



GXO PRIVACY NOTICE FOR EMPLOYEES, WORKERS AND CONTRACTORS

1. PURPOSE

The purpose of this Privacy Notice (the "**Notice**") is to inform you of GXO's practices regarding the processing of your Personal Data for HR and Business purposes in accordance with Applicable Laws.

In the context of your working relationship with GXO (the "**Company**", "**we**" or "**us**"), the Company (also known as a **Data Controller**), will process information about you and your dependents, in both paper and electronic format. We refer to such information as "Personal Data".

This processing may also be carried **GXO Logistics, Inc.**, registered at Two American Lane, Greenwich, CT 06831, USA, and other affiliates in the XPO group of companies (collectively, the "**GXO Group**").

If you have any questions regarding which GXO company you are working for or which is the Data Controller in relation to your Personal Data, please contact us (for contact details, see **Section 8** below).

The GXO Company which you are working for may be jointly responsible with GXO Logistics, Inc. and its affiliated entities and group companies for the lawfulness of the processing of your Personal Data.

This Notice may be complemented by additional notices and policies which provide more detailed information about particular processing activities.

In addition to words defined elsewhere in this Notice, the key terms used in this Notice are defined in **Annex I**.

2. WHAT INFORMATION (PERSONAL DATA) DO WE COLLECT AND PROCESS?

GXO processes different categories of Personal Data about you, for the purposes described in **Section 3**. These categories of Personal Data include the following:

2.1 Ordinary Personal Data

- Identification data: civil/marital status, first and last name, date and place of birth, nationality, gender, photograph;
- National identifiers: national identification or passport number; driver's license; social security number (as may be appropriate and permitted by applicable laws and except where prohibited by applicable laws); work permit;
- Contact details: postal or email address, telephone number (fixed and mobile), fax numbers (both business and private);
- Family members', dependents' and beneficiaries' and emergency contact data: name, address, date and place of birth, telephone number, age and number of children;
- Academic and professional qualifications: degrees, titles, skills, language proficiency, training information, employment history, CV/resume, past employment references;



- Information gathered as part of routine identification and background checks (as may be appropriate and permitted by applicable laws and except where prohibited by applicable laws);
- Financial details: bank account number, bank details, salary and compensation/benefits data, bonuses, pension qualification information, travelling expenses;
- Employment data: job title, function, level, supervisor and other job relationships, grade, business unit, department, dates and conditions of employment; disciplinary sanctions; performance review and job appraisals, dates and results of tests and training, promotions, succession/career planning, changes in role, absence records (holiday and other);
- (For the UK and Republic of Ireland) Diversity and Inclusion data: ethnicity, religion, sexual orientation, disability or long term condition, gender, marital status or civil partnership, first and second languages spoken, caring responsibilities, armed forces veteran or reservist or spouse or civil partner of an armed forces veteran or services person, homelessness, long term periods of absence or leave;
- IT related data: computer ID, user ID and password, domain name, IP address, log files, use of the Internet, e-mail, IT systems and applications;
- CCTV footage, dash cam and other recordings (as per our CCTV Policy) and other information from electronic systems, including on some sites fingerprint recognition.
- Communication data: email and electronic messages, voicemail, files and other correspondence material transmitted using systems of Company or for Company purposes and stored on servers or Company or on Company's behalf (as may be appropriate and permitted by applicable laws and except where prohibited by applicable laws); and
- Personal characteristics: hobbies, interests (as you may have defined on your CV for example).

2.2 Special Categories of Personal Data

Some of the Personal Data that we process are deemed **sensitive** and are referred to as “**Special Categories of Personal Data**”. For example, where necessary and authorized by Applicable Laws, data relating to your health, including short and long-term disability and medical care, as well as to your trade union membership or religion (for example, for tax law compliance or to accommodate religious holidays) and in relation to our monitoring of equality, diversity and inclusion within the business. We also process data relating to driving offences, information contained in whistleblowing reports and misconduct which may amount to criminal behavior or criminal offences for HR and Administrative as well as Compliance purposes, as may be appropriate and permitted by applicable laws.

2.3 Sources of the Personal Data

Personal Data Directly from You: We collect Personal Data directly from you (electronically, in writing, or verbal). We may, for example, ask you for information when you begin your employment with the Company. You may also provide new, updated or corrected data to the Company from time-to-time.

Personal Data That We Generate: We may also receive Personal Data from your colleagues or supervisors, for example, from sources generated by us in the normal course of your work, such as annual job performance reviews, pay rise history, disciplinary action,



and promotion history. Information on your use of the Internet, e-mail, Company systems and applications is automatically generated.

Personal Data from Third Parties: We may also receive Personal Data from third parties who provide services to the Company, such as companies that provide benefits including share option/equity awards, payroll, corporate purchasing cards, or other services. For example, if you have been hired through a third-party staffing or recruiting firm, we will receive Personal Details and information on your experience and qualifications from them. Where permitted or otherwise authorized by law, information received from third parties may include the results of background checks.

3. FOR WHICH PURPOSES AND ON WHICH LEGAL BASES DO WE PROCESS YOUR PERSONAL DATA

We process Personal Data for the following Purposes. For each purpose, the legal basis of the processing is specified, in accordance with Articles 6 and 9 of the GDPR.

3.1 HR Management and Administration

We process Personal Data to establish and perform the employment contract between you and us or to manage the working relationship between you and us; for appointments and approvals; to determine eligibility for initial employment (including the verification of references and qualifications); to manage working time and absences; to assess qualifications for a particular job or task; to administer payroll and healthcare and other benefits and equity-related awards; to gather evidence for disciplinary action or termination; to conduct performance reviews and determine performance requirements; to manage talent; to provide training and learning services; for disciplinary matters; to manage accidents and incidents at work; for the purposes of monitoring equality, diversity and inclusion, where authorized by Applicable Laws; or to manage legal or other disputes involving you, other workers or contractors or customers (or other individuals/members of the public).

Legal Basis. This processing is justified based on:

- The necessity for the performance of the employment contract;
- Our legitimate interests; or
- The necessity to comply with legal obligations.

We process the Special Categories of Personal Data and data related to suspected compliance violations to comply with legal and statutory requirements (for example, to confirm whether an employee is fit or not to perform his/her role or as part of our annual or new starter examination or in order to allow the employees to discount their membership for trade union membership in the payroll); and for the purposes of monitoring equality, diversity and inclusion, where authorized by Applicable Laws.

Legal Basis. This processing is justified based on:

- Your explicit consent;
- The necessity for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social data protection law;
- The necessity to protect the vital interests of data subjects; or
- The necessity for the establishment, exercise or defence of legal claims.



3.2 **Business Operations**

We process Personal Data to manage our projects, orders and accounts, work organisation, provide, supply or acquire products and services, product management, business development, and customer relationship management, employee travel, expense tracking and reimbursement, management reporting and analysis, to determine and review salaries; employee career development and talent management.

Legal Basis. This processing is justified based on:

- The necessity for the performance of a contract;
- The necessity for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social data protection law;
- reasons of substantial public interest (with a basis in law); or
- Our legitimate interests as specified above.

3.3 **Physical and Network Security, Communications and IT**

We process Personal Data to manage and maintain the functioning and security of our IT systems, applications and network; to enable internal contacts and communication; to protect our intellectual property, trade or business secrets and company-held information; and to provide IT support to employees.

Legal Basis. This processing is justified based on:

- Our legitimate interests as specified above.

3.4 **Compliance**

We process Personal Data to ensure compliance with GXO policies and applicable legal and other statutory obligations and for the purpose of facilitating audits, investigations and enquiries or allegations of employee misconduct or criminal behavior.

Legal Basis. This processing is justified based on:

- The necessity for the establishment, exercise or defence of legal claims;
- Our legitimate interests as specified above;
- The necessity for reasons of substantial public interest.

We will process information on criminal behavior only to the extent permitted by Applicable Law.

3.5 **Sale of Group Companies or businesses**

We process Personal Data for the purpose of sale of Group Companies or businesses.

Legal Basis. This processing is justified based on:

- The necessity for the establishment, exercise or defence of legal claims;
- The necessity for the performance of a contract;
- The necessity for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social data protection law; and



- Our legitimate interests as specified above.

4. **WITH WHOM DO WE SHARE YOUR PERSONAL DATA**

GXO takes care when sharing Personal Data with other GXO Group companies (i.e., Intra-Group) or with Third Parties as described below.

4.1 **Intra-Group**

We share your Personal Data with other GXO Group companies and departments (HR, IT, Compliance, Finance, etc.), for all the purposes specified in **Section 3** of this Notice.

4.2 **Third Parties**

We share Personal Data with service providers that have been selected by GXO to perform specific activities on our behalf (such as payroll providers, providers of HR and finance systems/solutions, operators of whistleblowing hotlines or technology companies which provide software and computing services (e.g., e-mail, calendar, telecommunications and information management services)). Any service providers engaged by GXO will have access to Personal Data solely to the extent necessary to enable them to perform services on GXO's behalf and GXO will endeavour to ensure that service providers are contractually prohibited from using Personal Data for any other purpose. GXO will obtain assurances from these Third Parties that they will safeguard Personal Data consistently with this Notice.

We share Personal Data with other companies, vendors and business partners to perform functions for us, where these companies are themselves responsible to determine the purposes and/or means of the processing and for the lawfulness of the processing. This includes financial institutions such as banks involved in processing direct deposits of paychecks or administering corporate credit cards, and health, insurance & benefits providers that handle our benefits programs for our employees.

We also share Personal Data with governmental and public authorities when required by law, including with the police (or other law enforcement or regulatory bodies) where relevant and necessary for criminal investigations.

We share Personal Data with our customers where it is relevant to your role; where relevant for the performance of GXO's legal and contractual obligations to its customers; or where it is necessary in relation to criminal or other investigations (including disciplinary and/or grievance investigations).

5. **INTERNATIONAL TRANSFER OF PERSONAL DATA**

Given that GXO Group companies are located and provide services all over the world, we need to transfer your Personal Data internationally. In particular, Personal Data collected by us may be transferred to and processed in countries outside the European Economic Area ("EEA"). Those countries may not have the same level of protection for Personal Data as in the EEA.

Please write to privacy@gxo.com if you want to receive further information or, where available, a copy of the relevant data transfer mechanism.



5.1 **Intra-Group**

International transfers are to the United States of America. The transfer of your Personal Data outside the EEA takes place on the basis of our Intra-Group Data Sharing Agreement, which is based on the European Commission's standard contractual clauses for data transfers, and in accordance with Applicable Laws.

5.2 **Third Parties**

Some of the third parties with whom we share Personal Data are also located outside the EEA. Certain third countries, such as Canada and Switzerland, have been officially recognized by the European Commission as providing an adequate level of protection. Transfers to third parties located in other third countries outside the EEA take place using an acceptable data transfer mechanism, such as the EU-US Privacy Shield framework for transfers to self-certified US organizations, the EU standard contractual clauses for data transfers, Binding Corporate Rules, approved Codes of Conduct and certifications, or in exceptional circumstances on the basis of permissible statutory exceptions.

6. **HOW LONG WE KEEP YOUR PERSONAL DATA**

We keep your Personal Data for no longer than is reasonably necessary for the purpose for which it was collected, being specified in our GXO Group records retention policies. In certain cases, Personal Data may be kept for an extended period of time in order to comply with legal obligations, or for the establishment, exercise or defence of a legal claim, in accordance with Applicable Laws. Our Data Retention Policy may be found at <https://ethics.gxo.com/>

If you have further questions regarding our retention of your Personal Data, you can contact us (see **Section 8** below).

7. **YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA**

In relation to the processing of your personal information by GXO, you have the following rights:

7.1 **Request Access to Your Personal Data**

You have the right to obtain confirmation from us whether your Personal Data are being processed and related information and to obtain a copy of your Personal Data undergoing processing subject to applicable exemptions under the data protection laws.

7.2 **Request Rectification of your Personal Data**

In certain circumstances, you have the right to request the Company to rectify (i.e., correct) any inaccurate Personal Data and to have incomplete Personal Data completed.

7.3 **Objection to Processing**

In certain circumstances, you have the right to object to the processing of your Personal Data on grounds relating to your particular situation.



7.4 Request the Portability of your Personal Data

You may receive your Personal Data that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit it to other data controllers without hindrance. This right only exists if the processing is based on your consent or a contract and the processing is carried out by automated means.

7.5 Request Restriction of Processing of your Personal Data

You may request to restrict processing of your Personal Data in certain cases permitted under the Applicable Laws. This enables you to ask us to suspend the processing of your Personal Data, for example, if you contest its accuracy.

7.6 Request Erasure of your Personal Data

You may request us to erase your Personal Data if there is no good reason for us continuing to process it. In these cases, we will delete, destroy or anonymize the Personal Data.

7.7 Right to lodge a complaint

You also have the right to lodge a complaint with a Supervisory Authority, in particular in the EU Member State of your residence, place of employment, or the location where the issue that is the subject of the complaint occurred.

7.8 Right to refuse or withdraw consent

In a situation where we have asked for your consent to processing, you are free to refuse to give consent and you can withdraw your consent at any time. Please keep in mind that withdrawing your consent does not have retroactive effect. This means that the withdrawal does not affect the lawfulness of past processing based on consent before its withdrawal. The Company is therefore not required to undo these past processing following the withdrawal of your consent.

8. CONTACT

If you wish to exercise any of the afore-mentioned rights (see **Section 7**) or if you have any questions regarding this Notice or other questions, comments or concerns about our privacy practices, please contact your HR manager or the Privacy Office at privacy@gxo.com.

9. UPDATES TO THIS NOTICE

GXO may from time to time make changes to this Notice to reflect changes in our legal or regulatory obligations. We will communicate any revised version of this Notice by posting it on the company intranet site and through other suitable means of communications.

This Notice was last updated on 1st December 2024.

Annex I: Definitions

Company	means the GXO legal entity that employs you.
Controller	means the entity that determines the purposes and the means of the Processing.
Applicable Laws	refers to all privacy and data protection laws, statutes, directives, regulations, decrees, and other legislative measures or decisions having effect in any jurisdiction from time to time, including without limitation, the EU General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "GDPR"), the UK Data Protection Act 2018 and the UK General Data Protection Act, and any national data protection and privacy laws.
Data Subject	Means the natural person to whom the Personal Data relates.
European Economic Area or EEA	Means the 28 EU Member States as well as Norway, Iceland and Liechtenstein.
Employees	includes full-time employees, part-time employees, temporary employees, reinstated employees, rehired employees and retired and former employees.
GDPR	means the EU General Data Protection Regulation 2016/679.
Personal Data	means any information about an identified or identifiable natural person (such as information relating to an employee, a consumer, website visitor or a customer's or supplier's employees). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to that person's physical, physiological, genetic, mental, economic, cultural or social identity. Examples of data that may permit this kind of identification include but are not limited to addresses, emails, telephone numbers, customer numbers or other identifiers, dates of birth, tax IDs/social security numbers, mobile telephone numbers and any compilation or adaptation of such information created by GXO in the course of its business relationship with Third Parties where the information relates to an identified or identifiable person.
Processing or Processed	means any operation or set of operations performed upon Personal Data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.
Special Categories of Personal Data	is a subset of a Personal Data that is Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union, genetic data, biometric data (for the purpose of uniquely identifying a natural person), data concerning health or data concerning a person's sex life or sexual orientation. Whilst not Special Categories of Personal Data, personal data



	relating to criminal convictions and offences or related security measures are also sensitive data.
Third Country	means a third country outside the EEA.
Third Party	means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data
Supervisory Authority	are the independent public authorities responsible for monitoring and enforcing the application of the Applicable Laws.