

## PRIVACY POLICY FOR CLIENT

The objective of this Privacy Policy for Client (the “**Policy**”) is to protect the rights and privacy of individuals’ Personal Data (defined below), by ensuring that the Personal Data will be used within the scope required in view of the nature and scale of the business of Sagawa Express (H.K.) Co., Ltd. (the “**Company**”), and in compliance with the The Personal Data (Privacy) Ordinance (Cap.486) and where appropriate other applicable laws and regulations in Hong Kong (collectively, the “**Applicable Law**”).

This Policy shall be effective as of August 1<sup>st</sup>, 2023 and is subject to further changes or revisions (which shall be notified to you). The Company shall continue to review the effectiveness of this Notice from time to time as and when necessary.

This Policy applies when the Company acts as the data controller of the Personal Data only. For any activities where the Company is the data processor for other data controller, you may check the details of such processing activities from the privacy policy or notice of processing of such company, organization, or service provider who is the data controller of such activity directly.

### 1. DEFINITION OF PERSONAL DATA

“**Personal Data**” refers to any data about an individual which can be used to identify such individual, whether from that data alone or in combination with other information. This includes any expression of opinion about an individual and intentions towards an individual. This also includes personal data held visually, such as photographs and video clips (including CCTV) as well as audio recordings.

### 2. PURPOSES FOR COLLECTION, USE & DISCLOSURE OF PERSONAL DATA

#### 2.1. Collection of Personal Data

The Company may, directly or indirectly, collect your personal data from the following sources:

- (1) Information that you or your representative directly provided to the Company;
- (2) Information that customer and service user directly provided to the Company such as information of contact person, consignor, and consignee;
- (3) Personal data received from affiliates and logistic network of the Company;
- (4) Information received from any agency or organization which is a customer or vendor of the Company that you work with (as a director, representative, or contact person);
- (5) Application, website, social media, and/or other public relation media you use in order to contact the Company;
- (6) Personal data received from vendor or business partner of the Company such as broker, delivery service provider, online platform service provider, or logistic agent; or
- (7) Any reliable public sources.

#### 2.2. Types of Personal Data Collected

The Company shall only collect personal data that are necessary and adequate (but not excessive) for a lawful purpose directly related to a function or activity. Depending on purposes of use and requirement of the operatives in processing personal data, the Company may collect various types of your personal data including:

- (1) Identification information such as name-surname, name prefix, date of birth, nationality,

- identification number, taxpayer identification number, fax number telephone number, e-mail, social media account (such as Line ID), address, copy of identification card, copy of driver license, copy of car registration, copy of household registration, copy of passport, photo, voice, signature, picture, and video;
- (2) Personal characteristics such as a copy of the professional license, copy of license (i.e., international transportation license), and job position;
  - (3) Financial information such as bank account, transaction information, financial credit information, withholding tax information, payment method, and other payment details; and
  - (4) Other information such as vehicle registration number, personal data that you provide to the Company when contacting us such as interest and type of service, communication with the Company through social media and other channels.

### **2.3. Purposes of use and disclosure**

The Company will process your personal data to: (i) perform contractual obligations as a party to the contract, (ii) comply with legal obligations, or (iii) for the legitimate interest. Personal Data which we collected from you may be collected, used and/or disclosed for the following purposes (collectively, the “**Purposes**”):

- (1) Purposes of Providing Delivery and Logistics Related Services
  - (i) Management of goods delivery and logistics including transportation planning, packing of goods for delivery, delivery of goods, coordination with those involved in the transportation of goods as well as taking any operation to fulfill the purposes as requested by the customer; and
  - (ii) Tracking and reporting on the status of transportation.
- (2) Purpose of Providing Export and Import Related Services
  - (i) Representing customer in export and import of goods including freight planning, arranging and coordinating with a business partner of the Company regarding the exportation and importation as well as taking any operation to fulfill the purposes as requested by the customer; and
  - (ii) Carrying out any process in relation to the customs clearance including coordinating with any relevant governmental organizations, preparing documents for consideration of relevant governmental organizations, and requesting related permissions from governmental organizations for importing, exporting, or transiting goods.
- (3) Purposes of Managing Warehouse
  - (i) Management of warehouse and storage services;
  - (ii) Preparing the record for inspection of relevant authorities; and
  - (iii) Supporting legal compliance, and regulations of relevant officials.
- (4) Marketing Purpose

The Company will inform and obtain your written consent before processing your personal data in direct marketing activities. Subject to your consent, the Company may collect, use, and disclose your personal data including but not limited to the following marketing purposes:

  - (i) Offering information and newsletter in relation to the logistic services of the Company. In the case where you no longer wish to be contacted for the marketing of services, you may proceed with the opt-out through the channels designated by the Company;
  - (ii) Service assessment in order to improve the quality of service, and to offer services

- that you may be interested in;
- (iii) Setting pattern and improving general marketing activities of the Company; and
- (iv) Using the information in preparation of advertisement and public relations materials via any media channels.

The Company will notify you when your personal data are used for direct marketing purpose for the first time. The Company will cease to use your data for such purpose if so required by you.

(5) Other Purpose

- (i) Registering customer accounts and creating a database for the provision of logistic services of the Company;
- (ii) Procedure for demanding the payment of debt;
- (iii) Fulfilling our contractual obligations whether directly or indirectly;
- (iv) Legitimate interests in relation to the carrying out of the business of the Company, by concerning the fundamental rights of the data subject such as for developing, improving, predicting, and solving problems that may incur in relation to the provision of service of the Company;
- (v) Supporting the stability and security of the Company;
- (vi) Assessment and management of your requests;
- (vii) Inspection, analysis, and preparation of documents upon request of governmental organizations and regulatory bodies;
- (viii) Compliance with applicable laws including performing obligations as business operator of the warehouse, silo, and cold room; and

In the case where the Company appoints third party service provider(s) to process your Personal Data (whether within or outside Hong Kong), the Company shall adopt contractual or other means to prevent any Personal Data transferred to the third party service provider(s) from being kept longer than is necessary for processing of the data.

The Company will not disclose or permit the disclosure or make available your Personal Data other than in accordance with the Purposes unless you have given a prior written consent to the Company or the Applicable Law allows the Company to do so without obtaining your consent.

If you could not share Personal Data that are necessary for the Company to process Personal Data based on the ground of contractual obligations, or legal obligations, the Company will not be able to perform its contractual obligations with such subject matter nor able to comply with legal obligations.

The Company will process Personal Data in strict compliance with Applicable Law. In case where you have given a consent to any data processing activity, you may withdraw your consent at any time by giving a written notice to the Company.

#### **2.4. Data Sharing and Disclosure**

- (1) The Company will not disclose your Personal Data without your consent. This is unless the disclosure has appropriate legal basis, such as:
  - (i) Is required based on the applicable laws and/or regulations;
  - (ii) Is necessary to respond to an emergency that threatens the life, your health or safety or another individual which cannot be obtained in a timely way, provided that the Company shall, in a reasonably timely manner, notify you of the disclosure and the purposes of the disclosure;
  - (iii) Is necessary for any investigation or proceedings; and
  - (iv) Is necessary to verify your personal particulars and process payment requests in

relation to the provision of the services which you may be entitled to or may have requested for.

- (2) In order to conduct our business operations more smoothly, we may also be disclosing the Personal Data you have provided to us to our third party service providers, agents, and/or our affiliates or related corporations, whether within or outside Hong Kong, or to relevant government authorities or law enforcement agencies when there is legal obligation or legitimate interest to do so, for one or more of the above-stated Purposes. This is because such third-party service providers, agents and/or affiliates or related corporations, or relevant government authorities or law enforcement agencies would be processing your Personal Data on our behalf for one or more of the above-stated Purposes. We will rely on the same basis as notified or consented by you for these transfer and processing activities. In such cases, we will ensure a standard of protection for the Personal Data so transferred that is comparable to the protection under the Applicable Law and the Company's standards.
- (3) In all other instances of disclosure of Personal data to third parties with appropriate legal basis, including express consent from you, insofar as is reasonably practicable the Company will endeavor to provide adequate supervision over the handling and administration of Personal Data by such third parties, as well as to provide for adequate forms of protection over such Personal Data.

### **3. RIGHTS OF DATA SUBJECT**

- 3.1. In accordance with the Applicable Law, you, as a data subject has the following rights (which may be amended pursuant to any regulations of the data protection law) which are exercisable in compliance with the Applicable Law:
  - (1) The right to withdraw consent you have given to us;
  - (2) The right to access Personal Data;
  - (3) The right to rectify Personal Data;
  - (4) The right to erase Personal Data;
  - (5) The right to restrict data processing;
  - (6) The right to Personal Data portability; and
  - (7) The right to reject the processing of Personal Data.
- 3.2. In responding to your request under this clause, the Company may be able to consider only your Personal Data that the Company processed as a data controller. For the exercising of your right for the Personal Data the Company processed as a data processor of other data controller, the Company will inform such data controller to consider and proceed according to your request as your data controller.

### **4. DATA PROTECTION OFFICER**

- 4.1. In case of any concerns regarding this Notice or any other issues related to Personal Data handling, please contact below:

The Company:

Name: Sagawa Express (H.K.) Co., Ltd.  
Address: Units 801-803, 8/F., Tins Enterprises Centre, 777 Lai Chi Kok Road  
Kowloon, Hong Kong SAR, China  
Tel: +852-2489-0282  
Email: shk-information@sgh-global.com

or

Data Protection Officer:

Position: Corporate Finance & Administration Division, Division Manager  
Address: Units 801-803, 8/F., Tins Enterprises Centre, 777 Lai Chi Kok Road  
Kowloon, Hong Kong SAR, China  
Tel: +852-2409-9128  
Email: shk-hr@sgh-global.com

- 4.2. When making any complaint or claim, please provide your contact details to enable the Company to revert to you as soon as practicable.
- 4.3. The Company does not charge any administrative fees relating to your personal data. However, a fee in processing certain requests (other than the request for rectification) under the data protection law may apply.

## **5. RETENTION OF PERSONAL DATA**

- 5.1. The Company has a duty to retain your Personal Data for a period of time after we cease the relationship with you. Apart from legal purposes, there are other purposes such as to provide references, or for financial reasons.
- 5.2. Your Personal Data will be retained for period(s) as are reasonable and necessary to meet the Company's legal and/or business purposes, and the Company will cease to retain your Personal Data as soon as it is reasonably practicable to assume that the purpose for collection of such Personal Data is no longer being served by such retention, and such retention is no longer necessary for legal and/or business purposes. Our current practice is to retain certain Personal Data of you for up to seven (7) years, subject to the applicable anonymization procedures and at all times in accordance with our document retention and erasure practice, and the Applicable Law.