

# **PRIVACY NOTICE**

DHL Passport Pickup NG 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 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 Passport Pickup NG Nigeria

DHL International Nigeria Ltd.

18, Ademola Street

C/O Olajide Oyewole & Co, SW/Ikoyi, Lagos
Nigeria



### 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 you need to schedule a pickup date or when you need to raise a ticket.

Such as: your name, passport number, birthdate, email address



### User authentication and authorization

Information to identify and verify you as a user of our systems and to verify your access to specific data.

Such as: your login ID, password



#### **Contract data**

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

Such as: activity on contract, party names



### **Identification data**

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

Such as: your passport number, birthdate



### 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 ticket when you have few challenges.

#### Why we collect your data

At DHL Passport Pickup NG 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 identify you	Performance of a contract
	Legal obligation
	Legitimate interest
	Consent

To manage our relationship with you, including	
To communicate with you	Performance of a contract Legitimate interest
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.



# 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.





# 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 verify your identity.

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.

### 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 <u>DPDHL Data Privacy Policy</u> 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.