

## **Privacy Policy for the Job Portal of Kuehne+Nagel Group**

### **We want you in our team**

The Kuehne+Nagel Applicant Portal provides a standardized digital representation of the entire application process, from creating an applicant profile, through the specific application process, all the way to job alerts. Protecting your personal data is accorded the very highest priority. Extensive technical and organizational measures have been taken to protect personal data against unauthorized access and misuse. Additionally we inform you about your rights under applicable data privacy laws.

If you are a California Resident please refer to our [PRIVACY STATEMENT-CALIFORNIA](#).

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## **1. Data controllers**

The data controller in the Applicant Portal is Kuehne+Nagel Management AG, Kuehne+Nagel Haus, P.O. Box 67, 8834 Schindellegi, Switzerland (hereinafter referred to as "Kuehne+Nagel").

In addition, the companies of the Kuehne+Nagel Group are data controllers in the specific application process. As a rule, the given Group company is the data controller in the application process for whose job advertisement you are applying (hereinafter referred to as the "Employer").

## **2. Contact for data protection issues**

The central contact for data protection at Kuehne+Nagel is the data protection officer. The data protection officer can be reached at the following address:

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

## **3. Data categories**

The following are the main categories of personal data processed:

- Master data (e.g. name, date of birth, place of residence)
- Documents (e.g. references, certificates, CV's)
- Education and training details (e.g. data about school education, university, professional qualification)
- Payment data (e.g. bank account details for travel expenses)
- Organizational data in case of internal applications (e.g. personnel number, cost center, department)
- Communication data (e.g. e-mail address, (mobile) phone number, IT user ID in case of internal applications)
- Video recordings in the selection process
- Assessment data
- Referrals
- Log data recorded while using IT systems

These may also include special categories of personal data as per Art.9 para. 1 General Data Protection Regulation (hereinafter referred to as "GDPR") such as health data or religion or trade union membership.

## **4. Consent**

By submitting your application, you warrant that you have read and agree with the information contained in this privacy policy regarding the processing and use of your personal data. If you have not yet reached the age of majority, you have obtained the prior authorization of a parent or legal guardian to apply for a position at Kuehne+Nagel. You also warrant that your information is correct.

If you are under the age of 16, please enclose a written consent from your parent or legal guardian to your application. Please note that if this condition is not satisfied, Kuehne+Nagel cannot consider your application, and will delete your data due to legal requirements.

## **5. Establishing a profile when joining the KN Talent Community**

### **5.1 Direct acquisition via the input screen**

You can create a profile in the KN Talent Community by registering and uploading your data and information under (<https://jobs.kuehne-nagel.com/global/en/jointalentcommunity?applyType=JTC>). For this process you can choose between the manual access of your data and the automatic download by using one of the icons shown on the registration page (e.g. LinkedIn).

The objective that Kuehne+Nagel is pursuing with the KN Talent Community is to give you the opportunity, both *before and after a specific application process*, to make your profile available via a search function to group companies of Kuehne+Nagel with whom you have not actively applied for a job.

Also, if you wish to apply multiple times within Kuehne+Nagel, or if you wish to apply in the future, you can avoid multiple data acquisition by saving your applicant profile in the KN Talent Community, so that the principle of data minimization will be observed.

Because this is an optional service in the Applicant Portal, the applicant profile settings give you the option of supplementing, rectifying or deleting personal data.

The legal basis for the storage of your applicant profile if you establish a profile without applying for a specific job or following completion of an application process, and for the transmission of your profile to the group companies, is provided by Art. 6 para. 1 a) GDPR, your Consent.

Your consent is valid until such time as your profile is deleted, and may be revoked at any time with future effect. In the event that you should revoke your consent, Kuehne+Nagel will deprive the Group companies of their access rights.

For more details regarding the duration of storage or the criteria determining such duration and your right of revocation, please refer to sections 12.1 and 13.

### **5.2 Data import from LinkedIn or other platforms**

If you have a professional profile at a platform like LinkedIn or another platform or data base as may be displayed as an option on the input screen, you can choose to transmit the data required for the application from such source to Kuehne+Nagel. This means that manual collection of master data via the input screen will only be partially necessary. Your profile will be created on transmission of the master data.

In addition to the master data, additional data such as your current Employer and position may be transferred from your profile at the source base of your choice. Such data is generally not required to create your applicant profile, yet may still be transmitted based on your profile or other settings of such other data bases. Kuehne+Nagel is not the data controller in these cases. For this reason, please check your settings prior to submission to determine which personal data is affected.

You have the option of adjusting, rectifying and deleting your data at any time using the applicant profile settings.

The legal basis for the transmission of your master data and additional data from source bases like LinkedIn is provided by Art. 6 para. 1 a) GDPR, your Consent given to the respective provider. The providers are also obligated to enter into contractual arrangements and take technical precautions to prevent misuse of your data upon transmission.

Please refer to the Privacy Policy of the respective provider for all additional information on data protection, in particular as regards revoking your consent.

## **6. Establishing a profile for job alerts**

The Kuehne+Nagel career page gives you the option to subscribe for an automatically generated job alert free of charge. The purpose of the job alert is to notify you of current jobs in the Kuehne+Nagel Group, and then for the group to acquire applicants. Subscribing is voluntary and is independent of the specific application process.

The legal basis for the e-mail job alert, and for the transmission of your profile to the group companies, is provided by Art. 6 para. 1 a) GDPR, your Consent.

Your consent is valid until such time as your profile is deleted, and/or you unsubscribe from the job alert, or the duration of storage as set out in 12.1 is terminated.

Your consent may be revoked at any time with future effect. In the event that you should revoke your consent, Kuehne+Nagel will deprive the Group companies of their access rights.

For more details regarding the duration of storage or the criteria determining such duration and your right of revocation, please refer to section 13.

## **7. Establishing a profile in the application process for a specific job**

As part of your application via the Applicant Portal for a specific job, it is possible to create an applicant profile and to sign up by entering your personal data. In so doing, your data is entered in an input screen and transmitted to and saved by Kuehne+Nagel. The data is transmitted to the Employer when the Employer receives access to your applicant profile.

For more details regarding the recipients or categories of recipients, please refer to section 10. For more details regarding the duration of storage or the criteria determining such duration, please refer to section 12.2.

Following successful sign-up, additional personal data is entered in the applicant profile and then transmitted to Kuehne+Nagel and/or to the Employer. The legal basis for the transmission and storage of your master data used in the creation of an applicant profile is provided by Article 6, para. 1 b) GDPR, Necessity for the establishment of an employment relationship.

Following successful application, additional personal data may be entered in your applicant profile, on the one hand in order to enable an objective hiring decision in the specific application process, and, on the other, to hone your application profile with information about training, certificates or language skills. We differentiate between obligatory and voluntary data collection in this regard.

For details regarding recipients or categories of recipients, please refer to section 10.

For more details regarding the duration of storage or the criteria determining such duration, please refer to section 12.2.

You can also set-up an applicant profile without directly applying for a specific job. In this case please refer to section 8 above for more details.

### **7.1 Expanding your profile information and further procedures in the selection process**

In your applicant profile, you have the option to enter other data in addition to the personal data required for the establishment of the employment relationship. Any data entry is voluntary and has no adverse effect on your application.

Entering and storing voluntary information gives you the opportunity to upload your resumé should you intend to apply for additional jobs at Kuehne+Nagel.

Following data acquisition and together with the application for a specific job, Kuehne+Nagel will transmit these data to the Employer as well when said Employer is granted access to your applicant profile. For more details regarding the recipients or categories of recipients, please refer to section 10.

Staffing of particularly sensitive job positions may require a further check of your application data on your career path. The result of this check is documented in the application management system. We inform you about such checks in a transparent manner in the framework of our job advertisements. This takes check place taking local legal requirements into consideration and by involving carefully selected service providers. In this regard, it is possible that third-party providers will be commissioned with the performance of additional tasks during the selection process. You also acknowledge that Kuehne+Nagel will provide them with timely information about the details of the respective process.

The EU regulations on combating terrorism (EC) No. 2580/2001 and (EC) No. 881/2002 require that none of our employees are terror suspects named in centrally managed lists (terrorism lists). Therefore, as part of the application process, it is necessary for us to carry out a data comparison against terror lists.

The legal basis for the processing of voluntary information is provided by Article 6, para. 1 b) and Article 6 para. 1 f) GDPR. The necessary legitimate interests of Kuehne+Nagel in satisfaction of the legal basis relate to the purpose of facilitating access to the continued application process and to guaranteeing the principle of data minimization.

### **7.2 Establishment of the employment relationship**

The collection of personal data required for the decision establishing the employment relationship is obligatory. While the employment relationship is being contractually initiated, the Employer has an interest in ensuring that you possess the professional competence and personal suitability required for the job in question.

The requirements of the specific job are taken into account in assessing necessity. For this reason, specific information is collected for the job in question. The master data is also required. No application is possible without the possibility of identifying you as a person, or the ability to contact you during the application process. Following data acquisition and together with the application for a specific job, Kuehne+Nagel transmits the data to the Employer when said Employer is granted access to your applicant profile.

For more details regarding the recipients or categories of recipients, please refer to section 10. The data will then be stored and used by the Employer until the specific application process is completed.

The legal basis for data processing for the establishment of the employment relationship is provided by Article 6 para. 1 b) GDPR.

### **7.3 Processing of special categories of personal data**

In principle, no special categories of personal data are collected in the data processing performed during the specific application process via the Applicant Portal. In this respect, when uploading documents like cover letters or your CV, you are required to ensure that these do not include any special categories of personal data.

Special categories of personal data include information revealing racial or ethnic origin, political opinions, religious or philosophical convictions or trade-union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning the sex life or sexual orientation of a natural person. Unlike simple personal data, the admissibility of special categories of personal data is determined by Art. 9 GDPR.

Whenever special categories of personal data are processed in conjunction with the respective national data protection laws (for example, health data, trade union membership), this processing is carried out on the legal basis of Art. 9 para. 2(b) of the GDPR in conjunction with the respective national data protection law. Furthermore, it may be necessary to process your health data in order to assess your ability to work in accordance with Art. 9 para. 2(h) 1 GDPR in conjunction with the respective national data protection law.

### **7.4 Submission to the personnel management system on hiring**

Following completion of the specific application process and upon hire, Kuehne+Nagel will transmit your master data to the personnel management system on behalf of the Employer. The transmission of your master data guarantees the principle of data minimization and is necessary for the implementation of the employment relationship. Absent the entry of your master data in the personnel management system, you cannot, for instance, enter your working hours, nor can you draw your wages.

### **8. Applying for a job without registration of an applicant profile**

You have the option of submitting your application without registering an applicant profile as well. However, the data you entered will not be available for you to draw on for future applications in this case.

The legal basis for the transmission and storage of your master data used for applying without registration is provided by Article 6, para. 1 b) GDPR, Necessity for the establishment of an employment relationship.

The application process can only be completed if you have given us your consent to store and use your data for purposes of the online application.

### **9. Participation in Kuehne+Nagel recruiting events**

Some Kuehne+Nagel locations organize Recruiting-Events in order to win potential candidates for multiple, similar job advertisement. Special events pages in different internet platforms inform about the contents of these events. You may apply for participation in these events by uploading your application in our application system via the link created for this purpose.

## **10. Recipients and categories of recipients**

During an application process, in principle only those persons who make the specific hiring decision will receive access to your applicant profile. These are generally Human Resources employees and one or more superiors.

In addition, compliance with legal obligations under the locally applicable employment law and social security or social protection law may necessitate that employee representatives (e.g. the Works Council and the SHE representative) be given access to your applicant profile during a specific application process.

The service providers used to manage the Applicant Portal may also access your applicant profile. The condition of being bound by directives, as well as data security and confidential treatment of your data by the service providers are ensured by means of order processing contracts (additional details regarding order processing are set out in Article 28, GDPR).

The transfer of data to recipients outside of Kuehne+Nagel takes place if required by law, or if you have given your consent to such transfer. The same applies to recipients within the Kuehne+Nagel Group, as data protection law does not provide for an intra-Group exemption. Under these conditions, recipients of your application profile may include:

- Companies in the Kuehne+Nagel Group who receive access to the applicant profile on the basis of a specific application process and who continue to process the data for hiring decision purposes;
- Companies in the Kuehne+Nagel Group in case you established a profile by joining the KN Talent Community;
- Public bodies and institutions, such as law enforcement agencies, who are given access to the applicant profile on the basis of compliance with statutory or regulatory obligations.
- Third-party providers commissioned with the performance of additional tasks during the selection process.

In addition, we use service providers to fulfil our contractual and legal obligations, among other things. Insofar as these service providers' processes personal data on our behalf, we have concluded the contracts required under applicable data protection law with them.

We select our service providers carefully and monitor them on a regular basis, especially regarding their diligent handling and protection of the data that they store and process. All service providers are obliged to maintain confidentiality and to comply with the statutory provisions. Service providers may also be other companies of the Kuehne+Nagel Group.

You will find a list of our contractors and service providers in Annex 1.

## **11. Data transmission to a third country**

We might transfer personal data recipients outside of the European Economic Area (EEA). In such case prior to the transfer, we ensure that either the respective country provides an appropriate level of data protection due to a decision of adequacy by the European Commission, or due to other appropriate safeguards (e.g. Binding Corporate Rules on data protection or EU Standard contractual Clauses), or a legal basis authorises the transfer or you explicit Consent.

You are entitled to receive an overview of third country recipients and a copy of the specifically agreed-provisions securing an appropriate level of data protection. For this purpose, please contact the Controller mentioned above.

Kuehne+Nagel has made use of Standard Contractual Clauses in accordance with Art. 46 para. 2 c) GDPR to ensure compliance with the European level of data protection in the respective third country.

Should a transfer to recipients outside the European Economic Area (e.g. authorities, courts) be necessary for the enforcement of or defense against legal claims, this shall be done in accordance with Art. 49 para. 1 e) GDPR.

## **12. Duration of storage or criteria for determining this duration**

### **12.1 Your KN Talent Community profile and job alert**

The personal data from your **KN Talent Community** profile and/or job alert subscription will be stored for **3 years** as of transmission to Kuehne+Nagel.

**Since the storage of your personal data from your KN Talent Community profile and/or job alert is based on your consent you can revoke your consent and request deletion of your profile and/or unsubscribe from your job alert at any time.** In such case your data will be deleted and the storage duration will be reduced accordingly.

### **12.2 Your applicant profile for a specific job**

The personal data from your specific job application will be stored for 6 months since last interaction. However we will consider your applicant profile as part of Kuehne+Nagel Talent Community for three years. The foregoing does not apply if you request deletion of your application data and the deletion request is not contradicting the Employer's statutory retention periods.

The purpose of the 3-years retention period is to satisfy the Employer's statutory obligations under labour law and in order to consider you for future employment opportunities.

After termination of the 3 years - period statistical data related to your application are stored only in anonymous form for statistical evaluations. This statistical data record does not allow any conclusions to be drawn about your person.

## **13. Rights of the data subject**

As an applicant and as a subject of the data processing that occurs in the Applicant Portal, you have data protection rights that you may assert against Kuehne+Nagel and the Employer. You can exercise your rights at any time via the following link <https://privacy.kuehne-nagel.com/dsar-form/>.

Should you have questions about data protection, please refer to section 2 for details about the contact person. The data protection rights are as follows:

**Right to information and access:** you have the right to obtain confirmation from us about whether or not your personal data is being processed, and, if this is the case, access to your personal data.

**Right to correction and deletion:** you have the right to obtain the rectification or inaccurate personal data. As far as statutory requirements are fulfilled, you have the right to obtain the completion or deletion of your data. This does not apply to data which is necessary for billing or accounting purposes or which is subject to a statutory retention period. If access to such data is not required, however, its processing is restricted (see the following).



**Restriction of processing:** if the legal requirements are fulfilled, you can demand that we restrict the processing of your data.

**Data portability:** if the legal requirements are fulfilled, you may request to receive data that you have made available to us in a structured, common and machine-readable format or - if technically feasible - to request that the data be transmitted to a third party.

**Objection to data processing based on the legal basis of “legitimate interest”:** you have the right to object to the processing of your personal data at any time, insofar as this is based on legitimate interest. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements, which override your rights.

**Withdrawal of consent:** in case you consented to the processing of your data, you have the right to revoke this consent at any time with effect for the future. The lawfulness of data processing prior to your withdrawal remains unchanged.

**Right to lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with a supervisory authority. You can appeal to the supervisory authority, which is responsible for your place of residence or your state of residency, or to the supervisory authority responsible for us.

Please note that the right to restriction of processing or the right to data portability, for instance, do not apply to all instances of data processing, but only under certain conditions. The same goes for the right to object.

**14. Origin of the data**

In principle, Kuehne+Nagel stores this personal data in the applicant profile that has been entered directly via the input screen (referred to below as "direct acquisition"). Collection in the absence of direct acquisition only takes place if you, as an external applicant, have given your consent to the transmission of personal data from your LinkedIn user profile to the operators of those sites. For more details regarding the transmission of personal data from LinkedIn, please refer to section 5.2.

This privacy policy was published in version 6.0 on February 07, 2022.

**Annex 1**

Service providers	Type of processing
Cornerstone OnDemand Limited 6 <sup>th</sup> Floor, 4 Coleman St., London, United Kingdom, EC2R 5AR	Provision and ongoing development of the cloud platform (Software as a Service) for the above-mentioned processing. Processing of personal data provided.
Phenom People, Ltd 6 Charles II Street, London, United Kingdom, SW1Y 4NW	Provision and ongoing development of the cloud platform (Software as a Service) for the above-mentioned processing. Processing of personal data provided.
MobileCV Oy Firdonkatu 2 T 73, 00520 Helsinki, Finland	Processing of personal data from video interviews / creation
Korn Ferry (Schweiz) GmbH Hardstrasse 201, 8005 Zurich, Switzerland	Processing of personal data required for assessments completion
QuestionPro GmbH Friedrichstr. 171 10117 Berlin Germany	Processing of personal data required for surveys
Trendvise Business Management GmbH Kreuzherrenstrasse 72 – 74, D-53227 Bonn Germany	Processing of personal data for recruitment campaigns and talent pool management



## PRIVACY STATEMENT-CALIFORNIA FOR JOB APPLICANTS

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Statement of Kuehne + Nagel or “K+N” and its subsidiaries (collectively, “we,” “us,” or “our”) and applies solely to visitors, users, and others who reside in the State of California (“consumers” “applicants” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

### Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, medical information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a	YES



	template or other identifier or identifying information, such as faceprints.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

We obtain the categories of personal information listed above from the following categories of sources:



We process personal information that you provide directly to us, such as when you register in the Kuehne + Nagel Applicant Portal, submit a job application on the sites or at a recruiting event, or when we conduct a phone or in-person interview. We may also receive personal information about you from other sources, such as from persons you indicate as a reference, persons who referred you for a position, in connection with background or employment checks, and from third party recruitment sources, including sites. Other sources include, without limitation, social sites where you have created a public page or profile or otherwise given permission so that recruiters can access your information on these sites. They also can include vendor sites where K+N has invited you to participate in assessments, evaluations or online interviews.

### Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- to communicate with you and respond to your requests or application
- for recruitment, evaluation, background screening and hiring purposes
- to enable your use of the Kuehne + Nagel Applicant Portal
- to analyze, develop and improve the Kuehne + Nagel Applicant Portal, our recruiting activities and Kuehne + Nagel products and services
- to maintain the security of the Kuehne + Nagel Applicant Portal and our sites, systems and networks
- to comply with applicable laws and regulations and to operate our business

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice. For a more detailed description regarding the use of personal information, please refer back to the [K + N Job Portal Privacy Notice](#). Data regarding applicants is retained indefinitely in an effort to improve the recruitment process.

### Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A:	Identifiers.
Category B:	California Customer Records personal information categories.
Category C:	Protected classification characteristics under California or federal law.
Category I:	Professional or employment-related information.



We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you authorize us to disclose your personal information in connection with the application process.

In the preceding twelve (12) months, we have not sold any personal information.

### Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

#### *Access to Specific Information and Data Portability Rights*

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

#### *Deletion Request Rights*

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the



context of our ongoing business relationship with you, or otherwise perform our contract with you.

2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
7. Comply with a legal obligation.
8. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### *Exercising Access, Data Portability, and Deletion Rights*

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at +1 (201) 413-5500
- Visiting [Kuehne-nagel.com](https://www.kuehne-nagel.com)

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

### *Response Timing and Format*

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in



writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### Non-Discrimination

Kuehne + Nagel will not discriminate against you for exercising any of your CCPA rights.

#### Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. We recommend that you check this page regularly for updated information about our data privacy practices.

#### Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Contact: Stephen Alfano, Corporate Counsel/Regional Data Protection Officer

Phone: +1 (201) 839 2107

Mobile: +1 (201) 856 1392

Website: [kuehne-nagel.com](https://www.kuehne-nagel.com)

Email: [stephen.alfano@kuehne-nagel.com](mailto:stephen.alfano@kuehne-nagel.com)

Postal Address: 10 Exchange Place, 20<sup>th</sup> Floor, Jersey City, NJ 07302

Attn: Stephen Alfano