

Privacy Notice for Drivers of Fleet Vehicles

At Jungheinrich AG ("Jungheinrich", "we", "us"), protecting the integrity, confidentiality and security of personal data is a priority. We process personal data in accordance with applicable data protection laws, in particular the General Data Protection Regulation (EU) 2016/679 ("GDPR").

This Privacy Notice applies to drivers ("you", "Driver") of connected fleet vehicles, which generate and store product- and machine-related data during operation.

1. Definitions

- **Vehicle and Usage Data ("Vehicle Data"):** Product- or machine-related data generated and stored during the operation and usage of Fleet Vehicles.
- **Fleet Vehicles ("FV"):** Any vehicle or machine equipped with a Jungheinrich telematics box, regardless of whether it is manufactured by Jungheinrich or a third party.
- **Jungheinrich Customer ("Customer", "Customers"):** Any legal entity (typically your employer or other owner of the Fleet Vehicles) that uses Fleet Vehicles and related digital services for its own operational purposes.
- **Jungheinrich Services ("Services"):** Any digital product, software or IT-services distributed and provided by Jungheinrich to Customers (e.g. Jungheinrich Fleet Management System).
- **Personal Data:** Any information relating to an identified or identifiable natural person ("data subject"). For the purpose of this Privacy Notice, the data subject is the driver of a Fleet Vehicle.
- **Processing:** Any operation performed on Personal Data, whether by automated means or not.

2. Jungheinrich's Roles in the Processing

In relation to Processing of Driver's Personal Data, Jungheinrich can act both as a Processor or as a Controller.

2.1. Jungheinrich as a Controller

The Controller for the Processing as specified in Section 3.2 and within the meaning of applicable data protection law is:

Jungheinrich AG

Friedrich-Ebert-Damm 129
22047 Hamburg, Germany

2.2. Jungheinrich as a Processor

In addition, Jungheinrich may act as a Processor in respect of the data referred to in section 3.1. Controller for this Processing is generally the Jungheinrich Customer.

Contact Details of the Data Protection Officer

If you have any questions regarding the Processing of your Personal Data or wish to exercise your rights (see Section 7), you can contact our **Group Data Protection Officer** via email: dpo@jungheinrich.com.

3. Description of the Processing

Jungheinrich processes Vehicle Data in different roles depending on the purpose of Processing.

3.1 Processing on Behalf of Customers (Jungheinrich as a Processor)

When Jungheinrich Processes Vehicle Data to provide its Services to the Customer, it acts as a Processor, Processing data solely on behalf of and under the instructions of the Customer (typically your employer or other owner of the Fleet Vehicles). The Customer alone determines the scope and purposes

of this Processing (e.g. fleet management, access control, compliance) and is therefore responsible for this Processing. For further information relevant to your specific situation, please contact the Customer.

The type and scope of Vehicle Data depend on the configuration of the Fleet Vehicle managed by the Customer. Where authorization systems (e.g. transponders) are used, certain data may be linked to an individual driver and thus constitute Personal Data. Scope and purposes of the Processing of Personal Data depend on the Services used by the Customer. Possible **categories of Personal Data processed on behalf of customers** include:

- **General personal data** (e.g. name, personnel number)
- **Driver-related data** (e.g. transponder ID, driving license details, authorizations)
- **Special categories of personal data** (if applicable) (e.g. medical data, where processed by the Customer)
- **Vehicle data** (e.g. access ID, driving times, vehicle usage, shock events)

3.2 Processing for Jungheinrich's Own Purposes (Jungheinrich as a Controller)

Jungheinrich also processes certain Vehicle Data for its own purposes. In this case, Jungheinrich acts as an independent Controller. This includes Vehicle Data **received from the Customer in the course of providing services**.

Categories of data processed:

- **Vehicle data** (e.g. access ID, driving times, vehicle usage, shock events)
- **Technical and log data** (e.g. logon/logoff times, system logs, timestamps, configuration changes)

Jungheinrich does not process sensitive data (e.g. health data) for its own purposes and does not use driver names or direct identifiers for analytics.

Purpose of Processing:

- Analysis of vehicle usage, condition and performance
- Improvement and development of products and digital services
- Identification of technical issues and optimization potential

Legal basis:

- Legitimate interests (Art. 6(1)(f) GDPR), in product improvement and innovation as well as IT Security

Retention:

For Personal Data processed on behalf of customers (Section 3.1.), retention periods are defined by the respective Customer in accordance with their internal policies and legal obligations.

Default retention period for Personal Data Processed when using Jungheinrich Services is six months but the Customer can configure it differently within the set range, depending on the configuration and purpose of use (e.g. safety or operational requirements) of each Customer. For further information relevant to your specific situation, please contact the Customer (typically your employer or other owner of the Fleet Vehicles).

Jungheinrich adheres to these retention periods when Processing data for its own purposes (Section 3.2) and deletes or anonymizes data accordingly, unless longer retention is required by law.

4. Disclosure of Personal Data

Internally, access to personal data is limited to the extent necessary and granted only to authorized personnel. Jungheinrich may share your Personal Data with affiliated companies within Jungheinrich Group or public authorities where required by law.

For Processing carried out for its own purposes, Jungheinrich engages trusted service providers (e.g. hosting and technical services).

These providers process Personal Data on behalf of Jungheinrich and under its instructions and are contractually bound to comply with applicable data protection laws.

5. International Data Transfers

In certain cases, Personal Data may be transferred to countries outside the EU/EEA.

Such transfers take place only where an adequate level of protection is ensured, in particular through:

- an adequacy decision (Art. 45 GDPR), or
- Standard Contractual Clauses (Art. 46 GDPR)

Additional safeguards may be implemented where necessary.

You may request further information using the contact details in Section 2.

6. Automated Decision-Making

Jungheinrich does not carry out automated decision-making, including profiling, within the meaning of Art. 22 GDPR.

7. Your Rights

If Jungheinrich processes your Personal Data, you have the following rights under data protection law:

- **Right of access:** You can request confirmation whether your data is processed and obtain access to it.
- **Right to rectification and erasure:** You can request correction of inaccurate or incomplete data and deletion of your data where legally permitted. Deletion may be restricted where retention is required by law or for the establishment, exercise, or defense of legal claims.
- **Right to restriction of Processing:** You can request restriction of Processing, for example if you contest accuracy, object to deletion, or if you need the data for the establishment, exercise, or defence of legal claims.
- **Right to data portability:** You can receive your data in a structured, machine-readable format and request its transfer to another Controller, where applicable.
- **Right to object:** On grounds relating to your particular situation, you can object to Processing based on our legitimate interests. We will then stop Processing unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or unless Processing serves the establishment, exercise, or defence of legal claims.
- **Right to withdraw consent:** If Processing is based on consent, you can withdraw it at any time. This does not affect the lawfulness of Processing carried out on the basis of consent before its withdrawal.
- **Right to lodge a complaint:** You have the right to lodge a complaint with a data protection supervisory authority.

You may exercise your data protection rights at any time by contacting either our Data Protection Officer (Section 2) or the Customer (typically your employer or other owner of the Fleet Vehicles). Please have in mind that, in order to fully process and respond to your request, Jungheinrich and the Customer might have to collaborate and share information about You and Your request.

Where Jungheinrich acts as a Controller (Section 3.2.), we may also request additional information to determine the scope of your request and to verify your identity before taking action on your request to protect your Personal Data (e.g., against data release to the wrong data subject).

Nevertheless, where Jungheinrich acts as a Processor (Section 3.1), we do not respond to your data protection enquiries directly, but instead forward them to the Jungheinrich Customer (e.g. your employer, or other owner of the Fleet Vehicles) and assist them in fulfilling their obligations to respond to your enquiries.

8. Amendments to this Privacy Notice

Jungheinrich may amend this Privacy Notice where necessary (e.g. due to legal or operational changes). Please, therefore, notice the current version of our Privacy Notice in the language relevant to you, as this is subject to changes: www.jungheinrich.com/en/privacydrivers.

Last change: 30 June 2026