

PRIVACY POLICY

Protecting personal data processed within the scope of business processes is important to us. Below are details on how DHL Global Forwarding (Italy) S.p.A. ("DHL") handles personal data acquired during navigation on DHL websites or when using shipping services and solutions provided by DHL.

A. SHIPPING SERVICES

Below are the details regarding the processing of personal data when using shipping solutions provided by DHL.

Types of Data Processed

Communication and processing of personal data are necessary requirements to fulfill legal and contractual obligations related to the execution of services by DHL. For example, DHL may process the following data:

- Sender's name, phone number, and email address
- Recipient's name, phone number, and email address
- Name, phone number, and email address of the purchaser/payee
- Name, phone number, and email address of the requester
- If applicable, sender's tax data
- If applicable, recipient's tax data
- If applicable, data required for customs operations
- If applicable, data required for managing complaints
- If applicable, identification data contained in sender/recipient identification documents.
- Purposes and Legal Bases of Processing

DHL processes personal data based on the following legitimacy criteria:

DHL will process personal data, with or without the use of electronic tools, based on logics and procedures consistent with the purposes indicated and in compliance with the principles of the European Regulation for the protection of personal data No. 679/16.

DHL processes personal data based on the following legitimacy criteria:

- Consent
- DHL's legitimate interest
- Fulfillment of obligations arising from a contract
- Compliance with legal obligations.

The data is processed to execute the contract concluded with DHL, including any pre-contractual phase, to avail of its products and services, as well as to fulfill tax and accounting obligations, management analyses, and monitoring of services, quality control of provided services, managing complaints, and providing after-sales support.

Personal data may also be processed to ensure compliance with applicable regulations concerning international sanctions, export control, and measures by competent authorities regarding restrictive measures against specific individuals (so-called Denied Parties).

In accordance with our general transport conditions, DHL may open and inspect the shipment for security, protection, customs reasons, or other regulatory reasons (for example, to prevent the transportation of prohibited and unacceptable items). If the shipment cannot be delivered due to the lack of necessary data to

identify the sender/recipient, DHL may open the shipment to identify a return or delivery address and contact the sender. We have a legitimate interest in this processing as it ensures the smooth operation and continuous improvement of the services offered to our customers.

B. OTHER USES

As the data controller, DHL may process personal data for the additional purposes outlined below. Providing personal data for the above purposes is optional, and refusal by the data subject does not affect the ability to use DHL's products and services, request assistance, or file complaints.

- Customer Satisfaction Survey

DHL may process personal data (e.g., name, shipping address, contact details) to assess customer satisfaction with its products and services, aiming to listen to user experiences and feedback for continuous improvement. These interactions with users are conducted randomly and on a sample basis.

Personal data may be processed with or without the use of electronic tools, based on logics and procedures consistent with the stated purpose and in compliance with the principles of the European Regulation for the protection of personal data No. 679/16.

The processing of personal data for the stated purpose is based on DHL's legitimate interest.

- Commercial Communications

DHL may process personal data (e.g., name, shipping address, contact details) for marketing purposes, including promotional activities, commercial initiatives, presentation of new products, services, and offers, as well as for conducting market research and statistical analysis. The processing of personal data for this purpose may be based on consent or, where permitted, on DHL's legitimate interest.

- Digital Messaging

DHL may provide messaging communication channels provided by third parties. Systems respond with keyword-based responses or forward the request to a staff member in a live chat. Our customer service can always be contacted through other means.

- Website Navigation

Personal data is collected to make the website accessible (e.g., IP address, date and duration of your visit). Further storage is performed in log files to ensure the functionality of websites and system security. DHL has a legitimate interest in data processing. Personal data is deleted once it is no longer needed to fulfill the purpose for which it was collected.

- Call Recording

In case of calls to our assistance numbers, the call may be recorded for shipment management purposes, quality monitoring of offered services, and staff training. Data is processed based on legitimate interest.

C. CATEGORIES OF DATA RECIPIENTS

Personal data is accessible to duly authorized personnel based on necessity criteria and may be communicated and transferred, within the national territory, to the following categories of subjects: Public Entities, Judicial Authorities, Law Enforcement Agencies, Insurances, as well as to third parties who, on behalf of DHL and for the above-mentioned purposes, are authorized to carry out certain activities (e.g., transportation services, customer care services, post-sales verification services, billing services, payment services, customs services,

call center services, post-sales verification services, communication agencies) and to other companies within the DHL Group. Where personal data processing is carried out on behalf of DHL by third-party companies, DHL will ensure that they operate in compliance with applicable regulations.

D. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION

Some companies within the DHL Group that may access your personal data are also located outside the European Union, in countries that may not ensure an adequate level of personal data protection according to the standards established by the Regulation. If personal data is transferred to other Group Companies located in so-called "third" countries, the transfer will be carried out in full compliance with the DHL Group's Data Privacy Policy and in line with what is provided for by the Regulation. The DHL Group's Data Privacy Policy has been approved by the competent European supervisory authority as a set of Binding Corporate Rules ("BCR"). In cases where the BCR do not apply, DHL takes necessary precautions for legitimate data transfer to "third" countries (e.g., through the implementation of Standard Contractual Clauses approved by the European Commission).

E. STORAGE OF PERSONAL DATA

Personal data will be stored ensuring adequate security and confidentiality and in a manner that prevents unauthorized access or use of personal data. Personal data will be stored in accordance with the principles of necessity, data minimization, and limitation of the retention period, for a period of time proportionate to the specific purpose for which the data is processed and for a period not exceeding the achievement of the same, without prejudice to different retention terms in accordance with applicable regulations.

F. DATA CONTROLLER

The data controller is DHL Global Forwarding (Italy) S.r.l., CF/P.IVA 00754800159, with registered office in Via delle Industrie 1 – 20060 POZZUOLO MARTESANA (MI).

For any and all requests, please write to dataprotection.freightita@dhl.com.

G. DATA SUBJECT RIGHTS

The data subject has the right to request from DHL, in line with the processing needs outlined in this notice, access to their personal data and the rectification or erasure of such data, or restriction of processing concerning them, or to object to processing, as well as the right to data portability. The data subject also has the right to lodge a complaint with the Italian Supervisory Authority:

Autorità Garante per la protezione dei dati personali

Piazza di Monte Citorio n. 121, 00186,

ROMA Fax: (+39) 06.69677.3785