

PRIVACY POLICY

Nippon Express NEC Logistics Hong Kong Limited
Website: <https://www.nipponexpress-necl.com.hk/zh-hant/>

Effective :25 Sep 2026

This Privacy Policy describes how Nippon Express NEC Logistics Hong Kong Limited collects, uses, transfers, stores and protects personal data in accordance with the Personal Data (Privacy) Ordinance (Cap.486) of Hong Kong and the governance standards of the NX Group and Nittsu NEC Logistics group. This policy applies to activities conducted within Hong Kong and processing of personal data of data subjects in Hong Kong.

1. Policy Commitment

- Comply with Hong Kong PDPO.
- Promote responsible data governance across the NX Group.
- Protect personal data through technical and organizational controls.

The Company shall periodically review this section to ensure continued compliance and alignment with business requirements and global governance expectations.

2. Scope

- Applies to employees, job applicants, customers, suppliers, contractors, visitors and website users.
- Applies to personal data in electronic and paper records.
- Covers all stages of personal-data processing: collection, holding, use, disclosure, cross-border transfer, retention and disposal.

The Company shall periodically review this section to ensure continued compliance and alignment with business requirements and global governance expectations.

3. Categories of Personal Data

- Identification information, contact information, employment records, education, logistics transaction records, financial information, IT access logs and CCTV records.

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4. Purposes of Processing

- Recruitment and onboarding.

- Employment administration, payroll and benefits.
- Customer relationship management.
- Logistics, warehousing and transportation services.
- Compliance, audit, risk management and investigations.
- Business continuity and security management.

The Company shall periodically review this section to ensure continued compliance and alignment with business requirements and global governance expectations.

5. Legal and Governance Framework

- The Company follows PDPO principles relating to collection, accuracy, retention, use limitation, security, transparency and access rights.
- Group governance requirements issued by NX Group and Nittsu NEC Logistics may also apply.

The Company shall periodically review this section to ensure continued compliance and alignment with business requirements and global governance expectations.

6. Sharing and Disclosure

- Group companies including Nittsu NEC Logistics, Ltd. and other NX Group entities.
- Professional advisers, auditors, insurers and regulators.
- Cloud and managed service providers under contractual data- protection safeguards.

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7. Cross Border Transfer

- Personal data may be transferred to Japan and other countries where group companies or service providers operate.
- Appropriate contractual, technical and organizational safeguards shall be implemented.

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8. Information Security

- Role based access control.
- Encryption and secure transmission.
- Security monitoring and incident response procedures.
- Employee awareness training.
- Third party security assessments where appropriate.

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9. Retention and Disposal

- Data will be retained only as long as necessary for business, legal and contractual requirements.
- Secure destruction procedures will be used when records are no longer required.

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10. Individual Rights

- Request access to personal data.
- Request correction of inaccurate data.
- Request cessation of direct marketing communications where applicable.

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11. Direct Marketing

- Marketing communications will be managed in accordance with applicable Hong Kong requirements and consent mechanisms.

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12. Cookies and Digital Services

- Cookies, analytics and security tools may be used to improve services and website performance and maintain website cybersecurity.

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13. Data Breach Management

- Incidents will be investigated promptly and escalated through established governance channels.
- Notifications will be made where required or appropriate.

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14. Responsibilities

- Management is responsible for oversight.
- Employees must comply with company policies and report suspected incidents.

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15. Contact Information

- Data Privacy Contact
- Nippon Express NEC Logistics Hong Kong Limited
- Email: adminhr@nipponexpress-necl.com.hk

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