

## **PRIVACY POLICY for KN PARTNERS AND CUSTOMERS- iCom Road**

Compliance with Data Protection and Privacy Laws is an integral part of KUEHNE+NAGEL (“KN”) companies’ way of conducting business in a trustworthy manner. KN acknowledges and protects the security and privacy of personal data of KN’s customers, subcontractors, suppliers and other business partners (“KN Partner”). Therefore, KN processes personal data in compliance with applicable laws on data protection and data security, including the General Data Protection Regulation (“GDPR”).

### **1. Purpose of the processing**

The processing of personal data for this specific tool, the iCom Road, serves the purpose of road shipment handling and delivery to customer. The system iCom Road is a communication tool for OPS Road business. The branches communicate between each other in case there are operational issues or complaints about KN shipments. Main objective is to streamline the internal communication and collaboration in order to improve customer service. The tool provides an automated ticket creation likewise an easy shipment data update when users manually create tickets.

Operational issues are for example shipment refusals, surplus, pieces missing, damages or status and documents missing.

### **2. Categories of personal data processed and legal basis**

For the above mentioned purposes, KN may process the following categories of personal data:

- a) Contact information, such as company name, individual full name, and office email address of our customers who choose to book a delivery advice service.
- b) Delivery address such as company name, office email address of customer in case of B2B customers and delivery address, individual full name and private email address in case of B2C customers who ordered a shipment transportation.

Name, surname, email address users to ensure they can access iCom Road.

Unless indicated otherwise, the legal basis for the processing of personal data is Article 6 (1) (b) or (f) of the General Data Protection Regulation or - if explicitly provided by KN Partner – the consent (Article 6 (1) (a) of the General Data Protection Regulation).

### **3. Transfer and disclosure of personal data**

The services provided by KN do not, in principle, target the handling (collection, processing, use) of personal data, but the provision of the transportation and logistics services. KN processes the personal data transmitted to us for the provision of our services. KN may transfer personal data to other KN companies, but only if and to the extent such transfer is required for the purposes mentioned above.

KN will not transfer personal data collected through this particular tool to any third parties. All data collected with this tool will be hosted within our own KN servers, stored in Hamburg, Germany.

Recipients of personal data may possibly be located in countries outside of the European Economic Area or other countries which ensure an adequate level of protection, in which applicable laws do not offer the same level of data protection as the laws of the respective individual's home country. In such cases and unless permitted otherwise by applicable law, KN takes measures to implement appropriate and suitable safeguards for the protection of personal data by other means.

#### **4. Retention Periods**

Unless explicitly indicated otherwise at the time of the collection of KN Partner's personal data (e.g. within an express consent provided by KN Partner), we erase personal data if the retention of the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed and no statutory retention obligations under applicable law require us to further retain personal data. For the purpose of this specific tool, KN Partner's personal data will be erased latest after the period of one year.

#### **5. Right to withdraw consent**

In case a KN Partner Contact declared its consent for the processing of certain personal data by KN, the KN Partner has the right to withdraw the consent at any time with future effect, i.e. the withdrawal of the consent does not affect the lawfulness of processing based on the consent before its withdrawal. In case consent is withdrawn, KN may only further process the personal data where there is another legal ground for the processing.

#### **6. Rights of and complaints by KN Partner and Data Protection Contact**

Any requests including those concerning access to, rectification or erasure of personal data restriction of processing, right to object to processing or any complaints shall be addressed to our [privacy@kuehne-nagel.com](mailto:privacy@kuehne-nagel.com).

The Data Protection Officer of the data controller can be reached using the following contact details:

*Kuehne + Nagel Management AG*  
*Kuehne + Nagel Haus*  
*P.O. Box 67*  
*8834 Schindellegi*  
*Switzerland*  
*Email: [privacy@kuehne-nagel.com](mailto:privacy@kuehne-nagel.com)*

Our Privacy Notice as well as the information about our data processing in accordance with Article (Art.) 13, 14 and 21 GDPR may change from time to time. It is therefore recommended to revisit this Privacy Notice in regular intervals.