

## HR PRIVACY NOTICE

Your trust matters to us. That's why we protect your personal data and use it responsibly starting with your application and throughout your employment with FedEx and its operating groups, subsidiaries and divisions. At FedEx, we are committed to protecting your privacy and the security of your personal data. FedEx has created this FedEx HR Privacy Notice ("**Privacy Notice**") to explain how FedEx collects and uses personal data ("**Personal Data**").

Last update: July 1, 2020.

When this Privacy Notice mentions "FedEx", "we", "us", or "our", FedEx is referring to the FedEx company that is deciding on the purposes and means of the processing of your Personal Data under this Privacy Notice. Your Personal Data is controlled by the local FedEx company that where you are applying for a position or where you are currently employed.

### Contact information

If you have any questions regarding the processing of your Personal Data you can contact your local FedEx company directly, which is available to deal with requests for information, applications or complaints. Notwithstanding your right to contact your FedEx operating company, you always have the right to contact FedEx Corporation directly, with questions, requests for information, or complaints:

#### FedEx Corporation

Attn: Legal Department – Head of Global Privacy  
1000 Ridgeway Loop Road, Ste 500  
Memphis, TN 38120  
United States of America  
E: [dataprivacy@fedex.com](mailto:dataprivacy@fedex.com)

You may also call 1.800.463.3339.

### Overview

This Privacy Notice answers the following questions:

1. Does this Privacy Notice apply to you?
2. What Personal Data does FedEx collect?
3. Why does FedEx process Personal Data?
4. Who has access to your Personal Data?
5. How long will FedEx process your Personal Data?
6. What measures does FedEx take to protect your Personal Data?
7. Where does FedEx store or transfer your Personal Data?
8. What if you have other questions or complaints?
9. Will there be updates to this Privacy Notice?

## 1. Does this Privacy Notice apply to you?

This Privacy Notice applies to you if you are an applicant, employee, or former employee of FedEx. This Privacy Notice does not include people working at FedEx as external consultants or employees of third parties providing services to FedEx.

## 2. What Personal Data does FedEx collect?

FedEx will need to process Personal Data in the course of its business activities and provision of services, specifically to administer our human resources program and to comply with applicable laws in the fields of employment, social security and workplace health and safety. Without your Personal Data, we will not be able to employ you or provide the benefits and programs/activities we promise to our employees. As a rule, the categories of Personal Data that you provide directly or indirectly to FedEx - depending on the role in which you provide them are:

- **Employment Application/Recruitment information**  
This may include your resumé or curriculum vitae, application form, work history, work permit information if applicable, education, degrees, academic records, languages and qualifications, references, citizenship/nationality, date of birth, gender, and other protected class data to the extent it is disclosed during the application and recruitment process, and any professional licenses, memberships, or certifications.;
- **Pre-employment screening information**  
We may maintain the information we collect when we conduct pre-employment verification of your identity, address, or references and, where permitted by local law, the verification of background checks (including criminal or judicial data) about you in accordance with applicable law;
- **Contact information**  
This may include your name, address, telephone numbers (home, mobile/cell, work), and email address;
- **Government identifier**  
Your government issued identifiers subject to the conditions of applicable law. This may include your ID details, tax identification number, social security number, passport number, and your driver's license number;
- **Financial information**  
Your bank and financial details for salary or payroll purposes. This may include your salary, other remuneration, your IBAN number or bank account number, bank name and details;
- **Employment information**  
This may include your employee identification number, badge number, job title and description, department and manager, reporting lines, work location, cost center, business unit or group, work status such as full time or part time, working hours, and probation period if applicable;
- **Electronic information**  
Information for use of company network and devices if applicable, which may include username, password, internet protocol address, geolocation, contact details, work telephone number and device data including use of apps on company devices (computer, telephone, tablet), company photo, if provided, and monitoring via electronic communications and/or video surveillance (**CCTV**) in so far as applied at your location;

- **Family information**  
This may include marital status, dependents, beneficiaries and partner/spouse, and emergency contact information;
- **Absence information**  
This may include information about your working hours and leaves, attendance, holiday/vacation, leaves or absences, travel and mobility;
- **Compensations and benefits information**  
Economic and financial information for compensation and benefits. This may include your banking and account details for remuneration and compensation, information on raises and bonuses, your benefits package and information and details associated with pensions or insurance programs that may be offered;
- **Performance information**  
This may include regular evaluation details, reviews and feedback, details about performance plans, and information associated with professional development such as training (both internal and external), courses, seminars and conferences, and succession planning information;
- **Travel information**  
Information collected for travel and expense purposes, which may include credit card, bank details (account number, IBAN, etc.), booking and itinerary details, passport information (number, expiration, issuing authority, etc.) and visa and immigration information, and travel preferences (seat preference, dietary restrictions, frequent flyer and corporate memberships, if provided); and
- **Mobility information**  
Information associated with mobility, transfers and relocation (either upon hiring or as part of a transfer or work assignment), which may include family details, immigration status and nationality/citizenship, tax and social security information.
- **Physical or mental health data**  
This may include information associated with any opinion of physical or mental health and data relating to disabilities and absence due to illness or pregnancy.
- **Protected classification information**  
This may include information that you provided such as your race, gender, and disability.

### 3. Why does FedEx process Personal Data?

Personal Data shall be collected, used, stored or otherwise processed if necessary within the framework of responsible, efficient and effective business management by FedEx.

#### *Business Purposes*

FedEx shall only collect, use or otherwise process Personal Data if the processing falls within the scope of one (or more) of the following legitimate business purposes:

1. **Human resources and personnel management.** This includes processing necessary to effectuate the employer-employee relationship with the employee or to process a job application (e.g. management and administration of recruiting and outplacement, compensation and benefits, payments, tax purposes, career and talent development, performance evaluations, discipline and counselling, training, travel and expenses, volunteer work and employee communications;

2. **Business process execution and internal management.** This purpose addresses the necessary processing of Personal Data in order to be able to effectively work with colleagues throughout FedEx and specific activities such as scheduling work, recording time, managing company assets, provision of central processing facilities for efficiency purposes, and managing and using employee directories;
3. **Health, Safety and security.** This purpose addresses activities such as those involving health and safety, the protection of FedEx and FedEx employees' assets and information, as well as the authentication of employee status and access rights;
4. **Organizational analysis and development and management reporting.** This purpose addresses activities such as conducting employee surveys, managing mergers, acquisitions and divestitures, and processing Personal Data for management reporting and analysis;
5. **Protecting the vital interests of employees.** This is where processing is necessary to protect the vital interests of an employee, e.g. for urgent medical reasons; and
6. **Compliance with legal obligations.** This addresses the processing of Personal Data as necessary for compliance with, and investigating employee compliance with, laws, regulations and sector specific guidelines to which FedEx is subject and the processing of Personal Data that is necessary for compliance with, and investigating employee compliance with, internal FedEx policies and procedures. This includes processing that is necessary as part of whistle-blowing obligations, the pre-employment screening and the matching of the names of employees with names on so-called designated party lists.

#### 4. Who has access to your Personal Data?

FedEx shares your Personal Data with third parties in the following circumstances:

- With its affiliates, operating groups, subsidiaries and divisions, or with third parties if such is necessary for the purposes as listed above. If appropriate, FedEx will require third parties to conduct activities in a manner consistent with FedEx policies and guidelines in relation to data protection.
- With data processors, i.e. parties processing Personal Data on our behalf. In such cases, these third parties are only allowed to use your Personal Data for the purposes described above and only in accordance with our instructions. FedEx will only use processors which provide sufficient guarantees to implement appropriate technical and organizational measures and ensure the protection of the rights of data subjects.
- With its employees if and to the extent necessary for the performance of their tasks. In such a case, access will be granted only if and to the extent necessary for the purposes described above and only if the employee is bound by confidentiality.
- If and when required to do so by law, court order, or other legal process, for example, with law enforcement agencies or other governmental agencies, to establish or exercise our legal rights or in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

## **5. How long will FedEx process your Personal Data?**

We will retain your Personal Data no longer than necessary for the purpose(s) for which we process your Personal Data and in accordance with (local) law. After the retention period we will delete or anonymize your Personal Data, unless we need to retain some of your Personal Data for another purpose. We will only do so if we have legal ground to retain your Personal Data. We will also ensure that Personal Data are only accessible for that other purpose.

For example, we need your Personal Data to document your absence. Employment laws dictate that we have to retain/store certain Personal Data. Generally, this period varies depending on the applicable jurisdiction and employment laws. In those cases, we will only store the Personal Data necessary to meet our legal obligations.

## **6. What measures does FedEx take to protect your Personal Data?**

FedEx maintains technical and organizational measures to protect your Personal Data against accidental or unlawful processing, including protecting your Personal Data against unauthorized access, maintaining the confidentiality, integrity and availability of your Personal data, and training personnel on information security requirements.

However, no security measure can guarantee against compromise. You also have an important role in protecting your Personal Data. Employees are expected to follow FedEx Information Security Standards, which can be found by searching keyword “standards.” If you have a reason to believe that your Personal Data has been compromised, please contact us as detailed above.

## **7. Where does FedEx store or transfer your Personal Data?**

Due to the fact that we operate in many countries around the world and have international systems for employees in place, FedEx may need to transfer your Personal Data to locations outside the country where you reside. In any case where we transfer Personal Data, FedEx shall ensure that such a transfer is subject to appropriate safeguards. For Personal Data originating in the European Economic Area, internal FedEx transfers are governed by the [FedEx Binding Corporate Rules](#). Transfers to third parties (outside the European Economic Area) will be governed by a contract based on the model contractual clauses for data transfers approved by the European Commission or other appropriate safeguards. For more detailed information about these safeguards, please contact [dataprotection@tnt.com](mailto:dataprotection@tnt.com) or [dataprivacy@fedex.com](mailto:dataprivacy@fedex.com).

## **8. What if you have other questions or complaints?**

Questions or complaints regarding the processing of your Personal Data can be directed to FedEx by using the contact information as provided at the top of this Privacy Notice.

## **9. Will there be updates to this Privacy Notice?**

FedEx may update this Privacy Notice from time to time. If an amendment will have a serious privacy impact, FedEx will endeavor to actively inform you about such amendments.