

## PRIVACY POLICY STATEMENT

Sun Cypress Shipping Company Limited ("SUN CYPRESS") takes individual privacy seriously. We respect personal data and are committed to fully implementing and complying with the data protection principles and all relevant provisions of the Personal Data (Privacy) Ordinance ("the Ordinance"). This Statement explains our policies and practices.

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 required to provide a better service
- to permit only properly trained, authorized employees to access personal data
- not to disclose your personal data to external parties unless you have agreed, we are required by law or we have previously informed you.

### **1. Information collection**

In order to provide a better service to you, we may collect information when you register with us, use our services, attend our functions, or communicate with us.

If specific information is requested but not supplied, we may be unable to provide the requested service. We only retain personal data for so long as it is necessary. However a copy may be archived indefinitely.

There are three broad categories of personal data held in the SUN CYPRESS. They are personal data contained in:

**Complaint and investigation records**, which include records containing information supplied by data subjects and/or collected in connection with complaints, investigations and related activities under the relevant provisions of the Ordinance;

**Personnel records**, which include personal details, job particulars, details of salary, payments, benefits, performance appraisals, disciplinary matters, etc. of every person employed with SUN CYPRESS;

**Other records**, which include administration and operational files, personal data provided to SUN CYPRESS from individuals for participating promotional and training activities organized by the SUN CYPRESS, and enquiries from the public, etc.

### **2. Main Purposes of keeping Personal Data**

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

- processing applications
- enhance our services' quality standard
- providing enquirers with contact and business information
- our operations, e.g., incorporation into our database, analysis, research and auditing
- notification of our services or changes of contact details, services and/or any other information
- marketing Sun Cypress's and/or its subsidiaries' services
- complying with laws in or outside Hong Kong
- legal proceedings, including collecting overdue amounts
- Other incidental or related purposes.

We may conduct direct marketing via fax, email, direct mail, telephone and other means of communication, or send e-newsletters to you. You may choose not to receive promotional materials, by simply telling us, and we will cease to do so, without charge.

### **3. Practices**

System Support Team is responsible for monitoring and supervising compliance with the Ordinance within SUN CYPRESS

The following are maintained to ensure compliance with the Ordinance:

- A Data Protection Log Book, as provided for in section 27 of the Ordinance;
- A Privacy Compliance Manual, which is a procedural manual on compliance with the Ordinance for use by staff of SUN CYPRESS
- Data Access Request Form (OPS003) for subject access/correction requests of personal data held by SUN CYPRESS

Data access and correction requests to the SUN CYPRESS may be addressed to the "systemsupport@suncypress.com" or with other person as specifically advised.

### **4. Disclosure**

We will keep the personal data confidential but may provide information to:

- personnel, agents, advisers, auditors, contractors, financial institutions, service providers and/or any other person in connection with our operations or services
- our overseas offices, affiliates, business partners and counterparts
- the public, including persons enquiring about our company, our services and other associated/incidental matters

- persons under a duty of confidentiality to us
- persons to whom we are required to make disclosure under applicable laws in or outside Hong Kong
- actual or proposed transferees or participants of our services and their agents, subcontractors, employees and/or their affiliates

We can not control how third parties use information.

## **5. Use of Cookies**

Cookies are commonly used to facilitate transmission and to provide more useful features. It is a piece of data stored in your computer. We use these devices to find out more about the use of our websites and user preferences, in order to improve our services. We may share summarized traffic data with the third parties. We note traffic, pages visited and time spent.

You may set your browser to reject cookies, or tell you when a cookie is being sent.

Cookies are necessary for some features of the website to work, e.g., to maintain continuity during a session. If they are not accepted, those features may not work properly.

## **6. 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 our privacy policies.

## **7. Hyperlinks**

Hyperlinks to other websites are provided for your convenience. You will leave our website for another location that is not controlled by us. Our privacy policies do not apply to other websites. Please refer to the privacy policies of the other websites.

## **8. Changes**

We may update this Statement. When we do, the changes will be posted on

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## **9. Your consent and rights**

By using our services, making an application or visiting our website, you consent to the collection and use of your information as outlined in this Statement.

Under the Ordinance, individuals 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.

Please send requests to access or correct data, questions or complaints to:

**System Support Team**

Sun Cypress Shipping Company Limited  
Room 2208, 22/F, One Island East,  
18 Westlands Road,  
Quarry Bay, Hong Kong.

Tel: (852) 2299 5399

Fax: (852) 2780 1607

E-mail: [systemsupport@suncypress.com](mailto:systemsupport@suncypress.com)

We may charge a reasonable fee for processing a data access request.

If there is any conflict between the Chinese and English versions of this Statement, the English version prevails.