

Privacy Notice

Lenton Group

22 September 2025

Introduction

Who we are

Lenton Group is a global logistics and transportation company that specializes in transportation by air, sea and land, supply chain solutions, warehousing and distribution, and e-commerce fulfilment. Our wide range of services comprise a variety of express and cargo-based economy and time-critical services, dangerous good handling, clinical trial logistic and cold chain management. Lenton Group is an Asian-based, cross-border service provider with an extensive network of owned-offices and trusted partners serving more than +220 countries / territories worldwide.

Privacy Notice Overview

Lenton Group and its Business Units (hereafter “Lenton Group”, “Lenton”, “we”) is committed to Personal Data protection. This Privacy Notice (“Notice”) sets out the principles and guidelines we apply to protect your Personal Data. This Notice is based on globally accepted, basic principles on data protection and is intended to provide you with an understanding of what Personal Data is collected and how it is used.

Scope

This Notice applies globally to all processing of Personal Data by Lenton Group and its Business Units, except where a Business Unit has adopted its own privacy notice that has been reviewed and confirmed by the Group Data Protection Officer (DPO) as consistent with the principles set forth herein. It governs the processing of Personal Data relating to applicants, business contacts (including clients and prospective clients), customers, suppliers, and other Third Parties.

Definitions

Personal Data

Personal Data refers to any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier.

For instance, Personal Data include a person’s name, personal or professional email address, personal or professional phone number, identifiers (such as login details like

an account number or password), occupation, and similar details. If we combine your Personal Data with other information we hold, we will treat the linked data as Personal Data as well.

Examples of Personal Data:

- Names
- Government-issued identification numbers (social security and driver's license numbers, etc.)
- Addresses
- Phone numbers
- Email addresses
- Photos

Processing

Processing refers to any operation performed on Personal Data, with or without the use of automated systems, such as to collect, store, organize, retain, archive, record, view, modify, adapt, alter, query, use, retrieve, forward, transmit, combine or delete data.

Examples of processing:

- Storing information in databases
- Transferring information from one database to another

Notes:

Data that has been anonymized such that individuals cannot be identified does not constitute Personal Data. The transportation of physical media (such as documents, computers, etc.) containing Personal Data does not constitute processing of that Personal Data.

Cookies

Cookies refer to small text files that are placed on a user's device (such as a computer, smartphone, or tablet) when they visit a website. Cookies are used to make websites work more efficiently, as well as to provide information to the owners of the site. They can be used to remember user preferences, track user behaviour, and personalize the user experience. Cookies can be session-based (temporary) or persistent (stored for a longer period).

Third Party

A Third Party refers to any external individual, organization, or entity that is not directly affiliated with Lenton Group. This includes, but is not limited to, service providers, contractors, sub-contractors, business partners, and other entities with whom Lenton Group may share your Personal Data for specific purposes as outlined in this Notice. Third Parties are subject to their own privacy practices and procedures, and Lenton Group ensures that any transfer of Personal Data to these parties complies with applicable data protection laws and regulations.

What Personal Data we process

Processing Activity	Purpose	Legal Basis	Personal Data Processed	Retention Period
Customer Service Investigation & Claims Management	Handling customer service inquiries and managing claims; evaluating business unit (BU) performance	Contract performance (claims) and legitimate interest (performance measurement)	Name, address, email, phone number, parcel number, collection request number, case number, free-text fields (e.g., parcel content)	3 years after case closure
Parcel Delivery	Shipment processing, tracking, delivery management	Contract performance, legitimate interest	Name, username, email, address, phone number, parcel number, date of birth, GPS coordinates, ID numbers, delivery instructions	3 years from shipment date
Customer Interaction	Notifications, marketing, satisfaction surveys, profiling, loyalty programs, websites improvement, any type of customer interaction	Contract performance, legitimate interest, consent	Name, email, address, phone number, parcel number, title, company, ID/passport numbers, HS code, login, gender, delivery and communication preferences, third-party data (e.g., neighbours), IP address, Cookies, local storage items, session storage items, your internet service provider, your browser type and operating system, the pages visited, the time spent on each page, and the sequence of pages accessed.	3 years after last interaction
Customs Processing	Duty/tax notifications and payments, proof of payment generation	Legal obligation	Name, email, address, phone number, SMS, parcel number, IP address, parcel content and value	7 years
Sanctions & Embargo Screening	Screening against Denied Party Lists (DPLs), license requests, parcel blocking decisions	Legal obligation	Name, email, address, phone number, parcel number, screening results (applies to consumers and employees)	30 days in live DB, 30 days–2 years in restricted DB, 2–10 years in archive (restricted access)

Processing Activity	Purpose	Legal Basis	Personal Data Processed	Retention Period
Export Control	Verification of export authorizations and permits for dual-use goods	Legal obligation	Name, address, parcel content (HS code), origin/destination countries, phone number	30 days in live DB, 30 days–2 years in restricted DB, 2–6 years in archive (restricted access)
Third Parties background checks	Fight against child labour, illegal migrant work, corruption	Legal obligation	Name, address	30 days in live DB, 30 days–2 years in restricted DB, 2–10 years in archive (restricted access)
KPI Reporting	Sales, marketing, and operational analysis; performance measurement	Legitimate interest	Name, email, address, phone number, parcel number	3 years (then anonymized if needed)
Whistleblowing	Receiving, investigating, and closing whistleblowing alerts; statistical reporting	Legal obligation, legitimate interest	Email, phone number, name, date/purpose of alert, any data provided during investigation	If the alert is not eligible: anonymized within 30 days If there is no action triggered by the alert: anonymized within 2 months If there is a legal/disciplinary action: retained until conclusion, then anonymized within 2 months (unless otherwise required)
Recruitment	Evaluate and process your application for employment with us, carry out right to work checks	Contract performance (employment contract), legitimate interests (to verify your suitability for our vacancies), legal obligation (right to work check)	Name, address, phone number, email address, CV, cover letter	1 year after last interaction

The Third Parties we might share your Personal Data with

Lenton Group may transfer your Personal Data internally or externally under strict compliance with applicable data protection laws (e.g., European GDPR, Hong Kong PDPO, Chinese PIPL).

With your consent, for contractual necessity, for our legitimate interest, or to comply with regulatory obligations, your Personal Data may be transferred to countries outside of your location, including those with lower levels of data protection.

Where we use Third Party service providers to assist us, your Personal Data may also be stored in accordance with their practices and procedures.

Your Personal Data may be disclosed or transferred to:

- Lenton Group Business Units – only for business purposes such as performing the requested services and invoicing or for our legitimate interests.
- Third-party service providers for the performance of the services (e.g., logistics partners and technical service providers, including sub-contractors).
- Technical support providers, for our legitimate interest (e.g. assisting with our websites).
- Providers assisting us with receipt of payments via our websites – to perform our contract with you or to take steps to enter into a contract with you.
- Recruitment agencies assisting us with filling our vacancies – for our legitimate interest to fill-in our vacancies.
- Professional advisers such as lawyers, accountants, insurance companies and business analysts – for our legitimate interests to ensure compliance, manage risk, and optimize business operations.
- Third Party software hosting companies which provide us with software solutions – for our legitimate interests to ensure efficient and secure software operations and support.
- Cloud service providers which host the Personal Data we collect from you – for our legitimate interests to ensure secure, scalable, and reliable data storage and management.
- Regulatory or legal authorities when required by law (e.g., tax reporting, court orders) – to comply with a regulatory obligation.

Where we store your Personal Data

Electronic versions of your Personal Data are stored on our own servers or on the ones of cloud service providers in Asia-Pacific, the European Union or the United Kingdom.

Where there is a cross-border transfer of your Personal Data, we will take steps to ensure your Personal Data is adequately protected. In such cases and in accordance with the regulations in force, we require our IT Third Parties to provide the necessary safeguards to ensure regulated, secure transfers (e.g. by requiring them to sign the European Commission's standard contractual clauses).

How we protect your Personal Data

Lenton Group undertakes to adopt all measures necessary to protect the security and confidentiality of your Personal Data and, in particular, to prevent any damage, erasure or unauthorised access by a Third Party. Lenton Group implements the following measures to protect your Personal Data:

Access Controls

Principle of Least Privilege

Lenton Group adheres to the principle of least privilege, ensuring that employees, contractors, and systems are granted the minimum level of access necessary to perform their job functions. This approach minimizes the risk of unauthorized data access.

Authentication

All individuals accessing Personal Data must be authenticated using approved authentication methods, such as usernames, passwords, and multi-factor authentication.

Access granting

Access granting is determined by the individual's role and responsibilities within the organization. Access control lists and role-based access control mechanisms are used to enforce authorization policies.

Monitoring and Logging

All access to your Personal Data is monitored and logged. Logs are regularly reviewed and audited to detect and investigate any unauthorized access or suspicious activities.

IT Security Measures

To protect your Personal Data, Lenton Group employs several IT security measures. We conduct regular security assessments and vulnerability testing to identify and mitigate potential risks. We also implement intrusion detection systems to monitor and respond to any unauthorized access or suspicious activities.

Organizational Measures

Lenton Group is committed to ensuring that all employees are aware of their data protection responsibilities. We provide regular training and awareness programs to educate employees on data protection policies, procedures and best practices.

Regular audits and reviews of data protection policies and procedures are conducted to ensure that your Personal Data is processed in accordance with the applicable laws, regulations and with the principles outlined in this Notice.

Data Risk Assessment

Before introducing new data processing methods, a comprehensive data risk assessment is performed. This assessment evaluates the compliance of the new IT system with applicable laws and regulations, as well as with the principles outlined in this Notice, to ensure that your Personal Data is processed securely.

Data Breach Response

If your Personal Data is affected by a security breach (destruction, loss, alteration or disclosure), Lenton Group undertakes to fulfil our obligation to notify Personal Data breaches to the relevant data protection authorities.

Your rights concerning your Personal Data

Your rights regarding your Personal Data

Subject to applicable laws, and unless the processing is necessary for compliance with a legal obligation, the performance of a contract to which you are a party, or for

legitimate interests pursued by Lenton Group, you have the following rights regarding your Personal Data:

- **right of access:** you may obtain a copy of your Personal Data being processed by Lenton Group;
- **right to rectification:** you may update your Personal Data or ask us to rectify your Personal Data processed by Lenton Group;
- **right to object,** in particular to prevent direct marketing: you may notify your preference not to receive direct marketing from Lenton Group or ask Lenton Group to stop processing your Personal Data;
- **right to erasure:** you may ask Lenton Group to delete your Personal Data;
- **right to restrict processing:** you may ask Lenton Group to suspend the processing of your Personal Data;
- **right to data portability:** you may ask Lenton Group to retrieve your Personal Data for reuse.
- **right to withdraw consent:** In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your Personal Data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Where we are providing you with marketing information, you can also change your marketing preferences by using the unsubscribe button at the bottom of our marketing e-mails sent to you. Once we have received notification that you have withdrawn your consent, we will no longer process your Personal Data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

How to exercise your rights?

You may exercise these rights by contacting at dpo@lentongrp.com.

All requests must be submitted with a proof of your identity, along with the subject and scope of the request, to help us identify the data in question.

Lenton Group undertakes to respond to your requests within one month. Occasionally, if your request is particularly complex, it may take longer than a month. In such cases, we will notify you and keep you updated on the progress.

No fee usually required

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What happens if you fail to provide Personal Data?

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as providing you with our products or services), or we may be prevented from complying with our legal obligations (such as complying with sanctions and embargos regulations).

Privacy Notice Review and Updates

We may change, modify, add or remove portions of this Notice at any time, and any changes will become effective immediately. Any changes we make to our Privacy Notice will be posted on this page and, where appropriate, notified to you.

Contact Information

For any questions or concerns regarding this Notice, please contact the Data Protection Officer of Lenton Group at dpo@lentongrp.com.

This Notice may be translated into other languages, but the English version shall always prevail.