

## Privacy policy

### 1 Information on the controller and its Data Protection Officer

- 1.1** The Hapag-Lloyd App and the HL Navigator App (each the "**App**") are provided by Hapag-Lloyd AG, Ballindamm 25, D-20095 Hamburg / Germany, e-mail: [info.de@hlag.com](mailto:info.de@hlag.com), phone: +49 40 3001-0 ("**HLAG**"). , represented by the Members of the Board of Hapag-Lloyd AG. You can find more details on the Members of the Board online at [www.hlag.com](http://www.hlag.com). The processing of personal data is subject to the EU General Data Protection Regulation ("**GDPR**") and the regulatory framework for ePrivacy in the European Union. HLAG is the controller of said processing activities.
- 1.2** If you would like to get in touch with our data protection officer, please contact Hapag-Lloyd AG, Corporate Data Protection, Ballindamm 25, D-20095 Hamburg / Germany, or by e-mail at [dataprotection@hlag.com](mailto:dataprotection@hlag.com), or by phone at + 49 40 3001 3430.

### 2 Information on the processing of personal data in connection with the App

#### 2.1 Informational use of the App

In order to provide you with the services of the App, we will have to process personal data relating to you as following:

- 2.1.1** If you just use the App for information purposes, HLAG may process "**Meta-Data**", i.e. installed application version and last update date of the location list, which are required for technical reasons in order to be able to offer you our App. HLAG uses these data solely for the purpose of enabling you to gain access to the App. The legal basis for this processing is Article 6 paragraph 1 point (f) of the GDPR (balancing of interests). Our legitimate interest is the provision of the App to its audience.

The provision of the Meta-Data is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the Meta-Data. However, if the Meta-Data is not provided, we cannot provide the App.

- 2.1.2** Furthermore, we process your "**User-ID**" which is assigned to you with the installation of the App. This User-ID is a pseudonym, i.e. such data cannot be attributed to you as a specific person without the use of additional information and will change in case you de-install and re-install the App.

We process the User-ID and information on your use of the App, i.e. which button was tapped ("**Visitor-Data**") with the Google Analytics technology in order to gain insights in visitors behaviour and preferences for the purposes of optimization of the App. All Visitor Data is saved connected to the pseudonymous User-ID and can be used to aggregate a usage profile. The Visitor-Data will not be used to determine your personal identity and will not be compiled with other personal data relating to you, unless you separately agree to do so.

The legal basis for this processing is Article 6 paragraph 1 point (f) of the GDPR (balancing of interests). Our legitimate interest is the measurement of the App audience and the improvement of the App.

The provision of the User-ID and Visitor-Data is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the User-ID and Visitor-Data. However, if the User-ID is not provided, we cannot provide the App. Due to technical reasons, it is not possible to use our App without providing the User-ID. You can opt-out from providing the Visitor-Data by switching off "App tracking" and "Crash reports" in the "Settings" menu.

- 2.1.3** No data is exchanged between your device and our server when the App is closed. You can stop the collection of any personal data related to your usage of the App by closing or uninstalling the App.

- 2.1.4** Any personal data is stored as long as you request to delete your personal data.

- 2.1.5** In the context of providing you with the App we do not do any automated decision making and/or profiling.

- 2.1.6** The App is hosted in the European Union by Hapag-Lloyd AG. We do not provide your personal data to third parties. However, Visitor Data is shared with Google

## **2.2** Use of services provided in the App

Via the App we provide certain online services, such as Quick Quotes and Online Booking, which may involve the processing of personal data. Using such services via the App is technically no difference to the use of the respective services via the

website of HLAG. In case you use such services, we would like to invite you to review our Privacy Terms on the HLAG website at <https://www.hapag-loyd.com/en/meta/privacy-statement.html>. In the Privacy Terms you will also find details on the retention periods applicable to the services distributed via the App.

### 3 Information on your rights as data subject

As data subject you have the following rights with regard to the processing of personal data concerning you, which you can exercise by contacting HLAG or its Data Protection Officer (for contact details see sect. 1 hereof).

- **Right of access**, art. 15 GDPR: You have the right to obtain from us information which personal data relating to you are processed. This right includes further information on the data processing, such as purpose, legal basis and recipients. You also have the right to request a copy of the relevant personal data.
- **Right of rectification**, art. 16 GDPR: You have the right to obtain from us rectification of inaccurate and/or completion of incomplete personal data concerning you.
- **Right to deletion** ("right to be forgotten"), art. 17 GDPR: You have the right to obtain from us the deletion of personal data concerning you on the grounds provided for by art. 17 GDPR. This is the case, for example, when the relevant data are no longer necessary for the purposes for which they were originally collected or when they have been unlawfully processed.
- **Right to restriction of processing**, art. 18 GDPR: You have the right to obtain from us the restriction of processing if one of the conditions provided in art. 18, para 1 GDPR applies. If so, further processing may only take place on the basis of the conditions provided in art. 18, para 2 GDPR (e.g. on the basis of your consent or for the establishment, exercise or defence of legal claims). You are entitled to such a right, for example, if you contest the accuracy of personal data relating to you.
- You also have the **right to data portability**, art. 20 GDPR and to **withdraw your consent**, art. 7, para 3 GDPR.

- Furthermore, you have the **right to lodge a complaint with a supervisory authority**, art. 77 GDPR: You have the right to lodge a complaint with a supervisory authority if you are of the opinion that the processing of personal data concerning you violates the GDPR.

Detailed information on the above mentioned rights are provided in the respective article of the GDPR, that can be downloaded under the following link: <http://eur-lex.europa.eu/legal-content/DE/TXT/HTML/?uri=CELEX:32016R0679>. Your rights may be restricted by virtue of legal provisions.

#### **Right to object**

You have the right to object on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on art. 6, para 1, sentence 1, lit. (f) GDPR. In such case the relevant controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

#### **4 Third Party processing activities**

If you initially download the App from an app store operated by a third party (e.g. Google Inc., Apple Inc.), it is possible that such a third party may store and use your personal data. We have no control over whether and to what extent such a third party might do this. We therefore recommend that you read the relevant operator's privacy policy before using their app store.

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