



Privacy Policy

A. PERSONAL DATA

GEODIS commits to take all the necessary measures to respect your privacy and protect data you are communicating, in order to keep them confidential. This policy describes how we collect, use, and share the information you provide to us when you access and use our websites, applications, products, events, services, or other offerings (the “Services”), and how you can control the use and disclosure of such data.

By utilizing our Services, you explicitly agree with the terms and conditions of this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should discontinue use of our Services.

What this Privacy Policy covers:

- Visiting our websites which display or link to this Privacy Policy;
- Visiting our offices and/or Warehouse Facilities;
- Receiving communications from GEODIS, including e-mails, texts, or fax;
- Registering for GEODIS events, including trade shows
- Using our applications or applications used for our Warehouse Management System, including Synapse, ConnectShip, MercuryGate, Manhattan and JDA¹.

This Privacy Policy does not apply to job applicants and candidates who apply for employment with us, or to employees and non-employee workers, whose personal information is subject to different privacy notices.

Types of Data Collected

You may be asked to provide us with certain information when accessing our Services. For example, you may voluntarily submit information to us that identifies you personally, including name, e-mail address, company name, address, phone number, and other information about yourself or your business (“Personal Data”). Personal Data can also include Navigational Information, where such information can directly or indirectly identify an individual. Navigational Information that is anonymized is not considered Personal Data. Navigational Information refers to information about your computer and your visits to our website and/or applications, such as your IP address, geographical location, browser type, length of visit, and pages viewed.

Sharing and transferring the Personal Data

The Personal Data that you may communicate to us are destined solely for use by persons authorized by GEODIS. However, we could be under obligation of communicating them to public authorities in order to comply with applicable laws and regulations.

GEODIS operates worldwide. Your Personal Data could thus be sent for storage in countries in which GEODIS and our affiliates operate, which you consent to by utilizing our Services. To revoke consent, please contact our Data Protection Officer (“DPO”), who can be reached at dpo@geodis.com. GEODIS agrees that these transfers shall occur in compliance with applicable regulations on the protection of personal data and in secure conditions to ensure the protection of your personal data.

Lawful basis for processing and Rights of persons

GEODIS has multiple lawful purposes for processing Personal Data, including: consent, a contractual basis, a legal obligation, and if GEODIS has a legitimate interest.

GEODIS individuals are entitled to access information concerning them and request its modification, rectification or deletion if the individual provided their data to GEODIS directly and not if one of the above lawful purposes applies at the following address:

7101 Executive Center Drive, Suite 333
Brentwood, TN 37027
dpo@geodis.com

B. COOKIES

Cookies are small text files containing letters and digits that are placed on your computer or access device. Cookies are stored when you visit a site which uses them, and can be used to track the pages that you visit on the site, allow you to resume navigation of the site on the page on which you last left it, or recall your preferences, including language preferences.

Cookies are very important to help us provide online services that are easier to use, to monitor the use of our website (<http://www.geodis.us>) and to improve the Services that we offer you.

In order to be able to browse our online website and use optimally the Services of GEODIS, you need to accept the installation of cookies on your computer. If you are opposed to the recording of cookies on your computer, you can set your browser so that it refuses some cookies or prohibits any deposit of cookies. However, if you choose to reject all cookies, your browsing of the website will be reduced and access to some functions of the GEODIS shall be limited.

C. HOW WE USE YOUR DATA

We use the Personal Data we collect as necessary to perform the Services on your behalf or on behalf of our Customers with whom you may have an account and for other legitimate and lawful business purposes. This may include:

- Establishing accounts to use the Services
- Sharing with our corporate parents, subsidiaries, other affiliated entities, and associated entities for the purposes described in this Privacy Policy
- Communicating with you in connection with services or as a result of a request
- Communicating promotional materials, such as surveys, newsletters, and other information
- Notifying you of changes to the Site
- Sharing with our service providers that perform certain business functions or services on behalf and with whom are bound by contractual obligations consistent with this Privacy Policy
- Evaluating and improving the Services
- To comply with a legal obligation, a court order, in order to exercise our legal claims, or to defend against legal claims
- To conduct aggregate analysis and develop business intelligence that helps us to enhance, operate, protect, make information decisions and report on the performance of our Services
- To prevent or investigate fraud (or for risk management purposes)
- To describe our Services to current and prospective business partners and to other third parties for other lawful purposes
- Maintaining a record of activities in connection with your use of the Site

We use the Personal Data we collect only in compliance with this Privacy Policy. We may use your Personal Data to:

- Improve your browsing experience by personalizing our website or other applications you may use;
- Send information or content to you which we think may be of interest to you by email, post, or other means, as well as marketing communications related to our business after receiving your express consent;
- Promote use of our Services to you and share promotional information content with you in accordance with your communication preferences;
- Send information to you regarding changes to our Privacy Policy;
- Meet legal requirements

We use the information collected through our applications and applications used for the Warehouse Management System to:

- To provide Services (which may include the detection, prevention, and resolution of security and technical issues;
- To respond to support requests.

We use your Navigational Information to:

- Operate and improve the websites and applications you may use
- Personalize your experiences

Users in the EU/EEA. If you are a visitor/customer located in the European Union (“EU”) or European Economic Area (“EEA”), all questions relative to the protection of Personal Data are handled by the Data Protection Officer (“DPO”), who can be reached at dpo@geodis.com. Our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it. GEODIS will collect Personal Data from you only where we have your consent to do so, where we need the Personal Data to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. If we ask you to provide Personal Data to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Data is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

California residents. GEODIS provides services to other businesses, and in doing so we may collect and process data on behalf of our business customers (“Customer Data”) that includes Personal Data about California residents; in doing so, GEODIS is a *service provider* under the CCPA. As a service provider, we will collect and process Personal Data on behalf of a particular customer in order to provide the services for which that customer has engaged us, in accordance with our contract with such customer. If you would like to exercise your rights under the CCPA with respect to your Personal Data that we hold as a service provider for a particular customer, you should contact that customer directly.

If you have a question or would like to submit a request related to the Personal Data (other than Customer Data) that we collect related to our business-to-business relationship with you or your company, please see the ***Access and Control of Your Data*** section below for information about how to submit such a request to us.

D. HOW WE PROTECT YOUR DATA

Information Security is a key aspect of GEODIS’ overall IT solution. Data security controls and measures are in place throughout the enterprise and integrated in processes and procedures used in everyday operations. Information Security policies and procedures are written, reviewed, and updated at least annually and are based on the ISO 27002:2013 standard “Code of Practice for Information Security Management”. These policies govern and protect the Information Security “CIA Triad” of Confidentiality, Integrity, and Availability of GEODIS data and systems.

Several methodologies are used to govern and protect access to GEODIS’ system resources and data. Access control lists are used to protect resources such as network, data, and application access.

GEODIS’ internal network resources are protected based on a layered approach and monitoring of the controls is implemented. Critical system infrastructure resources and cyber security control logs are sent to a Security Event and Incident Management (SEIM) solution that is monitored 24x7x365 by an external third party.

GEODIS incorporates an enterprise wide anti-virus solution. This solution is managed and monitored by the GEODIS Information Security team from a central management console. Real time reports are generated identifying suspected malicious behavior or infections, these reports are supplied to the Information Security team for mitigation as needed.

GEODIS utilizes both internal audit and third-party audits throughout the year to ensure policies and cyber security controls are working effectively. The Information Security team performs internal audits of key aspects of the access control and data governance policies.

E. RETENTION OF YOUR DATA

How long we keep information we collect depends on the type of information received and the legal/regulatory basis for having such data. As applicable, after such time, GEODIS will either delete or anonymize your information, or if this is not possible, then we will securely store your information and isolate it from any further use until deletion is possible.

GEODIS will retain Personal Data that you provide to us where we have an ongoing legitimate business need to do so. When we have no ongoing legitimate business need to process your Personal Data, we securely delete the information or anonymize it, or if that is not possible, then we will securely store your Personal Data as part of GEODIS's Data Retention Policy. We will delete this information from the servers at an earlier date if you so request, as described in the "To Unsubscribe to our Communications" below.

If you have elected to receive marketing communications from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our content, products, or services, such as when you last opened an email from us. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

E. ACCESS AND CONTROL OF YOUR DATA

If GEODIS does not have a lawful business right, you have the following data protection rights:

- You can request access, correction, updates or deletion of your Personal Data;
- You can object to processing of your Personal Data, ask us to restrict processing of your Personal Data or request portability of your Personal Data
- If we have collected and processed your Personal Data with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Data in reliance on lawful processing grounds other than consent
- You have the right to complain to a data protection authority about our collection and use of your Personal Data.

To exercise any of these rights, please contact us at dpo@geodis.com or by mail to Geodis Logistics LLC, 7101 Executive Center Drive, Suite 333, Brentwood, TN 37027, Attention: DPO. We will respond to your request to change, correct, or delete your information within a reasonable timeframe and notify you of the action we have taken.

To Unsubscribe From Our Communications

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails, updating your communication preferences, or by sending us email us at dpo@geodis.com. or by mail to Geodis Logistics LLC, 7101 Executive Center Drive, Suite 333, Brentwood, TN 37027, Attention: DPO.

F. INTERNATIONAL TRANSFER OF INFORMATION

To facilitate our global operations, we may transfer information internationally and allow access to that information from countries in which the GEODIS affiliated entities have operations for the purposes described in this policy. GEODIS would transfer information internationally:

1. As necessary for legitimate and lawful business purposes, including:

- Establishing an accounts to use our services
- Communicating with you in connection with services or as a result of a request
- Communicating promotional materials, such as surveys, newsletters, and other information
- Notifying you of changes to the Site
- Maintaining a record activities in connection with your use of the Site

2. Sharing with our corporate parents, subsidiaries, other affiliated entities, and associated entities for the purposes described in this Privacy Policy;

3. Sharing with service providers that perform certain business functions or services on our behalf and are bound by contractual obligations consistent with this Privacy Policy;

4. Evaluating and improving our services and the Site;

5. To comply with a legal obligation, a court order, or in order to exercise our legal claims, or to defend against legal claims;

6. To conduct aggregate analysis and develop business intelligence that helps us to enhance; operate, protect, make informed decisions, and report on the performance of our Services; and

7. To prevent or investigate fraud (or for risk management purposes).

This Privacy Policy shall apply even if we transfer Personal Data to other countries. We have taken appropriate safeguards to require that your Personal Data will remain protected. When we share information about you within and among GEODIS's affiliated entities, we make use of standard contractual data protection clauses, which have been approved by the European Commission, and we rely on the EU-U.S. and Swiss-U.S. Privacy Shield Framework to safeguard the transfer of information we collect from the European Economic Area.