

DHL EXPRESS PERU S.A.C. SECURITY ORGANIZATION

MANUAL

Keywords:

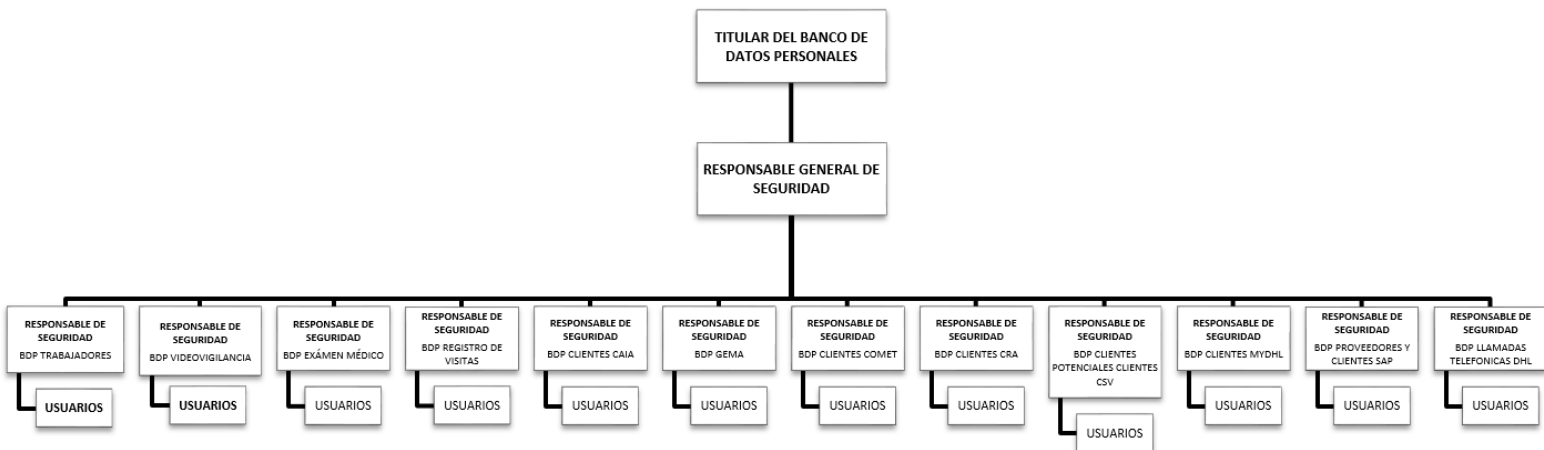
National Authority for the Protection of Personal Data (APDP)

RESPECT FOR THE LAW

DHL EXPRESS PERU S.A.C. (hereinafter "DHL") has a documented commitment to respect the principles of Law No. 29733, Personal Data Protection Law, and its Regulations approved by Supreme Decree No. 003-2013-JUS.

It also has a Privacy Policy on Data Protection, which is published on the website and demonstrates DHL's commitment to faithfully complying with current regulations on the matter.

ORGANISATIONAL STRUCTURE – PERSONS WHO PROCESS PERSONAL DATA WITHIN DHL



The identifications of the Security Officers are specified in **ANNEX A** of this document.

PERSONNEL WHO CARRY OUT THE PROCESSING OF PERSONAL DATA – DEFINITIONS

OWNER OF THE PERSONAL DATA BANK

A private legal entity (DHL) that determines the purpose and content of the personal data bank, the processing of the data and the security measures. It is represented by its General

Manager and/or Legal Representative designated by DHL (Definition according to Art. 2, paragraph 1 of the Law 7).

According to the Security Directive established by the APDP, the Owner of the personal data bank has the following responsibilities:

- a. It is responsible for granting and maintaining a sufficient level of protection for the personal data contained in the personal data bank under its ownership.
- b. It is responsible for determining and fulfilling the purpose and content of the personal data bank under its ownership.
- c. It is responsible for the processing of the personal data contained in the personal data bank under its ownership.
- d. It is responsible for ensuring compliance with the rights of the owner of personal data conferred in Law No. 29733, Law on the Protection of Personal Data.
- e. He is responsible for appointing DHL's Safety Officer.

SECURITY OFFICER

This is the one designated by the Owner of the personal data bank (DHL representative). The latter will coordinate the application of the Security Directive established by the APDP in the Company and will control the implementation of security measures in the personal data bank (Definition according to numeral 2 of Annex A: Glossary of the Security Directive).

The role of security officer of the personal data bank must be assigned to a person who has the necessary skills and authority to carry out his or her duties. When such a designation does not exist, it is understood that the role of security officer of the personal data bank falls to the owner of the personal data bank.

- It is responsible for the mechanism for accessing the personal data bank
- It is in charge of managing the use of passwords of the participants and users of the information systems that process personal data.
- It is responsible for authorizing or withdrawing user access to the personal data contained in the personal data bank. This must be recorded, and must include at least: user's name, date and time of assignment and/or withdrawal of authorization from the user.
- You can assign or withdraw the privilege or privileges (data to be processed or task to be performed) for the processing of personal data to authorized users. The user's name, privilege assigned or removed, date and time of assignment and/or removal of privileges must be recorded.
- You can allow the intervener or user to change the assigned password whenever they deem it necessary. You will need to record this fact.
- You must identify the accesses made to the personal data. To do this, you must implement an access log to the personal data bank, which must contain at least the following fields: date and time of access, person or persons making the access; identifier of the owner of the personal data; reason for access.

- You have the authority to delete personal data information.
- The Security Officer is, for the purposes of complying with an adequate response procedure, the body in charge of ruling on requests for access, rectification, cancellation and opposition (Form No. 1) submitted by the owner of the personal data.

USERS OF THE INFORMATION SYSTEM

This is the natural person who has access to an information system that processes personal data (i.e. access to DHL's personal data bank). This can be the system administrator, database administrator, operators, support staff or the owner of the personal data (Definition according to paragraph 3 of Annex A: Glossary, of the Security Directive).

The user is the one who directly and most frequently carries out the processing of personal data, this being its main function. The processing of personal data consists of any technical operation or procedure, whether automated or not, that allows the collection, recording, organization, storage, storage, processing, modification, extraction, consultation, use, blocking, erasure, disclosure by transfer or dissemination or any other form of processing that facilitates access, correlation or interconnection of personal data.