



# Privacy Policy (UAE)

APPLIES TO  
UDB Logistics FZCO (DIEZ)

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## PRIVACY POLICY (UAE)

This Privacy Policy explains how UDB Logistics FZCO (DIEZ) (“UDB”, “we”, “us”) collects, uses, stores, and shares personal data in connection with logistics and related services provided under the contracting entity named in this document (“Services”).

### 1. Scope

This Privacy Policy applies to personal data processed by UDB in connection with:

- customer onboarding and account management;
- shipment bookings, documentation, coordination, and exception handling;
- invoicing, payments, and operational communications;
- compliance screening and regulatory requirements (where applicable);
- customer support and relationship management.

This Privacy Policy does not replace portal-specific notices (e.g., Partner Portal Privacy Policy) which apply to the use of the portal as a system.

### 2. Roles

Depending on the context, UDB may act as:

- Controller (we decide why/how data is processed), e.g., onboarding, invoicing, compliance recordkeeping; and/or
- Processor (we process data on your instructions), e.g., shipment details provided by customers for service execution.

Where UDB acts as a Processor, processing terms are governed by the Data Processing Addendum (DPA).

### 3. Personal data we may process

We may process the following categories (as applicable):

- Contact and account data: names, job titles, business email/phone, company details.
- Shipment and documentation data: shipper/consignee/notify party details, addresses, identifiers, AWB/booking references, invoices, packing lists, HS codes, cargo descriptions, weights/values.

- Compliance-related data: screening results, export control approvals, and supporting documents (where required for the shipment).
- Operational communications: emails, messages, call logs, service tickets.
- Technical data (limited): when interacting with our systems, we may receive IP address, device/browser logs, and timestamps for security and troubleshooting. We do not use tracking cookies on the Legal Hub.

We do not intentionally seek to collect sensitive personal data. If such data is included in shipment documents, it will be processed only as required to provide the Services and meet legal obligations.

#### **4. Sources of data**

We receive personal data from:

- customers and partners (booking instructions, documents);
- carriers, ground handlers, agents, and subcontractors involved in shipment execution;
- authorities or official portals (where export approvals/clearances are required);
- publicly available sources (limited, for verification/compliance where reasonable).

#### **5. Purposes and legal basis**

We process personal data to:

- provide and operate the Services (booking, documentation, coordination, delivery, exceptions);
- communicate operational updates and resolve service issues;
- meet legal, regulatory, and compliance requirements (including screening/export control where applicable);
- manage billing, payments, and accounting;
- prevent fraud, protect security, and maintain service integrity;
- defend legal claims and maintain records.

#### **6. Sharing of personal data**

We may share personal data with:

- carriers and operational partners (airlines, ground handlers, trucking companies, warehouses) to execute the shipment;
- service providers supporting IT, hosting, communications, security, and business operations;
- authorities when required by law, export control, customs, or airport procedures;
- professional advisors (legal/accounting) where necessary.

We share only what is reasonably necessary for the purpose.

#### **7. International transfers**

Logistics is cross-border by nature. Personal data may be processed or accessed in multiple countries depending on routing, carriers, and operational parties. Where required, UDB applies reasonable safeguards and contractual controls to protect data during cross-border processing.

#### **8. Retention**

We retain personal data only as long as necessary for:

- providing the Services;
- contractual, operational, and compliance purposes; and
- legal/accounting requirements.

Retention periods may vary by shipment type and regulatory requirements.

## **9. Security**

UDB applies reasonable technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, or alteration. No system is 100% secure; customers should use secure channels and protect credentials where applicable.

## **10. Data subject rights**

Where applicable under law, individuals may request:

- access to their personal data;
- correction of inaccurate data;
- deletion or restriction (subject to legal/operational limits);
- objection to certain processing; and/or
- portability (where applicable).

We may need to verify identity and may be unable to fulfill requests where we must retain data to comply with legal obligations or to provide/defend Services.

## **11. Updates**

We may update this Privacy Policy from time to time. The “Last updated” date reflects the most recent revision. The current version is available in the Legal & Compliance Hub.

## **12. Contact**

For privacy inquiries, requests, or complaints, contact: [dpo@udb.ae](mailto:dpo@udb.ae).