

POLICY for the personal data collection, processing and protection of the personal data subjects

1. General Provisions

1.1. Objective

This policy for the personal data collection, processing and protection is the basic internal document of Beijing CDEK International Freight Forwarding Co Ltd (hereinafter: the Company) which governs the matters of personal data (hereinafter PD) collection, processing and protection. This Policy has been developed in accordance with:

- the Personal Information Protection Law (PIPL) of the PRC;
- the Cybersecurity Law of the PRC;
- other regulations which govern the personal data processing in the People's Republic of China.

This Privacy Policy shall be published on the Website at <https://cdek-express.cn/en/> and govern the processing of personal information provided by the users over the phone, via e-mail or other communication channels indicated on the Website.

The Website shall use only those cookie files which are strictly necessary to ensure its basic functioning (like loading the pages, maintaining the stable connection, and protection from automated requests).

The Website shall not use marketing, analytical or other cookies aimed at tracking user activity for commercial purposes.

Personal information shall be processed exclusively on the initiative of users when they contact the Company on their own via the communication channels specified on the Website.

This Policy can be updated in case of changes in the methods used to process personal information or in legal requirements. Current version is always available on the Website.

1.2. Scope of application

This Policy shall extend to all processes in the Company which serve to obtain and process personal information from the users, including through the use of information and telecommunication networks, as well as without their use.

This Policy shall be applied, in particular, but not limited to:

- when navigating through the Website, including page browsing, with the use of strictly necessary cookies which ensure the technical operability of the Website;
- when the users contact the Company on their own initiative via the communication channels indicated on the Website while otherwise using the Website in accordance with the User Agreement.
- in case of other Website use in accordance with the User Agreement.

The validity of this Policy shall not extend to Personal Data processing of Company employees and candidates for vacant positions, other Personal Data subjects not directly designated in this Policy, since these relationships are regulated by other internal acts.

In case where new features are added on the Website (for example, online orders or interactive forms), the Policy will be updated and supplemented in accordance with the requirements of the legislation of the People's Republic of China.

1.3. Terminology and Definitions

- 1) Personal data (PD) shall mean the information related to a PD subject which is identified or can be identified on their basis, recorded on electronic, paper and/or other tangible media;
- 2) Operator of the database where personal data are contained (hereinafter: the Operator) shall mean a government agency, an individual and/or a legal entity that collects, processes and protects PD.

In the context of this Policy, the Operator is a Chinese legal entity of the CDEK group registered in the People's Republic of China.

- 3) PD protection shall mean a range of measures, among others legal, administrative and technical, which are implemented for the purposes defined in applicable legislation.
- 4) PD processing shall mean a range of operations to accumulate, store, modify, supplement, use, distribute, depersonalize, block or destroy PD.
- 5) PD use shall mean the handling of personal data aimed at achieving the objectives of their owner, operator and a third party.
- 6) PD storage shall mean the operations to ensure the integrity, confidentiality and accessibility of PD.
- 7) PD distribution shall mean the operations resulting in the PD transfer, including through the mass media or the provision of access to PD in any other way.
- 8) PD subject shall mean the individual to which the PD relate.
- 9) A third party shall mean a person which is neither a subject, nor an owner and/or operator, but relates to such parties through circumstances or legal relationships related to the collection, processing, and protection of PD.
- 10) PD collection shall mean operations aimed at obtaining PD.
- 11) The law shall mean the legislation which establishes the rules for PD collection, storage and/or processing applicable in the territory(-ies) where PD are collected, stored and/or processed.

2. Basic Normative Provisions

2.1. Principles for the PD collection and processing

The Company shall ensure compliance with the principles of personal data (PD) collection, processing and protection established by the legislation of the People's Republic of China.

The PD collection and processing shall be carried out solely on the initiative of the personal data subjects, for example, when getting in touch over the phone or by e-mail. The Website neither uses marketing cookies nor collects personal data automatically except for the use of the minimum necessary technical cookies that ensure the Website operation. The processed personal data are limited to those necessary to handle requests or communicate with the subjects. No redundant data are collected. The Company stores personal data in such a format that permits subject identification only during the time period which is necessary to respond to a request or another inquiry from the personal data subject, and destroys the data after achieving this objective. The processed personal data shall be subject to destruction or depersonalization upon the achievement of processing objectives or if there is no further need to achieve these objectives, unless otherwise provided by Law and this Policy.

2.2. The objectives of PD processing

The personal data of the PD subjects shall be processed exclusively with the following purposes:

1. To provide the opportunity to communicate with the Company on the initiative of the subject, including the provision of information about services, responses to inquiries, contacts over the phone or by e-mail.
2. To conclude and fulfill agreements with the customers which initiate cooperation related to the provision of services.
3. To comply with the requirements of the legislation of the People's Republic of China, including the PIPL and other regulations related to personal data.
4. To conduct surveys and researches based on anonymized data which are aimed at improving the Company's performance and the quality of services, without identification of individual PD subjects.

Note:

The Website does not perform automated data collection and does not use marketing cookies. Any distribution by mail or service offering shall be carried out exclusively upon an explicit request from the subject and must not be bulk or automated.

2.3. Categories of the collected and processed personal data

The Company shall process only the personal data that are provided by the personal data subjects on their own when getting in touch over the phone, by e-mail or through other communication channels available on the Website.

Such data include:

- The name and contact information of the personal data subject (email address, phone number, WeChat ID and other contact information provided by the user).
- Other data necessary to handle an inquiry or enter into an agreement with the Company, if the interaction is initiated by the user.

3. Procedure and Conditions for Collecting and Processing Personal Data

3.1. Methods for Obtaining Personal Data of a Subject

The Company shall collect and process personal data of a personal data subject with the consent of the subject or their legal representative. It shall be permitted for the Company to collect personal data of the Customers:

- through the personal communication of data (submission of documents) by the subject over the phone, by e-mail or via other communication channels indicated on the Website, or other interaction with the Company which is necessary to respond to an inquiry or fulfill contractual obligations;
- through the data entry by the personal data subject to marketing leaflets (coupons);
- from third parties (customers, counterparties);
- from publicly available resources.

3.2. Procedure for obtaining the personal data subject's consent to personal data collection and processing

The consent shall be given by the personal data subject exclusively on their own initiative when getting in touch with the Company:

The consent can be expressed:

- verbally during a phone conversation;
- in writing or in an electronic message (for example, via e-mail) containing the subject's explicit consent for the processing of their data.

The consent shall come into effect when provided and remain in effect until the personal data subject's application to discontinue the processing of their personal data.

In the absence of a subject's consent, the processing of their personal data is not performed.

If personal data are obtained from third parties, the obligation to obtain such consent lies with these third parties.

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3.3. Personal data accessibility and confidentiality

In the course of its activities, the Company delegates the PD processing to third parties upon consent of the PD subjects, subject to mandatory compliance of the party that performs the delegated PD processing with the principles and rules of processing, as well as the PD security guarantees.

The list of individual allows to collect and process Personal Data shall be determined by the instructions from the Company Executive body and internal local regulatory acts. Before starting work, these individuals must be familiar with the provisions of applicable Personal Data legislation, including requirements for the Personal Data protection

procedure; with documents defining the Operator's actions regarding Personal Data collection and processing, including this Policy; with local acts on Personal Data collection and processing issues.

Access to Personal Data of Personal Data subjects shall be given to the Operator's employees in accordance with their official duties. The Operator's employees processing the Personal Data of Personal Data subjects must be informed about such processing, about the features and rules for such processing established by the regulatory legal acts and internal documents of the Operator. The Company Employee entitled to process Personal Data of Personal Data subjects shall be given a unique login and password to duly access the relevant information system. Information about the identifiers assigned to the Employee (login and password) shall be confidential and cannot be communicated by the Employee to third parties. The Employee shall ensure compliance with the confidentiality requirements and shall bear the risk of the consequences related to violation of such requirements. The authentication procedure shall be conducted by the employer's technical center, when the employee accesses the information system, by comparing the entered login and password with the relevant login and password assigned to the employee, information about which is contained in the information system. Upon successful completion of the authentication procedure, the Employee can perform operations with the PD subject's personal data in the information system. The Company does not publish personal data of the PD subjects in publicly available resources.

3.4. Personal Data Accumulation and Storage

1. Personal data shall be collected and stored with the exclusive purpose of processing user inquiries received over the phone or by e-mail.
2. Personal data shall be stored only to the extent necessary to perform a specific task and must not be used for other purposes.
3. The data retention period shall be limited to the time required for the processing of inquiries, and in any case must not exceed the period established by the legislation of the People's Republic of China.
4. The personal data subject shall have the right to request termination of processing or deletion of their data in a written or electronic request submitted to the Company.
5. Data destruction shall be performed by deleting the relevant information from the resources (paper or electronic) with no option for their further recovery.
6. The data shall not be stored in automated databases except for the internal records of the employees which are necessary to handle the inquiries.

3.5. Personal data protection

The Company shall take all necessary technical and other measures to protect personal data in compliance with the requirements of the legislation of the People's Republic of China.

6. Cross-border transfer

In the scope of the provided services, the Company can in rare cases transfer the Users' personal data outside the People's Republic of China (hereinafter referred to as the PRC).

Such data transfers are performed exclusively in cases where it is necessary to respond to User inquiries, provide information or support the operation of services, and only if there is an appropriate legal basis.

Data transfers outside the PRC shall be carried out in strict accordance with the PRC's Personal Information Protection Law (PIPL) and other applicable regulations.

Prior to such cross-border transfer, the Company shall ensure that all necessary procedures are performed, including:

- the assessment of necessity and safety of the personal data transfer;
- the conclusion of a contract with the receiving party to ensure the protection of the transferred data in compliance with the PIPL;
- obtaining an individual consent for the data transfer from the User if needed in accordance with the legislation or the conditions of data processing.

Data can be transferred only to those foreign organizations which ensure a level of personal data protection not lower than that established by the legislation of the People's Republic of China.

The Company undertakes to take all necessary technical and administrative measures to ensure proper safety of the transferred data, among others to prevent their leakage, unauthorized access, destruction, modification or other illegal handling.

The User hereby agrees that, should the cross-border transfer be needed, their personal information can be transferred and processed by third parties outside the PRC, provided that all above-stated requirements are satisfied and the lawful interests of the User are respected.

3.7. Handling the inquiries from the personal data subjects

To satisfy the rights of personal data subjects established by the legislation of the People's Republic of China, the Company developed procedures to handle inquiries and requests from the personal data subjects, and to inform the personal data subjects about the data processing purposes and methods.

The personal data subjects shall have right to submit inquiries to the Company in order to:

- learn whether the Company possesses their personal data;
- learn the objectives, methods and time periods of personal data processing;
- request personal data blocking or destruction in cases stipulated by this Policy or the legislation;
- implement other rights stipulated by the personal data law of the PRC.

Inquiry format:

The inquiry shall contain details that allow the identification of the PD subject or their legal representative (for example, the identity document number, date of issue, issuing authority)

and confirmation of data processing by the Company (for example, the email address or phone number provided when getting in touch with the Company), the signature of the PD subject or their legal representative, and the date of submission.

Conditions to handle inquiries:

It is not permitted for the employees of the Company to provide information about personal data over the phone, by fax or e-mail without the possibility of reliable identification of the personal data subject.;

Inquiries shall be handled exclusively through the official communication channels of the Company indicated on the Website.

Address for inquiries:

Inquiries shall be submitted at the official e-mail or postal address of the Company indicated on the Website.

The Company shall undertake to consider the received inquiries within the time limits established by the legislation of the People's Republic of China and provide answers to the extent sufficient to exercise the PD subjects' rights.