



# DPDHL MEASURES CONCERNING THE EU GENERAL DATA PROTECTION REGULATION (GDPR)

Global Data Protection  
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Deutsche Post DHL  
Group

# I. INFORMATION ABOUT THE EU GENERAL DATA PROTECTION REGULATION

**On April 14th, 2016, the European Parliament adopted the General Data Protection Regulation (GDPR). It came into force on May 24th, 2016.**

The GDPR is binding and directly applicable in all Member States two years after its entry into force.

Application date is therefore: May 25th, 2018.

It replaces the Data Protection Directive 95/46/EC and was designed to harmonize data privacy laws across Europe.

## II. GDPR: ACTION PLAN

**Maintaining high standards for protection of personal data and ensuring the security of our IT systems are vital both for our business operations and for the good reputation of the Deutsche Post DHL Group.**

As a global company whose business model is based on connecting people and transferring data and content securely, we believe that we have a special responsibility in this regard. We have therefore developed standards which are laid out in our Data Privacy Policy (a summary of which is available on the Group website)<sup>1</sup> which apply throughout the Group and which are approved by the Supervisory Authorities (SAs) as Binding Corporate Rules for cross-border data transfers. Combined with an effective data protection management system (as explained below), we have also adopted high data protection standards to meet the expectations of our customers.

Building upon this foundation, we are aligning our data protection management towards the GDPR and have been preparing the implementation intensively. This includes:

- making executives and employees familiar with the new requirements by training and focused communication measures
- reviewing and developing explanatory guidelines and templates
- performing audits on the level of implementation of the GDPR requirements and verifying their conformity (through Privacy Impact Assessments)
- updating our processes regarding the rights of data subjects and the extended information obligations

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<sup>1</sup> [http://www.dhl.com/content/dam/downloads/g0/legal/summary\\_dpdl\\_privacypolicy.pdf](http://www.dhl.com/content/dam/downloads/g0/legal/summary_dpdl_privacypolicy.pdf)

### III. DATA PROTECTION MANAGEMENT

**DPDHL's data protection management is a systematic approach which ensures our group's compliance with the legal and operational requirements for protection of personal data.**

This includes:

- constantly expanding the global Data Privacy Network (a network of dedicated experts in each entity in each country) and conducting data protection trainings on a regular basis
- providing new guidelines as well as updating and supplementing existing guidelines
- drawing up an annual risk-based data protection audit plan.

### IV. ACCOUNTABILITY / PRIVACY IMPACT ASSESSMENT

**The GDPR requires the controller to provide proof that the processing for which it is responsible is legally compliant.**

To ensure compliance with the monitoring and documentation duties, the following measures have been carried out within DPDHL Group and regular documentation includes:

- a) Record of processing activities (= Data Protection Record, DPR)
- b) Deletion concept (meaning instructions on when personal data must be deleted)
- c) Authorization concept (specifies which roles/functions are allowed to have reading and/or writing access)
- d) Security concept (meaning a documentation of IT applications including a detailed risk analysis)
- e) Overview of service providers used including controller-processor contracts
- f) Privacy Impact Assessments (are used for IT applications to evaluate compliance with national and international data privacy and notification requirements).

Compliance with the standards that we set in our Data Privacy Policy is periodically reviewed by both the DPDHL internal audit department and by the Federal Data Protection Commissioner of Germany as the Lead supervisory authority.

## V. DUTIES TO INFORM AND THE RIGHTS OF DATA SUBJECTS

**DPDHL is aware of and ensures the rights of the data subjects under the GDPR. These rights include for example the right of access, rectification, erasure and data portability.**

### *a) Extended information obligations*

To comply with extended transparency obligations, DPDHL is in the process of reviewing and updating the Privacy Notices on its websites. Based on Master Guidelines, processes covering the information of customers and of employees are also being updated in the offline environment, e.g. in local branches.

### *b) Rights of Data subjects and request management*

Based on a well-established process for dealing with data subjects' requests in Germany, a model process for the timely handling of data subject requests under the GDPR has been developed and is in the process of being introduced in all our legal entities in Europe. The IT security officers in each country are responsible for reporting data breaches, in accordance with the DPDHL Information Security Policy.

## VI. PROCESSOR RELATIONSHIPS

**Where a business unit of DPDHL uses a third party service provider to process personal data, it is required to enter into a Controller Processor Agreement (CPA) which complies with the standards of the DPDHL Master Template for CPA.**

The business unit also receives guidance on what controls over the service provider are required and how they should be documented to ensure that the service provider keeps to the agreed technical and organizational measures.

## VII. MONITORING OF LEGAL DEVELOPMENTS

**The GDPR contains various clauses which allow and sometimes even require the individual Member States to make additions to provisions of the GDPR.**

DPDHL therefore permanently monitors new legislation as well as plans for new EU laws and publications by regulators and other authorities. DPDHL incorporates this into its internal training and communication activities.