



CCTV PRIVACY NOTICE

Your trust matters to us. That is why we protect your personal data and use it responsibly. At FedEx Express International B.V. and its operating groups, subsidiaries and divisions, including any TNT company (“**FedEx**”), we are committed to protecting your privacy and the security of your personal data. FedEx has created this CCTV Privacy Notice (“**CCTV Notice**”) to explain how FedEx uses Closed Circuit Television (“**CCTV**”) and the recording that shows your personal data, which is any information that relates to an identified or identifiable natural person, such as your image (“**Personal Data**”).

Last update: July 2019.

When this CCTV Notice mentions “FedEx”, “we”, “us”, or “our”, FedEx is referring to the local FedEx company that controls the CCTV system through which your image is captured. Notwithstanding the local systems and processes, FedEx also operates international systems for which FedEx Express International B.V. having its headquarters in Hoofddorp, The Netherlands (for Europe) and/or FedEx Corporation, having its headquarters in Memphis, United States of America (for global) will control your Personal Data.

Contact information

If you have any questions regarding the processing of your personal data you can contact your local FedEx company directly, which is available to deal with requests for information, applications or complaints. Notwithstanding your right to contact the local FedEx company, you always have the right to contact the following FedEx companies directly, which are also available to deal with requests for information, applications or complaints:

FedEx Express International B.V.

Attn: Legal Department
Taurusavenue 111
2132 LS Hoofddorp
The Netherlands
E: dataprotection@tnt.com (soon: dataprotection@fedex.com)

FedEx Corporation

Attn: Legal Department - Compliance
1000 Ridgeway Loop Road, Ste 600
Memphis, TN 38120
United States of America
E: dataprivacy@fedex.com

Overview

This CCTV Notice answers the following questions:

1. Does this CCTV Notice apply to you?
2. What Personal Data does FedEx collect?
3. Why does FedEx process Personal Data?
4. Who has access to your Personal Data?
5. How long will FedEx process your Personal Data?
6. What measures does FedEx take to protect your Personal Data?
7. Where does FedEx store or transfer your Personal Data?
8. What rights can you exercise in relation to your Personal Data?
9. What if you have other questions or complaints?
10. Will there be updates to this CCTV Notice?



1. Does this CCTV Notice apply to you?

This CCTV Notice applies to you if you are an employee, contractor or any other visitor of the premises of FedEx where CCTV is used. If CCTV is used on a premise of FedEx, this will be indicated with a sign at the entrance(s) to the premises.

2. What Personal Data does FedEx collect?

Through the CCTV system, your image is captured and recorded.

3. Why does FedEx process Personal Data?

Personal Data will only be collected, used, stored or otherwise processed when necessary for FedEx within the framework of securing its premises, to ensure the safety and health of individuals to protect its business property and assets. FedEx will only process Personal Data based on applicable legal ground(s). To clarify why we process Personal Data, we will first clarify the legal ground(s), subsequently, we will clarify our relevant business purpose(s).

Legal Grounds

FedEx processes your Personal Data based on one of the following legal grounds:

- The processing is necessary for us to comply with our legal obligations,
- The processing is necessary to protect your vital interests or of other individuals, or
- The processing is necessary for the legitimate interests of FedEx, except where such interests are overridden by your interests or fundamental rights and freedoms.

Business Purposes

FedEx will only collect, use or otherwise process Personal Data if the processing falls within the scope of one (or more) of the following legitimate business purposes:

1. **Safety and security.** This purpose addresses activities such as those involving health and safety, the protection of FedEx assets, FedEx employees' assets and customer, supplier or business partner assets and the authentication of employee, customer, supplier or business partner status and access rights. This includes the processing that is necessary for the prevention and investigation of incidents, and also the security of access to FedEx premises, including buildings and sites;
2. **Protecting the vital interests of employees or others.** This is where processing is necessary to protect the vital interests of an employee or others, e.g. for safety and urgent medical reasons;
3. **Compliance with legal obligations.** This addresses the processing of Personal Data as necessary for compliance with, and investigating employee compliance with, laws, regulations and sector specific guidelines to which FedEx is subject and the processing of Personal Data that is necessary for compliance with, and investigating employee compliance with, internal FedEx policies. This includes processing that is necessary for the prevention and investigation of incidents, including crime or fraud committed on FedEx premises (e.g. a search warrant from a law enforcement agency).

In case of suspicion of crime or fraud or other serious incidents, FedEx can install hidden cameras. FedEx will only collect your Personal Data through hidden cameras when this is considered necessary for the abovementioned purposes. FedEx will only use hidden cameras temporarily and will keep the



invasion into the private life of the people recorded by hidden cameras restricted to a minimum.

4. Who has access to your Personal Data?

FedEx shares your Personal Data internally and with third parties in the following circumstances:

- With its affiliates, operating groups, subsidiaries and divisions, or with third parties if such is necessary for the purposes as listed above. If appropriate, FedEx will require third parties to conduct activities in a manner consistent with FedEx policies and guidelines in relation to data protection.
- With data processors, i.e. parties processing Personal Data on our behalf. In such cases, these third parties are only allowed to use your Personal Data for the purposes described above and only in accordance with our instructions. FedEx will only use processors which provide sufficient guarantees to implement appropriate technical and organizational measures and ensure the protection of the rights of data subjects.
- With its employees if and to the extent necessary for the performance of their tasks. In such a case, access will be granted only if and to the extent necessary for the purposes described above and only if the employee is bound by confidentiality.
- If and when required to do so by law, court order, or other legal process, for example, with law enforcement agencies or other governmental agencies, to establish or exercise our legal rights or in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

5. How long will FedEx process your Personal Data for?

We will retain your Personal Data no longer than necessary for the purpose(s) for which we process your Personal Data in accordance with our retention policies and in accordance with (local) law. After the retention period we will delete or anonymize your Personal Data, unless we need to retain certain of your Personal Data for another purpose. We will only do so if we have a legal ground to retain your Personal Data. We will also ensure that Personal Data are only accessible for that other purpose.

Regarding CCTV images specifically, FedEx will retain your Personal Data for a maximum of 30 calendar days. After this period, your Personal Data will be automatically erased, unless FedEx has a legal ground to do otherwise, for example the investigation into a specific incident. In such cases, FedEx will erase your Personal Data after it is no longer necessary for the purpose of the processing.

6. What measures does FedEx take to protect your Personal Data?

FedEx has taken appropriate technical and organizational measures to protect your Personal Data against accidental or unlawful processing, including by ensuring that:

- Your Personal Data is protected against unauthorized access;
- The confidentiality of your Personal Data is assured;
- The integrity and availability of your Personal Data will be maintained;
- Personnel are trained in information security requirements; and
- Actual or suspected data breaches are reported in accordance with applicable law.



7. Where does FedEx store or transfer your Personal Data to?

Generally, the CCTV recordings are stored locally. However, FedEx may need to transfer your Personal Data to other locations, which may include locations outside the country where you reside. In any case where we transfer Personal Data, FedEx shall ensure that such a transfer is based on a legal ground and subject to appropriate safeguards.

Transfers of Personal Data originating from the European Economic Area ('**EEA**') to operating groups, subsidiaries and divisions within FedEx outside the EEA are governed by the Binding Corporate Rules as laid down in article 47 of the EU General Data Protection Regulation ('**GDPR**').

Transfers to third parties (outside the EEA) will be governed by a contract based on the model contractual clauses for data transfers approved by the European Commission or other appropriate safeguards as laid down in article 46 of the GDPR. For more detailed information about these safeguards, please contact dataprotection@tnt.com or dataprivacy@fedex.com.

8. What rights can you exercise in relation to your Personal Data?

In accordance with the law applicable to the use of your Personal Data, you have rights in relation to your Personal Data. Note that we will have to balance your rights and your request to exercise them against our rights and obligations to process your Personal Data and our obligation to protect the rights and freedoms of others. A number of rights that you have in relation to your Personal Data, as applicable in the European Economic Area, are explained below:

Right of access

You are entitled to a copy of the Personal Data we hold about you and to learn details about how we use it. Your Personal Data will usually be provided to you digitally or we might offer you the possibility of viewing your Personal Data (i.e. the relevant images) on premise. As a rule, we will require you to prove your identity before providing the requested information.

Right to rectification

We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you believe this is not the case, you have the right to request that any incomplete or inaccurate Personal Data that we process about you is amended.

Right to erasure

You have the right to ask us to erase your Personal Data, for example where the Personal Data is no longer necessary for the original purpose for which they were collected, where Personal Data has become obsolete or where you withdraw your consent to the grounds on which data is processed. However, this will need to be balanced against other factors. For example, we may not be able to comply with your request due to certain legal or regulatory obligations.

Right to restriction of processing

You are entitled to ask us to (temporarily) stop using your Personal Data, for example where you think that the Personal Data we hold about you may be inaccurate or where you think that we no longer need to use your Personal Data.

Right to data portability

You may have the right to ask that we transfer Personal Data that you have provided to us to a third party of your choice. This right can only be exercised when you have provided the Personal Data to us,



and when we are processing that data by automated means based on your consent or in order to perform our obligations under a contract with you.

Right to object

You have the right to object to processing which is based on our legitimate interests. You may also ask us to stop using your Personal Data that we are processing for marketing purposes at any time (if any), and if you do so, FedEx will immediately cease to use your Personal Data. For other purposes based on our legitimate interests, we will no longer process the Personal Data on that basis when you file an objection, unless we have a compelling legitimate ground for the processing.

Rights relating to automated individual decision-making

You have the right not to be subjected to a decision based solely on automated decision-making, including profiling, which produces legal effects concerning you or similarly significantly affects you. If you have been subject to an automated decision and do not agree with the outcome, you can contact us using the details below and ask us to review the decision.

Right to withdraw consent

We may ask for your consent to process your Personal Data in specific cases. When we do this, you have the right to withdraw your consent at any time. FedEx will stop the further processing as soon as possible after the withdrawal of your consent. However, this does not affect the lawfulness of the processing before consent was withdrawn.

Please use [this link](#) if you would like to exercise any of your rights.

9. What if you have other questions or complaints?

Questions or complaints regarding the processing of your Personal Data can be directed to FedEx by using the contact information as provided at the top of this CCTV Notice.

You also have the right to lodge a complaint with the competent (local) data protection authority in the jurisdiction where you work, where you live or where an alleged infringement takes place. As a rule, the lead supervisory authority for FedEx in the EEA is the Dutch Data Protection Authority, unless the alleged infringement is purely a local matter. A listing of the European Data Protection Authorities can be found [here](#).

10. Will there be updates to this CCTV Notice?

FedEx may update this CCTV Notice from time to time. If an amendment will have a serious privacy impact, FedEx will endeavour to actively inform you about such amendments.

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