| DOCUMENT REF | VERSION | CLASSIFICATION | STATUS | OWNER | NEXT REVIEW |
|---|---|---|---|---|---|
| KF-GDPR-ROPA-03 | 1.4 · 2 Nov 2026 | Internal | Approved | Privacy lead, Kestrel | 2 Nov 2027 |

COMPLIANCE RECORDS · KESTREL FREIGHT B.V. AND KESTREL FREIGHT GMBH

# Register of processing activities

*Pursuant to Article 30 GDPR (Dutch: AVG) and § 70 BDSG, covering Kestrel Dispatch, Kestrel Driver, Kestrel CRM and the AI dispatch assistant.*

## 1. Scope and parties

1.1 **Controllers.** Kestrel Freight B.V., Venlo (KvK registration) and Kestrel Freight GmbH, Duisburg (Handelsregister Duisburg), acting as joint controllers under an arrangement dated 14 August 2026 (ref. KF-JCA-01). The Venlo entity is the point of contact for data subjects.

1.2 **Processor.** Techsy, under the data processing agreement KF-DPA-2026-01 (signed 14 August 2026), hosting in the EU (Frankfurt region). Sub-processors are listed per activity in section 2 and in Annex A; Kestrel is notified 30 days before any change. An external DPO was appointed voluntarily on 1 September 2026 on account of activity 2.2 (contact: privacy@kestrel-freight.example).

## 2. Processing activities

| NO. | PROCESSING ACTIVITY | PURPOSE | LAWFUL BASIS | DATA CATEGORIES AND DATA SUBJECTS | RETENTION | PROCESSOR / SUB-PROCESSOR | TRANSFER OUTSIDE EU |
|---|---|---|---|---|---|---|---|
| 2.1 | **Order and dispatch management** (Kestrel Dispatch) | Plan, execute and document transport orders for shippers | Contract Art. 6(1)(b) | Order data, consignee names and phone numbers, delivery addresses and timestamps. *Shipper contacts, consignees.* | 7 years after the financial year (Art. 52 AWR; § 147 AO) | Techsy (Postgres, EU-Frankfurt); e-mail delivery provider (EU) | No |
| 2.2 | **Driver location tracking** (Kestrel Driver app) | ETA to shippers, exceptions, proof of route, driving-time safety | Legitimate interest Art. 6(1)(f) · balancing test in DPIA-02 | GPS position every 30 s on shift only, speed, device and driver identifier. *142 employed, 11 subcontracted drivers.* | Raw positions 90 days; per-load aggregates (route, stop times) 7 years | Techsy; Mapbox (map tiles and routing, no position storage) | No |
| 2.3 | **Driver HR and compliance records** | Licence, ADR, medical validity; tachograph; payroll link | Legal obligation; contract Art. 6(1)(c), (b) · Reg. (EU) 165/2014 | Name, date of birth, licence classes, certificate expiry, tachograph card number, depot. *Drivers.* | Employment plus 2 years; tachograph data 12 months | Techsy; payroll provider NL; payroll provider DE | No |
| 2.4 | **Shipper account management** (Kestrel CRM) | Quotes, account history, invoicing contacts, prospecting | Contract; legitimate interest for prospects Art. 6(1)(b), (f) | Business contact details, communication history, quote and rate history. *Employees of shippers; prospects.* | Active plus 3 years after last contact; prospects 18 months | Techsy; transactional e-mail provider (EU) | No |
| 2.5 | **AI dispatch assistant** (drafting only) | Draft load plans and replies to shipper e-mails for human review | Legitimate interest Art. 6(1)(f) · human sign-off before any send | Order data, incoming shipper e-mail text, driver first names and shift status; no HR data, no raw positions. *Shipper contacts, drivers.* | Prompts and drafts 30 days; no training on Kestrel data | Techsy; Anthropic (Claude API, zero data retention terms) | Yes · USA SCCs module 2 + DPF; TIA-01 |
| 2.6 | **Proof of delivery** | Evidence of delivery; dispute and damage handling | Contract; legal obligation Art. 6(1)(b), (c) | Photo of goods, consignee name and signature, timestamp, location of signature. *Consignees.* | 7 years | Techsy; object storage (EU) | No |
| 2.7 | **Driver recruitment** (website forms) | Assess and contact applicants | Pre-contractual steps; consent for talent pool Art. 6(1)(b), (a) | Name, contact details, CV, licence classes, availability. *Applicants.* | 4 weeks after decision; 12 months with consent | Techsy (Kestrel CRM); no job-board sync | No |

## 3. DPIA status: driver location tracking (activity 2.2)

| REFERENCE | STATUS |
|---|---|
| DPIA-02 | Completed |
| **RESIDUAL RISK** | **COMPLETED** |
| Low | 22 Sep 2026 |

Works council (OR, Venlo) and Betriebsrat (Duisburg) consulted 14 September 2026; favourable DPO opinion 19 September 2026; driver notice v2 issued with the app update of 6 October 2026. Prior consultation under Art. 36 not required. Review by 22 September 2027 or on any change to sampling interval, retention or purpose.

| RISK IDENTIFIED | INITIAL | MEASURE IN PLACE | RESIDUAL |
|---|---|---|---|
| Continuous surveillance of employees | High | Tracking runs from shift start to shift close in the app only; October sample: 0 positions outside shift (n = 142) | Low |
| Location data used in appraisals | Medium | Prohibited by policy HR-07; raw data visible to dispatch during shift only; every access logged, reviewed monthly | Low |
| Retention beyond need | Medium | Automated deletion of raw positions after 90 days, verified weekly by job report | Low |
| Third-party access via map provider | Low | Tile and routing requests carry no driver identifier; contract reviewed | Low |

## 4. Data subject requests, 2026

Requests **6** Closed **5** Mean response **10 days** Longest **18 days** Overdue **0** Extensions used **0**

| REF | RECEIVED | TYPE | SUBJECT | CHANNEL | DUE | CLOSED | DAYS | OUTCOME |
|---|---|---|---|---|---|---|---|---|
| DSR-01 | 9 Feb | Access Art. 15 | Former driver | E-mail | 9 Mar | 21 Feb | 12 | Provided: HR file and per-load aggregates |
| DSR-02 | 3 Apr | Erasure Art. 17 | Applicant | Web form | 3 May | 8 Apr | 5 | Erased; no retention exception applied |
| DSR-03 | 18 Jun | Objection Art. 21 | Driver (tracking) | Letter via OR | 18 Jul | 2 Jul | 14 | Not upheld, reasons given; off-shift exclusion confirmed in writing |
| DSR-04 | 27 Jul | Rectification Art. 16 | Shipper contact | E-mail | 27 Aug | 28 Jul | 1 | Phone number corrected in CRM |
| DSR-05 | 12 Sep | Access Art. 15 | Consignee | E-mail | 12 Oct | 30 Sep | 18 | Provided: 3 POD records, third-party signature redacted |
| DSR-06 | 6 Oct | Erasure Art. 17 | Prospect | E-mail | 6 Nov | Open | 27 | Identity verified 2 Nov; erasure scheduled, within period |

Statutory period one month from receipt (Art. 12(3)), extendable by two months for complex requests; identity verified before any disclosure; files under KF-DSR-2026.

| VERSION | DATE | CHANGE | AUTHOR | APPROVED BY |
|---|---|---|---|---|
| 1.0 | 18 Aug 2026 | Initial register; activities 2.1 to 2.4 and 2.6 | Privacy lead (Kestrel), with Techsy | Managing director, Kestrel Freight B.V. |
| 1.1 | 2 Sep 2026 | Activity 2.5 (AI dispatch assistant) added; TIA-01 attached | Privacy lead | External DPO |
| 1.2 | 22 Sep 2026 | DPIA-02 completed; raw positions retention set to 90 days; consultation recorded | Privacy lead | External DPO; OR and Betriebsrat noted |
| 1.3 | 14 Oct 2026 | Annex A sub-processors updated; recruitment retention 4 weeks after decision | Privacy lead | External DPO |
| 1.4 | 2 Nov 2026 | Section 4 (request log) added; annual review date fixed | Privacy lead | Managing director, Kestrel Freight B.V. |

**Managing director, Kestrel Freight B.V.**

*signed electronically*

Venlo · 2 Nov 2026

**Data protection officer (external)**

*signed electronically*

Eindhoven · 2 Nov 2026

**For the processor: Techsy, delivery lead**

*signed electronically*

2 Nov 2026 · DPA KF-DPA-2026-01