

# Privacy Notice

We, NOVA POSHTA GLOBAL RO S.R.L., a limited liability company organized and functioning in accordance with the Romanian legislation, having its registered office at Bucharest, 3<sup>rd</sup> District, 24 Burniței Street, Office A74, 1<sup>st</sup> Floor, (hereinafter referred to as “**Nova Poshta Global RO**” or the “**Company**” inform you in the following about the processing of your personal data (hereinafter: data) when visiting our website and using our services.

If you have any further questions regarding data protection, please contact us at:

**Nova Poshta Global RO,**  
Bucharest, 3<sup>rd</sup> District, 24 Burniței Street, Office A74, 1<sup>st</sup> Floor  
Email: dataprotection\_ro@novapost.com

## 1 Who is the controller for processing your data?

Controller under data protection laws, especially the General Data Protection Regulation (hereinafter: GDPR) is NOVA POSHTA GLOBAL RO, Bucharest, 3<sup>rd</sup> District, 24 Burniței Street, Office A74, 1<sup>st</sup> Floor.

## 2 Where do we get your data from?

NOVA POSHTA GLOBAL RO receives your data from different sources and they serve different purposes.

If you are a sender of packages/parcels, then we receive your data directly from you.

As the recipient of parcels, we receive your data from the sender. This sender transmits your data, details of the parcel and any other data required for the dispatch of the parcel electronically or analogously.

## 3 How do we process your data when you visit our website?

Each time you visit our website, our system automatically collects data and information from your device.

### 3.1 Which data do we process?

The following data is processed when you visit our website:

- Information about your browser type and version used
- The operating system
- IP address
- Data and time of access
- User agent

### 3.2 What is the purpose of processing my data?

The temporary storage of data by the system is necessary to enable delivery of the website to your device. For this purpose, your data must remain stored for the duration of the session.

The data is also stored in the log files of our system. Any storage of this data together with other personal data of the user does not take place.

Storage in log files takes place in order to ensure the functionality of the website. In addition, we use the data to ensure the security of our information technology systems.

These purposes are also our legitimate interest in data processing according to Art. 6 para. 1 lit. f GDPR.

### 3.3 What is the legal basis for processing my data?

The legal basis for the processing of your data and the log files is Art. 6 para. 1 lit. f GDPR.

### 3.4 When will the data be deleted?

Your data will be deleted or blocked as soon as the purpose of storage ceases to exist. For the purpose of the collection of data for the provision of the website, this is the case when the respective session has ended.

The purpose of data storage in log files ceases at the latest after seven days . Storage beyond this period is possible. In this case, the IP addresses of the users are deleted or alienated, so that an assignment of the client is no longer possible.

## 4 How do we process your data when you register on our platform?

If you decide to register on our platform, we will process your data to identify you as a user of the platform and to provide you with access to various features and services of the platform that you can use as a registered user. You can delete your registered user account by contacting our customer service.

### 4.1 Which data do we process?

- Your mobile phone number
- Your email address
- First and last name

### 4.2 What is the purpose of processing my data?

The registration of the user is necessary for the fulfillment of the contract between you and us for the provision of transport and logistics services or for the performance of pre-contractual measures.

This purpose includes the processing of your data also for:

- Managing payment for the services you order, regardless of the payment method used.  
Example:

If, when ordering one of our services via the website, you wish to activate the function to store your payment data and delivery address for future services, we will need to process the data provided in order to activate this function for you. By agreeing to enable this feature, your payment data will be automatically entered for subsequent Services so that you do not have to re-enter it each time, and the data will be considered valid for subsequent Services. You can change or delete your payment data at any time in the "Payment Information" section (in your registered user account on the website or in the "My Account" section of the application).

- Activating mechanisms necessary to prevent and detect unauthorized use of the platform (e.g., when ordering services or making returns), and possible fraudulent activity against you and/or us. If we believe that a transaction may be fraudulent, or if we detect unusual behavior that indicates an attempt to fraudulently use our features or services, such actions may result in the blocking of the transaction or the deletion of your user account.

- We may process data about your location and contact details in order to provide you with certain services, such as (branch or post office finder etc.)

#### 4.3 What is the legal basis for processing my data?

The registration serves the fulfillment of the contract between you and us on the provision of transport and logistics services or the implementation of pre-contractual measures pursuant to Art. 6 para. 1 lit. b GDPR.

We process data for the purpose of unauthorized platform use as well as for the prevention of fraudulent acts and other criminal offenses based on our legitimate interest pursuant to Art. 6 para. 1 lit.f GDPR.

## 5 How do we process your data in the course of providing our transport and logistics services?

We process your data within the framework of the provision of our transport and logistics services

#### 5.1 Which data do we process?

For example, the following data of the sender/recipient are processed:

- Name (first and last name of sender and recipient),
- Email (for customs)
- Mobile phone number
- Address,
- Package/parcel data,
- Payment data, if applicable,
- Data on whether the recipient received the parcel or the parcel was delivered to a substitute recipient

#### 5.2 What is the purpose of processing my data?

The sender data is processed for the fulfillment of the contract between the sender and us for the provision of transport and logistics services or for the performance of pre-contractual measures.

The recipient data is processed in order to deliver the items/parcels to the recipient. In addition, the data processing of recipient data serves both the purpose of documenting the delivery and providing proof to the recipient and the sender.

We process your master data, payment data, and performance-related data in connection with the following purposes to fulfill our legitimate interests as set forth below:

- Detection and prevention of fraud as well as criminal acts
- Administrative purposes, in particular accounting to fulfill internal administrative purposes
- Handling legal or other concerns (including potential concerns) arising out of the contract between you and us for the purpose of litigation (court order and lawsuit proceedings) or defense of claims
- Outsourcing/professionalization of receivables management to external service providers to save costs

### 5.3 What is the legal basis for processing my data?

The sender's data is processed on the basis of the contract between the sender and us for the provision of transport and logistics services or for the performance of pre-contractual measures pursuant to Art. 6 para. 1 lit. b GDPR.

The recipient's data is processed in accordance with Art. 6 Para. 1 lit. e GDPR in conjunction with § 41a PostG (German Postal Act) to ensure a functioning postal system.

The legal basis for the processing of your data aufgrund our legitimate interests is Art. 6 para. 1 lit. f GDPR.

## 6 How do we process your data for advertising and marketing purposes?

We process your data to promote our products and for other marketing purposes.

### 6.1 Which data do we process?

The following data are mainly processed:

- Name,
- E-mail address
- Mobile phone number (with consent)
- If applicable, a device-related advertiser ID, a cookie-related ID, etc.

### 6.2 What is the purpose of processing my data?

We process your data to provide you with information about our own and similar products and to obtain information about the functions or services provided under the contract, in particular for quality assessment, as well as to be able to determine the level of customer satisfaction with the services received.

We also use your data to evaluate the effectiveness and segment analysis of the advertising shown to users on the platforms of some of our partners. For this purpose, we work with third parties that provide us with technologies (such as cookies, pixels, development toolkits) that are necessary for the use of these services. Please note that while we do not provide personally identifiable information to these partners, we do provide them with some sort of identifier each time (e.g., a device-related advertiser ID, a cookie-related ID, etc.). For more information, please see the section "8. How do we process your data when using cookies and similar technologies?".

### 6.3 What is the legal basis for processing my data?

The processing of customer data for direct marketing purposes is based on our legitimate interests according to Art. 6 (1) lit. f GDPR. You have the right to object to the processing at any time.

If we use your data for the effectiveness and segment analysis of advertising, then we process your data with your prior consent pursuant to Art. 6 (1) lit. a GDPR. For more information on cookies and similar technologies, please see "8. How do we process your data when using cookies and similar technologies?".

## 7 How do we process your data via contact form, e-mail and telephone?

We process your data when you contact us with your various inquiries via our contact form, email or by phone.

Our website contains a contact form that can be used for electronic contact. If you use this option, the data entered in the input mask will be transmitted to us and stored.

Alternatively, it is possible to contact us via the provided e-mail address or telephone. In this case, the personal data you provide will be processed.

### 7.1 What data is processed?

The following data are mainly processed:

- Name,
- E-mail address
- Your request/inquiry

### 7.2 What is the purpose of processing my data?

We process your data as part of our customer service to help with your requests and inquiries.

### 7.3 What is the legal basis for processing my data?

The legal basis for the processing of data via the contact form is Art. 6 para. 1 lit. a GDPR if consent has been given.

The legal basis for the processing of data transmitted in the course of sending an e-mail is Art. 6 (1) lit. f GDPR. If the e-mail contact aims at the conclusion of a contract, the additional legal basis for the processing is Art. 6 para. 1 lit. b GDPR.

## 8 How do we process your data when using cookies and similar technologies?

Our website uses cookies and similar technologies. Cookies are text files that are stored in the browser or by the browser on the user's device. When user accesses a website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string of characters that enables the browser to be uniquely identified when the website is called up again. Similar technologies, such as tracking software, are used to e.g., determine how many users visit our website and how often.

Technically necessary cookies and technologies: We use cookies to make our website functional. Some elements of our website require that your browser can be identified even after a page change.

Technically unnecessary cookies and technologies: We also use cookies on our website, which enable an analysis of the user's surfing behavior. When visiting our website, the user is informed about the use of cookies for analysis purposes and we ask for the user's consent for the processing of personal data used in this context. In this context, a reference to this Privacy Notice is also made

## 8.1 What data is processed?

The following data is stored in the technically necessary cookies:

- Language settings
- Log-in information

Technically unnecessary cookies and technologies collect information about the use of our website, such as the browser and operating system used, the domain name of the website from which our website is accessed, the number of visits, the average time spent on the website and the pages viewed.

## 8.2 What is the purpose of processing my data?

The purpose of using technically necessary cookies is to enable you to use our websites. Some functions of our website cannot be offered without the use of cookies. For these, it is necessary that the browser is recognized even after a page change. For example, we need cookies to retain your language settings, showing you information on the website or sustain your log-in when you change pages.

The use of non-essential cookies and technologies is for the purpose of improving the quality of our website and its content. In this way, we learn how the website is used and can thus constantly optimize our offer. Also, such cookies serve the advertising purposes, in particular to evaluate effectiveness and segment analysis of advertising

## 8.3 What is the legal basis for processing my data?

The legal basis for the processing of personal data using technically necessary cookies within the meaning of Section 25 (2) TTDSG is Article 6 (1) lit. f GDPR.

The legal basis for the processing of personal data using technically unnecessary cookies and technologies is the existence of a relevant consent Art. 6 para. 1 lit. a GDPR.

# 9 Who is your data forwarded to?

In order to achieve the purposes set forth in this Privacy Notice, we will need to provide access to your personal information to the NOVA POSHTA group of companies, and to third parties who assist in providing services to you, as follows

- Financial institutions;
- Organizations involved in the detection and prevention of fraud;
- Providers of technological and analytical services;
- Partners and service providers in the areas of logistics, transport and delivery and/or their partner organizations (for example, delivery partners abroad, courier service providers, customs service providers);
- Service providers in the area of customer care;
- Marketing and advertising partners and service providers, such as social media sites, advertising agencies, or advertising partners.

In order to improve the efficiency of our service, some of these providers are located outside the European Economic Area, where the level of data protection differs from the level of data protection in the European Union. In such cases, we will transfer your data with appropriate security measures as well as using the appropriate means of data transfer recognized at the international level, in particular in the standard contractual clauses, and other appropriate additional means. You can familiarize

yourself with the content of the standard contractual clauses at the following link:

[https://commission.europa.eu/law/law-topic/data-protection\\_en](https://commission.europa.eu/law/law-topic/data-protection_en)

## 10 When will your data be deleted?

We will store your personal data for as long as is necessary for the purposes stated in this Privacy Notice, in particular to fulfill our contractual and legal obligations.

In the process, we may also store your personal data for other purposes. This is the case, for example, if we are legally obliged to do so (e.g. under the German Commercial Code, the German Fiscal Code, the German Money Laundering Act) or if or as long as the law permits us to continue storing it for certain purposes, including for the establishment, exercise or defense of legal claims.

## 11 What rights do you have?

You may exercise the following rights, subject to the relevant legal requirements, by contacting us at [dataprotection\\_de@novapost.com](mailto:dataprotection_de@novapost.com):

- Right to object pursuant to Art. 21 GDPR, provided that the processing of your data is based on a legitimate interest,
- Right to access your personal data stored by us pursuant to Art. 15 GDPR; in particular, you may request information about the processing purposes, the category of personal data, the categories of recipients, the planned storage period, the origin of your data, unless it was collected directly from you,
- Right to rectification of inaccurate data or completion of correct data according to Art. 16 GDPR,
- Right to delete your data stored by us in accordance with Art. 17 GDPR insofar as no legal or contractual retention periods or other legal obligations or rights to further storage are to be observed,
- Right to restrict the processing of your data pursuant to Art. 18 GDPR, insofar as the accuracy of the data is disputed by you, the processing is unlawful, but you object to its erasure; NOVA POSHTA GLOBAL RO no longer requires the data, but you need it for the assertion, exercise or defense of legal claims or you have objected to the processing pursuant to Art. 21 GDPR,
- Right to data portability pursuant to Art. 20 GDPR, i.e. the right to receive your personal data, which you have provided to us, in a structured, commonly used and machine-readable format, or to request the transfer to another controller.
- Right to complain to a supervisory authority. The data protection supervisory authority responsible for NOVA POSHTA GLOBAL RO is:  
Berlin Commissioner for Data Protection and Freedom of Information, Alt-Moabit 59-61, 10555 Berlin

## 12 Changes to this Privacy Notice

As we continue to develop our products, website, etc., to improve our service to you, changes to this Privacy Notice may be necessary. Therefore, we encourage you to review this Privacy Notice from time to time.