

PRIVACY NOTICE ON CUSTOMER SERVICE-RELATED DATA PROCESSING ACTIVITIES

I. PURPOSE OF THIS PRIVACY NOTICE

The purpose of this Privacy Notice is to provide information about all processing of personal data carried out in connection with the Controller's customer service activities, including the IT systems and artificial intelligence-based solutions used in the course of such processing. This Notice describes the main characteristics of the data processing activities and the rights available to data subjects.

This Privacy Notice is a shortened version of the Controller's Privacy Notice relating to its postal services.

II. CONTACT DATA OF THE CONTROLLER

Name: GLS General Logistics Systems Hungary Kft.

Registered office: 2351 Alsónémedi, GLS Európa str. 2.

Email address: adatvedelem@glshungary.com

Postal address: 2351 Alsónémedi, GLS Európa str. 2.

Name of the DPO: dr. Katona Rita

Contact data of the DPO: adatvedelem@glshungary.com

III. CUSTOMER SERVICE-RELATED DATA PROCESSING ACTIVITIES

	Purpose of the data processing	Legal basis of data processing	Scope of personal data processed	Duration of data storage
1	Complaint management	Compliance with legal obligation (Article 6(1)(c) GDPR. The legal obligation is based on Section 17/A-17/C. of Consumer Protection Act and on Section 57 of Postal Act)	Recipient's name, e-mail address, Delivery address, phone number, Sender's name, address, phone number, e-mail address, Other authorized Recipient's name, telephone number, email address, Pickup address, The number of the official certificate suitable for the proof of identity, bank account number	3 years after the complaint has been filed
2	Customer Service Case Management (Emails) Email addresses concerned: info@glshungary.com ; jofogas@glshungary.com ; import@glshungary.com ; export@glshungary.com ; global@glshungary.com ; importvam@glshungary.com ;	Compliance with legal obligation (Article 6(1)(c) GDPR. The legal obligation is based on Section 17/A-17/C. of Consumer Protection Act and on Section 57 of Postal Act)	Recipient's name, e-mail address, Delivery address, phone number, Sender's name, address, phone number, e-mail address, Other authorized Recipient's name, telephone number, email address, Pickup address, The number of the official	5 years from the date of the inquiry/request.

	exportvam@glshungary.com ; pickup@glshungary.com ; bo@glshungary.com ; vip@glshungary.com ; beszedes@glshungary.com ; customsdoc@glshungary.com ; ccsup@glshungary.com ; ecsomag@glshungary.com ; isr@glshungary.com ; pickup@glshungary.com ; transit@glshungary.com ; vaterafutar@glshungary.com ; wronglocker@glshungary.com ; belsougyek@glshungary.com ; belsougyek@glshungary.com		certificate suitable for the proof of identity, bank account number	
3	Provision of services, complaint handling, related quality management and process improvement activities, monitoring and analysis of service quality, as well as training purposes, including the anonymisation and use of data for training a machine learning-based virtual assistant.	Legitimate interests pursued by the Controller (Article 6(1)(f) GDPR) The Controller has a legitimate interest in establishing internal processes tailored to the requests and needs received, as well as in the continuous monitoring, review, analysis and, where necessary, improvement of such processes. This includes enhancing the efficiency of customer service operations, reducing response times, and providing training and education to personnel involved in customer service activities to ensure a high standard of customer support.	Recipient's name, telephone number, email address, shipment delivery address; sender's name, telephone number, email address, residential address; recipient/consignee's name, telephone number, email address; shipment collection address; identity card number; bank account number.	5 years (pursuant to Sections 17/A-17/C of Act CLV of 1997 on Consumer Protection (Fgytv.), and Section 54(7) and Section 57 of Act CLIX of 2012 on Postal Services (Postatv.)).
4	Managing COD	Performance of a contract (Article 6(1)(b) GDPR)	Recipient's name, Recipient's e-mail address, home address, bank account number, position, phone number. Contract Indicating the personal data is	The end of the fifth year following the dispatch of the parcel (Postal Act Section 55.§ (7))

			not a prerequisite to the contact signed with GLS, but if the Client wishes to order this service, indicating the data is a condition of its performance. If it is not indicated, the service cannot be performed, therefore indicating it is mandatory.	
5	Provision of a New Client Starter Package in connection with the performance of a contract for parcel logistics services	Performance of a contract (Article 6(1)(b) GDPR)	Client's name, address, phone number Indicating the personal data is not a prerequisite to the contact signed with GLS, but if the Client wishes to order this service, indicating the data is a condition of its performance. If it is not indicated, the service cannot be performed, therefore indicating it is mandatory.	5 years following the termination of the contract
6	Handling of telephone calls, customer service inquiries and complaints via telephone.	Compliance with a legal obligation (<i>Article 6(1)(c) GDPR</i>) Legal obligation: Sections 17/A-17/C of Act CLV of 1997 on Consumer Protection (Fgytv.) and Section 57 of Act CLIX of 2012 on Postal Services (Postatv.).	voice of the data subject	3 years from the date of the call recording.

IV. APPLICATION OF ARTIFICIAL INTELLIGENCE TECHNOLOGIES

To support its customer service operations, the Controller uses artificial intelligence-based technology to analyse and categorize the content of customer inquiries, route cases to the appropriate handling process, and prepare draft responses.

The artificial intelligence technology used by the Controller does not make decisions based solely on automated processing that produce legal effects concerning the data subject or similarly significantly affect the data subject.

The Controller remains responsible at all times for the final handling of the case, as well as for the response provided to the customer/data subject.

V. DATA PROCESSORS

The Controller engages data processors in connection with the handling of customer service inquiries, the provision of services, complaint management, quality management and process improvement activities, including in the following areas:

- outsourced telephone customer service;
- customs clearance services;
- IT and infrastructure service providers; and
- in relation to the use of artificial intelligence, the following service providers:
 - Telekom Rendszerintegráció Zrt. (artificial intelligence services and operation);
 - Cisco Systems, Inc. (Cisco Webex Contact Center platform in connection with artificial intelligence services);
 - Microsoft Corporation (Microsoft Azure cloud infrastructure in connection with artificial intelligence services).

The data processors may process personal data solely on behalf of and in accordance with the instructions of the Controller for the purpose of providing customer service activities and supporting artificial intelligence-based customer service processes.

VI. RIGHTS OF THE DATA SUBJECT

1. Right of access by the data subject (Right to be informed)

- 1.1. Data Subjects have a right to receive information from the Controller whether their personal data is being processed. If data is being processed, the Data Subject may request information from the Controller about the following:
 - a) purposes of the data processing.
 - b) the categories of personal data concerned.
 - c) the recipients or categories of recipient to whom the personal data has been or will be disclosed, in particular recipients in third countries or international organisations.
 - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period.
 - e) the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing.
 - f) the right to lodge a complaint with a supervisory authority;
 - g) where the personal data is not collected from the data subject, any available information as to their source.
 - h) information about the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
- 1.2. The Controller shall provide a copy of the personal data undergoing processing free of charge once per year to the Data Subject. For any further copies requested by the Data Subject, the Controller may request reimbursement of costs (in the case of paper-based information: HUF 10/sheet). If the data subject has submitted the request electronically, the controller shall provide this data – unless otherwise instructed by the Data Subject – in electronic form to the Data Subject.

2. Right to rectification

The data subject shall have the right to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

3. Right to erasure (right to be forgotten)

3.1. The Data Subject shall have the right to obtain from the Data Controller the erasure of personal data concerning them without undue delay, and the Data Controller shall be obliged to erase personal data relating to the Data Subject without undue delay where one of the following grounds applies.

- a) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed.
- b) if the processing is based on the Data Subject's consent, the Data Subject withdraws this consent, provided that the data processing has no other legal basis.
- c) the data subject objects to the data processing, if the rules of erasure exist in respect of this objection;
- d) the personal data has been unlawfully processed;
- e) the personal data has to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject;
- f) the personal data has been collected in relation to the offer of information society services referred to in Article 8(1) of the Regulation (GDPR).

3.2. The Controller is not obliged to erase the personal data if the data processing is required:

- a) for exercising the right of freedom of expression and information.
- b) for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.
- c) on the basis of public interest concerning public health.
- d) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes insofar as the right referred to in paragraph 3.3.1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) for the establishment, exercise or defence of legal claims.

4. Right to restriction of processing

4.1. The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data.
- b) the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead.
- c) the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.
- d) the data subject has objected to processing; in this case, the restriction applies pending the verification whether the legitimate grounds of the controller override those of the data subject.

5. Right to data portability

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the Controller, in a structured, commonly used and machine-readable format and shall have the right to transmit the data to another controller without hindrance from the Controller, provided that

- a) the legal basis of processing is the data subject's consent, and
- b) the processing is carried out by automated means.

6. Right to object

The Data Subject shall have the right to object to the processing of their personal data, including profiling. In such a case, the Data Controller shall no longer process the personal data, unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject, or which relate to the establishment, exercise or defence of legal claims.

7. Exercise of Rights

With regard to personal data, requests for information, rectification, restriction, erasure, and withdrawal of consent may be submitted at any time using the contact details below:

- by post: 2351 Alsónémedi, GLS Európa utca 2.
- by e-mail: info@glh-hungary.com

8. Lodging a Complaint

- 8.1. If the Data Subject considers that the processing of personal data relating to them infringes the provisions of this Notice or the GDPR, the Data Subject shall have the right to lodge a complaint in connection with such data processing. The complaint may, at the Data Subject's discretion, be submitted either to the Data Controller or to the competent supervisory authority.
- 8.2. The Data Controller receives complaints relating to data processing at the following contact details:
- by post: 2351 Alsónémedi, GLS Európa utca 2.
 - by e-mail: adatvedelem@glh-hungary.com

Where a complaint is submitted to the Data Controller using a contact detail other than those specified above, the time limit for its examination shall commence on the date the complaint is received at the above address.

A complaint may be submitted to the supervisory authority as follows:

National Authority for Data Protection and Freedom of Information (in Hungarian: Nemzeti Adatvédelmi és Információszabadság Hatóság)

- Address: 1055 Budapest, Falk Miksa utca 9–11.
- Postal address: 1363 Budapest, P.O. Box 9
- E-mail: ugyfelszolgalat@naih.hu
- Website: www.naih.hu

9. Judicial Remedies

In the event of an infringement of their rights, the Data Subject shall have the right to bring an action before a court against the Data Controller. Upon submission of the claim, the court shall act in the matter as a matter of priority. The adjudication of the case falls within the jurisdiction of the regional court (contact details of the Budapest-Capital Regional Court: 1055 Budapest, Markó Street 27., P.O. Box 1363: 16).

At the choice of the Data Subject, the proceedings may also be initiated before the regional court having jurisdiction over the Data Subject's place of residence or habitual residence. The competent regional court based on the place of residence or habitual residence may be found at <https://birosag.hu/birosag-kereso>.

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