

PRIVACY POLICY AS OF 10/10/24

The limited liability company under Luxembourg law, **KIEM TRANSPORTS LUX SARL** (hereinafter "**KIEM TRANSPORTS LUX**" or the "Company"), registered in the Luxembourg Trade and Companies Register under number B183740, with its registered office at 59, rue Jean-Baptiste Gillardin, L-4735 Pétange, in its capacity as data controller (hereinafter, the "**Data Controller**") within the meaning of European Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data (hereinafter the "**GDPR**"), is committed to paying particular attention to the protection of its clients' personal data. The Company considers that respecting its clients' privacy and using their personal data with caution are essential elements.

To this end, this privacy policy applies to KIEM TRANSPORTS LUX clients, its suppliers, the recipients of deliveries made by KIEM TRANSPORTS LUX, anyone contacting KIEM TRANSPORTS LUX through its website www.kiemtransportslux.lu, using social media, or by email. It provides the Company's clients and all concerned parties with the most comprehensive and clear information regarding the processing of their personal information within the Company's business activities and the **GDPR**.

In accordance with regulatory requirements, this privacy policy sets out:

- The nature of the personal information processed;
- The purposes and methods of processing personal information;
- The identity and contact details of the data controller;
- Third parties involved in processing activities;
- The retention period for personal information;
- Security measures adopted to protect personal information;
- The rights of the individuals concerned with regard to privacy protection.

I. Key Definitions

- "**Data Controller**": Refers to the person who, alone or jointly with others, determines the purposes and means by which personal data is or will be processed.
For the purposes of this Privacy Policy, KIEM TRANSPORTS LUX is the Data Controller of personal data submitted by its clients.
- "**Data Subject**": Refers to any natural person, identified or identifiable, affected by personal data within the scope of services provided by KIEM TRANSPORTS LUX (e.g., clients).
- "**Personal Data**": Refers to all data that directly or indirectly identifies individuals (e.g., names, first names, identifiers, phone numbers, etc.).
- "**Usage Data**": Refers to data collected automatically and generated by the use of services.
- "**Processor**": Refers to any natural or legal person acting on behalf of and under the instructions of the Data Controller to provide a specified service.
- "**Cookies**": Refers to small files stored on the user's computer hard drive or in the browser memory when KIEM TRANSPORTS LUX SARL services are used.

- **"Data Managers"**: Refers to, among others, postal service operators, distribution centers, warehouses, IT service providers, customer support service providers, or payment service providers.

II. Purposes of Data Processing

Personal data is automatically collected by the Company's website or received through various sources such as forms, phone calls, emails, applications, or any other means of communication.

When ordering transportation services or other services provided by KIEM TRANSPORTS LUX, the concerned individuals, particularly clients, may be asked to provide personal data, which may include (but is not limited to):

- Identification information such as first and last name, date, and place of birth;
- Contact details such as email, phone number, address, postal code, city, country of residence;
- Professional information, such as the employer or the country where the user operates;
- Information related to shipments and services (tracking numbers, delivery addresses, location data, packaging type, customs information, etc.);
- Financial information (bank details, payment status, billing information, etc.);
- Purchased products or requested services;
- Information on the user's professional experience (CV, cover letter);
- Personal data contained in cookies;
- Any other type of personal data provided in connection with the services rendered.

In general, the Company processes the personal data of the concerned parties only when necessary to execute a contract concluded with the Company, to comply with a legal obligation to which the Company is subject, or when processing is necessary to protect the vital interests of the concerned person or others. Processing based on the Company's legitimate interest can only occur if this interest is not overridden by the rights of the concerned parties. In such cases, consent will be requested.

Furthermore, the Company processes personal data in various formats for the purpose of preparing and executing service agreements concluded, notably with its clients, and for commercial purposes:

• Usage Data and Cookies

When users of the Company's website browse the site or exchange information with the Company online, data is exchanged between the users' computers and the Company's website (using text files known as "cookies").

The Company's website temporarily collects non-sensitive browsing data in compliance with applicable laws through automated means to enable and improve user navigation (e.g., IP address, date/time and duration of the visit, URL, pages viewed on the site, device used, and other information).

User activity on the website is also tracked through cookies, which collect and store certain data.

Users have the option to change their browser settings to refuse the collection of data through cookies. Otherwise, users accept the collection of their data in this manner.

The data collected in this way may be processed anonymously for statistical purposes.

• **Orders**

In the context of orders for transportation services to be carried out by the Company, customers must provide their personal data to complete their orders and ensure compliance with contractual obligations. This personal data will, where applicable, allow customer service to assist customers who have submitted inquiries or questions related to their orders.

Order-related data will be stored by the Data Controller as long as necessary to ensure compliance with contractual and legal obligations.

• **Legal Obligations**

The personal data collected will enable the Data Controller to meet all legal obligations, as well as to respond to requests and other requirements from public authorities.

• **Newsletter and Promotional Offers**

Personal data may be used, in accordance with applicable laws, to contact the relevant individuals, notably clients, upon their request, or, for example, through newsletters, marketing, or commercial sales operations.

Regarding commercial messages that may be sent to the relevant individuals, notably clients, without their consent being legally required, they may at any time opt out of receiving all or part of these communications by following the unsubscribe link or the instructions provided in the emails, or by directly contacting the Data Controller.

III. Retention of Personal Data

The Data Controller will retain the personal data of the data subjects, notably clients, only for the time necessary to provide them with the required services, to fulfill its legal or tax obligations, or for the minimum duration required by law.

The Data Controller also reserves the right to retain usage data for internal analysis purposes, as well as to enhance security or improve the functionality of its service.

At the end of the retention period, the Company will delete or anonymize personal data, unless it is required to retain certain data for other purposes, in which case it must have a legal basis for doing so. For example, under customs regulations, the Company is obligated to retain/store all or part of the collected personal data. This personal data will then only be retained to comply with our legal obligations.

IV. Disclosure of Personal Data

The Data Controller reserves the right to disclose the collected personal data to the following recipients:

- The fiduciary within the scope of payroll and personnel management as well as accounting;
- The software provider for managing transportation orders.

The Data Controller may also disclose personal information to comply with legal obligations, protect its rights, or protect the rights of affiliates or third parties.

V. Data Sharing and Transfer

The Data Controller may transfer clients' personal information to key third-party providers acting as data processors, for commercial operations and to fulfill its contractual obligations.

In this context, the Data Controller will ensure, to the extent possible, that all processors act diligently to protect personal information and that they do not use such information for purposes other than those contractually agreed upon between the parties.

Clients can request an updated list of processors involved in handling personal information related to the site's activities by sending an email to compta@kiemtransportslux.lu.

To fulfill its obligations, the Data Controller may also engage a subcontractor, who will have access to the client's personal data solely to perform the specific tasks assigned to them. The subcontractor is required not to disclose or use the data for other purposes throughout the duration of their involvement.

VI. Security Measures

Users' personal data are processed by the Data Controller using computerized, automated, and electronic tools and, in a limited number of cases, using paper-based methods.

In accordance with the GDPR, specific security measures have been implemented to prevent data loss, illegal or inappropriate use of data, and unauthorized access.

To this end, access to the data has been restricted to authorized employees of the Data Controller, as well as to authorized employees of third-party providers acting as processors on behalf of the Data Controller.

This access is further limited to the minimum necessary to perform professional tasks and is subject to confidentiality obligations.

Although the Data Controller strives to use all deemed necessary means to protect personal data, absolute security cannot be guaranteed.

The data subject therefore accepts the risks associated with providing personal information over the Internet and will not hold the website responsible for any security breach unless such breach results from gross negligence or intentional misconduct by the Data Controller.

VII. Rights of the Concerned Parties

Data subjects have the right to request confirmation on whether or not the Data Controller holds personal data concerning them

If this is the case, under the GDPR, clients also have the right to:

- Be informed about the collection and use of their personal data;
- Access their personal data for free;

- Rectify inaccurate personal data;
- Request the deletion of personal data;
- Withdraw consent for data processing at any time;
- File complaints with the competent data protection authority.

Data subjects can contact the Data Controller for any questions, complaints, or to exercise their privacy rights via the email address compta@kiemtransportslux.lu.

Before responding to these requests, the data subjects will need to provide proof of their identity; otherwise, the requests cannot be fulfilled.

Data subjects also have the option to file a complaint with the Luxembourg National Commission for Data Protection (Commission Nationale pour la Protection des Données).

By using the services provided by the Data Controller, data subjects acknowledge that they have been informed of this Privacy Policy, understand it, and accept its content.

VIII. Changes to This Privacy Policy

The Company reserves the right to revise, change, modify, update, supplement, add, or remove provisions from this privacy policy at any time.

Any future changes will be published on the Company's website and, where applicable, notified to clients via email. Clients are encouraged to regularly check this privacy policy for updates or changes.