

THIRD-PARTY SERVICE PROVIDER PRIVACY NOTICE (EUROPE)

VENDORS, SERVICE PROVIDERS, AGENTS, AND SUBCONTRACTORS

INTRODUCTION

Your privacy is important to Expeditors.

We created this Third-Party Service Provider Privacy Notice ("**Notice**") to help you understand who we are, what Personal Data we collect, why we collect it, and what we do with it when we engage you or your company as a vendor, service provider, agent, sub-broker, professional consultant, subcontractor, or carrier for transportation and logistics related services (collectively, "**you**" or "**your**").

"**Personal Data**" ("**Data**" or "**your Data**") is defined in different ways depending on what country you are in. However, in general, it means any information or set of information from which Expeditors is able to, directly or indirectly, identify you. Please keep in mind, your Data does not include anonymous information, that is, data that cannot be associated with or tracked back to you.

You or your company may be required to participate in Expeditors' due diligence review process. This Notice allows you or your company to share and document relevant information needed by Expeditors in connection with our preferred supplier and service provider program. Some data collected through this process (e.g., in a due diligence questionnaire) may be Personal Data of the shareholders, management personnel, key personnel, agents, or other individuals within your company ("**Representatives**"). To that end, you warrant that you have provided a copy of this Notice to each of the Representatives and have obtained that Representative's written consent substantially in the form of the consent attached to the Service Provider Agreement ("**SPA**").

We encourage you to take some time to read this Notice in full.

WHO IS EXPEDITORS?

When this Notice mentions "**we**," "**us**," or "**Expeditors**," it refers to the controller or handler of your Personal Data, namely the Expeditors affiliate that decides which of your Data are collected and how they are used, as well as **Expeditors International of Washington, Inc.**, 3545 Factoria Blvd. SE, Bellevue, WA 98006, U.S.A. ("**Expeditors Corporate**"). The Expeditors affiliate controlling your Data is Expeditors International (UK) Ltd / Expeditors Ireland Limited.

WHAT TYPES OF PERSONAL DATA ABOUT YOU DO WE PROCESS?

Most of the Personal Data Expeditors processes is information that you voluntarily and knowingly provide to us. We also collect Data from you and through our interactions with you. Sometimes, we collect data inferred from other information you provide us, information obtained from a third-party with your knowledge, or from publicly accessible sources. We may also process Data without your consent where we are allowed to do so.

Please note, the list below is not exhaustive. What we actually process will vary depending on your country of residence, job position, and activities.

Categories of Personal Data	Examples of Types of Personal Data We Collect
Individual Identification Information	First name, last name, title, country, date and place of birth, nationality, language(s) spoken, photograph (subject to your consent), national identification number, passport number, driver's license number
Contact Information	Email, phone number, postal address
Network Traffic Data and Other Related Data	Online identifiers, internet protocol address, cookies, device identification, websites visited, language settings
Account Login Data	Login credentials, username, password, other information used to access or secure Expeditors systems and applications

Appointment Related Information	Appointment date, job title and code, employee number, photographs / video, region, work contact information, organizational business, division, department, location, manager's name, computer or facilities access and authentication information, mandatory policy acknowledgement sign-off sheets, geographic mobility, photographs, travel restrictions
Data Regarding Qualifications and Career Development	Assessment or test evaluation information, employment history with your company, project history, education history, professional certifications, completion of training programs and reports, competency or personality assessment, language skills
Images and / or Videos From Which You May Be Identified	Images captured by CCTV or visitor recognition or authentication devices, videos, photos, biometric data (such as fingerprints), your signature
Service Fees	Bank account information
Any Other Information That You Decide to Voluntarily Share with Expeditors	Feedback, opinions, information provided in emails and letters, during telephone calls, and conversations
Background Check or Criminal Data	Data relating to criminal behavior, criminal records or proceedings regarding criminal or unlawful behavior (only in certain countries, for certain roles and only upon request of Expeditors)

HOW DO WE USE YOUR PERSONAL DATA?

We process your Data to run our business and manage our relationship with you effectively, lawfully, and appropriately, both during your company's engagement, and at the time when your company's appointment ends. Below is an overview of the purposes for which we may process your Data:

Purposes for Processing Personal Data	Examples of Purposes for Processing Personal Data
Business Operations Execution	To administer existing and future business arrangements, to ensure that you and / or your company have the appropriate experience and qualifications to provide services on behalf of Expeditors, to ensure that you and your company will comply with Expeditors' Code of Business Conduct and anti-corruption policies, to assure you and your company will comply with obligations under anti-corruption laws such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, to contact you with information and notices related to your use of our products and services as our Third-Party Service Provider, to contact you with special offers and other information we believe will be of interest (in accordance with any privacy preferences expressed to us by you), to invite you to participate in surveys and provide feedback to us (in accordance with any privacy preferences expressed to us by such individuals), to improve our products and services and develop new products and services, to improve our marketing and promotional efforts, to use for any other purpose about which we provide notice at the time of collection
Relationship Management	To contact you by phone call, text (SMS), or email messaging, to facilitate communications, to maintain emergency contact
Security & Protection of Interests / Assets of Expeditors	To deploy and maintain technical and organizational security measures, to conduct internal audits and investigations, to enable monitoring and surveillance for security, health, and safety, to provide IT support and services, to protect the security of Personal Data as well as Expeditors systems and premises
Compliance With Legal Obligations	To disclose Personal Data to government institutions or supervisory authorities as applicable in all countries in which Expeditors operates, such as tax and national insurance deductions, to comply with record-keeping and reporting obligations, to comply with government inspections and other requests from government or other public authorities, to monitor and enforce compliance with Expeditors policies and procedures and with legal and regulatory requirements, to respond to legal process such as subpoenas, to pursue legal rights and remedies; to manage any internal complaints or claims, to enable work-related injury and illness reporting
Defense of Legal Claims	To establish, exercise or defend legal claims to which Expeditors is subject

ON WHAT LEGAL BASIS DO WE USE YOUR PERSONAL DATA?

Your Personal Data is processed pursuant to one or more of the following lawful bases:

- (i) your consent (only when legally required or permitted);
- (ii) the need to establish and fulfill the sub-contract we have with your company. We will process your Data to enable us to run our business and manage our relationship with you effectively, lawfully, and appropriately while you are undertaking certain duties and responsibilities on behalf of your company's provision of services to Expeditors;
- (iii) the need for Expeditors to comply with legal obligations and to establish, exercise, or defend itself from legal claims;
- (iv) the need to pursue our legitimate interests, including:
 - ensuring that our networks and information are secure and to stop damage to computer and electronic communication systems;
 - preventing fraud;
 - collecting outstanding receivables;
 - administering and generally conducting business within Expeditors and across Expeditors; and
 - preventing or investigating suspected or actual violations of law, breaches of the terms of your company's contractual agreement(s) with Expeditors or non-compliance with Expeditors Code of Business Conduct;
- (v) the need to respond to your requests (such as responding to your requests regarding the handling of, access to, or changes to your Personal Data);
- (vi) the need to protect the vital interests of any person such as to report possible criminal acts or threats to public security to a competent authority; and/or
- (vii) any other legal basis otherwise permitted by local laws.

Where we process special categories of Personal Data (or Sensitive Personal Data), we will obtain your explicit consent unless your consent is not required by law or if the Data is required to protect your health in an emergency. In certain circumstances, where your Data is processed based on your consent, you have the right to withdraw your consent. This will not affect the lawfulness of the processing that has taken place before your consent was withdrawn.

WHEN DO WE SHARE YOUR PERSONAL DATA?

We may share your Data with the following parties:

Expeditors Affiliates. Your Data may be shared with Expeditors affiliates. Access will be limited to those who have a need to know. This may include limited members with administrative functions, (e.g., finance, payroll, legal, employee relations, insurance, and IT departments), and certain managers (i.e., only persons with assigned responsibility or managerial responsibility for you or your group). Individuals at Expeditors Corporate also may process your Data in connection with their job responsibilities.

Third-Party Providers. Like many other businesses, we may outsource certain processing activities to trusted third-party service providers to perform functions and provide services to us. These include, without limitation: information services or information technology service providers (e.g., for software procurement, maintenance, and data hosting), payroll providers or human resources providers, insurance companies, employee benefit providers, and background check providers.

Expeditors' Customers. We may share your Data with our customers (e.g., for sales and marketing purposes, providing contact lists for customer support, relationship management, etc.).

Public and Governmental Authorities. When required by law or necessary to protect our rights and properties, we may share your Data with entities that regulate or have jurisdiction over Expeditors. We may also disclose your Data as a part of our regular reporting activities, where necessary to protect an individual's or the public's safety, where your Data is already publicly available, or with your consent (to the extent that consent is required by law).

Professional Advisors and Others. We may share your Personal Data with other parties including professional advisors, such as banks, insurance companies, auditors, lawyers, accountants, or other outside professional advisors.

WHEN DO WE TRANSFER YOUR PERSONAL DATA ABROAD?

Expeditors has a global footprint. Your Data may be processed in the European Economic Area (“**EEA**”) and or outside the EEA depending on the purpose of processing.

Some of these countries are recognized by the European Commission as providing an adequate level of protection for your Data. Transfers from the EEA to countries not recognized by the European Commission as providing an adequate level of protection are governed by appropriate cross-border transfer solutions (e.g., approved standard contractual clauses) and will only be used consistent with your relationship with Expeditors and the practices described in this Notice.

Where required by law, Expeditors and its affiliates have entered into appropriate cross-border transfer solutions for intra-Expeditors group transfers.

For transfers to trusted third-party providers, we will endeavor to ensure that the provider applies suitable safeguards to protect the privacy and security of your Data during the transfer.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We keep your Data in accordance with applicable law and our internal document retention policies.

Your Data is kept only for as long as is necessary to fulfill the purposes for which it was collected (see above section “**How Do We Use Your Personal Data?**”) or until you revoke your consent.

Expeditors may be subject to a legal, contractual, or similar obligation to retain your Data. This may include mandatory data retention laws applicable in your country, government orders to preserve Data relevant to an investigation or similar proceeding, or our obligation to retain Data for litigation purposes.

If we are not required to destroy or erase your Data, we may pseudonymize or anonymize it so that your Data cannot be associated with or tracked back to you.

HOW DO WE PROTECT YOUR DATA?

We take appropriate physical, technical, and organizational measures consistent with applicable laws and regulations to protect your Data, taking into account the state of the art, the risks we have identified in our industry, the costs of implementation, and the nature of the Data to be protected. This includes requiring our service providers to use appropriate measures to protect the confidentiality and security of your Personal Data.

WHAT ARE YOUR CHOICES?

You may exercise any of the rights you may have under applicable data privacy laws in your country. All requests must be made in writing and are subject to certain limitations and applicable law. We generally do not engage in automated decision-making processing activities with respect to your data. In the event automatic data processing is utilized, upon your written request, we will provide you with an opportunity to express your views and will provide any other safeguards required by law.

QUERIES, COMPLAINTS, AND OBJECTIONS

Please submit any questions, complaints, requests, or objections to **Expeditors International of Washington, Inc.**, 3545 Factoria Blvd. SE, Bellevue, 98006, U.S.A., Attn: Legal Department, to dataprivacy@expeditors.com. you may lodge complaints with your local data protection supervisory authority if you believe we have not complied with the requirements of the law with respect to your Data.

WHEN WILL THERE BE UPDATES TO THIS NOTICE?

We may modify or update this Notice at any time to reflect changes to applicable legislation, legal requirements, or internal standards, policies, and procedures. The most current version of this Notice will govern our use of your Data.