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# Privacy Policy (HK)

APPLIES TO  
UDB Logistics Limited

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GOVERNING LAW  
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CONTACT  
dpo@udb.com.hk

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## PRIVACY POLICY (HK)

This Privacy Policy explains how UDB Logistics Limited (“UDB”, “we”, “us”) collects, uses, stores, and shares personal data in connection with logistics and related services provided under the contracting entity named in this document (“Services”).

This Privacy Policy is intended to reflect UDB’s handling of personal data under applicable Hong Kong data protection requirements, including the Personal Data (Privacy) Ordinance (Cap. 486) (“PDPO”), where applicable.

### 1. Scope

This Privacy Policy applies to personal data processed by UDB in connection with:

- customer onboarding and account management;
- shipment bookings, documentation, coordination, and exception handling;
- invoicing, payments, and operational communications;
- compliance screening, air cargo security / Regulated Agent workflows, and regulatory requirements (where applicable);
- customer support and relationship management.

This Privacy Policy does not replace portal-specific notices (e.g., Partner Portal Privacy Policy) which apply to the use of the portal as a system.

### 2. Roles

For Hong Kong privacy purposes, UDB may act as a “data user” where it controls the collection, holding, processing or use of personal data.

Depending on the commercial context, UDB may also describe its role as:

- Controller / data user (we decide why/how data is processed), e.g., onboarding, invoicing, compliance recordkeeping; and/or
- Processor / service provider (we process data on customer instructions), e.g., shipment details provided by customers for service execution.

Where UDB processes personal data on customer instructions, processing terms are governed by the Data Processing Addendum (DPA), where applicable.

### **3. Personal data we may process**

We may process the following categories (as applicable):

- Contact and account data: names, job titles, business email/phone, company details.
- Shipment and documentation data: shipper/consignee/notify party details, addresses, identifiers, AWB/booking references, invoices, packing lists, HS codes, cargo descriptions, weights/values.
- Compliance-related data: screening results, export control approvals, Regulated Agent / air cargo security records, identity/access verification records, and supporting documents (where required for the shipment or applicable workflow).
- Operational communications: emails, messages, call logs, service tickets.
- Technical data (limited): when interacting with our systems, we may receive IP address, device/browser logs, and timestamps for security and troubleshooting. We do not use tracking cookies on the Legal Hub.

We do not intentionally seek to collect sensitive personal data. If such data is included in shipment documents, it will be processed only as required to provide the Services and meet legal obligations.

### **4. Sources of data**

We receive personal data from:

- customers and partners (booking instructions, documents);
- carriers, ground handlers, agents, and subcontractors involved in shipment execution;
- security screening providers, Regulated Agent / air cargo security partners, and approved subcontractors involved in shipment execution;
- authorities or official portals (where export approvals/clearances are required);
- publicly available sources (limited, for verification/compliance where reasonable).

### **5. Purposes of processing / use**

We process/use personal data to:

- provide and operate the Services (booking, documentation, coordination, delivery, exceptions);
- communicate operational updates and resolve service issues;
- meet legal, regulatory, and compliance requirements (including screening/export control where applicable);
- comply with air cargo security, Regulated Agent, customs, export control, and other applicable regulatory requirements;
- manage billing, payments, and accounting;
- prevent fraud, protect security, and maintain service integrity;
- defend legal claims and maintain records.

### **6. Sharing of personal data**

We may share personal data with:

- carriers and operational partners (airlines, ground handlers, trucking companies, warehouses, screening/security service providers) to execute the shipment;
- service providers supporting IT, hosting, communications, security, and business operations;
- authorities when required by law, air cargo security, export control, customs, airport, or regulatory procedures, including CAD where applicable;
- professional advisors (legal/accounting) where necessary.

We share only what is reasonably necessary for the purpose.

## **7. International transfers**

Logistics is cross-border by nature. Personal data may be processed, transferred, or accessed in multiple countries depending on routing, carriers, authorities, and operational parties. Where required, UDB applies reasonable safeguards and contractual or operational controls to protect data during cross-border processing.

## **8. Retention**

We retain personal data only as long as necessary for:

- providing the Services;
- contractual, operational, and compliance purposes; and
- legal/accounting requirements.

Retention periods may vary by shipment type, regulatory requirements, air cargo security / Regulated Agent requirements, accounting needs, and dispute/claim requirements.

## **9. Security**

UDB applies reasonable technical and organizational measures designed to protect personal data against unauthorized access, loss, misuse, or alteration. Measures may include access controls, confidentiality obligations, operational document-handling controls, and secure communication practices where appropriate.

## **10. Data subject rights**

Where applicable under law, individuals may request:

- access to their personal data; and/or
- correction of inaccurate personal data.

UDB will handle access and correction requests in accordance with applicable data protection law. We may need to verify identity and may be unable to fulfill requests where we must retain data to comply with legal, regulatory, operational, accounting, security, or claims requirements.

## **11. Updates**

We may update this Privacy Policy from time to time. The “Last updated” date reflects the most recent revision. The current version is available in the Legal & Compliance Hub.

## **12. Contact**

For privacy inquiries, access/correction requests, or complaints, contact: [dpo@udb.com.hk](mailto:dpo@udb.com.hk).