

The following information is intended to provide you with an overview of the processing of your personal data as contracting parties or parties who are interested in our products and services and of your rights under the GDPR.

1. Data controller and contact details of the data protection officer

The data controller responsible for the processing of your personal data is:

Deutsche Post Direkt GmbH
Junkersring 57
53844 Troisdorf
Germany
Telefon: +49 228 189 15990

You can also reach our data protection officer at the above-mentioned address or via the e-mail address datenschutz@postdirekt.de. If you would like your enquiry to be handled confidentially, you are kindly requested to contact our data protection officer by post.

2. Categories of personal data

The personal data categories that are processed by Deutsche Post Direkt depend largely on the reason for and background in which a contractual relationship with you is established or exists. Deutsche Post Direkt processes the following data categories within the framework of contracts or in relation to enquiries, depending upon the specific service or product involved:

- Company name, if applicable, consisting of the last name, first name, address, contact details (telephone number, e-mail address)
- Additional contacts, position held, contact details (telephone number, e-mail address)
- Identity verification data (for instance, identification data), authentication details (for instance, sample signature), tax ID
- Payment and order details (for instance, bank account and credit card details, payment orders), credit score (payment behaviour)
- Order history and revenue

If we contact you directly during the business relationship, additional data are processed, for instance relating to the channel of communication used, the date, reason for and outcome of the communication, and copies of the correspondence.



3. Purposes of data processing and legal bases

Deutsche Post Direkt processes your above-mentioned personal data and personal data categories to fulfill the respective agreement or to implement pre-contractual measures (e.g. contact requests) in accordance with Art. 6 (1) b) GDPR. Your contact details are also used for these purposes, for example in connection with specific information and queries.

In addition, Deutsche Post Direkt is subject to a number of legal requirements (such as the *Geldwäschegesetz* (German money laundering act) and tax laws) and hence also processes your data if processing is necessary for compliance with a legal obligation to which the controller is subject pursuant to Article 6 (1) c) or if processing is necessary for performing a task carried out in the public interest or in exercising official authority vested in the controller pursuant to Article 6 (1) e) of the GDPR. The purposes of data processing include, amongst others

- fraud prevention and prevention of money laundering;
- fulfilling tax reporting and monitoring obligations;
- the fulfillment of regulatory and judicial instructions and orders (for example within the framework of the directives on protection against the SARS-CoV-2 coronavirus issued by the federal state government of North Rhine-Westphalia) and
- risk assessment and risk management at Deutsche Post Direkt and within DHL Group.

If necessary, Deutsche Post Direkt will process your data in weighing up the legitimate interests of Deutsche Post Direkt or third parties in accordance with Article 6 (1) f) of GDPR, for instance:

- Data exchange with credit agencies (for instance, credit reform) to determine credit or default risks
- Defence of legal claims and defence in legal disputes
- Safeguarding IT security and IT operations at Deutsche Post Direkt
- Crime prevention
- Plant and building safety measures (for instance, access control)
- Use of guest wi-fi
- The processing of contact details within the framework of inquiries or requests that are not related to (pre-)contractual relationships,
- The processing of customer data for internal administrative purposes (Recital 48) by companies belonging to the DHL Group (for example sales management and support by central sales units of the Group, risk management, controlling),
- Business management measures and measures aimed at further developing products and services.



Likewise, when weighing up the legitimate interests of Deutsche Post Direkt in accordance with Article 6 (1) f) of the GDPR, Deutsche Post Direkt will process your data, for instance based upon existing contracts or requests for information on additional products and services (advertising) in line with requirements, as follows:

- Posted advertising unless you have objected to your data being processed for this purpose. You may object to the use of your data for direct marketing purposes at any time (cf. point 7), with effect for the future, using any of the above-mentioned contact details (cf. point 1).
- E-mail advertising for other similar products and services of Deutsche Post Direkt provided that Deutsche Post Direkt has received your e-mail addresses in connection with selling products and services from you and that you have not objected to the processing of any such data. You may object to the use of your data for direct marketing purposes at any time (cf. point 7), with effect for the future, using any of the above-mentioned contact details (cf. point 1) without incurring any additional costs apart from the costs of transmitting the objection. Any time we use your e-mail address, we shall again point out very clearly that you can object to your e-mail address being used at any time.
- Telemarketing in the event that we have your presumed consent for this purpose, unless you have objected to your data being processed for telemarketing purposes. You may object to the use of your data for direct marketing purposes at any time (cf. point 7), with effect for the future, using any of the above-mentioned contact details (cf. point 1).

Provided that you have given us consent to processing your personal data for one or more specific purposes, processing based upon your consent will be lawful in accordance with Article 6 (1) a) of the GDPR. Consent given may be withdrawn at any time with effect for the future at any of the above-mentioned contact addresses (cf. point 1). Consent can be given for

- sending Deutsche Post Direkt newsletters to your e-mail address,
- Email advertising for other products and services that are not related to the receipt of the email address within the context of products and services already purchased,
- Telemarketing for additional Deutsche Post Direkt products and services on the condition that there is no indication of presumed consent.

4. Recipients and categories of data recipients

- The only parties within Deutsche Post Direkt who will have access to your data are those who need the data in order to meet our contractual and statutory obligations. Any service providers engaged by Deutsche Post Direkt may also be given access to data for these purposes provided they have been commissioned as processors in accordance with Article 28 of the GDPR. Additional legal bases for the transmission of data to the recipients and categories of recipients listed below are set out in Art. 6 (1) a), b), c), d) and f) GDPR.

Potential recipients of personal data may therefore include:

- public authorities and institutions (for instance tax authorities, the German central tax office) if a statutory or regulatory obligation exists;
- other banks and financial service institutions;
- processors for the support/maintenance of software/IT applications, archiving, document processing, call centre services, compliance services, controlling, data screening in accordance with statutory requirements, data destruction, audit services and payments;
- Companies belonging to the DHL Group that are commissioned to perform data processing for internal administration purposes (see also Point 3.),
- credit agencies as part of enquiries about creditworthiness;
- Courts and legal representatives at court proceedings within the framework of legal disputes;
- Auditors and tax accountants;
- Cooperation partners with which joint campaigns and projects are conducted in agreement with the customer;
- other data recipients on the basis of their consent.

5. Transfer of data to third countries or international organisations

Data are only transferred to countries outside the European Union (EU) or the European Economic Area (EEA) (so-called third countries) if this is necessary or prescribed by law for fulfilling your orders (for instance tax notification requirements), if you have given us your consent or as part of processing. If service providers are used in third countries, which is currently not the case, they are obliged to observe European data protection standards by taking relevant measures in addition to written instructions (for instance, by agreeing on EU standard contractual clauses).

6. Timeframes for data retention

Deutsche Post Direkt processes and stores your personal data for as long as is required for the performance of contractual and statutory obligations and on the basis of interests, taking into account the respective data category. Once the data is no longer needed for this purpose, it will be deleted at regular intervals unless further – temporary – processing, such as in a separate archive with restricted access authorization, is required for the following purposes:

- The fulfillment of retention periods under commercial and tax legislation (such as the Handelsgesetzbuch [German Commercial Code], the Abgabenordnung [German Fiscal Code], and the timeframes of two to at minimum ten years stipulated therein for the retention or documentation of data after creation, for example, of the annual financial statement or receipt of commercial and business correspondence, etc.),
- Retention of evidence for 30 years pursuant to Section 197 BGB (German Civil Code), for example within the context of legally binding claims or claims from enforceable settlements or enforceable documents.



- Retention of evidence for three years pursuant to Section 195 BGB (German Civil Code) for the purpose of providing evidence and the possible clarification of judicial or extrajudicial claims (for example correspondence within the context of processing the rights of data subjects).

7. Your additional data protection rights – objection rights

You have the following additional rights as a data subject unless this is precluded by contractual and statutory obligations:

- Right of access (Article 15 of the GDPR) with the restrictions set forth in Sections 34, 35 of the *Bundesdatenschutzgesetz* (BDSG - German data protection act), new version
- Right to rectification of incorrect data (Article 16 of the GDPR)
- Right to erasure (right to be forgotten) (Article 17 of the GDPR) with the restrictions set forth in Sections 34 and 35 of the BDSG, new version
- Right to restriction of processing of personal data (Article 18 of the GDPR)
- Right to data portability (Article 20 of the GDPR)
- Right to lodge a complaint with a data protection supervisory authority (Article 77 of the GDPR)
- Right to object (Article 21 (I) of the GDPR) on grounds relating to the data subject's particular situation to processing of personal data concerning them or data processing pursuant to Article 6 (I) e) and Article 6 (I) f) of the GDPR
- Right to object to processing of data for direct marketing purposes (Article 21 (III) of the GDPR). You may object to the processing of your data for direct marketing purposes at any time, with effect for the future, using any of the above-mentioned contact details (cf. point 1).

8. Obligation to provide data

As part of our business relationship, you will need to provide the personal data that are required in order to establish and maintain a business relationship and in order to perform the associated contractual obligations or that we are legally required to collect. Without these data, we shall have to refuse to conclude the contract or fulfil the order or shall no longer be able to fulfil an existing contract and may need to terminate it.

