

ANNEX 1. DATA PROCESSING ACTIVITIES COVERED BY THE GENERAL TERMS AND CONDITIONS

Data processing activities may differ depending on the contract to which they relate. The table below summarises the data processing activities carried out by the Service Provider, broken down by contract type.

Data processing activity	Long-term contract	Dispatch at GLS ParcelShops	Service ordered on the https://ecsomag.hu website
DATA PROCESSING RELATED TO PARCEL DELIVERY			
Data processing related to the home delivery service (postal service)	x	x	x
Different data processing activities related to additional services	x	x ¹	x ²
OTHER DATA PROCESSING ACTIVITIES RELATED TO CONTRACTS CONCLUDED OR TO BE CONCLUDED WITH CLIENTS/SENDERS			
Data processing related to contacting potential customers by phone ("cold calls")	x	not applicable	not applicable
Data processing relating to customer visits	x	not applicable	not applicable
Quotation, contract	x	not applicable	not applicable
Data processing relating to contracts signed with sole traders, smallholders	x	not applicable	not applicable
Invoicing	x	not applicable	not applicable
Managing COD collections	x	x	x
Debt management	x	not applicable	not applicable
Recipient information printed on the parcel label	x	x	x
Data of contact persons related to contracts	x	not applicable	not applicable
DATA PROCESSING RELATED TO CUSTOMER SERVICE			
Data processing related to e-mails received at the e-mail addresses info@glshungary.com, jofogas@glshungary.com	x	x	x
Complaint management	x	x	x
Managing COD	x	x	x
New customer start package	x	not applicable	not applicable
Phone calls	x	x	x
DATA PROCESSING RELATED TO FILING DAMAGE CLAIMS, DAMAGE CLAIM ADMINISTRATION			
Data processing related to filing damage claims	x	x	x
Data processing related to payments relating to legitimate damage claims	x	x	x
Data processing related to lost, unfound parcels	x	x	x
Data processing related to ADR parcels	x	not applicable ³	not applicable ⁴

¹ Only for additional services that the sender is entitled to order under the General Terms and Conditions.

² Only for additional services that the sender is entitled to order under the General Terms and Conditions.

³ As this additional service cannot be ordered under the General Terms and Conditions the Service Provider may only process personal data in this context if the sender has dispatched a product that falls within the scope of the ADR in breach of the provisions of the GTC.

⁴ As this additional service cannot be ordered under the General Terms and Conditions, the Service Provider may only process personal data in this context if the sender has dispatched a product that falls within the scope of the ADR in breach of the provisions of the GTC.

DATA PROCESSING BY PARCELSHOPS			
Parcel dispatch at GLS ParcelShops	not applicable	x	not applicable
Parcel collection (parcel delivery) at GLS ParcelShop	not applicable	x	not applicable
Filing a complaint at the ParcelShop	not applicable	x	not applicable
DATA PROCESSING APPLICABLE TO SERVICES ORDERED VIA THE https://ecsomag.hu INTERFACE.			
Registration on the https://ecsomag.hu website	not applicable	not applicable	x
One-off parcel delivery ordered on the https://ecsomag.hu website	not applicable	not applicable	x
Invoicing for services ordered on the https://ecsomag.hu website	not applicable	not applicable	x
Data processing related to e-mails received at the ecsomag@glshungary.com e-mail address	not applicable	not applicable	x

1. DATA PROCESSING RELATED TO DELIVERY OF PARCELS

1.1. DATA PROCESSING RELATED TO DOOR-TO-DOOR DELIVERY (POSTAL SERVICE)

Purpose of the data processing: Performing the contract on postal services (delivering parcels) and the proof of delivery

Legal basis of data processing: Performance of a Contract

Scope of personal data processed:

Related to the Sender (personal data collected from the data subject or his /her representative)
Name, Pickup address, Email address, Telephone number, Signature

Related to the Recipient

- i. personal data collected from the Sender: Name, Delivery address, Email address, Telephone number,

These data are provided by the Sender based on the legal relationship (contract) between the Sender and the Recipient. The email address and the telephone number is not compulsory in the event of a basic door-to-door delivery service.

- ii. personal data collected from the Recipient (data subject): Signature

Related to the Other authorized recipient (in the event the parcel is not delivered directly to the Recipient): Signature (which is collected from the data subject)

Duration of data storage: The end of the year following the dispatch of the parcel

1.2. DIFFERENCES BETWEEN THE DATA PROCESSING RELATED TO THE NORMAL AND THE VALUE-ADDED SERVICES

This Point contains those personal data which (1) shall be provided to the Controller contrary to the door-to-door delivery,

(2) shall be provided in addition to the personal data processed for door-to-door delivery or (3) shall not be provided due to the nature of the service.

Personal data or rules related to the purpose of the data processing, legal basis of data processing and duration of data storage not mentioned herein shall be processed and applied in compliance with the rules applicable to door-to-door delivery.

Data processing related to the SMSService, ContactService, PreadviceService, FlexDeliveryService

Scope of personal data processed: Telephone number of the Recipient

Collecting (processing) telephone number is necessary for the performance of the contract.

Data processing related to a ShopDeliveryService, FlexDeliveryService and the Delivery to a GSL ParcelLocker

Scope of personal data processed:

Personal data collected from the Sender: Telephone number and email address of the Recipient

Personal data collected from the data subject: (Recipient or Other authorized recipient): the number of the official certificate suitable for the proof of identity (only in the event of a delivery to a ParcelShop)

Collecting (processing) telephone number and email address is necessary for the performance of the contract.

Legal basis of data processing: Related to the official certificate the legitimate interest of the Controller, related to the other personal data mentioned above the Performance of the Contract

Data processing related to the AddresseeOnlyService

Scope of personal data processed: the number of the Recipient's official certificate suitable for the proof of identity

Legal basis of data processing: Legitimate interest of the Controller

Data processing related to the Contactless Delivery Service:

Scope of data processed: the same as for the Home Delivery Service, except that the signature of the recipient/receiver is not processed.
Duration of data storage: last day of the fifth calendar year following the date of dispatch of the postal consignment

2. OTHER DATA PROCESSING ACTIVITIES RELATED TO CONCLUDING OR ENTERING INTO CONTRACTS WITH CLIENTS/SENDERS

2.1. DATA PROCESSING RELATED TO CONTACTING POTENTIAL CUSTOMERS BY PHONE ("COLD CALLS")

Purpose of the data processing: Contacting potential customers, making quotations
Legal basis of data processing: Legitimate interest of the Controller
Scope of personal data processed: Contact person's name, phone number, e-mail address, position, customary behaviours relating to parcel sending.
Duration of data storage: Until the purpose of data processing is achieved. In the case of customers where a quote is made and then a contract is signed, the data is stored for the duration specified for this data processing purpose.

2.2. DATA PROCESSING RELATED TO CUSTOMER VISITS

Purpose of the data processing: Visiting potential customers with the purpose of making a quotation or concluding a contract.
Legal basis of data processing: Legitimate interest of the Controller
Scope of personal data processed: Contact person's name, phone number, e-mail address, position, customary behaviours relating to parcel sending, place, date of visit to customer, names, phone number and e-mail address of participants.
Duration of data storage: Until the purpose of data processing is achieved. In the case of customers where a quote is made and then a contract is signed, the data is stored for the duration specified for this data processing purpose.

2.3. QUOTATION, CONTRACT

Purpose of data processing: signing and performing the contract for the provision of parcel logistical services.
Legal basis of data processing: Performance of a Contract.
Providing the personal data is a prerequisite of the contract signed with GLS and is mandatory.
Scope of personal data processed: Client's (Sender's) name, Client's (Sender's) website

address, name of person authorized to act on behalf of the Client (Sender); Client's (Sender's) bank account number, Contact person's name, e-mail address, phone number, Parcel pick-up address.
Duration of data storage: 5 years from termination of contract.

2.4. DATA PROCESSING RELATING TO CONTRACTS SIGNED WITH SOLE TRADERS, SMALLHOLDERS

Purpose of data processing: signing and performing the contract for the provision of parcel logistical services.
Legal basis of data processing: Performance of a Contract.
Providing the personal data is a prerequisite of the contract signed with GLS and is mandatory.
Scope of personal data processed: Client's name, mother's name, home address, personal identification data, place and date of birth.
Duration of data storage: 5 years from termination of contract.

2.5. INVOICING

Purpose of data processing: invoicing the fee payable for the service.
Legal basis of data processing: Compliance with legal obligation (The legal obligation is based on Section 169(2) of the Accounting Act).
Scope of personal data processed: Client's (Buyer's) name, address, Recipient's name, address, phone number, e-mail address.
Duration of data storage: Based on Section 169 of the Accounting Act, 8 years.

2.6. MANAGING COD

Purpose of data processing: collecting and settling COD.
Legal basis of data processing: Performance of a Contract
Indicating the personal data is not a prerequisite to the contact signed with GLS, but if the customer wishes to order this service, indicating the data is a condition of its performance. If it is not indicated, the service cannot be performed, therefore indicating it is mandatory.
Scope of personal data processed: Contact person's name, e-mail address, Recipient's name, e-mail address, address, bank account number, position, phone number.
Duration of data storage: The end of the year following the dispatch of the parcel

2.7. DEBT COLLECTION

Purpose of data processing: managing and collecting debt
Legal basis of data processing: Performance of a Contract

Scope of personal data processed: Buyer's Name, address, mother's name, place and date of birth, phone number, e-mail address.

Duration of data storage: 5 years following termination of contract or collection of debt.

Based on the General Business Conditions, these personal data are transmitted to the Companies specialized in debt collection defined in Annex 3.

2.8. RECIPIENT'S PERSONAL DATA PRINTED ON THE LABEL

Purpose of data processing: Perform postal services (delivery)

Legal basis of data processing: Performance of a Contract

Scope of personal data processed: Recipient's name, delivery address, Recipient's phone number

Duration of data storage: These personal data are provided to the data subject after delivery.

2.9. CONTACT PERSONS RELATED TO THE CONTRACTS

Purpose of data processing: Cooperation in order to perform the postal service contract

Legal basis of data processing: Legitimate interest of the Controller

Scope of personal data processed: Contact person's name, phone number, email address

Duration of data storage: During the term of the contract to the end of the position of contact, otherwise 5 years following the termination of the contract

3. DATA PROCESSING RELATED TO CUSTOMER SERVICE

3.1. DATA PROCESSING RELATED TO E-MAILS RECEIVED AT THE E-MAIL ADDRESSES INFO@GLS-HUNGARY.COM, JOFOGAS@GLS-HUNGARY.COM

Purpose of data processing: communication with the customer, complaint management

Legal basis of data processing: Compliance with legal obligation (The legal obligation is based on Section 17/A-17/C. of Consumer Protection Act and on Section 57 of Postal Act)

Scope of personal data processed: Recipient's name, e-mail address, Delivery address, phone number, Sender's name, address, phone number, e-mail address, Other authorized Recipient's name, telephone number, email address, Pickup address, The number of the official certificate suitable for the proof of identity, bank account number

Duration of data storage: 5 years

3.2. COMPLAINT MANAGEMENT

Purpose of data processing: complaint management, complaint approval, parcel identification

Legal basis of data processing: Compliance with legal obligation (The legal obligation is based on Section 17/A-17/C. of Consumer Protection Act and on Section 57 of Postal Act)

Scope of personal data processed: Recipient's name, e-mail address, Delivery address, phone number, Sender's name, address, phone number, e-mail address, Other authorized Recipient's name, telephone number, email address, Pickup address, The number of the official certificate suitable for the proof of identity, bank account number

Duration of data storage: 3 years after the complaint has been filed

3.3. MANAGING COD

Purpose of the data processing: Managing (modifying) inquiries relating to COD received at the e-mail address beszedes@glshungary.com

Legal basis of data processing: Performance of a Contract

Indicating the personal data is not a prerequisite to the contact signed with GLS, but if the Client wishes to order this service, indicating the data is a condition of its performance. If it is not indicated, the service cannot be performed, therefore indicating it is mandatory.

Scope of personal data processed: Recipient's name, Recipient's e-mail address, home address, bank account number, position, phone number.

Duration of data storage: The end of the year following the dispatch of the parcel

3.4. NEW CLIENT START PACKAGE

Purpose of data processing: Performance of the contract on parcel logistics

Legal basis of data processing: Performance of a Contract

Indicating the personal data is not a prerequisite to the contact signed with GLS, but if the Client wishes to order this service, indicating the data is a condition of its performance. If it is not indicated, the service cannot be performed, therefore indicating it is mandatory.

Scope of personal data processed: Client's name, address, phone number

Duration of data storage: 5 years following the termination of the contract

3.5. PHONE CALLS

Purpose of data processing: providing information, complaint management

Legal basis of data processing: Compliance with legal obligation (The legal obligation is based on

Section 17/A-17/C. of Consumer Protection Act and on Section 57 of Postal Act)

Scope of personal data processed: voice of the data subject;

Duration of data storage: 5 years

4. DATA PROCESSING RELATED TO FILING DAMAGE CLAIMS, DAMAGE CLAIM ADMINISTRATION

4.1. DATA PROCESSING RELATED TO FILING DAMAGE CLAIMS

Purpose of data processing: complaint management, complaint approval which could be filled in various ways including complaint received at the e-mail address qualitygroup@glshungary.com

Legal basis of data processing: Compliance with legal obligation (The legal obligation is based on Section 57 of Postal Act)

Scope of personal data processed: Recipient's name, phone number, e-mail address, home address, Sender's name, phone number, e-mail address, home address, Other authorized Recipient's name, phone number, e-mail address, home address, personal identity card number, bank account number

Duration of data storage: The end of the year following the dispatch of the parcel

4.2. DATA PROCESSING RELATED TO PAYMENTS RELATED TO DAMAGE CLAIMS ACCEPTED BY THE CONTROLLER

Purpose of data processing: complaint management, complaint approval

Legal basis of data processing: Compliance with legal obligation (The legal obligation is based on Section 169(2) of the Accounting Act)

Scope of personal data processed: Statements, invoices

Duration of data storage: 8 years

4.3. DATA PROCESSING RELATED TO LOST, UNFOUND PARCELS

Purpose of data processing: parcel identification, managing claims received at the e-mail address lossp@glshungary.com

Legal basis of data processing: Compliance with legal obligation

Scope of personal data processed: recipient's name, phone number, e-mail address, home address, Sender's name, phone number, e-mail address, home address, Other authorized Recipient's name, phone number, e-mail address, home address

Duration of data storage: The end of the year following the dispatch of the parcel

4.4. DATA PROCESSING RELATED TO ADR PARCELS

Purpose of the data processing: Certification of being compliant with ADR regulations

Legal basis of data processing: Compliance with legal obligation (The legal obligation is based on Point 1.3.2.4. of the Government Decree 178/2017 (VII. 5.) (ADR Regulation) based on the Decree 61/2013. (X. 17.) NFM of the National Development Ministry on the domestic application of Annexes A and B to the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) which has been modified by the Decree 20/2019. (VIII.1.) ITM)

Scope of personal data processed: name of car driver (and other persons related to ADR parcels), his or her mother's name, place and date of birth, home address, e-mail address, position

Duration of data storage: 5 years

5. DATA PROCESSING RELATED TO THE PARCEL SHOP ACTIVITY

5.1. DISPATCHING PARCELS AT THE PARCEL SHOP

Purpose of the data processing: Performing the contract on postal services (delivering parcels) concluded with the Client and the proof of delivery

Legal basis of data processing: Performance of a Contract

Scope of personal data processed:

Related to the Sender (personal data collected from the data subject or his /her representative) Name, Pickup address, Email address, Telephone number, Signature

Related to the Recipient (personal data collected from the Sender): Name, Delivery address, Email address, Telephone number,

Duration of data storage: The end of the year following the dispatch of the parcel

5.2. DELIVERING PARCELS AT THE PARCEL SHOP

Purpose of the data processing: Performing the contract on postal services (delivering parcels) concluded with the Client and the proof of delivery

Legal basis of data processing: Performance of a Contract

Scope of personal data processed:

Related to the Sender (personal data collected from the data subject or his /her representative) Name, Pickup address, Email address, Telephone number, Signature

Related to the Recipient

- personal data collected from the Sender: Name, Delivery address, Email address, Telephone number,
- These data are provided by the Sender based on the legal relationship (contract) between the Sender and the Recipient.

- personal data collected from the Recipient (data subject): Signature

Related to the other authorized recipient (in the event the parcel is not delivered directly to the Recipient): Signature (which is collected from the data subject)

Duration of data storage: The end of the year following the dispatch of the parcel

5.3. FILLING COMPLAINT AT THE PARCEL SHOP

Purpose of data processing: complaint management

Legal basis of data processing: Compliance with legal obligation (The legal obligation is based on Section 17/A-17/C. of Consumer Protection Act and on Section 57 of Postal Act)

Scope of personal data processed: Recipient's name, e-mail address, Delivery address, phone number, Sender's name, address, phone number, e-mail address, Other authorized Recipient's name, telephone number, email address, Pickup address, The number of the official certificate suitable for the proof of identity, bank account number

Duration of data storage: 3 years after the complaint has been filed

6. DATA PROCESSING APPLICABLE TO SERVICES ORDERED VIA THE [HTTPS://ECSOMAG.HU](https://ecsomag.hu) INTERFACE

6.1. REGISTRATION ON THE E-CSOMAG PORTAL

Purpose of data processing: To simplify the Sender's ordering process for the one-off parcel delivery service

Legal basis of data processing: The user's consent

Scope of personal data processed:

Mandatory personal data to be provided: The user's email address and password,

Optional data to be provided during registration: Username, pick-up address(es), delivery address(es), invoicing address, e-mail address, phone number, bank account number

Data storage period: until the User's consent is withdrawn, that is, until the registration is cancelled

6.2. ONE-OFF PARCEL DELIVERY ORDERED VIA THE E-CSOMAG PORTAL (CONCLUSION AND PERFORMANCE OF A PARCEL DELIVERY CONTRACT)

Purpose of data processing: Performance, and confirmation of the performance, of the contract concluded with the Sender for the one-off parcel delivery service

Legal basis of data processing: The performance of a contract;

The scope of personal data processed in relation to the Sender (picked up directly from the Sender or the Sender's representative): Sender's name, pick-up address(es), invoicing address, e-mail address, phone number, bank account number

Provision of the Sender's name, pick-up address, invoicing address, e-mail address and phone number is mandatory when ordering a home delivery service, otherwise the contract will not be concluded.

In the case of a COD collection service, provision of the bank account number is mandatory, otherwise this additional service cannot be ordered.

Scope of personal data processed in relation to the Recipient

- collected directly from the sender: Name, delivery address, e-mail address, phone number
- Controller collects this data from the sender based on the legal relationship (contract) between the sender and the recipient; provision of this data – except for the recipient's email address – is mandatory.
- collected directly from the recipient (in relation to other receivers): Name, signature

Duration of data storage: The end of the calendar year following the dispatch of the postal consignment

The service fee is paid through the OTP SimplePay system.

On the online interface of the SimplePay system, the Sender is directed to a secure online payment interface operated by OTP Mobil Kft., where the Sender enters his/her Card details and personal data necessary for the payment to be made by the given payment method. The Card details are to be provided directly in the banking system provided by OTP Bank Nyrt. If the Customer has saved his/her Card details for later payment during the payment process, these Card details are also stored directly in the banking system. OTP Bank Nyrt. qualifies as the Controller in respect of the Card details. OTP Mobil Kft. may access the Card details saved and stored in the banking system whenever a payment is made with the saved card, during the Card details scanning process, based on a contract concluded with OTP Bank Nyrt., on the instruction and on behalf of the Bank, as processor. For further details of this data processing activity, please refer to the Privacy Policy available here: <https://simplepay.hu/vasarlo-aff/>

The Service Provider does not have access to the card details and personal data provided by the Sender during the payment process and does not qualify as a controller with regard to this data.

6.3. INVOICING FOR SERVICES ORDERED ON THE [HTTPS://ECSOMAG.HU](https://ecsomag.hu) WEBSITE

Purpose of data processing: invoicing the fee payable for the service.

Legal basis of data processing: Fulfilment of a legal obligation (Basis of the legal obligation: Section 169(2) of the Accounting Act)

Scope of personal data processed: Sender's name, invoicing address, e-mail address

Providing this information is mandatory, otherwise the Service Provider cannot issue the electronic invoice. Without this information, the Sender cannot order the service.

Duration of data storage: Based on Section 169 of the Accounting Act, 8 years.

The invoice is issued in the szamlazz.hu system, which is operated by KBOSS.hu Kft. KBOSS.hu Kft. qualifies as a controller in respect of the services ordered on the <https://ecsomag.hu> website within the scope of invoicing (including: issuing and storing invoices). KBOSS.hu Kft.'s

privacy policy is available here: <https://www.szamlazz.hu/adatvedelem/>

6.4. DATA PROCESSING RELATED TO E-MAILS RECEIVED AT THE ECSOMAG@GLS-HUNGARY.COM E-MAIL ADDRESS

Purpose of data processing: processing of data relating to the performance of the service, withdrawal from or cancellation of contract

Legal basis of data processing: Performance of a legal obligation (Basis of the legal obligation: Section 17/A17/C of the Consumer Protection Act, Section 57 of the Postal Act)

Scope of personal data processed: recipient's name, phone number, e-mail address, consignment destination address, sender's name, phone number, e-mail address, pick-up address, name of person actually taking delivery, his/her phone number, e-mail address, consignment pick-up address, personal identity card number, bank account number

Duration of data storage: 5 years