

We would like to inform you about how we handle your personal data in accordance with the General Data Protection Regulation (GDPR):

Responsible for data protection:

Orient Overseas Container Line Ltd., Zweigniederlassung Deutschland
represented by Branch Manager Jan Schmahl

Am Wall 157, 28195 Bremen,

Tel.: +49 421 3018-0

E-Mail: hreneg@oocl.com

You can contact our company Data Protection Officer at: mail@kaschae.de

Purpose and legal basis of data processing:

You may provide us with your details by handing over a business card, or we may collect them in order to initiate or execute an order.

Failure to provide the data requested by us may result in the contract with us not being concluded.

We process your personal data for the following purposes in connection with the contract: identification, support, and execution of the contract (Art. 6 (1) (b) GDPR).

Further processing of your personal data will only take place if required or permitted by law or if you have given us your express consent (Art. 6 (1) (a) GDPR).

In certain cases, we process your aforementioned data on the basis of a legitimate interest pursuant to Article 6 (1) (f) GDPR, e.g. for the purpose of statistical (anonymized) evaluations and optimization of our services or for deciding on the risk of payment defaults.

We do not use automated decision-making or profiling.

Recording your customer data in our system

The data is entered into our “CPF” (Customer Profile) system, which is part of the “IRIS-4” (Integrated Regional Information System, Version 4) processing system.

The following data is recorded:

- First and last name
- Phone number
- Email address
- Contact status (active/inactive)

The data can be entered in various ways:

- Directly into the CPF system by employees in OOCL offices.
- Directly into the CPF system from data records transmitted to us by you via EDI.

The data entered is regularly checked and, if necessary, adjusted in the CPF system by a team based in Bremen.

Consent to newsletters, participation in competitions or special promotions:

In such cases, we ask you to provide us with your name, address, and email address so that we can notify you. Participation in such a promotion also requires your voluntary participation and consent.

You can revoke your consent to the processing of personal data at any time. Revocation can be made informally, e.g. by email to the sales department. Please note that the revocation only applies to the future. However, this does not affect the legality of the processing carried out up to the point of revocation.

Credit check

If we make advance payments to you or if you conclude a loan or other credit agreement with us, we have a legitimate interest (Art. 6 (1) (f) GDPR) in checking your creditworthiness or credit rating. We carry out credit checks for the following purposes: to verify your identity and to assess default or credit risk.

To this end, we work with credit agencies (e.g. Creditreform), to which we transfer your aforementioned data and from which we receive information. If the credit check is negative, the contract may be rejected.

Recipients of your data:

Within our company, only employees involved in the contractual process (e.g. Sales, Accounting, Controlling) have access to your personal data. Your data will not be passed on to third parties.

To support our business activities, we use contractors with whom we have concluded a contract for order processing.

We may have to pass on your personal data to an authority (e.g. tax office, court, etc.) for the purpose of fulfilling our legal obligations. In such a case, the legal basis for the disclosure is Art. 6 (1) (c) GDPR.

Depending on the payment method you have selected, your payment details will be transmitted to the relevant payment service provider.

Transfer of your data to third countries:

As a matter of principle, we do not transfer customer data to so-called third countries, i.e. countries outside the EU or the EEA. Exceptions exist with regard to the use of the Group's

own databases and software solutions, e.g. IRIS-4. At the request of the parent company, Orient Overseas Container Line Ltd (OOCL Ltd), certain specified customer-related data for all group companies worldwide is entered into the group's own IRIS-4 database and managed there. The German branch is a dependent branch of the parent company OOCL Ltd.

The IRIS-4 database is hosted on the group's own servers in its own data center in the Hong Kong Special Administrative Region (HKSAR). The system is administered and maintained exclusively by OOCL's own staff. There is a detailed authorization concept in place to ensure that each organization worldwide only has access rights to its own customer data.

If employees from the sales departments in Bremen or from the Customer Service Center in Shanghai work on the Group's own systems, the data generated as a result is also processed by OOCL Ltd.

Both China and the Hong Kong Special Administrative Region (HKSAR) are considered third countries in terms of data protection law. Although China has comprehensive data protection legislation, it remains unclear whether this has resulted in a level of data protection comparable to that within the EU.

The management of OOCL headquarters committed to complying with EU data protection regulations when the GDPR came into force in 2018 and has issued and implemented numerous international guidelines on data protection, e.g.

- Global HR Policies & Guidelines - Personal Data Protection and Privacy (Version 2 dated May 25, 2018), in particular Section 2.9, "Protection of Customers' and Vendors' Personal Data".
- Internal standard operating procedures and implementation guidelines stipulate that access to customer data is restricted exclusively to authorized roles (e.g., CSV, OPS, IT, GISC) and is strictly limited to business operations and system processing. Customer data is used only for the agreed scope of services, is properly maintained, and is updated in controlled environments, with responsibility assigned to specific personnel such as regional managers and local CSV teams.

Furthermore, OOCL Ltd has made a binding commitment that, in the event that OOCL is required by authorities or other sovereign entities in China or the HKSAR to provide information on personal data relating to EU citizens (employees, customers, and suppliers of OOCL (m/f/d)) to provide information on personal data of EU citizens, OOCL undertakes to do the following:

- Inform the EU citizens concerned (m/f/d) about the request for information.
- To submit to the jurisdiction of the Regional Court of Bremen for the assertion of claims arising from data protection violations by EU citizens.

- To appoint a person as EU representative with power of attorney for service of process for the EU.
- To pay damages and/or compensation for pain and suffering to affected persons on the basis of a court or administrative decision.

With regard to the use of CPF/IRIS-4, a procedure directory was created in accordance with Art. 30 GDPR in consultation with the company data protection officer.

For OOCL customers, data collection and processing in IRIS-4 does not constitute a transfer to a third country, as the German branch is a dependent branch of the parent company OOCL Ltd. and the data is collected directly from the data subjects by OOCL as the controller. Nevertheless, OOCL must apply the GDPR, as the data processing takes place within the scope of the activities of a branch in the EU (Art. 3 (1) GDPR).

Storage period:

We delete your personal data according to the following criteria:

- When the business relationship with us ends, we immediately block your personal data for any further use.
- In this case, we delete your personal data at the latest upon expiry of the statutory retention period (§ 147 (3) of the German Fiscal Code), i.e. after 10 years have elapsed since the relevant order.
- If you have given us your express consent for a specific processing operation without a time limit, we will store your data until you revoke your consent or until you delete your customer account yourself or the contract with you ends.

Your rights

We are happy to inform you below about the rights you have as a data subject with regard to the processing of your personal data by us.

The right to information

You have the right to request confirmation from us as to whether your personal data has been processed. If this is the case, you have the right to obtain information about the data collected, stored, or used about you, as well as the following information:

- the purposes of the processing;
- the recipients or categories of recipients to whom we have disclosed or will disclose the personal data;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of further rights (see below);
- if the personal data is not collected from you, all available information about its origin;

- the existence of automated decision-making, including profiling, and, if applicable, further details about this.

You have the right to be informed about the appropriate safeguards pursuant to Art. 46 GDPR when your data is transferred to a third country or an international organization.

Right to rectification

You have the right to request that we immediately correct any inaccurate or incomplete personal data concerning you.

Right to erasure

You may request that we delete your personal data immediately. We are obliged to delete your personal data immediately if one of the following reasons applies:

- Your personal data is no longer necessary for the purposes for which we collected it or otherwise processed it.
- You revoke your consent and there is no other legal basis for processing.
- You object (see below) to the processing.
- Your personal data has been processed unlawfully.
- The erasure of your personal data is necessary for us to comply with a legal obligation under Union law or the law of the Member States.
- We have collected the personal data on the basis of a child's consent.

Right to restriction of processing

You have the right to request that we restrict processing if one of the following conditions applies:

- You dispute the accuracy of the personal data.
- The processing of the data is unlawful and you refuse to have the personal data deleted and instead request that the use of the personal data be restricted.
- We no longer need the personal data for the purposes of processing, but you need the data to assert, exercise, or defend legal claims; or
- You have objected to the processing (see below) and it is not yet clear whether our legitimate reasons outweigh yours.

Right to information

If you have asserted your right to rectification, erasure, or restriction of processing against us, we are obliged to notify all recipients to whom your personal data has been disclosed of this rectification, erasure, or restriction of processing, unless this proves impossible or involves disproportionate effort. You have the right to be informed by us about these recipients.



Right to data portability

You also have the right to receive the personal data concerning you in a structured, commonly used, and machine-readable format. In exercising this right, you may request that the personal data concerning you be transmitted directly from us to another controller, where technically feasible. This must not adversely affect the freedoms and rights of other persons.

Right of objection

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal data concerning you that is based on any of the following:

- The processing of your personal data by us is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us; or
- The processing is necessary to safeguard our legitimate interests or those of a third party, unless your interests or fundamental freedoms requiring the protection of your personal data prevail.

You also have the right to object to profiling based on this processing.

If we process your personal data for direct marketing purposes, you have the right to object at any time to the processing of your personal data for such marketing purposes. This also applies to profiling insofar as it is related to such direct marketing.

You also have the right to object, on grounds relating to your particular situation, to the processing of your personal data that we carry out for scientific or historical research purposes or for statistical purposes, unless the processing is necessary for the performance of a task carried out in the public interest.

Right to lodge a complaint with the supervisory authority

You have the right to lodge a complaint with a supervisory authority, in particular in the country of your residence, place of work, or the location of the alleged infringement. If you have any doubts, you can contact the State Commissioner for Data Protection and Freedom of Information (Dr. Timo Utermark, Georgstraße 122-124, 27570 Bremerhaven, Tel.: +49 421 3612010 oder +49 471 5962010, email: office@datenschutz.bremen.de), which is responsible for us. In addition to exercising this right, other administrative or judicial remedies remain unaffected.