

DATA PRIVACY POLICY STATEMENT PERSONAL DATA (PRIVACY) ORDINANCE

GENERAL

This Privacy Policy Statement sets forth the information on the obligations and policies of SF Supply Chain (Hong Kong) Limited (the "Company") under the Personal Data (Privacy) Ordinance (Cap.486) of Hong Kong (the "Ordinance"). This Privacy Policy Statement specifically describes the Company's obligations in respect of the data privacy laws of Hong Kong. Our privacy practices may vary among the regions in which we operate to reflect local legal requirements.

In this Privacy Policy Statement, the term "personal data" shall have the same meaning given to it in the Ordinance.

COMPANY POLICY

The Company shall fully comply with the obligations and requirements of the Ordinance. The Company's management, officers, employees and representatives shall, at all times, respect the confidentiality of and endeavour to keep safe any and all personal data collected, held, processed or used for, or on behalf of, the Company. The Company shall endeavour to ensure all collection, storage, transmission, handling and use of personal data by the Company shall be done in accordance with the requirements of the Ordinance. Where an individual legitimately requests access to and/or correction of his/her personal data held by the Company, the Company may provide and/or correct that data in accordance with the provisions of the Ordinance.

COLLECTION OF PERSONAL DATA

The Company collects personal data from you only where necessary for the fulfillment of the reasonable, legitimate and proper business purposes of the Company. All collection of personal data shall be carried out in a fair and lawful manner. The Company collects personal data:-

- that you have voluntarily provided to the Company or its agents;
- from your use or supply of services and/or products provided by or to the Company or its agents;
- from your use of the Company's website(s) and/or application(s);
- where you are the recipient of the services and/or products provided by the Company or its agents;
- when you apply for a job with the Company; and/or
- when you access the Company's premises.

Without such personal data, the Company may be unable to provide you with the services or products that you require, to source supply of services and/or products from you, to process your job application or to proceed with the purposes for which such personal data is collected, or if it is able to, there may be delay in the provision, sourcing or processing thereof, for which the Company shall not be held liable nor responsible for.

In addition, when you visit our websites, use our mobile applications, or interact with our tools, widgets or plug-ins, the Company's web servers may also collect data relating to your online session by automated means, the use of which is to provide aggregated, anonymous, statistical information so that the Company may better meet the demands and expectations of visitors to its sites, and take necessary actions in respect of any illegal or unlawful contents on any website



visited through the Company's web servers. The types of data may include, but are not limited to: the browser characteristics; operating system; IP address and/or domain name; language preferences; device characteristics; URLs; information on actions taken; and dates and times of activity.

A "cookie" is a text file that the Company's websites send to your machine to uniquely identify your browser or to store information or settings in the browser. This information may include, but is not limited to, relevant login and authentication details as well as information relating to your activities and preferences across the Company's websites. You can disable cookies on your web browser, however if you do so you may not be able to access all parts of our websites.

USE OF PERSONAL DATA

Your personal data may be used for:

- verifying your identity;
- effecting delivery of the Company's services and/or products locally or abroad;
- providing, monitoring and improving the Company's products and services, such as warehousing, transportation, logistics, supply chain management, and other value-added services);
- establishing, managing and administering your account(s) with the Company;
- communicating with you about, and administering your participation in special events, programs, surveys, contests, draws and other offers or promotions of the Company;
- processing claims in connection with our services and/or products;
- matching (as defined in the Ordinance) your personal data with other data collected for other purposes and from other sources including third parties in relation to the provision of products and/or services to you in accordance with the prevailing requirements set out in the Ordinance;
- advertising products and/or services provided by the Company upon your consent in accordance with the prevailing requirements set out in the Ordinance;
- sourcing of supply of services and/or products to the Company;
- staff recruitment;
- such other purposes as may be required for the running of the Company's business or by applicable laws and regulations and agreed to between you and the Company.

ACCURACY OF PERSONAL DATA

Where possible, the Company will validate data provided using generally accepted practices and guidelines. This includes the use of check sum verification on some numeric fields such as account numbers or credit card numbers. In some instances, the data provided will be validated against preexisting data held by the Company. In some cases, as per the requirements of the Ordinance, the Company is required to view original documentation before the personal data may be used, such as with personal identifiers (as defined in the Ordinance) and/or proof of address. The Company fully complies with the "Rights of Access and Correction" obligations of the Ordinance. Please refer to the section titled "Access and Correction of Personal Data" below for details on how you can obtain and correct any personal data relating to you that the Company may hold. Please note that the accuracy of such personal data we collect, use and disclose depends to a large extent on the information you provide. You have a right to request correction of your personal data and we recommend that you let us know if there are any errors in your personal data and keep us up-to-date with changes to your personal data.

RETENTION OF PERSONAL DATA

Any personal data supplied by you will be retained by the Company and will be accessible by our employees and third parties (as applicable) for the purposes set out in this Privacy Policy Statement or as otherwise indicated by prior notice to you.

The Company will destroy any personal data it may hold in accordance with its internal policy. Generally speaking, the Company's policies cover the following principles:

- Personal data will only be retained for as long as is necessary to fulfil the original or directly related purposes for which it was collected, unless the personal data is also retained to satisfy any applicable statutory or contractual obligations; and
- Personal/business data are safeguarded by either account authentication and passwords or access rights permission to avoid unauthorized access of personal data. For digital records or physical copies containing nonrecurring/non-current personal data not required by audit requirement, the Company will purge/destroy them after use.

DISCLOSURE OF PERSONAL DATA

All personal data held by the Company will be kept confidential but the Company may, where such disclosure is necessary to satisfy the purpose, or a directly related purpose, for which the data was collected provide such information to the following parties:

- Any subsidiaries, holding companies, associated companies, or affiliates of, or companies controlled by, or under common control with the Company;
- Any person or company who is acting for or on behalf of the Company, or jointly with the Company, in respect of the purpose or a directly related purpose for which the data was provided;
- Any other person or company who is under a duty of confidentiality to the Company and has undertaken to keep such information confidential, provided such person or company has a legitimate right to and need to know such information;
- The Company's dealers, agents, contractors, suppliers; its professional advisers, including its accountants, auditors and lawyers who have a need to know such data;
- Government and regulatory authorities and law enforcement agencies and other organizations, as required or authorized by law;
- Any financial institutions, charge or credit card issuing companies, credit providers, credit information or reference bureaus, or collection agencies, security agencies, necessary to establish and support the payment of any services being requested;
- Your authorized representatives or your legal advisers when requested by you to do so;
- Any proposed or actual participant, assignee or transferee of all or any part of the Company's operation or business.

Personal data may also be disclosed to any person or persons pursuant to any statutory or contractual obligations or as required by court of law, provided such person or persons are able to prove the required right/authority to access such information. In addition, personal data may be disclosed under any of the circumstances described in Part 8 of the Ordinance in which the concerned personal data are exempt from the provisions of Data Protection Principle 3 of the Ordinance.

TRANSFER OF PERSONAL DATA OUTSIDE HONG KONG

At times it may be necessary for the Company to transfer certain personal data to places outside Hong Kong in order to carry out the purposes, or directly related purposes, for which the personal data were collected. Where such a transfer is performed, it will be done in compliance with the prevailing requirements of the Ordinance. By submitting your personal data, you agree to this transfer.

SECURITY OF PERSONAL DATA

Physical records containing personal data are securely stored in locked areas and/or containers when not in use.

All physical computer data are safeguarded by storing in locked cabinets. Computer data are stored within computer systems which are protected within server room with access control system. Storage media will also be placed in cabinets or server rooms.

Access to records and data without appropriate management authorization are strictly prohibited. Authorizations are granted only on a "need to know" basis that is commensurate with an individual's responsibilities and their training.

Where the Company holds, uses and/or transmits your personal data it will be adequately protected from accidental and/or unauthorized disclosure, change and/or destruction.

LINKS TO THIRD PARTY WEBSITES

Our websites may contain links to other sites and pages which are operated by third parties. We have no control over the content of the linked websites or the way in which the operators of those websites deal with your personal data. You should review the privacy policy for those third party websites to understand the ways in which your personal data may be used by those third parties.

ACCESS AND CORRECTION OF PERSONAL DATA

Under the Ordinance, individuals have the right to:

- Ascertain whether the Company holds any personal data relating to them and, if so, obtain copies of such data ("right of access");
- Require the Company to correct personal data in its possession which is inaccurate for the purpose for which it is being used by means of a data access request (right of correction); and
- Ascertain the Company's policies and practices in relation to personal data, which are those policies and practices set out in their entirety herein.

An individual may exercise his or her right of access by:

- Completing the Data Access Request Form as prescribed by the Privacy Commissioner for Personal Data; and
- Sending the completed form, along with appropriate proof of identity and the prescribed fee to the Company at the address listed below.



The Company will, upon satisfying itself of the authenticity and validity of the access request, make every endeavour to comply with and respond to the request within the period set by the Ordinance.

An individual may exercise their right of correction by writing to the Company at the address listed below, specifying the data obtained through the Data Access Request mentioned above which needs to be corrected.

Satisfactory proof and/or explanation of the inaccuracy is essential before the Company would consider correcting the specified data.

Upon satisfying itself of the authenticity and validity of the correction request, the Company will comply with and respond to the request as required by the Ordinance.

DIRECT MARKETING

In accordance with the requirements of the Ordinance, the Company will honour an individual's request not to use his or her personal data for the purposes of direct marketing.

Upon an individual's consent, the Company may use his or her personal data (including name, contact information, and information about the products and services that he or she has purchased or subscribed to) to deliver to such individual, through various communication channels by using email address, correspondence address, mobile phone number, telephone number, service number and service account number, etc., various promotion materials including the Company's latest offers, gifts, discounts, benefits, information relating to the Company's products and services, computer peripheral, accessories and mobile applications, personal assistance services and information services. For the avoidance of doubt, this consent can be withdrawn at any time .

Individual can at any time send request to the Company together with his/her contact details to stop receiving the promotion materials aforesaid or to start receiving the same.

Any such request should clearly state the details of the personal data in respect of which the request is being made.

THE COMPANY'S CONTACT DETAILS

All enquiries regarding the Company's compliance with its obligations under the Ordinance should be in writing to:

SF Supply Chain (Hong Kong) Limited
25/F, Goodman Interlink,
39 Tsing Yi Road,
Tsing Yi,
Hong Kong.