

Privacy Policy

Honour Lane Shipping Limited, its branches, offices and affiliates (the "HLS", "we", "us" and "our") are committed to protecting privacy of individual with respect to personal data. This Privacy Policy describes how HLS collect and process your personal information through HLS websites, devices, products, services, online and applications that reference this Privacy Policy (together "HLS Service"). **By using HLS Service, you are consenting to the practices described in this Privacy Policy ("Policy").**

Subject to relevant data protection laws in force in places including but not limited to Hong Kong and the European Union (the "EU"), we are the data controller that control the collection, holding, processing or use of your personal data. This Privacy Policy (the "Policy") is also part of our Terms of Use for the HLS Service.

During your visit and/or access to/use the HLS Service, please read the Policy carefully to ensure that you fully understand and accept it. Otherwise, please stop your visit and/or access to/use the HLS Service.

We respect your privacy and we promise:

- To implement computer, physical and procedural safeguards to protect the security and confidentiality of the personal data we collect;
- To limit the personal data collected to the minimum level to provide services requested by you;
- To permit only our properly trained, authorized employees to access the personal data;
- Not to disclose your personal data to external parties unless you have agreed. In the event that we are required by laws to disclose it, we will previously inform you.

1. Information Collection

In order to provide a better service to you, we may, in the course of and in relation to provision of our services or products, collect and process the following information about you:

- 1) Information (such as, your name, your company name, address, telephone number, mobile phone number, fax number, email address, website, nature of business and product/service details etc. of your company) disclosed by you when you make registration in the HLS Service, use our services, attend our functions, or communicate with us. In some circumstances, we may also collect personal identification data such as your passport or identity card number, date of birth and/or nationality for security and verification purposes;
- 2) In connection with an account sign-in facility, your log-in and password details;
- 3) The contents of any communications you send to us, for example, to report a problem or to submit queries, concerns and/or comments regarding the HLS Service or its contents; and
- 4) Information from surveys that we may, from time to time, run on the HLS Service for research purposes, if you choose to respond to, or participate in them.

The provision of personal data by you is necessary in order for us to provide you with the requested services and for us to perform our contractual obligations (if any) to you (as one of the legitimate interests of HLS). If you do not supply such data, we may be unable to provide the requested service.

We only retain personal data for so long as it is necessary for the fulfillment of the purpose (including any directly related purpose) for which the data is or is to be used.

In addition, when you browse the HLS Service, we will collect the basic technical information that your browser sends to the HLS Service such as your browser type and language, access time, the address of the site from which you access the HLS

Service, your Internet Protocol (IP) address, or click stream data within our website (i.e. the actions taken in connection with the HLS Service) etc. We collect such technical information during your visit/use to the HLS Service through our automatic data collection tools, which may include cookies and other commonly used technologies. We collect such data for the purpose of improving the functionality of the HLS Service. Further information on cookies is set out below.

2. Use of Information

The purposes for which information may be used by us in and outside Hong Kong include:

- 1) Processing applications;
- 2) Providing services and information offered through the HLS Service;
- 3) Providing services to facilitate trade between Hong Kong and overseas (or otherwise), and providing enquirers with contact and business information;
- 4) Our operations, e.g., incorporation into our database, analysis, research and auditing;
- 5) Notification of HLS services in Hong Kong and or around the world (and similar services conducted by our business partners and counterparts);
- 6) Distribution of HLS publications and research materials (and those of our business partners and counterparts);
- 7) Marketing HLS services or products (and those of our business partners and counterparts engaged in similar or peripheral activities, such as business matching services, sourcing and conferences);
- 8) Complying with laws, regulations or codes of practice in or outside Hong Kong;
- 9) Legal proceedings, including collecting overdue amounts;
- 10) Other purposes directly relating to the activities identified above;
- 11) Prevention or detection of crime, and protection of the security and safety of our online system portals;
- 12) Verification of identity in our online system portals where it is necessary to verify

your identity.

Your personal identification data such as date of birth and nationality (if collected by us) will be used solely for the purpose in 11) above. Your photo, passport or identity card number and its copy will be used solely for the purposes in 11) and 12) above.

We may conduct direct marketing via fax, email, direct mail, telephone call and other means of communication whether now or hereafter known, or send e-newsletters to you. You may choose not to receive promotional materials, by simply telling us (see below for our contact details), and we will cease to do so, without charge. If applicable law requires that we receive your explicit consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your explicit consent.

3. Disclosure

We will keep the personal data we hold confidential but may provide your personal data to:

- 1) Personnel, agents, advisers, auditors, contractors, financial institutions, and service providers in connection with our operations or services;
- 2) Our overseas offices, promotional event / event co-organizers, affiliates, business partners and counterparts (e.g. other trade promotion bodies, etc.);
- 3) The public, including persons enquiring about Hong Kong companies;
- 4) Persons under a duty of confidentiality to us;
- 5) Persons to whom we are required to make disclosure under applicable laws in or outside Hong Kong;
- 6) Actual or proposed transferees or participants of our services.

We may provide your personal data as required or permitted by law to comply with a summons, subpoena or similar legal process or government request, or

when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property, or the rights, property or safety of others, including but not limited to advisers, law enforcement, judicial and regulatory authorities in or outside Hong Kong. We may also transfer your personal data to a third party that acquires all or part of our assets or shares, or that succeeds us in carrying on all or a part of our business, whether by merger, acquisition, reorganization or otherwise.

To prevent and detect crimes and to protect the security and safety of our services, we may provide your personal identification data such as your full passport/identity card no., date of birth and nationality to the law enforcement authorities in Hong Kong including the Hong Kong Police Force, Immigration Department, Customs and Excise Department and other similar authorities upon their lawful request (but not to any other third party save as expressly specified below).

4. Cookies

Cookies are small, sometimes encrypted text files that are stored on computer hard drives by websites that you visit. They are used to help you to navigate on websites efficiently as well as to provide information to the owner of the website. Cookies do not contain any software programs. There are two general types of cookies, session cookies and persistent cookies. Session cookies are only used during a session online and will be deleted once you leave a website. Persistent cookies have a longer life and will be retained by the website and used each time you use HLS Service. Both session and persistent cookies can be deleted by you at any time through your browser settings and in any event, will not be kept longer than it is necessary.

We use cookies to find out more about the use of HLS Service and user preferences to improve our services. We may provide summarized traffic data

to advertisers solely for the purpose of customizing the advertising to you. We note traffic, pages visited and time spent. We store your shopping cart and wish list for your later use. We may link the information to you, so that you may receive information more suited to your interests.

Web browsers often allow you to erase existing cookies from your hard drive, block the use of cookies and/or be notified when cookies are encountered. If you elect to block cookies, please note that you may not be able to take full advantage of the features and functions of the HLS Service. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit www.allaboutcookies.org. Cookies are necessary for some features of the website to work, e.g., to maintain continuity during a browser session.

- 1) We may use an email delivery and marketing company to send emails that you have agreed to receive. Pixels tags and cookies are used in those emails and at our HLS Service to help us to measure the effectiveness of our advertising and how visitors use HLS Service.
- 2) We may use a third-party advertising company to serve ads when you use HLS Service. This company may use information (not including your name, address, email address or telephone number) about your use of HLS Service in order to provide advertisements about goods and services that may be of interest to you. In the course of serving advertisements to the HLS Service, our third-party advertiser may place or recognize a unique "cookie" on your browser. If you would like more information about this practice and to know your choices about not having this information used by this company, please refer to the Cookie Policy of respective company directly.

5. Security

Personal data stored electronically are password-protected. Encryption technology is used on our secured web areas. Our computer systems are placed in

restricted areas. We only permit authorized employees to access personal data. These employees are trained on the Policy.

6. Hyperlinks

HLS Service may, from time to time, contain links to external sites operated by third parties for your convenience. We have no control of and are not responsible for these third party sites or the content thereof. Once you leave the website of HLS Service, we cannot be responsible for the protection and privacy of any information which you provide to these third party sites. You should exercise caution and look at the Privacy Policy for the website you visit.

7. Children's Personal Data

Our websites, products and services are primarily intended for adults. A child must not create an account without the consent of a parent or guardian. If a child's personal data is collected with prior parental consent, we will only use or disclose the data as permitted by law, with the explicit consent of the child's parents or guardians, or when necessary for the protection of the child. If we accidentally collect a child's personal data without verified prior consent from the child's parents, we will attempt to delete the data as soon as possible.

8. Changes of the Policy

The Policy may be updated regularly, changes of which will be posted on www.hlsholding.com/privacy_en.html. Therefore, you shall refer to the updated Policy for any changes and updates. We are not obliged to give you any notice of changes of the Policy.

9. Data Transfers

We will generally hold your data on our servers hosted in Hong Kong. However, we may transfer it to our overseas offices elsewhere in the world for the purpose of processing into our database or to any of the people listed at Article 3 above,

who may be located elsewhere. If you are located in the European Economic Area (“EEA”) your personal data may be transferred to countries located outside the EEA which do not provide a similar or adequate level of protection to that provided by countries in the EEA. Such transfers will only be made in accordance with applicable laws including where necessary for us to comply with our contractual obligations with you. We will take all steps reasonably necessary to ensure that any personal data are treated securely and in accordance with the Policy.

10. Your Data Privacy Rights

By using HLS Service, you acknowledge the collection and use of your personal data by us as outlined in the Policy. If you do not agree with the use of your personal data as set out in the Policy, or the Terms of Use, please do not use the HLS Service.

Under the Hong Kong Personal Data (Privacy) Ordinance, you have the right:

- To check whether we hold personal data about you and to access such data;
- To require us to correct inaccurate data;
- To ascertain our policies and practices in relation to personal data and the kind of personal data held by us.

If you are in an EU Member State, subject to certain limitations and/or restrictions, you have the right under the data protection laws in the EU:

- To request access to and rectification or erasure of your personal data;
- To obtain restriction of processing or to object to processing of your personal data, and to the right to data portability.

Individuals in the EU also have the right to lodge a complaint about the

processing of their personal data with their local data protection authority.

If you wish to exercise one of the above mentioned rights, cease marketing communications, and/or raise questions or complaints please contact us at:

Honour Lane Shipping Limited
Room 1501, 15/F, Tower II,
Nina Tower, 8 Yeung Uk Road,
Tsuen Wan, Hong Kong
Tel: (852) 2544 1366
E-mail: hongkong@hlsholding.com

Where permitted by law to do so, we may charge a reasonable fee for processing a data access request.

(Last updated on 03 Feb, 2021)