

Personal Data Privacy Notice

General Data Protection Regulation (GDPR) Compliance

GAT Logistics Solutions Group (GATLSG)'s Personal Data Privacy Notice and General Data ProtectionRegulation (GDPR) Compliance

GATLSG is committed to protecting the security and privacy of your personal data. As such, GATLSG processes personal data in accordance with applicable laws and regulations on data protection. The purpose of this notice is to inform you about your privacy rights and our obligations to you under the General Data Protection Regulation (GDPR).

1. Processing personal data related to the use of our website and online platforms

GATLSG may process the following personal data about you:

- Personal data that you actively and voluntarily provide when completing the contact form for your inquiries. This information may include name, e-mail address, telephone number, and any personal information you submit in the comment section; and
- Information that is automatically sent to us by your web browser or device, such as your IP-address, device type, browser type, referring site, sites accessed during your visit, the date and time of each visitor request.

Our purpose for processing your personal data

- To provide customer service and respond to your inquiries;
- To verify your identity; and
- As reasonably necessary to enforce the applicable terms of use, to establish or preserve a legal claim or defense, to prevent fraud or other illegal activities, including cyberattacks on GATLSG's website.

Legal basis for processing your personal data

- To exercise our rights and perform our obligations in connection with any contract we execute with you (Article 6 (1) (b) General Data Protection Regulation);
- To comply with legal obligations (Article 6 (1) (c) General Data Protection Regulation); and/or
- In the furtherance of a legitimate interest (Article 6 (1) (f) General Data Protection Regulation). Generally, the legitimate interest pursued by GATLSG to ensure efficient performance and management in regards to your customer service requests and business transactions.

Links to other websites

This Privacy Notice applies only to our GATLSG websites and not to other websites or applications operated by third parties. We may provide links to other websites and applications which we believe may be of interest to you. GATLSG is not responsible for the privacy practices of such other websites or applications.

GATLSG does not use Cookies on its websites.

2. Processing personal data of GATLSG's business partners:

In the furtherance of GATLSG's business relationship, GATLSG may process the followingtype of personal data of current and future contact persons from our customers, suppliers, vendors and partners ("Business Partners"):

- Contact information, including but not limited to work addresses, telephone numbers, work cellular phone numbers, work fax numbers, and work email addresses;
- Data necessary for processing payments and fraud prevention, which may include credit/debit card numbers, bank account information, security code numbers and other related billing information;
- Further information necessarily processed in a project or contractual relationship with GATLSG or voluntarily provided by you, such as personal data relating to orders placed, payments made, and requests;
- Personal data collected from publicly available resources, integrity data bases and credit agencies; and
- If legally required for trade and export regulation compliance screenings: date of birth, identification numbers, identity cards and information about relevant and significant litigation or other legal proceedings against Business Partners.

Our purpose for processing Business Partner's personal data

- To communicate with Business Partners about products, services, and projects of GATLSG or Business Partners including but not limited to responding to requests or providing information about purchases or services;
- To enter into and perform any contractual obligations with Business Partners;
- To facilitate transactions and orders of products or services, process payments, perform necessary accounting, audits, bill and collect debts, arrange shipments and deliveries, facilitate repairs, and provide support services;
- To conduct customer surveys, marketing campaigns, market analysis, or other promotional activities or events;
- To maintain the security of our products, services and websites;
- To prevent and detect security threats, fraud and/or other criminal or malicious activities;
- To ensure compliance with legal obligations (such as record keeping obligations), export control and customs compliance, Business Partner compliance screening obligations including Know Your Customer forms, or meet industry standards; and
- To solve disputes, enforce our contractual agreements, and to establish, exercise, or defend legal claims.

Legal basis for processing our Business Partner's personal data

The legal basis for GATLSG processing data about you is that such processing is necessary for the purposes of:

- To exercise our rights and perform our obligations in connection with any contract we execute with you (Article 6 (1) (b) General Data Protection Regulation),
- To Comply with our legal obligations (Article 6 (1) (c) General Data Protection Regulation), and/or
- In the furtherance of GATLSG's legitimate interests (Article 6 (1) (f) General Data Protection Regulation) including but not limited to ensuring efficient performance or management of our business relationship with you.
- In some cases, we may ask if you consent to the relevant use of your personal data.

Transfer of your personal data

GATLSG may transfer your personal data to:

- Generally, we do not disclose personal data to third parties without your consent. Despite this, we may be required to disclose data on you to third parties in individual situations.
- GATLSG affiliates or subsidiaries in connection with your purchase orders, services orders, or other business requests;
- To third parties that provide information technology services; and
- To courts, arbitration bodies, law enforcement authorities, regulators or attorneys if necessary to comply with the law, or in regards to filing or defending our rights or legal claims.

Data Security

GATLSG abides by good data management practices, a high duty of care and strict data security measures to protect your personal data.

GATLSG and any service providers involved in the processing of personal data take the appropriate technical and organizational measures to protect personal data against unauthorized access and accidental or unlawful destruction, alteration, disclosure, transfer or all other unlawful forms of processing.

Data Retention

GATLSG erases your personal data if the retention of that personal data is no longer

necessary for the purposes for which they were collected or otherwise processed. In some instances, we retain personal data for the following purposes:

- Personal data is stored for the duration of the employment or service relationship with a customer or Business Partner;
- To the extent required to comply with legal obligations including but not limited to any retention obligations under tax, commercial, and employment laws;
- To ensure our ability to comply with court orders or other legal obligations, that may exist in a given jurisdiction.
- The data retention period can vary by data category. GATLSG may have a statutory obligation to retain certain data for a specific time period. Due to this, the exact time periods and procedures for data destruction vary by data category.

Withdraw Consent

You have the right to withdraw consent, **at any time**, in cases where you have actively given consent to process certain personal data. Please be aware that withdrawing consent does not preclude GATLSG from processing your personal data, where there is another legal ground or legitimate purpose to continue processing that data.

Your Rights

The GDPR affords the following rights to the Citizens of the European Union:

- To request and obtain confirmation from GATLSG as to whether your personal data is being processed or not;
- To obtain from GATLSG a copy of all personal data collected;
- To rectify any personal data processed by GATLSG if it contains errors;
- Data portability concerning personal data, which you actively provided;
- To obtain from GATLSG erasure of your personal data or have it redacted it to the point that it can no longer be used to identify you;
- To request restrictions regarding the processing of personal data including ceasing to collect and process your data, where applicable; and
- Object, on grounds relating to your particular situation, to processing of personal data concerning you.

Exercising your Data Privacy Rights and Contact Information

GATLSG is committed to protecting your personal data. We will always use our best efforts to address any requests, complaints, or questions you may bring to our attention.

Any data privacy related questions, comments, concerns, complaints, or in the event you wish to exercise any of your data privacy related rights can be sent to: dataprivacy@gatelesis.com

You also have the right to address any personal data privacy concerns by contacting your National Data Protection Authorities.

A list and contact information of local data protection authorities can be found online at: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080

Changes to this Privacy Notice

This Privacy Notice was last updated on May 24, 2018.

We may update the Privacy Notice due to changes in our data processing or applicable legislation. An updated Privacy Notice is available on our website.