fdx Privacy Notice

Updated and effective: September 5, 2025

Introduction

Learn more about Interest-Based Advertising and your Ad choices here.

This Privacy Notice applies to individuals who visit or otherwise interact with the fdx website(s), who use the fdx SaaS platform, whether as a business customer or on behalf of our business customers. Depending on your interactions with FedEx websites and applications, you may also be subject to other FedEx Privacy Notices, including the FedEx Privacy Notice.

This Privacy Notice is not a contract and does not create any legal rights or obligations.

When this Privacy Notice mentions "FedEx", "fdx", "we", "us", or "our", we are referring to the FedEx company that is deciding on the purposes and means of the processing of your Personal Data under this Privacy Notice. When using fdx services globally, your Personal Data is controlled by FedEx Dataworks, having its headquarters in Memphis, Tennessee.

Contact Information:

FedEx Dataworks

3630 Hacks Cross Road Memphis, TN 38125 United States of America

Overview

This Privacy Notice answers the following questions:

- 1. What Personal Data does fdx collect?
- 2. How does fdx collect Personal Data?
- 3. How does fdx process Personal Data?
- 4. How does fdx disclose your Personal Data?
- 5. How long will fdx retain your Personal Data?

- 6. What measures does fdx take to protect your Personal Data?
- 7. Where does fdx store or transfer your Personal Data?
- 8. What rights can you exercise in relation to your Personal Data?
- 9. What are my privacy rights if I am a California resident?
- 10. What if you have other questions or concerns?
- 11. Will there be updates to this Privacy Notice?

1. What Personal Data does fdx collect?

In the course of its business activities and providing services, fdx will need to process Personal Data. Without your Personal Data, we will not be able to provide you with the requested services. As a rule, the Personal Data that you provide directly or indirectly to fdx when using our services and visiting our websites are:

• Business Contact information.

This may include your name, business address, employee email address and employee phone number;

• Financial information.

This may include your bank account number, payment card information, payment status, and invoices;

• Account information.

This may include log-in details, including your email address, and other information provided through your account.

• Purchase and preference information.

This may include your order history, such as what products you have purchased and whether you have returned any products. Our tracking tools on retailer sites may collect order information on the order confirmation page, including order ID number, product codes, and shipping method.

Demographic and Behavioral Data

We may combine data from third-party sources or other FedEx affiliates in order to provide you better or new services. This data may include gender, age, income, behaviors/hobbies, retail interests, and consumer spending.

Automatically generated information.

This may include IP address, unique device or user ID, system and browser type, date and time stamps, referring website address, content and pages you accessed on our Websites or mobile apps, dates, times and locations actions take place, websites you visit (if you connect to our in-store wireless services), click-stream information and device location (if you turn on the feature in the mobile app).

In addition to the above categories of Personal Data, we may collect other types of information which may or may not contain Personal Data. Information related to the fdx business customers which may include: business customer's product catalog, location data, shipment volume, number of returns, and overall product trends. Depending on your interaction with fdx and our business customers, we may also get information about you from third parties and service providers that we engage to send promotional communications for us or provide marketing and advertising services.

2. How does fdx collect Personal Data?

We collect Personal Data directly from our business customers when they register as fdx members, when you utilize other products or services offered by FedEx or its affiliates, and when you visit fdx websites. We may also receive Personal Data indirectly from our fdx business customers when you place an order with an online retailer that is an fdx business customer. We may also obtain Personal Data about you from third parties, including data providers (such as Dunn & Bradstreet) and marketing partners (such as Facebook and Google).

We also use cookies and similar technologies on our site. Through these cookies, we automatically obtain Personal Data as listed above when you visit our site. To

learn more about the cookies and similar technologies, please consult our <u>cookie</u> notice.

When fdx receives Personal Data indirectly, we rely on the provider of the Personal Data for the accuracy of the information and that the provider has the authority to provide that information to fdx.

3. How does fdx process Personal Data?

Personal Data shall be collected, used, stored or otherwise processed when necessary within the framework of responsible, efficient and effective business management of fdx. fdx processes Personal Data based on applicable legal ground(s). The legal ground is often intrinsically linked to the business purpose. This means, for example, that the performance of an agreement can be both a legal ground and a business purpose for fdx. Therefore, we will first clarify the legal ground(s) on which fdx processes your Personal Data and, subsequently, the business purpose(s) that we use your Personal Data for:

Legal Bases

In general, fdx processes your Personal Data based on one of the following legal bases:

- The processing is necessary to perform an agreement between you and fdx,
- The processing is necessary for us to comply with our legal obligations,
- The processing is necessary to protect your vital interests or those of other individuals,
- The processing is necessary for the legitimate interests of fdx, except where such interests are overridden by your interests or fundamental rights and freedoms, or
- Where appropriate and required, we will ask for your consent.

Business Purposes

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

A. **Product development, research and improvement of fdx products and/or services**. fdx processes Personal Data for the development and improvement of fdx products and/or services, research and development

- (e.g., analyze information related to the fdx platform and products to improve our services).
- B. **Performing agreements**. This includes services related to our supply chain data management platforms, tracking services, communication with individuals and other parties regarding services, responding to requests for (further) information, dispute resolution and preparing agreements (e.g., link shipment tracking numbers to your account to enable customers to follow their shipments). These may include services operated by FedEx affiliates, operating groups, subsidiaries and divisions.
- C. Marketing Purposes. fdx may process, use or disclose information to tailor the content, recommendations, and offers we, our retailers, or our business partners display to you, both on the fdx platform and elsewhere online. We may also use or disclose your information to deliver and provide you with targeted advertising to facilitate the targeted advertising of unaffiliated third-party advertisers and business partners (i.e., deliver advertising, communications and content more specific to your interests from us as well as third parties and business partners), and to contact you with personalized offers from us, our advertisers, or business partners. In order to attract and retain customers, we or our service providers may also use information we collect to better understand our audience and track advertising impressions in advertising and marketing campaigns. We may also combine two or more elements about shipments you receive and or orders to perform analyses and targeted marketing activities related to your recipient behavior.
- D. Business process execution, internal management and management reporting. This includes activities such as managing company assets, debt collection, conducting internal audits and investigations, finance and accounting, implementing business controls, provision of central processing facilities for efficiency purposes, managing mergers, acquisitions and divestitures and Processing Personal Data for management reporting and analysis (e.g., conduct investigations into shipping accounts to detect fraud).

- E. **Safety and security**. Personal Data shall be included in the processing for activities such as those involving safety and health, the protection of fdx and customer, supplier or business partner assets and the authentication of customer, supplier or business partner status and access rights (e.g., provide safe and secure services for online and offline transactions).
- F. **Protecting the vital interests of individuals**. This includes processing data when necessary to protect your vital interests or those of other individuals (e.g., for urgent medical reasons).
- G. **Compliance with legal obligations**. This addresses the processing of Personal Data for compliance with laws, regulations and sector specific guidelines to which fdx is subject (e.g., matching names of clients, suppliers and business partners against denied parties' lists).

4. How does fdx share your Personal Data?

We may share your Personal Data identified in the "What Personal Data does fdx collect?" section above in the following circumstances:

- With FedEx's affiliates, operating groups, subsidiaries and divisions to help operate, improve, customize, and market our services. We may also share your Personal Data with these affiliated companies and subsidiaries so that they may contact you with their own direct marketing.
- With service providers and third parties operating on our behalf. In such
 cases, these service providers and third parties only use your Personal Data
 for the purposes described above and only in accordance with FedEx
 policies and guidelines in relation to data protection. We 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. To attract and retain customers, we may share your
 information with service providers that provide advertising or marketing
 assistance, track advertising impressions, and perform data analysis. These

- service providers have access to personal information needed to perform their functions, and other uses consistent with applicable law.
- With unaffiliated third parties, business partners who may offer products, services, and or targeted marketing to you. These third parties and business partners have their own privacy notices that govern the collection and use of your Personal Data.
- With ad tech companies that provide services to enhance the targeted marketing campaigns of unaffiliated third parties. To the extent this transfer is deemed a "sale" or a "share" of Personal Data, you may have the right to opt out of the transfer in accordance with Section 8 (What Choices and Privacy Rights can You Exercise in Relation to Your Personal Data).
- With our 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 divesture, merger, consolidation, or asset sale, or in the unlikely event of bankruptcy.

5. How long will fdx retain your Personal Data?

We will retain your Personal Data no longer than necessary for the purpose(s) for which we process your Personal Data. After the retention period, we will delete or anonymize your Personal Data, unless we need to retain certain elements of your Personal Data for another purpose. We will only do so if we have a legal basis to retain your Personal Data. We will also ensure that Personal Data are only accessible for that other purpose.

6. What measures does fdx take to protect your Personal Data?

fdx maintains appropriate 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. You should not share your username and password with anyone, and you should not re-use passwords across more than one website. If you have reason to believe that your Personal Data has been compromised, please contact us as detailed above.

7. Where does fdx store or transfer your Personal Data?

Due to the nature of our business and the services we provide to our clients, fdx may need to transfer your Personal Data to locations outside the country where you reside. In any case where we transfer Personal Data, fdx shall ensure that such a transfer is subject to appropriate safeguards. For Personal Data originating in the European Economic Area (EEA), Switzerland and the United Kingdom, 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.

8. What choices and privacy rights can you exercise in relation to your Personal Data?

Based on the law applicable to the use of your Personal Data, you may have rights that you can exercise in relation to your Personal Data. Note that in some cases we are not required to completely comply with your request, for example because such rights may be conditional or because we have to balance your rights against our rights and obligations to process your Personal Data and to protect the rights and freedoms of others. A number of the rights you may have in relation to your Personal Data, as applicable to the use of your Personal Data, are explained below:

Right of access

You may be entitled to a copy of the Personal Data we hold about you and to learn details about how we use it. Your Personal Data will usually be provided to you digitally. We may require you to prove your identity before providing the requested information.

Right to rectification

We take reasonable steps to ensure that the information we hold about you is accurate and complete. However, if you believe this is not the case, you may have the right to request that any incomplete or inaccurate Personal Data that we process about you is amended.

Right to deletion

You may have the right to ask us to erase your Personal Data, for example where the Personal Data we collected is no longer necessary for the original purpose, where Personal Data has become obsolete or where you withdraw your consent (if we are processing your Personal Data based on consent). However, this will need to be balanced against other factors. For example, we may not be able comply with your request due to certain legal or regulatory obligations.

Right to restriction of processing

You may be entitled to ask us to (temporarily) stop using your Personal Data, for example where you think that the Personal Data we hold about you may be inaccurate or where you think that we no longer need to use your Personal Data.

Right to data portability

You may have the right to ask that we transfer Personal Data that you have provided to us to a third party of your choice. This right can only be exercised when you have provided the Personal Data to us, and when we are processing that data by automated means on the basis of your consent or in order to perform our obligations under a contract with you.

Right to object

You may have the right to object to processing which is based on our legitimate interests. In case of the processing of Personal Data for marketing purposes, you have the right to object at any time. When you ask us to stop using your Personal Data for marketing purposes, fdx will immediately cease to use your Personal Data. For other purposes based on our legitimate interests, we will no longer process the Personal Data on that basis when you file an objection based on your grounds relating to your particular situation,

unless we have a compelling legitimate ground for the processing. Note, however, that we may not be able to provide certain services or benefits if we are unable to process the necessary Personal Data for that purpose.

Rights relating to automated decision-making

You may have the right not to be subjected to automated decision-making, including profiling, which produces legal effect for you or has a similar significant effect. If you believe you have been subject to an automated decision and do not agree with the outcome, you can contact us using the details below and ask us to review the decision.

Right to appeal

If we deny your request, you may be entitled to submit an appeal. If you are entitled to submit an appeal, instructions on how to submit an appeal will be included in our response to you explaining why we denied your request.

Right to withdraw consent

We may ask for your consent to process your Personal Data in specific cases. When we do this, you have the right to withdraw your consent at any time. fdx will stop further processing as soon as possible after the withdrawal of your consent. However, this does not affect the lawfulness of the processing before consent was withdrawn.

Email <u>dataprivacy@fedex.com</u> for your requests about these rights.

Cookies and Tracking Tools: You may be able to refuse or remove some or all of the cookies and other tracking technologies on the fdx website through your browser settings. You can delete cookies by going to the preferences, tools or options menus of your browser. If you choose to do so, some features of the website may not function properly. Selections you make are device-specific and browser-specific, meaning that you may need to make your selections on each browser on each device you use to access the website.

About Our Ads / Interest-Based Advertising: fdx may work with network advertisers, ad agencies, analytics service providers, and other vendors to serve advertisements on our websites and in connection with the fdx services; to serve our advertisements elsewhere online; and to provide us with information

regarding use of and traffic on our websites and in connection with the fdx website/platform. We also use tracking tools to recognize new or past customers, store your password if you are registered on our site, improve our website, and better understand the interests of our customers and our website visitors.

These advertisements may be tailored based on information collected automatically (through tracking tools like cookies and web beacons) about your activities in connection with the fdx website/platform and other websites, mobile applications, and services you visit, over time and across different devices you use and across the various websites and platforms you visit. Your browser may give you the ability to control cookies. How you do so depends on the type of cookie. Certain browsers can be set to reject browser cookies. If you would prefer not to have your online activity tracked for purposes of receiving interest-based advertising, you can opt-out by navigating to your browser settings and updating your preferences to remove your cookies. Choices you make are browser and device specific.

To learn more about interest based advertising by third parties, including through cross-device tracking, and to exercise certain choices regarding cookies and similar technologies, including opting-out of interest-based advertising, please visit the <u>Digital Advertising Alliance</u>, <u>Network Advertising Initiative</u>, <u>Digital Advertising Alliance</u>. fdx adheres to the Digital Advertising Alliance's Self-Regulatory Principles for Online Behavioral Advertising.

Google Analytics: We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the fdx website/platform and report on activities and trends. This service may also collect information regarding the use of other websites, apps, and online resources. You can learn about Google's practices by going to google.com/policies/privacy/partners and opt out of them by downloading the Google Analytics opt-out browser add-on, available at tools.google.com/dlpage/gaoptout.

9. What are my privacy rights if I am a California resident?

If you reside in California, we are required to provide additional information to you about how we use and disclose your information, and you may have additional rights with regard to how we use your information. We have included this California-specific information below.

Consistent with the "What Personal Data does fdx collect? Section above, we collect certain categories and specific pieces of information about individuals that are considered "Personal Information" in California. As detailed above, we may collect this Personal Information from you and other third-parties. We collect, share, sell, and disclose Personal Information for the business and commercial purposes described in the "How does fdx process your Personal Data?" and "How does fdx disclose your Personal Data?" sections above.

As described above in the "How does fdx disclose your Personal Data" section, we may disclose your Personal Data with third parties and business partners who may offer products, services, and/or targeted advertising to you. Our disclosure of Personal Data to these third parties may constitute a "sale" or "share" as those terms are defined under California law. You may opt out of disclosure of your Personal Data to these third parties by emailing dataprivacy@fedex.com or please call customer support.

Given the divergent practices of organizations that offer browsers and the lack of a standard in the marketplace, we do not respond to Do Not Track signals at this time.

Subject to certain exceptions, as a California consumer, you have the right to: (i) access your Personal Information and (ii) obtain deletion of your Personal Information. To the extent permitted by applicable law, we may be required to retain some of your Personal Information, and certain Personal Information is strictly necessary in order for us to fulfill the purposes described in this Privacy Policy.

Should you wish to request the exercise of your other rights as detailed above with regard to your Personal Information, we will not discriminate against you by offering you different pricing, products or services, or by providing you with a different level or quality of products or services, based solely upon this request. Please contact us as described above to exercise such rights.

If you are a California consumer and you wish to exercise your rights as outlined in this section, you may need to provide information so that we can verify your identity. We will use the information you provide when exercising your rights for no other purpose other than to verify your identity.

You also have the option of designating an authorized agent to exercise your rights on your behalf. For authorized agents submitting requests on behalf of California residents, please contact us as described above, with any evidence you have that you have been authorized by a California consumer to submit a request on their behalf.

10. What if you have other questions or concerns?

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

You also have the right to lodge a complaint with the competent (local) data protection or government authority in the jurisdiction where you work, where you live or where an alleged infringement takes place. For individuals in the European Economic Area or Switzerland, the lead supervisory authority for FedEx is the Dutch Data Protection Authority (Dutch DPA), unless the alleged infringement is purely a local matter. A listing of the European Data Protection Authorities can be found here.

11. Will there be updates to this Privacy Notice?

fdx may update this Privacy Notice from time-to-time. If an amendment has a serious impact, fdx will endeavor to actively inform you about such amendments. fdx will publish an up-to-date Privacy Notice on the Websites at all times indicating the latest amendments.