

1 Privacy Statement

This policy applies to subsidiaries of Loscam International Holdings Co., Limited and their related bodies corporate in Malaysia (collectively referred to in this policy as "Loscam", "us" or "we") which may process your personal data.

1. Your rights in relation to privacy

We understand the importance of protecting the privacy of an individual's personal data and are committed to compliance with all applicable privacy laws. This statement sets out how we aim to protect the privacy of your personal data, your rights in relation to your personal data managed by us, and the way we collect, hold, use, transfer, disclose, or otherwise handle (collectively, "**process**") your personal data.

In processing your personal data, we will comply with all applicable data privacy laws, including, but not limited to, the Malaysian Personal Data Protection Act 2010 ("**PDPA**"). For avoidance of doubt, unless otherwise provided in this Privacy Statement, words and expressions defined in the PDPA shall have the same meanings or be construed in the same manner when used in this Privacy Statement. This privacy statement may be updated from time to time.

2. What kinds of personal data do we process?

Personal data refers to any information that relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in our possession, including sensitive personal data and expression of opinion about the data subject

During the provision of our services, we may collect your personal data. Generally, the kinds of personal data we collect include (among others):

(a) Pre-employment

- (i) Application forms – name, email address, postal address, telephone numbers;
- (ii) Resume details – which will usually include details such as an individual's name, address, email address, telephone numbers, academic qualifications, employment history and referees;
- (iii) Reference checking;
- (iv) Pre-employment medical (with the prospective employee's consent and if relevant to their employment);
- (v) Drug and alcohol testing (with the prospective employee's consent and if relevant to their employment); and
- (vi) Criminal record checks.

(b) Employment

- (i) Employment application forms;
- (ii) Personal details including name, email address, postal address and telephone numbers;
- (iii) Emergency contact details;
- (iv) Bank account details (for payroll purposes);
- (v) Tax file number details;
- (vi) Performance reviews.

(c) Commercial customers

- (i) Sole proprietorships or partners – names, email addresses, postal addresses, telephone numbers and job titles of the contact persons, partners or officers in their professional capacity;
 - (ii) Companies – company and/or business registration number, director details, contact details for senior managers or other contact persons;
 - (iii) Financial details including banking details;
 - (iv) Trade reference and credit checks;
 - (v) Customer reference numbers and trading partner reference numbers.
- (d) **Suppliers**
- (i) Personal details – including names, addresses, telephone numbers;
 - (ii) Financial details including banking details;
 - (iii) Sole proprietorships or partners – names, email addresses, postal addresses, telephone numbers and job titles of the contact persons, partners or officers in their professional capacity;
 - (iv) Companies – company and/or business registration number, director details, contact details for senior managers or other contact persons.
- (e) Video monitoring records in public area of Loscam’s workplace.

In some circumstances we may also process other personal data provided by you and you hereby agree to the processing of the same.

3. How do we collect personal data?

Generally, we collect your personal data directly from you, and retain a record of it, including through hardcopy forms or online forms via our internet (for external users) and intranet (for employees), or email communications.

Examples of how we may collect personal data include (but not limited to):

- (i) Opening a customer account;
- (ii) Registering for Loscam Online;
- (iii) Registering for HMS (Hire Management System);
- (iv) Surveys, newsletters, and focus groups;
- (v) Exchanges and discussions with you, whether in person or via telephone, email, fax or post;
- (vi) Our website, including the completion of online forms, registering or subscribing to any of our services, submitting material or information or otherwise requesting further information or services; or
- (vii) Such other sources to whom you have given your consent to disclose data relating to you

There may be other occasions when we collect your personal information from other sources, such as credit reporting agencies (in the case of customers and prospective customers), recruitment agents or referees in relation to job applicants, and publicly maintained records including publicly available information on social media or similar sites. Generally, we will only collect your personal data from sources other than you if it is unreasonable or impracticable to collect your personal data from you.

4. What are the purposes for which we collect, hold, use and disclose your personal data?

The purposes for which your Personal Data is processed may comprise part or all of the following:

(a) Customers or Suppliers

- (i) delivering products or services and providing you, or an entity with which you are connected, with returnable packaging solutions and associated services;
- (ii) fulfilling any contractual obligations and business transactions with you, or an entity with which you are connected;
- (iii) fulfilling internal operational requirements;
- (iv) accounting, billing and other internal administrative purposes;
- (v) developing and facilitating a business relationship with you or an entity with which you are connected;
- (vi) providing you, or any entity with which you are connected, with customer support;
- (vii) inviting you to events, functions or training events and providing you with updates and publications (subject to your consent, if such information is provided to you in your personal capacity);
- (viii) identifying and informing you of our services that may be of interest to you (subject to your consent, if such information is provided to you in your personal capacity);

(b) Job applicants

- (i) assessing your suitability for a vacancy with us for which you have applied;
- (ii) background and reference checks;
- (iii) obtaining references in relation to you;

(c) Employees

- (i) payment of salary and other compensation;
- (ii) administration of benefits (including medical and retirement benefits), insurance claims and work related expenses;
- (iii) administration of immigration or visa requirements;
- (iv) tax return purposes and pension fund administration;
- (v) supervision and management;
- (vi) performance appraisals, promotions and career development activities;
- (vii) providing references in relation to you;
- (viii) disciplinary matters or to investigate complaints or grievances;
- (ix) human resources management purposes;
- (x) maintaining attendance records, including for sickness and other absences;
- (xi) taking decisions as to your fitness for work and for health management;
- (xii) training and staff development, including arranging staff social functions and recreational activities;

(d) General

- (i) marketing purposes, including providing marketing materials to you;
 - (ii) enforcing our rights against you in any legal proceedings, or to defend ourselves against any claim, in relation to you;
 - (iii) complying with applicable laws or regulations; or
- for any other purpose that you have consented to and/or which has been notified to you on or before the time when the personal data is collected.

(collectively, the "**Purposes**")

Where personal data is processed, we take steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal data to us. However, if you do not provide certain information that we have indicated as mandatory, then we may not be able to provide our products and/or services to you.

5. To whom do we disclose your personal data?

We may disclose your personal data to the following third parties located within or outside Malaysia for any of the Purposes described above:

- (a) **Our group of companies.** We may share your personal data among our group of companies, including our subsidiaries, for the Purposes described above.
- (b) **Our service providers.** We use other companies or contractors to perform services on our behalf or to assist us with the provision of services to you, or during your employment with us.
- (c) **Other business partners.** We may need to engage with other business partners in connection with the services we provide to you or your employment with us, including but not limited to insurance companies, credit card companies, current / potential employers.
- (d) **Third parties connected with business transfers.** We may transfer your personal data to third parties in connection with a reorganisation, restructuring, merger, acquisition or transfer of our business or where we acquire or form a joint venture with any other business, in which case we may disclose your personal data to any prospective buyer, new owner, or other third party involved in such change to our business, or where we will sell or transfer any of our assets, in which case the personal data we hold about you may be sold as part of those assets and may be transferred to any prospective buyer, new owner, or other third party involved in such sale or transfer provided that the receiving party agrees to treat your personal data in a manner consistent with this statement.
- (e) **Any other third parties connected with the any of the following purposes:**
 - (i) Superannuation plan administration arrangements – we provide employees' personal details to the external administrator of the superannuation plan to which the employee is a member;
 - (ii) Payroll arrangements – we utilise a third party hosted programme to maintain our payroll data;
 - (iii) Video monitoring – external security advisors/contractors and our managerial staff may view security tapes that have been recorded in the workplace;
 - (iv) Medical – we may, with the employee's consent, provide the company doctor or any medical specialists retained by us with employee's medical records for the purposes of their employment with us;
 - (v) IT arrangements – our external IT providers have access to data contained within our systems. Those providers will only be provided access to personal data for the purposes for which they are contracted including software development and testing;

- (vi) Third party pallet controllers - we will not provide your information to third party pallet controllers unless you have authorised such access. Access to the Loscam Online portal will be controlled by your nominated company administrator to your account. Invoices and transaction details will only be provided to email and postal addresses nominated by the customer; and
- (vii) Truck driver access to our sites – Upon entering a Loscam site third party drivers will be required to complete an induction process. Personal information will be required to be provided, including name and address to provide subsequent evidence that an induction has been completed

(collectively, the "**Third Parties**")

Generally, we will only disclose your personal data if that disclosure is necessary for the purpose(s) (or directly related to the purpose(s)) for which that data was collected, as notified to you on or before the time of collection or otherwise with your consent. This disclosure is always on a confidential basis or otherwise in accordance with law. We may also disclose your personal data with your consent or if disclosure is required or authorised by law.

6. Overseas disclosure

All data including personal and non-personal data may be stored on servers located outside the relevant jurisdiction in which it was collected or Australia, Hong Kong or China.

By providing your personal data to us, you consent to us storing your personal data on servers hosted in the jurisdiction of collection; your personal data will remain within our effective control at all times. The server host's role is limited to providing a hosting and storage service to us, and we've taken steps to ensure that our server hosts do not have access to, and use the necessary level of protection for, your personal data.

We may disclose your personal data with the Third Parties including our related companies overseas in order to provide necessary services and for administrative or other business management purposes, or for any of the Purposes, and you hereby consent to such disclosure. Our related companies are located in Australia, New Zealand, South East Asia, and the Greater China regions. Before disclosing any personal data to an overseas recipient, we take steps reasonable in the circumstances to ensure that the overseas recipient is bound by privacy obligations that are no less stringent than those imposed on us under the applicable data privacy laws that we are subject to in relation to your personal data.

7. Direct marketing

We cannot use or transfer your personal data to any third party for direct marketing purposes without your prior consent.

Subject to your prior consent, and the further details set out in the relevant personal data collection statement provided to you on or before the collection of your personal data, we may use your name, [mobile phone number, email address, postal address, previous purchase history and personal preferences] to provide you with materials relating to any information, newsletters, promotions, rewards, discounts, offers or events, which are in relation to logistics, packaging and shipping products or services provided by us or our affiliates, subsidiaries or holding companies ("**Marketing Materials**"). Subject to your prior consent, we may disclose your name, [mobile phone number, email address, postal address, previous purchase history and personal preferences] to our affiliates, subsidiaries or holding companies, in order for them to send you the Marketing Materials.

You have the right to choose not to receive any Marketing Materials or to not have your personal data transferred to our affiliates, subsidiaries or holding companies in order to send you Marketing Materials, by checking the appropriate opt-out box on the relevant forms we used to collect your personal data.

You can also ask us to cease providing you with Marketing Materials at any time, by sending a request via the contact details set out in paragraph 13 or through any opt-out mechanism contained in a marketing communication to you.

8. Security of your personal data

We take all of the necessary technical and organizational security measures reasonable in the circumstances to ensure that the personal data we process is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. We process personal data in both hard copies and electronic forms in secure databases on secure premises, accessible only by authorised staff.

Personal data we hold is generally stored in computer systems. These may be operated by our service providers. In all cases, we have rigorous information security requirements aimed at eliminating risks of unauthorised access to, and loss, or misuse of information. These requirements include but are not limited to:

- Access control for authorised users such as user names and passwords;
- Limiting access to shared network drives to authorised staff;
- Virus checking; and
- Specialised IT support to deal with security risks.

In certain cases, your personal data is encrypted by Secure Socket Layer technology ("**SSL**") during transmission. This means that an approved encryption procedure is used for communication between your computer and our servers if your browser supports SSL.

However, despite all our efforts, please be aware that no security measures or systems are perfect. We cannot fully guarantee that the storage and process of your personal data is absolutely secure. To the extent permitted by applicable laws and regulations, we shall not be liable for any damages or losses in connection with your personal data caused by:

- (a) act of God such as floods, tornadoes earthquakes, bushfires or epidemics;
- (b) social event such as wars, riots or government actions;
- (c) any computer virus, trojan horse or other malware;
- (d) theft, burglary, robbery or any criminal offence in this kind, or any intrusion or illegal conduct by hackers; or
- (e) any reasons beyond our reasonable control or predictability.

9. Retention of personal data

We shall destroy or de-identify personal data in order to anonymise it in circumstances where it is no longer required for the purposes it was collected, unless we are otherwise required or authorised by law to retain the information. Generally, personal data will be destroyed after a

period of 7 years following its collection or an employee's separation from the business, or 2 years in relation to an unsuccessful job applicant who has been rejected, unless it is required or may be required to be kept for longer or shorter due to the purpose for which it was originally obtained, or subsequent circumstances which require it to be held for a longer period. This includes inactive customer accounts.

10. Can you remain anonymous?

Our website at www.Loscam.com or other associated websites owned by Loscam can be accessed without telling us who you are or revealing any personal data. However, we may use tracking software to collect your IP address, the website you came from, and the website you visit next. This information may be aggregated to measure statistics about visitors to this site. We may also use this data to monitor site performance and to make the site both easier and more convenient to use. We do not use this software to collect individual personal data or individual IP addresses. The data are used solely in anonymous and summarized form for statistical purposes and for developing the website.

You should be aware that we may be required to disclose your personal data without your consent in order to comply with any court orders, subpoenas, or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we will notify you if we are required by law to disclose your personal data.

11. Use of Cookies

"Cookies" are small files that enable us to store information related to your computer and you, the user, specifically, while you visit one of our websites. Cookies help us determine how frequently our internet pages are accessed as well as the number of users, and they help us configure our offers so that they are as convenient and efficient as possible for you.

We use what are called "session cookies", those that are stored exclusively for the duration of your visit to one of our internet pages. We also use "persistent cookies" for retaining information about visitors who repeatedly access one of our internet pages. The purpose of using cookies is to be able to offer you optimal user guidance as well as to "recognize" you and thus be able to present (as much as possible) diversified internet pages and new contents during repeated use.

Generally, we do not create an individual profile of your online activities. The content of a persistent cookie is limited to a reference number, and your name, email address, IP address, etc., are not saved on the majority of our sites.

12. Can you access and correct the personal data that we hold about you?

We take steps reasonable in the circumstances to ensure personal data we process is accurate, up-to-date, complete, relevant and not misleading. Subject to applicable laws, you have a right to access and seek correction of your personal data processed by us if it is inaccurate, incomplete, misleading or outdated.

If at any time you would like to access or correct the personal data that we hold about you, or you would like more information on our approach to privacy, please contact us via the contact details set out in paragraph 13 below.

We shall grant access to the extent required or authorised by applicable data privacy law and take steps reasonable in the circumstances to correct personal data where necessary and appropriate.

To obtain access to your personal data:

- (a) you will have to provide proof of identity to ensure that personal data is provided only to the correct individuals and that the privacy of others is protected;
- (b) we request that you be reasonably specific about the information you require; and
- (c) we may charge you a reasonable administration fee, which reflects the cost to us for providing access in accordance with your request.

We may choose not to release your personal data, as permitted under the applicable data privacy laws. For example, if it is not possible to provide you with your requested personal data without revealing the personal data of another individual.

If we refuse your request to access or correct your personal data, we will provide you with written reasons for the refusal and details of complaint mechanisms. We will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and our needs.

We will endeavour to respond to your request to access or correct your personal data within 21 calendar days from the date of receipt of your request.

13. How to contact us

For further information or enquiries regarding your personal data, or to submit a data access or correction request, or if you would like to opt-out of receiving any promotional or marketing communications, please contact our Head of Legal & Company Secretarial Department, or our office in Malaysia at:

Legal and Company Secretarial Department
Loscam (Asia Pacific) Co., Limited
Unit 3103-6, 31/F Infinitus Plaza, 199 Des Voeux Road Central, Hong Kong
+852 2200 0656, or
Corporate_Legal@loscam.com;

OR

Loscam (Malaysia) Sdn. Bhd.
Lot 22, Jalan Playar 15/1,
Seksyen 15 40200 Shah Alam, Selangor, Malaysia
Tel+ 60 3 5511 7066

14. Privacy complaints

If you have any privacy complaints, please contact our Corporate Legal Department. At all times, privacy complaints will:

- (a) be treated seriously;
- (b) be dealt with promptly;
- (c) be dealt with in a confidential manner; and
- (d) not affect our existing obligations or affect the commercial arrangements between you and us.

Our Corporate Legal Department will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation.

15. Third party websites

This privacy policy only applies in relation to the processing of personal data by us. If you click on a hyperlink taking you from this website to another website, we shall not be responsible for the privacy and security practices or the content of such website, or any collection of your personal data by the third party operating such website, and you should refer to the privacy policy of each website you enter.

16. Language

This privacy policy has been prepared in English and Malay language. In the event of any inconsistency between the English and Malay language versions, the English version shall prevail to the extent of the inconsistency.

17. Updates

This privacy policy is current at the date below. We may change it periodically. If we change this policy, we will display the updated policy on www.loscam.com and also provide a link to the previous archived copy on www.loscam.com. Last update of this Privacy Policy: