), the National Commission for the Retirement Savings System (CONSAR in Spanish), the Federal Conciliation and Arbitration Council, as well as other local authorities such as the Local Conciliation and Arbitration Board of the diverse federal states;

xi) To execute personnel administration processes;

*xii)* Data verification and data analysis, promotions, benefits, draws, financial products and services, along with other services for DHL employees;

*xiii)* To manage assets and working equipment allocation and use, along with other DHL resources, including computer systems, telecommunications systems and corporate email accounts, with its corresponding access controls -including allocation of user networks and other mechanisms;

xiv) To monitor attendance, holidays, sick leaves; along with the physical and logical access to the facilities, DHL's technology and security resources, and the use of registration logs and other tools; xv) Video surveillance for security use and loss control, and

xvi) To fulfill legal applicable requirements and to handle requirements from relevant authorities.

We will also process your personal data for other <u>secondary objectives</u>, that do not give rise nor are necessary for the legal and/or commercial relationship we get into with you, these being:

## A) Customers

*i*) To contact customer service department;

*ii)* To manage your purchase history and other transactions;

*iii)* To share your comments, suggestions, complaints and clarifications about our services and products;

*iv)* To assess quality on our services and products through diverse tools, including surveys;

v) To implement activities aimed to promote, maintain and improve our services and products;

*vi*) To engage in chats and/or discussion forums;

vii) To notify DHL about problems with its web site;

*viii)* To send notifications about offers, advertising announcements and/or messages, promotions, for commercial or marketing purposes, by printed or electronic means;

ix) To use the various services available on DHL's websites;

*x*) To allow personal data management, administration and security;

xi) To keep physical, electronic and processing backups of your personal data, according to applicable norms and legislation, and

xvi) To fulfill legal applicable requirements.

## **B)** Providers

*i*) To manage support service for providers;

- *ii)* To manage transactions history;
- *iii)* To handle comments, suggestions, claims and clarifications;
- *iv)* To get notifications about problems with DHL websites, along with service reports and reports from other operations with DHL;
- v) To manage communications through notices, messages, news, invitations to events; whether by printed media, electronic media, by telephone and/or face to face; for marketing advertising, commercial or marketing research, unless you expressly indicates your willing not to receive them;
- vi) To provide online services;
- *vii)* To assess quality on our processes through diverse means, including satisfaction surveys and opinion surveys;



viii) To apply conventional penalties for any breach of a contractual obligation, and ix) If applicable, to manage the granted warranties and, if necessary, to enforce them.

## C) Prospective providers, Providers, Visitors and Third parties

- *i*) To set up video surveillance cameras in DHL's facilities and buildings, for security use and loss prevention;
- ii) To manage security incidents;
- iii) To manage personal data administration and security, in terms of treatment; and
- *iv)* To manage data to update our databases.

## D) Employees

- *i*) To manage internal communications and work environment;
- *ii)* To manage employee's information to ensure correct integration of data in the data base and in personnel directories; as well as personnel dossiers and creation of documents requested by the employee;
- *iii)* To implement performance assessment programs, along with assessment, training and education to improve employees' skills and abilities;
- *iv)* To manage employee's involvement in events;
- *v*) To elaborate and deliver work certificates and employment reference letters;
- *vi*) To transfer their data to third parties to manage working benefits through agreements with given third parties;
- *vii)* To manage oral, written and electronic communications to send notifications about offers, events, campaigns, promotional messages and/or notices;
- *viii*)To manage data security by applying the appropriate valid legal regulations in terms of security, hygiene and eventualities, evacuation and emergency plan; to apply tests and assess employees on security policies;
- *ix)* To apply conducive disciplinary actions in case of infringement of the Law, Contracts, Internal Work Policies and DHL Policies;
- *x*) To manage employee's obligations via trials and administrative procedures, in the case of alimony, FONACOT and INFONAVIT credits, and
- *xi)* If applicable, to manage and support work termination, as well as the payment of the corresponding settlement, according to the Federal Labor Law and any other applicable legislation.

## 5. HOLDER CONSENT.

In conformity with the Provisions, the Holder states that: *i*) this Notice was given to him/her by DHL previous to personal data collection and/or treatment, *ii*) He/she has read, understood and agreed to the terms of the Notice for property, financial and/or sensitive data and, consequently, data provided shall include handwritten name and signature at the bottom of the page of this document, or the short version of the Privacy Notice; or he/she shall express consent through dialog windows in our websites. The foregoing, based on articles 8 and 9 of the LFPDPPP, along with articles 11, 12, 13, 14, 15 and 16 of the Regulation, without prejudice of exceptions established by articles 10 and 37 of the LFPDPPP that give us the power to treat and transfer your personal data in order to fulfill our legal and contractual obligations, or by virtue of the current and/or future legal relationship we are or will be in with you.



To collect, process and transfer personal data not being of financial, property or confidential character; tacit consent is given in terms of this Notice while not objecting nor opposing to the content in the following (48) hours after personal data has been collected and this Notice has been made available by our different means, including its publication on our web site.

# 6. DATA TRANSFER TO THIRD PARTIES.

With the aim of complying with our legal, commercial and/or labor obligations, DHL Group companies need to share your personal data between each other, and with Third parties whether in and out the country, with whom we have agreements. Third parties receiving your personal data shall maintain confidentiality with respect that data received by DHL, observing and respecting the terms of this Notice and the corresponding contract.

DHL may transfer your personal data to its main branch, along with affiliate and subsidiary companies located whether in or out the country that belong to the same corporate group, and that operate under the same processes and internal policies.

Recipient Third party	Transfer objective	Transfer	Requirement for
party		national or	Consent
		international	
National companies	Corporate management and	National	Basis: Art.
pertaining to	operational		37 section III and VII of
DHL	support.		the LFPDPPP.
Corporate group			
Foreign	Corporate management and	International	Basis: Art.
companies	operational		37 section III and VII of
	support.		the LFPDPPP.
pertaining to			
DHL			
Corporate group			

The following table shows DHL data transfers to third parties.

# 7. PROCEDURE TO EXCERCISE ARCO RIGHTS AND WITHRAWAL OF CONSENT.

You have the right at any time to access, rectify, cancel or oppose to the above regarding your personal data and the details of its treatment, as well as to withdraw through your legal representative any consent for its treatment with given objectives - including secondary objectives - by direct or indirect means. Every request shall be submitted via email to: avisoprivacidad@dhl.com, with the information and documents listed below:

- 1. Full name, address or other mean for instance an email address to notify the reply to your request;
- 2. Documents proving your identity hard copy of your voter identification card, passport or Visa



whether in printed or electronic format or, if applicable, of the legal representative - printed or electronic hard copy of the simple power of attorney with handwritten signature from you, two witnesses and the grantor, with its corresponding official identifications - voter identification card, passport or Visa);

- 3. Clear and detailed description of the personal data in which your are aiming to exercise one of the ARCO rights; and
- 4. Any other element or document which shall facilitate location of your personal data.

If it is a request to access your personal data, DHL shall provide your information, via electronic means, with previous validation of identity from you or your legal representative, as applicable.

In the case of requests to rectify personal data, specification of the changes to be performed shall be given, as well as documentation to support it.

DHL will notify the answer to your request within a period that does not exceed the (20) days after your request to access, rectify, cancel or object has been acknowledged, for effects that, where warranted, it becomes effective within (15) days after acknowledgment of the answer.

In all cases, DHL reply will be notified through the option selected when submitting the request, or if applicable, by any other mean previously agreed with you. In accordance with the LFPDPPP, aforementioned periods shall be extended only one time by an equal period when justified by the circumstances of the case.

Personal data will be delivered free of charge, you shall only cover justified fees for shipment or reproduction costs for copies or any other formats. In the case of submitting a new request within a period of less than (12) months, you shall cover corresponding expenses indicated in the LFPDPPP, unless relevant modifications to the Privacy Notice are performed, causing new consultations.

You may contact our Privacy Officer to receive, record, handle and reply your requests to exercise the ARCO rights and every other right stated in the LFPDPPP; the Officer shall be contacted at the offices set out in paragraph 8, or through our web site or via email.

In the case of having inaccurate or insufficient information provided in the request, or when not having corresponding support documents for identity validation, we may request you within the following (5) days to provide the necessary elements or documents to process the aforementioned. You then have (10) days to give an answer to our requirement, counting from the following day of reception. If no answer is submitted in the given period, the corresponding request shall be deemed not to have been entered.

## 8. PRIVACY OFFICER.

For any requests concerning personal data protection, please contact our Privacy Officer at: Avenida Fuerza Aerea Mexicana #540, Colonia Federal, Delegacion Venustiano Carranza, Mexico City, Mexico, Z.P. 15700, email <u>avisoprivacidad@dhl.com</u>

## 9. <u>RESTRICTIONS ON USE AND DISCLOSURE OF DATA</u>.

DHL shall keep your personal data during the necessary period to manage the commercial, labor and/or legal relationship with you, as well as for keeping the records required by the LFPDPPP, its regulations and, if applicable, other legislations in commercial, administrative, labor and social security matters.



Personal data collected by DHL is protected against damage, loss, tampering, use or destruction, unauthorized access or treatment, by the adequate administrative, technical and physical measures, in compliance with LFPDPPP Law and its regulations.

To limit the use and disclosure of your personal data, please send an email to our Privacy Officer <u>avisoprivacidad@dhl.com</u> with your request

### Data collection on DHL websites

DHL shall collect personal data through their website, or by using Automatic Data Collection Tools. Automatic Data Collection Tools used by DHL on websites include cookies, Web Beacons and links embedded on emails.

*Use of Cookies.*- The proper functioning of DHL websites requires you to enable "cookies" on your browser. "Cookies" are small files of data transferred from the website to your computer's or mobile device's hard drive while you visit one of our websites. Most browsers enable cookies automatically by default, you can change your browser's settings to enable or block cookies. When blocking cookies you may also disable diverse functions of DHL's websites or they might not show correctly. If you rather eliminate cookies, you can eliminate the file after each session in the browser.

This cookies may be disabled. To learn how to do it, you can go to the following link or electronic address:

Internet Explorer: <u>http://windows.microsoft.com/es-MX/windows-vista/Block-or-allow-cookies</u>
Google Chrome: http://support.google.com/chrome/bin/answer.py?hl=es&hlrm=en&answer=95647

*Use of Web Beacons.* - also known as Internet tags, Pixel tags and clearGIFs). DHL may use Web Beacons, alone or combined with cookies, in their websites and HTML format emails, to collect information about the use of websites and your interaction with emails. The Web Beacon is an electronic image, also referred to as single pixel (1X1) or GIF, which can recognize processed information on your computer, like cookies, time and date where you entered the website and the sections visited.

*Links embedded on emails.* - Emails with embedded links allow DHL to know if such link was activated and if you visited the destination website. This information may be included in your profile.

Protection to minors, legally incompetent people or people with disabilities: DHL does not collect or process any personal data from minors, legally incompetent people or people with disabilities, and it urges parents and/or legal guardians to take an active role on their children's and/or legal representee's online activities. In the event of DHL considering that personal data of a minor, legally incompetent person or a person with disabilities has been disclosed, in contravention of this Notice, we shall proceed to eliminate such data as early as possible. If you have knowledge of such personal data disclosed by a child under the age of 18, a legally incompetent person or a person with disabilities, please send an email to avisoprivacidad@dhl.com



DHL reserves its right to amend this Notice for effects of reflecting changes in our data protection practices, resulting from our continuous improvement process, as well as the legal, regulatory and administrative changes carried out. We invite you to make a periodic review of our Privacy Notice in our website, where any changes will be published alongside with the date of the latest update.

# 11. EXPRESSION OF CONSENT.

To express your consent on data treatment according to the aforementioned descriptions in this Notice of Privacy, please sign this document and deliver it to our Human Resources Department, Legal Department or to our Privacy Officer.

I hereby give my express consent to obtain, process, treat, transfer and use the personal data aforementioned in this Notice of Privacy.

Name:

Signature

Date:

Latest update: July 5th 2017