



# Global Privacy Policy FAQs

## Introduction

The following FAQs provide employees with a general understanding and best practices for applying the privacy principles in the Global Privacy Policy. These apply to all situations where you come into contact with personal data in the course of performing your employment duties at FedEx.

Additional requirements may apply to the use of personal data within a specific job function. Should you have any questions about your obligations, please contact the Global Data Privacy Office at [dataprivacy@fedex.com](mailto:dataprivacy@fedex.com).

## Privacy Principles

**1. Fair and Lawful.** When Processing Personal Data, the rights of the individual related to their Personal Data must be protected. Personal Data must be collected and Processed fairly and lawfully.

### ***Are you Processing the Personal Data fairly and lawfully?***

The main purpose of this principle is to be “fair” and protect the interests of the individuals whose Personal Data is being Processed. You should be open about developments, practices and policies with respect to Personal Data. If over time, there are new ways to use Personal Data, perhaps because of changes in technology, you may be able to use previously collected Personal Data for the new purpose if it is fair and lawful to do so.

In practice, you should:

- have legitimate grounds for collecting and using the Personal Data;
- be transparent about how you intend to use the data, and give individuals appropriate privacy notices when collecting their Personal Data;
- handle people’s Personal Data only in ways they would reasonably expect;
- make sure you do not do anything unlawful with the data; and
- not use their information in ways that unjustifiably has a negative effect on them.

**2. Purpose Specification.** Personal Data can be used or Processed only for the purpose defined at the time of collection and shall not be further used or Processed in any manner incompatible with that purpose. Personal Data may not be collected and stored for potential future use unless allowed by local law.

## Definitions

### **What is “Personal Data”?**

Personal data is any information that can directly or indirectly be used to identify a natural person, whether that individual is an employee, a customer or employee of a customer, a vendor or employee of a vendor, a job applicant or any other third party. Examples of personal data include, names, identification numbers, email addresses, individual phone numbers, photos, IP addresses, device ID, etc. In most cases, information about a business (company name, general phone number) is not personal data.

### **What is “Processing”?**

Processing means any operation performed on Personal Data, including collection, storage, access, review, transfer, copying, deletion or any other handling of the data. Examples include collecting customer information for FedEx records, accessing Workday records of an employee or transferring files with customer or employee information to a vendor.



### ***What are you trying to achieve by collecting the Personal Data?***

Specify the reason or reasons for which you are collecting Personal Data. Anything you do with the data must be compatible with this purpose.

In practice, you should:

- be clear from the outset about why we are collecting Personal Data and what we intend to do with it;
- give proper privacy notices to individuals when collecting their Personal Data; and
- ensure that if we wish to use or disclose the Personal Data for any purpose that is additional to or different from the originally specified purpose, the new use or disclosure is fair.

If you wish to use or disclose Personal Data for a purpose that was not contemplated at the time of collection (and therefore not specified in a privacy notice), you have to consider whether this will be fair. If using or disclosing the information would be unfair because it would be outside what the individual concerned would reasonably expect, or would have an unjustified adverse effect on them, then you should regard the use or disclosure as incompatible with the purpose you obtained the information for. Because it can be difficult to distinguish clearly between purposes that are compatible and those that are not, focus on whether the intended use of the information meets the fair Processing requirements set out above.

### **3. Collection Limitation.** FedEx only collects Personal Data necessary to meet the specified purpose at the time of collection and only to the extent allowed by local law.

#### ***Are you collecting the minimum amount of information necessary to achieve the purpose specified?***

You should identify the minimum amount of Personal Data you need to properly fulfill your purpose, and only collect that amount of Personal Data. You should not hold additional Personal Data on the off-chance that it might be useful in the future.

In practice, you should:

- hold Personal Data about an individual that is sufficient for the purpose you are holding it for; and
- not hold more information than you need for that purpose. For example, if you only need contact information to deliver a package, do not also collect any additional information, such as a customer's occupation, age or gender.

### **4. Deletion.** Personal Data no longer needed for the purpose specified at the time of collection shall be deleted according to applicable retention schedules unless it is subject to an exception from the Legal Department.

#### ***Are you only keeping the data for as long as necessary for the purpose specified?***

Personal Data Processed for any purpose or purposes should not be kept for longer than is necessary for that purpose or those purposes. Consult your operating company's applicable retention policies and schedules for guidance.

In practice, you should:

- refer to the retention schedules;
- review the length of time you keep Personal Data;
- consider the purpose or purposes you hold the information for in deciding whether (and for how long) to retain the Personal Data;
- securely delete information that is no longer needed; and
- update, archive or securely delete information if it goes out of date.



## 5. Data Quality. Personal Data should be accurate, and if necessary, kept up to date.

### *Are you taking steps to ensure the data is accurate?*

It is in everyone's interest to have accurate data. If you are using your own resources to compile Personal Data about an individual, then you must make sure the information is correct.

In practice, you should:

- take reasonable steps to ensure the accuracy of any Personal Data you obtain (e.g., inviting data subjects to update their contact details);
- identify the source of any Personal Data;
- carefully consider any challenges to the accuracy of data; and
- consider whether it is necessary to update the information.

It may be impractical to check the accuracy of Personal Data someone else provides. In recognition of this, if you are holding inaccurate Personal Data, you will not be considered to have breached this principle as long as:

- you have accurately recorded information provided by the individual concerned or a third party;
- you have taken reasonable steps in the circumstances to ensure the accuracy of the information; and
- if the individual has challenged the accuracy of the information, this is clear to those Processing it.



## 6. Security Safeguards. Personal Data must be protected using technical, managerial and physical security measures against risk of loss, unauthorized access, destruction, use modification or disclosure.

### *Are you following the InfoSec standards?*

You must follow the InfoSec standards to ensure we have appropriate security measures to prevent Personal Data from being accidentally or deliberately compromised.

In practice, you should:

- follow the InfoSec standards [keyword: “standards”];
- be clear about who in your organization is responsible for ensuring information security;
- make sure you have the right physical and technical security, backed up by robust policies and procedures and reliable, well-trained staff; and
- notify InfoSec of any breach of security [keyword: “incident”].

## 7. Transparency. Individuals must be notified at the time of collection how their Personal Data is being used or Processed. They must be aware of who is collecting the Personal Data, the purpose for the Processing of the Personal Data and if third parties will Process the Personal Data, that adequate safeguards are in place. All such notices must be approved by the Legal Department.

### *Are you being clear and open about how we collect and use Personal Data?*

It's important for individuals to know at the outset how their information will be used so they can make an informed decision. You must provide information about why and how we collect and use their information.

In practice, you should:

- be open and honest about our identity; and
- tell people what we are collecting, how we intend to use any Personal Data we collect about them, the type of entities that will receive their data and any other information necessary to ensure that the Processing is performed fairly.

**8. Individual Participation.** To the extent required by local law, individuals have a right to access their Personal Data and where appropriate, to correct or delete it and exercise any other right provided by local law.

Depending on the law that applies, rights can include the following:

- a right of access to a copy of the information comprised in their Personal Data;
- a right to object to Processing on grounds relating to his or her particular situation;
- a right to prevent use of their Personal Data for direct marketing;
- a right to object to decisions being taken by FedEx made by automated means (without human involvement);
- a right in certain circumstances to have inaccurate Personal Data rectified, blocked, erased or destroyed;
- a right to file a complaint with the national data protection authority; and
- a right to claim compensation for damages caused by a breach of law.

In practice, you should:

- immediately forward a privacy-related request to the Global Privacy Office at [dataprivacy@fedex.com](mailto:dataprivacy@fedex.com);
- timely and adequately follow any instructions provided by the Global Privacy Office or Legal Department in relation to the request of the individual, for instance to provide specific information regarding the individual or to amend certain information; and
- never respond to a privacy-related request without first contacting the Global Privacy Office or the Legal Department and receiving instruction.



## Leave Requests Containing Special Categories of Personal Data

***Does the Global Chief Compliance and Governance Officer (“GCCGO”) or the Global Privacy Office need to approve leave requests?***

Some leave requests may require you to Process special categories of Personal Data (e.g., health information). Your local Human Resources or Legal Departments can approve these requests without the approval of the GCCGO or Global Privacy Office.

For any questions or if you are uncertain about how to comply with any of these principles, please reach out to the Global Privacy Office at [dataprivacy@fedex.com](mailto:dataprivacy@fedex.com).