

Privacy Policy for Freight Quotation Services

Our Commitment

Tradelink Electronic Commerce Limited (hereinafter referred to as “**Tradelink**”, “**the Company**”, “**We**”, “**our**” or “**us**”) respect the privacy rights of our customers and their authorised signatories (for body corporates) (hereinafter referred to as “**you**” or “**your**”) and we are committed to safeguarding your privacy and ensuring that your personal data is protected. This Privacy Policy explains, among other things, the types of personal data we collect and how we process and protect that data.

We shall keep your personal data confidential and shall ensure that our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of your personal data comply with the Personal Data (Privacy) Ordinance (Cap.486, the Laws of the Hong Kong Special Administrative Region) (“**PDPO**”), as amended from time to time.

The term “**personal data**” shall have the meaning as ascribed to it under the PDPO.

Personal Information Collection Statement (“**PICS**”)

This PICS is issued pursuant to the PDPO in relation to the operation of our business.

1. Definitions

Under this PICS, unless the context otherwise requires, the following words and expressions shall have the following meanings:

- 1.1 “**Hong Kong**” means the Hong Kong Special Administrative Region of the People’s Republic of China.
- 1.2 “**Platform**” means the platform for the provision of FQS.
- 1.3 “**Services**” or “**FQS**” means the services provided by Tradelink, including without limitation, matching services to shippers and Service Provider for shipping and/or forwarding goods.
- 1.4 “**Service Provider**” mean carriers and/or forwarder.
- 1.5 “**Tradelink Registration Forms**” means any of the paper or electronic forms or documents used by the User or Service Provider to register with Tradelink to use the Services, to give any instructions to Tradelink, to add

or unsubscribe any Services, to make any specific authorisations, to amend any records, and/or for any other purposes of and incidental to any Services.

- 1.6 **“User”** means the user of the Services and/or person who has registered with Tradelink by signing any Tradelink Registration Form(s) for the use of the Services.

Purpose of Collection and Use of Personal Data

2. You need not supply any personal data in order to access the Platform but if you want to use the Services, it is necessary for you to provide us with certain essential personal data as required in the Tradelink Registration Forms and other documents in relation to the Services. We may also ask you for other information which helps us to offer you tailored products and services that we think may be of interest to you. The types of personal data we may collect include your name, address, email, telephone number, Hong Kong identity card number, your business information such as company name and business title.
3. We shall have the right to collect, hold, process and/or use, your personal data in accordance with, this PICS. If you are unable or unwilling to provide us with complete and correct personal data, we may not be able to provide or continue to provide the Services to you.
4. Tradelink shall observe the PDPO and procure all staff of Tradelink to comply with the reasonable standards of confidentiality. Your personal data (e.g. telephone number, business and email addresses) will be used for the purposes of:
 - (i) providing the Services to you;
 - (ii) providing you with regular communications from us with details of our business and our products and services;
 - (iii) handling of your complaints and inquiries;
 - (iv) research and analysis of the data in the aggregate;
 - (v) marketing, making suggestions or recommendations of goods or services provided by Tradelink or Tradelink’s subsidiaries, associated companies or business partners which are relevant or helpful to your business and which you may be interested in;

- (vi) detection or prevention of crime;
- (vii) auditing purposes;
- (viii) other purposes otherwise expressly agreed between Tradelink and the User; and
- (ix) making disclosures as required by applicable laws.

- I object to the use of my personal data for direct marketing of goods and/or services as mentioned in Clause 4(v) above.

For the purpose of this Clause 4 (v) above, Tradelink may not use your personal data unless with your written consent. At any time you object to the use of your personal data for direct marketing of goods and/or services as mentioned in Clause 4(v) above, you can opt out by sending us an opt-out request to the person and address as specified in Clause 10 below. Upon receipt of your request, we shall cease to use your personal data as soon as possible for direct marketing purpose without charge to you.

Possible Transferees

5. You agree that Tradelink may disclose and transfer your personal data (e.g. telephone number and business and email addresses) to any of the following parties within the same jurisdiction or from one jurisdiction to another in compliance with the requirements of the PDPO:
 - i. any agent, contractor or third party service provider who provides administrative, telecommunications, computer, payment or securities clearing or other services to Tradelink in connection with any Services;
 - ii. any person where such disclosure is required by law;
 - iii. any person owing a duty of confidentiality to Tradelink, including any subsidiaries or associated companies which have undertaken to keep such information confidential and our agents, professional advisors and consultants;
 - iv. credit reference agencies and, in the event of default, debt collection agencies; or
 - v. any actual or proposed assignee of Tradelink or transferee of Tradelink's rights or obligations.

6. Save and except for the above purposes and subject to clause (5) above, Tradelink shall not disclose the personal data to any third party (other than the Intended Recipient) without the consent of the User.

7. Tradelink shall restrict access to personal data to officers, employees, consultants and agents of Tradelink who have a need to know or use the data and who have been trained to handle such data and observe confidentiality properly.

Browsing information collected from you (“Cookies”)

8. We use Cookies and similar technologies to collect data about you when you visit the Platform. Cookies are files that store information on the hard drive or browser of your computer which allow us to recognise that you have visited the Platform before. We use Cookies to give you the best possible experience on the Platform, evaluate the Platform, review your browsing habits, personalize your browsing experience. The types of data we may collect from you when you visit the Platform include:
 - information about the type of browser you use;
 - details of web pages you have viewed;
 - your IP address; and
 - the hyperlinks you have clicked.

The information we obtain from our use of Cookies may not contain your personal data.

9. You may refuse to accept Cookies (by modifying the relevant Internet options or browsing preferences of your computer system), but to do so you may not be able to utilize or activate all of the functions and services of the Platform.

Your rights in relation to your Personal Data

10. The User shall have the right to request for access and correction of personal data held by Tradelink. Request for access and correction or any inquiries in relation to the our Privacy Policy should be in writing and addressed to Privacy Compliance Officer, 11/F & 12/F, Tower B, Regent Centre, 63 Wo Yi Hop Road, Kwai Chung, Hong Kong, Tradelink may charge a reasonable amount of fee for handling such request for access or correction.

Protecting your Personal Data

11. We maintain appropriate technical and organizational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to your personal data.
12. The Platform may contain hyperlinks to other websites provided by third parties. We do not control these third party websites or any of the content contained on those websites. Once you have left the Platform, we cannot be responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the privacy statement for the website(s) you visit.

Retention of your Personal Data

13. Unless there is a mandatory legal, regulatory or contractual requirement for us to keep your personal data for a specified period, we shall only retain your personal data for as long as is necessary to fulfil the purpose for which the same was originally collected.

Third party merchants

14. If you want to use, order or receive any services or products from any company, organisations or Service Providers hosted in the Platform which are operated by third party merchants, you acknowledge that any personal data provided by you, once transferred to the relevant merchant, is beyond our control and thus outside the scope of protection offered by us.

Miscellaneous

15. If there is any inconsistency or conflict between the English and Chinese versions of this Privacy Policy, the English version shall prevail.
16. We may change this Privacy Policy from time to time by posting an updated version on the Platform).
17. This Privacy Policy shall be governed by, and construed in accordance with, the laws of the Hong Kong.

Last updated on : 1st January 2021