

Service Provider Personnel Privacy Notice

Federal Express Corporation (“FedEx”) together with its subsidiaries and affiliated Companies, is committed to protecting your privacy and the security of your personal data. The Service Provider Personnel Privacy Notice (“Privacy Notice”) explains how FedEx collects and uses personal data relating to individuals who are employed by or are seeking employment with one or more companies contracted to provide package transportation, pickup, and delivery services to FedEx (referred to as “service providers”).

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

Last date Updated: March 25, 2025

When this Privacy Notice mentions “FedEx,” “we,” “us,” or “our,” it is referring to FedEx deciding on the purposes and means of processing of your personal data.

The following questions are answered within this Privacy Notice:

1. What does the term “Personal Data” refer to?
2. What do the terms “GPS” and “VEDR” refer to?
3. What personal data does FedEx collect of service provider personnel?
4. Why does FedEx process personal data of service provider personnel?
5. Who has access to your personal data?
6. How long does FedEx retain your personal data?
7. How does FedEx protect your personal data?
8. Where does FedEx store or transfer your personal data?
9. How do service providers use and protect your personal data?
10. How can service provider personnel request access to their personal data?
11. Will there be updates to this Privacy Notice?
12. What if I am a California “Consumer”?

1. What does the term “personal data” refer to?

The term “**personal data**” is defined by the data protection regulation that applies to you based on the jurisdiction in which you reside. In general, **personal data**, is information that can directly or indirectly be used to identify a natural born person, including:

- Name
- FedEx badge ID number and log-in information
- Government-issued identification numbers (social security and driver’s license numbers, certifications, etc.)
- Addresses

- Phone numbers
- Email addresses
- Photos

2. What do the terms “GPS” and “VEDR” refer to?

GPS refers to a Global Positioning System that uses satellite technology to track location.

GPS equipment may include, but is not limited to, package scanners and related software, Video Event Data Recorder devices and other electronic devices mounted on vehicles, tractors and trailers, and other mobile computing devices equipped with GPS technology that can identify, record, and transmit the exact geolocation of the device using a combination of GPS, mobile phone, and Internet technology.

GPS data refers to the geolocation and timestamp data collected by GPS equipment.

Triggering Event refers to an event that activates the capture and storage of Video Event Data Recorder data (i.e., a collision, hard acceleration, hard braking, or hard lateral motion).

Video Event Data Recorder (“VEDR”) refers to video recorder systems on service provider vehicles leased to FedEx include internal- and external-facing cameras that may record video, sound, and motion sensor data (**VEDR Data**). The VEDR system uses computer hardware and software to record VEDR Data, store it when Triggering Events occur, and transmit the VEDR Data a VEDR provider. The VEDR system also collects GPS data, as defined above.

The VEDR systems on service provider vehicles may also include the use of Machine Vision and Artificial Intelligence (“**MV+AI**”) functionality. **MV+AI** uses in-cab cameras to predict whether a driver is engaged in distracted driving behaviors (e.g., eating, drinking, being distracted or fatigued, using a cell phone, not wearing a seat belt, smoking, or other such behaviors) as elected by FedEx and service providers (“Distracted Driving Behaviors.”)

VEDR provider refers to one or more third-party vendors that contract with service providers to license, lease, sell, or host the computer hardware, software, cameras, sensors, and storage used to operate the VEDR systems. The VEDR provider receives the VEDR data and GPS data transmitted by these devices in real- time. If a triggering event occurs, the VEDR data is stored and used by the VEDR provider in preparing reports for a service provider.

3. What personal data of service provider personnel does FedEx collect?

FedEx will need to collect and process your personal data in the course of its commercial relationship with your service provider business, business activities, provision of services, as well as for security purposes and to comply with applicable laws in the fields of federal motor carrier safety, health and safety, wage and hour and tax compliance, and as otherwise required by applicable law. FedEx collects the following personal data:

- **Pre-employment screening information**

We collect your personal data when we conduct pre-employment verification of

your identity, address, and/or references and (where permitted by local law) background checks. These background checks may also be conducted on an ongoing basis (including criminal or judicial data) as well as drug screens all in accordance with applicable law. We may use third-party providers for verification and background check services that provide criminal and judicial information and screening.

- **Contact information**

This may include your FedEx badge identification number, name and former names, address and former addresses, telephone numbers (home, mobile/cell, work), photo, date of birth, and email address.

- **Employment information**

This may include the service provider's business name, supervisor's name, address, phone number, as well as unemployment information.

- **Driver's license and driving history information**

We collect information relating to your driver's license, including number, state/province, type, and history.

- **Driver Qualification Certification**

In connection with safety and regulatory compliance, the service provider agrees that all personnel assigned to operate a vehicle under the FedEx motor carrier authority meet training and experience standards. This includes maintaining a valid Qualification Certification. FedEx receives confirmation from a qualified provider that the service provider's drivers have a Qualification Certification for a specific size/type of vehicle to be operated.

- **Government identifiers**

We collect your government- issued identifiers as required and subject to applicable law. These may include your ID details, tax identification number, social security number, visa, passport number, and your driver's license number.

- **Compensation, hours worked, and financial information**

In the case of a compliance assessment to ensure that service provider is complying with applicable wage and hour and tax withholding obligations, FedEx may collect financial information including your hours worked, compensation and bonuses, as well as your bank account number, bank name, and details.

- **GPS data**

We collect GPS Data to track customer packages; promote safety, security, and contract and legal compliance; and enhance network analyses, mapping, and route optimization applications. We may also collect the geolocation data at a specific point in time (time stamp) of GPS equipment used by service provider personnel.

- **VEDR data**

When enabled, a VEDR system continuously records data in connection with the operation of the service provider vehicle leased to FedEx. The VEDR data collected may include video of the driver and/or passenger(s); interior and exterior of the vehicle; outside environment showing road conditions, obstacles, and weather conditions; detailed vehicle operational metrics such as speed, mileage, distance traveled, and engine running time, harsh braking, sudden acceleration, cornering; near collisions and actual impact due to accidents or crashes; and audio may be recorded at the discretion of the service provider. To comply with its contractual obligations, the service provider is responsible to arrange for data collection by the VEDR provider so that data relating to triggering events occurring during the performance of services for FedEx are captured and stored. FedEx does not have any interests or obligations related to the use of the VEDR data by the service provider at other times or in other ways.

- **Information relating to incidents, investigations, claims, and litigation**

This may include information relating to incidents and investigations you may be involved in during your time working for the service provider and providing service to FedEx. It may also include any claims or litigation you are involved in during that time.

- **Sensitive information**

Some of the personal data we collect is considered to be sensitive information under the privacy laws of some jurisdictions. We will only use your sensitive information for the purposes specifically identified in this Privacy Notice or at the time we asked you to provide the information. We will not use or disclose your sensitive information for any other purpose without first requesting and obtaining your consent.

4. Why does FedEx process personal data of service provider personnel?

Personal data will be collected, used, stored, or otherwise processed, if necessary, within the framework of responsible, efficient, and effective business management by FedEx. The types of personal data that FedEx may collect about you and the circumstances in which we may collect your personal data are controlled by the contractual arrangements between FedEx and the service provider.

Business Purposes

FedEx will only collect, use, or otherwise process personal data if the processing falls within the scope of one (or more) of the following legitimate purposes:

A. Business process execution and management, including:

- To provide service to FedEx customers, including ensuring timely delivery to the correct location and providing package, trailer, or shipment information to customers
- Ensuring quality, including reviewing historical data to investigate accuracy and

- integrity of package tracking, scanning, coding, and signature compliance
- Analyzing service provider contractual performance and business results
- Verifying services provided to FedEx to determine or validate applicable charges
- Enhancing route planning technology, routing, and navigation applications, address geo- coding and mapping information
- Responding to accusations of service provider personnel misconduct or damage claims
- Conducting other legitimate business activities

B. Health, safety, and security, including:

- Those activities involving health, safety, and security, including the protection of vital interests of individuals (e.g., for urgent medical reasons) and promoting physical safety in crisis situations
- Assessing service provider compliance with contractual agreements relating to safety
- Investigating VEDR triggering events
- To conduct verification of your identity, address, and where permitted by local law, background checks. Background checks may also be conducted on an ongoing basis (including criminal or judicial data) as well as drug screens in accordance with applicable law
- Locating lost or stolen physical assets or gathering information about the same
- Locating missing or misdelivered packages or gathering information about the same
- Conducting other legitimate activities relating to health, safety, and security

C. Compliance with legal, contractual, or ethical obligations, including:

- Compliance with, and investigating compliance with, laws, regulations and sector specific guidelines to which FedEx is subject
- Compliance with, and investigating compliance with, any agreements entered into between the Service Provider Business and FedEx
- Compliance with, and investigating compliance with, internal FedEx policies and procedures
- Demonstrating FedEx legal compliance and aiding in legal proceedings
- Responding to subpoenas issued by law enforcement
- Supporting insurance claims or disputes
- Processing that is necessary as part of whistle-blowing obligations, the pre-employment screening, and the matching of names on so-called designated party lists
- To administer or defend the legal interests of FedEx
- Conducting other legitimate activities relating to legal, contractual, or ethical obligations

5. Who has access to your personal data?

FedEx does not sell your personal data for monetary or other valuable consideration. We also do not share your personal data for the purposes of advertising to you based on your interactions across multiple businesses.

FedEx may share your personal data with third parties in the following circumstances:

- With its affiliates, operating companies, operating groups, subsidiaries, and divisions for the purposes listed in Question 4 (Why does FedEx process personal data of service provider personnel?).
- With third-party administrators and professionals such as background and identification verification services, consumer reporting agencies, drug screening services, insurers, insurance brokers, benefits providers, claims administrators, retirement plan administrators, testing companies, lawyers, and accountants who provide services necessary for the purposes listed in Question 4 (Why does FedEx process personal data of service provider personnel?). As appropriate, FedEx will require third parties to conduct activities in a manner consistent with FedEx policies and guidelines in relation to data protection.
- With data processors and service providers, i.e., parties processing personal data on our behalf such as technology database management, workplace security, system management and security, application hosting, and travel administration. In such cases, these third parties are only allowed to use your personal data for the purposes described in Question 4 (Why does FedEx process personal data of service provider personnel?) and only in accordance with our instructions.
- With its 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 in Question 4 (Why does FedEx process personal data of service provider personnel?). All FedEx employees are subject to a duty of 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.
- We may also provide personal data to third parties as necessary to investigate safety and security incidents including shipper and recipient complaints, defend the company's legal interests, ensure the safety and security of personnel and property, and where otherwise required by law (e.g., to comply with an agency investigation or respond to a subpoena).
- With other third parties subject to your prior authorization.

6. How long does FedEx retain your personal data?

FedEx will keep any personal data it receives in connection with stated purposes above only as long as reasonably needed for those purposes.

7. How does FedEx protect your personal data?

FedEx has implemented reasonable security measures to protect the data stored in its systems and to meet legal requirements that apply to specific types of personal data that can be identified with a specific person.

FedEx is not responsible for the data protection and privacy practices of the service provider or the VEDR provider.

8. Where does FedEx store or transfer your personal data?

Since we operate in many countries around the world and have international systems in place, FedEx may need to transfer your personal data to locations outside the country where you reside. In any case where we transfer personal data, FedEx shall ensure that such a transfer is subject to appropriate safeguards. For personal data originating in the European Economic Area, 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. For more detailed information about these safeguards, please contact us as described in Question 12 (What if I am a California “Consumer”?).

9. How do service providers use and protect your personal data?

Please direct any questions you have about the service provider company’s data protection and retention practices and access procedures to the service provider.

10. How can service provider personnel request access to their personal data?

The service provider is responsible for giving you access to VEDR data, GPS data, and any applicable driver certification compliance data in accordance with local employment and privacy laws and the service provider’s business practices. Please direct any questions about how to request access to your data to the service provider. FedEx will provide reasonable assistance to the service provider in responding to a data access request when necessary or appropriate.

11. Will there be updates to this Privacy Notice?

FedEx may update this Privacy Notice from time to time. If an amendment has a serious privacy impact, FedEx will endeavor to actively inform you about such amendments.

12. What if I am a California “Consumer”?

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. This section only applies if and to the extent that you are a Consumer as defined under the California Consumer Privacy Act, as amended.

Consistent with Question 3 (What personal data of service provider personnel does FedEx collect?), we collect certain categories and specific pieces of information about individuals that are considered "Personal Data" in California. We may collect this personal data from you, third parties you authorize to provide personal data to FedEx, and to

other sources we engage in during the applicable period of your employment with a business which provides service to FedEx, as well as the period thereafter required to comply with legal or regulatory obligations.

We may disclose your personal data to the categories of third parties and for the reasons described in Question 5 (Who has access to your personal data?). We collect your personal data for the business and purposes described in Question 4 (Why does FedEx process personal data of service provider personnel?).

Consistent with Question 5 (Who has access to your personal data?) we do not “sell” or “share” your personal data. Consistent with Question 4 (Why does FedEx process personal data of service provider personnel?). FedEx only uses and discloses your sensitive personal data for purposes that are authorized by subsection (a) of Section 1798.121 of the California Consumer Privacy Act. We do not respond to opt-out preference signals at this time.

Subject to certain exceptions, if you are a California consumer, you have the following rights with respect to your personal data:

- **Right of access**

- Subject to applicable law, you are entitled to inspect or receive information relating to the personal data FedEx has collected about you.

- **Right to correction**

- We take reasonable steps to ensure that the personal data we hold about you is accurate and complete. However, if you believe the personal data we maintain about you is inaccurate, you may request that any inaccurate personal data that we process about you is corrected, considering the nature and purposes of the processing of the personal data. We reserve the right to conduct an analysis of whether the information we hold concerning you is accurate considering the totality of the circumstances.

- **Right to request deletion**

- You have the right to ask us to delete your personal data, subject to certain exceptions. For example, we may not be able comply with your request due to legal or regulatory reasons or where your personal data is necessary in order for us to fulfill the purposes for which it was collected as described in this Privacy Notice. If we are unable to fulfill your request to delete personal data, we will provide an explanation as to why we need to retain that information.

Should you wish to request the exercise of your other rights with regard to your personal data, we will not discriminate or retaliate against you, based solely upon this request. To exercise these rights, you can complete [the OneTrust webform](https://privacyportal.onetrust.com/webform/8a471a7b-6a52-49d0-bcb0-fa8bdb61598f/c121cce6-6cfb-4c3d-9b61-334f56a01b5f) (found at <https://privacyportal.onetrust.com/webform/8a471a7b-6a52-49d0-bcb0-fa8bdb61598f/c121cce6-6cfb-4c3d-9b61-334f56a01b5f>) and we will remove Personal Data if required or send an email to FXGSPPDSARS@fedex.com.

If you are a California consumer and you wish to exercise your rights as outlined in this section, you may need to provide additional information to verify your identity (such as name and e-mail) 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 in this section, with any evidence you have that you have been authorized by a California consumer to submit a request on their behalf. Please know we may independently require the consumer to verify their identity in accordance with applicable law.