

PRIVACY STATEMENT – ECU Sales Accelerator App

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1. WHAT IS COVERED BY THIS PRIVACY STATEMENT?

- 1.1 ECU Worldwide (“**ECU Worldwide**” or “**We**”) is a multi-national freight forwarding company headquartered in Belgium. We are a global leader in LCL (“Less than Container Load”) consolidation & FCL (“Full Container Load”) and related services.
- 1.2 ECU Worldwide has more than 300 offices in over 160 countries. Our group consists of several companies (“**the ECU Worldwide Companies**”) that process personal data:

An overview of all ECU Worldwide companies that process personal data can be obtained by e-mailing us at dataprivacy@ecuworldwide.com.

- 1.3 ECU Worldwide offers to its employees a personalised digital Application: ECU Sales Accelerator App (“**App**”). The App is intended for internal purpose only by ECU Worldwide Sales team. The app is designed to boost efficiency and productivity in line with organization’s Digital transformation journey. Combining advanced technology with business intelligence, the app offers unmatched power, precision, and convenience.

Key Features:

- Compatibility with Android and iOS operating systems
- Easy-to-navigate, light, modern interface
- Real-time dashboards to design performance-oriented action plans
- Ability to add new accounts, opportunities & leads to drive sales
- Automated alerts for efficient sales beat planning
- Overview of customer performance and new opportunities

- 1.4 This Privacy Statement explains how and why we process your personal data, how we protect them and how long we keep them, when you use the App.

What is the purposes for processing your personal data?

What are the legal grounds for processing your personal data?

What are your rights with respect to the processing of your personal data?

Which categories of personal data will be processed?

Who will have access to your personal data?

Will your personal data be transferred to countries outside the EEA?

Do we use any cookies or similar technologies?

Will we make use of automated decision-making?

How long will your personal data be retained?

Are your data safe and secure?

Who can you contact?

Changes to this privacy statement?

2. WHAT ARE THE PURPOSES FOR PROCESSING YOUR PERSONAL DATA?

2.1 In the context of the App, we only process your personal data in the framework of the execution of our contractual relationship and for legitimate business reasons. These purposes may include but are not limited to:

- providing you with the services of the App;
- the good organisation of our services;
- customer management;
- dealing with enquiries, and requests;
- user management and administration;
- Statistics and analysis.

3. WHAT ARE THE LEGAL GROUNDS FOR PROCESSING YOUR PERSONAL DATA?

3.1 In the context of the App, we will mainly process your personal data based one of the following legal grounds:

- because it is necessary for the performance of a contract to which you are party ("**Contract**");
- for the purposes of our legitimate interests, including (but not limited to) our business activities, customer and supplier management etc. In this respect, we will always determine case by case whether our interests are not overridden by your interests, fundamental rights and freedoms ("**Legitimate interests**").

3.2 For each specific purpose for which we process your personal data, we will rely on one single legal ground. In the table below, you can find an overview of the applicable legal grounds for the purposes mentioned above:

Purpose	Legal Ground
Customer management	- Legitimate interests
Sales	- Legitimate interests
Dealing with enquiries, requests and complaints	- Legitimate interests
Statistics	- Legitimate interests

3.3 If we have the legal obligation to obtain your free, informed, specific and unambiguous consent to process your personal data for certain purposes, we will only process your data for such purposes to the extent that we have obtained such consent from you.

3.4 Location Services: Location Services allows the App to gather and use information based on the current location of your mobile to provide the Key Features given under section 1.3 above. By enabling Location Services for your devices, you agree and consent to the transmission, collection, maintenance, processing and use of your location data and location search queries by the App. You can disable Location Services at any time.

4. WHAT ARE YOUR RIGHTS WITH RESPECT TO THE PROCESSING OF YOUR PERSONAL DATA?

4.1 You have several rights concerning the information we hold about you. We would like to inform you that you have the right to:

- obtain confirmation that we are processing your personal data and request a copy of the personal data we hold about you;

- ask that we update the personal data we hold about you, or correct such personal data that you think is incorrect or incomplete;
- ask that we delete personal data that we hold about you, or restrict the way in which we use such personal data if you believe that there is no (longer a) lawful ground for us to process it;
- withdraw consent to our processing of your personal data (to the extent such processing is based on consent);
- receive a copy of the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and to transmit such personal data to another party (to the extent the processing is based on consent or a contract);
- object to our processing of your personal data for which we use legitimate interest as a legal basis, in which case we will cease the processing unless we have compelling legitimate grounds for the processing.

4.2 In order to exercise any of your rights, you can send us a request, indicating the right you wish to exercise by e-mailing us at dataprivacy@ecuworldwide.com.

4.3 If you are unhappy with the way we have handled your personal data or any privacy query or request that you have raised with us, you have a right to complain to the Data Protection Authority (“DPA”) in your jurisdiction. If you would like to be directed to the appropriate DPA, please contact us.

5. **WHICH CATEGORIES OF PERSONAL DATA WILL BE PROCESSED?**

5.1 If you register for using the App, you will be asked to provide us with the following personal data:

- Name;
- Language;
- Job title and department;
- E-mail address; and
- Mobile number;

Before using the App, you will always have to login by entering your email and your password.

5.2 For the purposes mentioned above, we can also process the following personal data:

- electronic identification data (e.g. IP addresses, browser type, cookie identifiers,...);
- data about the use of the App (e.g. the products and services you order);
- data about how you interact with us (e.g. when you contact us) and other similar information;
- identification data (e.g. name, address (private/work), phone number (private / work), e-mail address (private / work), country of residence) of other individuals than users (e.g. other contact persons within your company, contact persons of shipping parties etc.)
- all other personal data which are communicated to us in the framework of the use of the App

5.3 We may obtain these data in the context of the use of the App. In particular, we may obtain these data because you give them to us or because they are generated by the system.

6. **WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?**

6.1 Employees and representatives of the Ecu Worldwide companies which are involved in the functioning of the App and/or the services provided on this App, and this on a strict need-to-know basis.

6.2 We also reserve the right to disclose your personal information as required by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator or any other legal process served on us.

7. WILL YOUR PERSONAL DATA BE TRANSFERRED TO COUNTRIES OUTSIDE THE EEA?

Whenever we share your personal data externally (i.e., outside of ING) with third parties in countries outside of the European Economic Area (EEA) we ensure the necessary safeguards are in place to protect it. In case of transfer to a country outside the European Economic Area whose local regime is considered as inadequate by the European Commission, ING relies upon, amongst others: • the conclusion or the execution of an agreement, a transaction or a third-party transaction in your favour; • Requirements based on applicable local laws and regulations. • EU Model clauses, when applicable, we use standardised contractual clauses in agreements with service providers to ensure personal data transferred outside of the European Economic Area complies with GDPR. • data transfer that are necessary for reasons of public interests; • your explicit consent; • the respect of international treaties. If you need any clarification about your personal data being shared with a company located in a third country outside of the EEA, please contact dataprivacy@ecuworldwide.com.

8. DO WE USE ANY COOKIES OR SIMILAR TECHNOLOGIES?

No cookies are used on the App.

9. HOW LONG WILL YOUR PERSONAL DATA BE RETAINED?

9.1 Your personal data will not be retained longer than necessary for the purposes described above.

9.2 Depending on the specific situation and the applicable national legislation, we may however retain your personal data for a longer period. This will in particular be the case if any of the following periods is longer : (i) as long as is necessary for our daily business; (ii) any retention period that is required by law; or (iii) the end of the period in which litigation or investigations might arise.

9.3 When your personal data is no longer necessary for a process or activity for which it was originally collected, we delete it, or bundle data at a certain abstraction level (aggregate), render it anonymous and dispose of it in accordance with the applicable laws and regulations.

10. ARE YOUR DATA SAFE AND SECURE?

10.1 The data of the APP are stored at ECU Worldwide's data centers which are highly secured. We employ strict technical and organizational (security) measures to protect the information in the App from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage both online and offline.

These measures include:

- training to relevant staff to ensure they are aware of our privacy obligations when handling personal data;
- administrative and technical controls to restrict access to personal data on a 'need to know' basis (roles and rights mechanisms, passwords);
- technological security measures (including fire walls, encryption and anti-virus software, monitoring of access, customer-specific controls, regular review of user accounts, regular back-ups etc.);
- incident management (strict procedures for incidents, bug fixing, personal data breaches etc.);
- physical security measures, such as staff security badges to access our premises.

- 10.2 Although we use appropriate security measures once we have received your personal data, the transmission of data - especially over the internet (including by e-mail) - is never completely secure. We endeavor to protect personal data, but we cannot guarantee the security of data transmitted to us or by us.

11. WILL WE MAKE USE OF AUTOMATED DECISION-MAKING?

- 11.1 Automated decisions are defined as decisions about individuals that are based solely on the automated processing of data and that produce legal effects that significantly affect the individuals involved.
- 11.2 As a rule, your personal data will not be used for automated decision-making. We do not base any decisions about you solely on automated processing of your personal data.

12. WHO CAN YOU CONTACT?

- 12.1 We hope that this Privacy Statement helps you understand, and feel more confident about, the way we process your data. If you have any further queries about this Privacy Statement and this APP in general, please contact dataprivacy@ecuworldwide.com.

13. CHANGES TO THIS PRIVACY STATEMENT

- 13.1 We may modify or amend this Privacy Statement from time to time. Any changes we may make to this Privacy Statement in the future will be posted on this page. To let you know when we make changes to this Privacy Statement, we will amend the revision date at the top of this page. The new modified or amended Privacy Statement will apply from that revision date. Please check back periodically to see changes and additions.