



myGLS Application PRIVACY POLICY

1. PERSONAL DATA CONTROLLER AND DATA PROTECTION OFFICER

The Personal Data Controller is

General Logistics Systems Poland Sp. z o.o. with its registered office at Tęczowa 10, Głuchowo, 62-052 Komorniki.

(hereinafter referred to as: "GLS Poland")

In order to clarify issues related to the processing of personal data, we encourage you to contact the Controller's designated Data Protection Officer, via a dedicated e-mail address: dataprotection@gls-poland.com.

It is also possible to contact GLS Poland through a letter sent by traditional mail to the address:

GLS Poland,

ul. Tęczowa 10, Głuchowo,

62-052 Komorniki

with annotation "Inspektor Ochrony Danych" (Data Protection Officer)

2. GENERAL INFORMATION

Personal data

Personal data is any information regarding an identified or identifiable natural persons. This type of data includes, among other things, first name, surname, address, phone number and e-mail address.

Information that cannot be linked to a specific or identifiable person (such as statistical data) is not considered personal data.

Applicable personal data protection law and confidentiality obligation

All GLS Group companies located in the European Union are subject to the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter: "GDPR") and other relevant national data protection laws.

GLS Poland provides postal and transportation services, by which it is obliged to respect the secrecy of correspondence and ensure the security of shipments, in accordance with the provisions of the Postal Law and the Transport Law.

Application - software owned by GLS Poland in the form of a mobile application made available free of charge to Service Recipients for use;

Non-Logged User – a Service Recipient who is a natural person, using the Services provided through the Application which do not require the creation of an Account;

Logged-In User – a Service Recipient who is a natural person who has an Account and uses the Services provided through the Application.

Other definitions are described in detail in the Application Terms and Conditions available in .pdf format at: <https://gls-group.com/PL/en/meet-mygls> and for Users logged into the Application in the panel Account – Others: "Privacy Policy".

3. INFORMATION SECURITY

At GLS Poland, the security of our Customers' personal data is a priority. With advanced technological measures and strict organizational procedures, we provide comprehensive protection of your data from unauthorized access, loss or misuse.

Our commitment to personal data protection is based on best market practices and full compliance with applicable laws, including the GDPR. Each personal data protection request is carefully recorded, analyzed and resolved with the utmost attention to detail.

The Application provides, among other things:

Confidentiality, integrity and availability of data

We ensure confidentiality through access control, integrity through change monitoring, and availability through redundant systems. The Application architecture also guarantees resilience to threats.

Data encryption

Personal data is encrypted according to the latest cryptographic standards both during transmission ("data in transit"), using HTTPS with TLS, and storage ("data at rest") on servers with encryption and physical isolation.

Identification and authentication

We use strong passwords with strong cryptographic algorithms and monitor login session activity to detect suspicious activity.

Data restoration

Disaster Recovery and Business Continuity procedures have been implemented, enabling rapid recovery of data and system functionality after a failure.

Physical security of servers

Data is stored in locations with access control, monitoring and 24/7 security.

Event logging

We record all key system activities, enabling us to analyze incidents and identify security breaches.

Data minimization

We process data only to the extent necessary to provide services, in accordance with the minimization principle.

Security tests and audits

We systematically carry out audits, penetration tests and assessments of the effectiveness of technical and organizational security measures.

IT security management

We provide software updates, up-to-date system security policies, and certifications and audits for compliance with the best security standards.

4. CATEGORIES OF PERSONAL DATA AND THE PURPOSES OF THEIR PROCESSING

GLS Poland as a data controller processes the following categories of Logged-In Users' data:

- First name,
- Surname,
- Parcel delivery address,
- Parcel Sender address,
- E-mail address,
- Phone number,
- Phone model,
- Town/city, country, the date and time of the current device on which the Logged-In User is using the Application,
- Location of the device on which the Logged-in User is using the Application.

If the Application is used by a Non-Logged User, only the entered parcel number is processed in the Application.

Your personal data is processed for the following purposes:

- enabling the receipt of information about Parcels and Shipments in terms of their current status and history of status changes, for Non-Logged Users,
- enabling the creation and use of a Logged-In User account; detailed information on the scope of services provided to Logged-In Users is provided in the Application Terms and Conditions,
- fulfilling legal obligations by GLS Poland (e.g., fiscal, accounting, arising from the provisions of the Postal Law, the Transportation Law),
- providing commercial information about GLS Poland products and services, electronically in the form of e-mail, SMS and push messages – depending on the consents given by the Logged-In User,
- ensuring contact with GLS Poland in all matters concerning the use of the Application,
- ensuring the secure use of the Application,
- analytical and statistical purposes,
- analysing how users use the Application in order to improve its performance and user experience.

In order to continuously improve our application and adapt it to the needs of Logged-In Users, we use the Piano analytics tool. It helps us understand which features are most popular and how users navigate the application. The consent of the Logged-In User allows us to do this more effectively.

If a Logged-In User gives their consent, their activity in the application (e.g. screens visited, buttons clicked) will be linked to a unique user ID (account ID). This will allow us to better understand the needs of Logged-In Users and offer more personalised features in the future.

The Piano tool may collect the following data:

- User ID (Visitor ID): Always anonymised by truncation.
- IP address: Always anonymised by truncation.
- Activity in the application: Screens visited, clicks, navigation, interactions with features.
- Technical data: Device type and model, operating system, application version.
- Geolocation (approximate): Country, region, device language.

The tool is provided by Applied Technologies Internet SAS (France). The collected data is anonymised or pseudonymised as quickly as possible – ID addresses are shortened and login and device identifiers are replaced with pseudonymous keys. This means that it is not possible to directly link the data to a specific person. In particular, it is not possible to assign this data to the user's computer or end device.

The legal basis for processing data in a personalized manner is the voluntary consent provided by the Logged-In User (in accordance with Article 6(1)(a) of the GDPR).

A Logged-In User can withdraw their consent at any time in their account settings in the application. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

This data is stored for a maximum of 25 months, after which it is automatically deleted.

In connection with the use of the Application, GLS Poland communicates with Logged-In Users by sending messages to the Application User's inbox and push notifications if the Logged-In User has activated such type of notifications. Through them, GLS Poland provides the User with information about:

- confirmation of shipment and delivery of the parcel,
- parcel status,
- Application operation, updates, technical interruptions,
- amendments to the Regulations and Privacy Policy,
- new products and services.

In order to receive push notifications, the Logged-In User must activate them in the inbox by going to the My Account panel in the bottom menu and then the Notifications panel.

Marketing contacts are made only after the Logged-In User has given the appropriate consent for the given communication channel (SMS, e-mail, push). This consent applies to the selected communication channel, which means that if the Logged-In User provides more than one email address in the Application, marketing messages may be sent to each of them. The rules for withdrawing granted consents are described below.

5. DATA SUBJECT RIGHTS

The person whose data is processed has the right to:

- receive information and access the data that concerns them (the data subject's right of access under Article 15 of the GDPR),

- rectify their personal data that is incorrect and to update the data (right to rectify data, Article 16 of the GDPR),
- request the deletion of their personal data (the right to erasure, under Article 17 of the GDPR),
- request the cessation of processing (right to restrict processing, under Article 18 of the GDPR),
- request the transfer of data to another controller (right to data portability, under Article 20 of the GDPR),
- object to the processing of their personal data (right to object, under Article 21 of the GDPR).

Fulfillment of natural persons' rights under the GDPR

To make a request for the realization of one of the above-mentioned rights, send a message to the Data Protection Officer at GLS Poland. Indicate which right the message concerns so that GLS Poland can take the necessary steps to implement the request.

You can also send a letter by regular mail to the Data Protection Officer at GLS Poland.

Please note that, in connection with the application, for the purpose of identifying a person, GLS Poland may ask for additional proof of identity to protect against unauthorized access to data.

Withdrawal of consent

If the basis for data processing is a person's consent, that person has the right to withdraw consent at any time.

The consent of the Logged-In User to the processing of their personal data for the purpose of providing commercial information and analysing their use of the Application is given by the User performing the appropriate action in the application. The Logged-In User can then independently manage the consents given, including withdrawing them, on their profile in the Application by going to: My Account/General/Contracts and Regulations and moving the slider next to the appropriate options.

Filing a complaint regarding improper processing of personal data

The data subject also has the right to file a complaint with the supervisory authority. In Poland, such an authority is the Personal Data Protection Office.

6. SHARING DATA

GLS Poland may share personal data with:

- GLS subsidiaries,
- entities that are under contract to provide services to GLS Poland or on behalf of GLS Poland (Processors), in particular IT service providers,
- other persons or organizations under applicable legal provisions.

The Logged-In user can also decide to share their data with another user of the application, using the option of sharing shipments with trusted recipients of their choice.

7. RETENTION PERIOD AND DELETION OF DATA

GLS Poland processes personal data only for such time as is necessary to fulfill the purpose for which they were collected. The data storage period is determined based on the following requirements:

- operational requirements – the period during which the information is necessary to achieve the objectives,
- legal requirements – the period of time when GLS Poland is obliged to keep data to comply with regulations,
- legitimate interests of GLS Poland – the period in which the data is processed for the purpose of their implementation, in particular for the purpose of determining and asserting potential claims, in connection with the performance of the contract.

Archived data is available only to authorized employees. After the expiration of the data retention period, the data is permanently deleted.

If the User has not used the Application for more than 12 months, the account will automatically be deleted.

The Logged-In User can also delete their account in the Application themselves by using the “delete account” button. After deletion of the account, the User's personal data will be deleted within a maximum of 3 months.

Uninstalling the Application does not automatically delete the account, after reinstalling the Application the account is active if 12 months have not passed since the uninstallation.

8. CHANGES TO THE PRIVACY POLICY

The current version of the Privacy Policy is available in .pdf format at: <https://gls-group.com/PL/en/meet-mygls> and for Users logged into the Application in the panel Account – Others: "Privacy Policy".

The Data Controller reserves the right to amend the provisions of the Privacy Policy at any time. The Data Controller will notify all Logged-In Users of the change in the Privacy Policy by PUSH notification from the Application, by SMS or by e-mail, depending on the extent of data provided and consents given by the User in question.