EXTERNAL PRIVACY NOTICE

The objective of this External Privacy Notice (the "**Notice**") 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 SG SAGAWA AMEROID PTE. LTD. (the "**Company**")'s business, and in compliance with the Personal Data Protection Act 2012 of Singapore ("**PDPA**") and other applicable Personal Data protection laws and regulations (collectively, the "**Applicable Law**").

By using the services provided by the Company (including but not limited to the Personal Relocation Service) (the "Services"), you hereby agree to our collection, use and/or disclosure of your Personal Data and any Personal Data of another individual which you provide to us in accordance with this Notice and the Applicable Law. You may withdraw your consent in respect of the collection, use or disclosure of your Personal Data by submitting a written request to the Data Protection Officer (whose contact details are set out below) but upon such withdrawal the Company may not be able to provide all or part of the Services to you.

This Notice shall be subject to further changes or revisions. The Company shall continue to review the effectiveness of this Notice from time to time.

1. DEFINITION OF PERSONAL DATA

"**Personal Data**" refers to any data, whether true or not, about an individual who can be identified, whether from that data alone or in combination with other information to which the Company has or is likely to have access.

For the avoidance of doubt, Personal Data may include, amongst others, (a) any opinion about an individual, (b) expression of intentions towards an individual, (c) Personal Data held visually, such as photographs and video clips (including CCTV footages), and/or (d) 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 in accordance with the Applicable Law:
 - (1) Information that you or your representative directly provides to the Company;
 - (2) Information that customer and service user directly provides 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.

You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Further, when you provide us with any Personal Data relating to a third party, you represent, warrant and undertake to us that you have obtained the consent of the third party to provide us with their Personal Data unless otherwise provided by the Applicable Law.

- **2.2.** <u>Types of Personal Data Collected</u> Depending on purposes of use and to the extent necessary for the purposes stated in this Notice, the Company may collect various types of your Personal Data including:
 - (1) Identification information such as name-surname, name prefix, date of birth, nationality, last three (3) digits and letter of your identification number, fax number telephone number, e-mail, social media account (such as Line ID), address, copy of car registration, copy of household registration, 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 of the Company. Personal Data which we collect 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

In the case where the Applicable Law permits and/or the Company obtained your consent to process data, the Company may collect, use, and disclose your Personal Data including but not limited to the following marketing purposes:

- 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.

(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 Law including performing obligations as business operator; and

In the case where the Company appoints third party service provider(s) to process your Personal Data, the Company (and/or the appointed third party service provider(s)) will process your Personal Data in accordance with the Applicable Law.

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 prior consent to the Company or permitted by the Applicable Law without requiring your consent.

If you are unable to (or withdraw your consent to) provide the Personal Data necessary for the Company to process Personal Data for any reason whatsoever, the Company may not be able to provide you with the Services.

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.

2.4. Data Sharing and Disclosure

- (1) The Company will not disclose your Personal Data without your permission. This is unless the disclosure has appropriate legal basis, such as:
 - (i) Is required based on the Applicable Law 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 reasonably timely manner, notify you of the disclosure and the purposes of the disclosure;
 - (iii) Is necessary for any investigation or proceedings; and/or
 - (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) Personal Data will be kept confidential but, subject to the provisions of any Applicable Law, we may share your Personal Data with:
 - •appropriate persons in our parent and affiliated companies (which may be located within and outside Singapore) subject to paragraph 2.4(3) below;
 - •credit reference agencies and other companies for use in credit decisions, for fraud prevention and to pursue debtors, and they may keep a record of any search that they do:
 - •any person, including agents, contractors or third party service providers (within or outside the SGH Group) who provides administrative, marketing, telecommunications, computer, payment or data processing or other services in connection with the operation of our business and provision of our products and services to you;
 - any government departments or other appropriate governmental or regulatory authorities, or if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use, Standard Conditions of Carriage, Service Guide and other agreements, or to protect our rights, property, or safety and those of our customers or others; and
 - any actual or proposed purchaser of all or part of the business or assets of SGH, or in the case of any merger, acquisition or other public offering, the purchaser or subscriber for shares in SGH or any company within the SGH Group.
- (3) The company may transfer the personal information we collect about you to countries (including but not limited to Japan) other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information.

 The company will take steps to establish appropriate data protection and information security requirements with such recipients to confirm that Personal Data is properly protected in accordance with this Notice and the Applicable Law. In particular, we will ensure that overseas recipients whom we transfer your Personal Data to, will be bound by legally enforceable obligations (in accordance with the Applicable Law) to provide the transferred Personal Data a standard of protection that is at least comparable to the protection under the PDPA.

3. RIGHTS OF DATA SUBJECT

- 3.1. In accordance with and subject to the Applicable Law, you, as a data subject have rights (which may be amended pursuant to any regulations of the Applicable Law) which include but are not limited to:
 - (1) The right to withdraw consent you have given to us;
 - (2) The right to access Personal Data; and
 - (3) The right to rectify Personal Data.

Please contact our Data Protection Officer (whose contact details are set out below) if you wish to exercise or seek clarity in respect of any of the aforementioned rights to your Personal Data.

4. SECURITY

4.1. The Company will make all reasonable arrangements to ensure (a) that Personal Data in our possession or under our control are protected against unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, and (b) the prevention of the loss of any storage medium or device on which your Personal Data is stored. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our

best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

4.2. In the event of a data breach of your Personal Data, we will take the appropriate actions in accordance with the Applicable Law.

5. DATA PROTECTION OFFICER

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

The Company:

Name: SG SAGAWA AMEROID PTE. LTD.

Address: 15 Pioneer Walk #02-01,

Pioneer Hub Building, Singapore 627753

Tel: 6602-9933

Email: sgsa-enquiry@sgh-global.com

or

Data Protection Officer:

Name: Celestia Khoo

Address: 15 Pioneer Walk #02-01,

Pioneer Hub Building, Singapore 627753

Tel: 6602-9933

Email: celestia.khoo@sgh-global.com

- 5.2. When making any complaint or claim, please provide your contact details to enable the Company to revert as soon as possible.
- 5.3. The Company does not charge any administrative fee relating to your Personal Data. However, a fee in processing certain requests (other than the request for rectification) may apply, save in accordance with the Applicable Law.

January 01, 2025