



Lancer Container Lines Ltd.

Privacy Policy

I. Objective

To establish a comprehensive privacy program, Lancer Container Lines Limited hereby adopt principles aligned with concepts and requirements from applicable data protection laws including India's Digital Personal Data Protection Act, 2023 ("DPDP Act"). Please note that terms used but not defined under this privacy notice shall have the meaning ascribed to such term under the DPDP Act.

II. Purpose

Lancer is committed to protecting the privacy and security of personal data belonging to Users ("you", "your", "yours") and processed in accordance with requirements. The protection of your privacy is an important concern to which we pay special attention to when processing your personal data with respect to our business processes. We process personal data collected during visits to our Platform according to the legal provisions of India.

III. Scope

This privacy notice describes the information about you that Lancer collects through the Platform(s), how that information is used, maintained, shared, protected and how you can update it. It applies to personal data received by our Company from India, and personal data processed outside India for the purpose of providing goods and services to data principals in India in digital format (and non-digital format, if digitized subsequently). Please note that we are not obligated to observe compliances in relation to such sets of personal data that are excluded from the scope of applicable law (including personal data that has been made publicly available by the data principal to whom such data belongs or by any person acting under a legal obligation to disclose the personal data).

This policy applies to the processing of personal data of customers, employees (current, former, and prospective), and vendors/contractors, where such data is collected, stored, processed, or shared by the organization in the course of its business operations.

IV. Definition

In this policy, the following terms shall have the following meanings:

"Personal Data" Any data about an individual who is identifiable by or in relation to such data, directly or indirectly (e.g., phone number).

"Data Fiduciary" The entity that determines the purpose and means of processing personal data (the organization).

"Data Subject" shall mean any individual person who can be identified, directly or indirectly, via an identifier such as a name, an ID number, contact details, or location data.

"Third Party Vendors" shall mean any individual or organization providing services to Lancer on a contractual basis.

Registered Office: Lancer House, Mayuresh Chambers Premises Co-op. Society Ltd, H02, Plot No. - 60, Sec -11, CBD Belapur
India 400614 CIN: L74990MH2011 PLC214448 | Website: www.lancerline.com | Email: info@lancerline.com |
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We may update Lancer's Privacy Policy from time to time. The revised and most current version of the policy will be updated and posted on the website directly. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

This Privacy Policy outlines how we handle your data to ensure transparency and clarity regarding your privacy;

- a. *What data we collect?*
- b. *When and how we collect the data?*
- c. *Why do we collect the data?*
- d. *Why do we share your data and with whom?*
- e. *How long do we keep your personal data?*
- f. *How do we secure your personal data?*
- g. *Children*
- h. *What are your rights as a data subjects?*

a. What data we collect?

Personal data refers to data that lets us know the specifics of who you are and which may be used to identify, contact or locate you (e.g. name, age, gender, mailing address, telephone number and e-mail address).

Customers: - "Personal Data of Customers": -

- While using our Services, we may ask you to provide us with certain personally identifiable information (also known as PII or Personal Information) that can be used to contact or identify you. Personally Identifiable Information may include, but is not limited to:
- Email address
- First name and Last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- KYC Details / Documents
- Geographical Location

Employees – "Personal Data of Employees": -

- Personal data collected for recruitment, on boarding, payroll, performance management, attendance, compliance, and exit formalities. Includes data such as:
- Name, address, contact details
- Government IDs (PAN, Aadhaar where applicable)
- Bank details for salary processing
- Employment records, attendance, and performance data



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- Employee data shall be processed only for lawful and legitimate employment-related purposes.

Vendors / Service Providers – Personal Data of Vendors/ Service Providers: -

- Personal data collected from vendors, suppliers, consultants, and service providers for:
 - Contract management
 - Payment processing
 - Compliance and statutory requirements

Includes:

- Contact person details
- Business identification documents
- Bank and tax-related information
- Vendor data shall be processed strictly for business and contractual purposes.

If you provide us any Personal Information of another Data Subject, you must ensure that you are authorised to do so and that such person is informed about this Privacy Policy.

You can choose not to provide any Personal Information that we may request of you, but, in general, the Personal Information we request is required in order to provide you with access to and use of the Services, and the lack of such information may prevent us from doing so and impact the service capability and certain features of the Services.

We may ask you to provide certain additional information about yourself on a case to case basis in relation to our Services. It is clarified that any data which does not reveal your specific identity, does not relate to an identified or identifiable individual, information that is publicly available, information about software and hardware usage, information in relation to the products you purchase or who you purchase them from, or any anonymised or aggregated data (“Other Information”) is not considered as PII or Personal Information.

Cookies Data

Our website, mobile applications and other platforms may use cookies and similar tracking technologies to track the activity on our Services and hold certain information. For instance, cookies help us learn which areas of our website are useful and which areas need improvement.

You can choose whether to accept the use of cookies and similar technologies in general by changing the settings on your browser. However, you disable cookies, your, if experience of our Services may be diminished and some features may not work as intended.

b. When and how we collect the data?

We provide a range of Services including (without limitation) various delivery and logistics solutions through innovative technology and connected tools. In order to achieve this, we collect Personal Information and Other Information from you in a number of ways including:



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- Directly from you, for example when you use our website, our Services, mobile applications, or when you contact us through phone, WhatsApp, email or chat
- When you make an account with us
- When you are a recipient or sender of goods transported by us or services provided by us
- When you use a tracking ID to track your package
- When you provide us information to verify your identity
- Indirectly, when you purchase products or receive packages from any of our clients with whom we have a legally binding contract
- When you reach out to our customer support teams or when a support ticket is created
- When you provide us feedback
- Our social media pages
- Web forms and surveys
- Off-site services and events that relate to our Services
- When you contact our customer service
- APIs
- At the time of delivering consignments
- Other interactions with you

c. Why do we collect the data?

Personal data of customers, employees, and vendors shall be collected only for lawful purposes and with consent, wherever required under the DPDP Act, 2023. We only use your personal data if we have a proper reason or a legitimate purpose for doing so. We only use your data for one or more of these reasons:

- To fulfil a contract, we have with you, or
- If we have a legal duty to use your data for a particular reason, or
- When we get your consent to use it, or
- To fulfil the purpose for which we have collected your personal data; or
- When it is in our legitimate interests which are our business or commercial reasons for using your data, but even so, we will not unfairly put our legitimate interests above what is best for you.

**The use of your information is subject to the privacy notice in effect at the time of our use.*



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We endeavour to collect only such information that is reasonably necessary to perform services for you or to respond to your inquiries. You are responsible for ensuring that the information you provide is accurate, complete and current.

d. Why do we share your data and with whom?

Data will not be used beyond the stated purpose without appropriate legal basis. As a rule, we do not transfer or share your Personal Information with any third party unless we are required to do so. We may share your Personal Information in the following ways:

✚ Within Lancer:

Our businesses around the world are supported by a variety of Lancer teams and functions, and personal information will be made available to them if necessary for the provision of services, account administration, sales and marketing, customer and technical support, and business development. All of our employees and contractors are required to follow our data protection and security policies when handling personal data.

✚ Group Companies:

We may disclose your Personal Information with group companies of Lancer for the purposes set out in this Privacy Policy, including:

- for enabling them to provide the Services;
- for optimizing our shared processes; and
- for other cross-affiliate initiatives.

✚ Regulatory or Government Authorities:

We may disclose your Personal Information in good faith belief that such action is necessary to:

- comply with a legal obligation;
- comply with a request from any government, regulatory or public authority (for example: to fulfil a legal obligation during export of a shipment);
- protect and defend the rights or property of the Data Fiduciary;
- prevent or investigate possible wrongdoing in connection with our Services; and
- protect the personal safety of users of the service or the public.

✚ Our third-party service providers:

We collaborate with service providers around the world for any support needed. Personal data may be made available to these parties only when necessary to fulfil the services they provide to us, such as software, system, and platform support; direct marketing services; credit score rating check, online know-your-customer services, cloud hosting services; advertising; and order fulfilment and delivery.

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Our third-party service providers are not permitted to share or use personal data we make available to them for any other purpose than to provide services to us. However, for data aggregation purposes we may use and monetize anonymized personal data at our discretion.

e. How long do we keep your data?

Please inform us promptly of any changes to your Personal Information so that we can keep our records accurate and up to date. We take reasonable measures to ensure that the Personal Information we hold remains accurate and current.

We will retain your Personal Information only for as long as necessary to fulfil the purposes for which it was collected, and for a reasonable period thereafter to meet audit, accounting, contractual, technical, legal, and security requirements, and to resolve any potential disputes.

We may retain other information, including non-personal information, indefinitely or for the period permitted by applicable law. These retention practices apply even if you choose to delete your account with us.

f. How do we secure your personal data?

We take information security seriously and maintain reasonable administrative, technical, and physical safeguards designed to protect the Personal Information you provide from accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use. In exceptional circumstances, if any Personal Information appears on a package or letter, it may be visible to unauthorized individuals.

Application, data, infrastructure, and network security are key focus areas in which robust data security practices are implemented. Recognizing the right to privacy as a fundamental individual right, we have adopted appropriate measures to safeguard personal data.

You also play an important role in protecting your Personal Information. Please do not share your username, one-time passwords (OTPs), or any other account-related security credentials with anyone.

g. Children

Our Services are not aimed at children (under the age of 18) and do not provide information specifically targeting children or proactively collect their personal information. If you are under 18 you may use our website and our services only with the involvement of a parent or legal guardian. However, if you have visited our website or used our services, we may store your details as set out in this Privacy Policy.

Parents or guardians may authorise person under the age of 18years (child) / persons with disabilities to use our website provided they assume all responsibility and legal liability for the conduct of such child/persons with disabilities.

h. What are your rights as a data subjects?

Depending on your jurisdiction and applicable data protection laws, you may be entitled to access the personal information we maintain, or request the rectification of any inaccurate or incomplete data.

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Subject to certain legal exemptions—including requirements for internal auditing, security, fraud prevention, or statutory retention—you may also have the right to request the erasure of your personal information or the restriction of its processing.

We maintain a strict non-discrimination policy for users exercising their privacy rights. To report a personal information breach, please contact our privacy team at secretarial@lancerline.com

V. Changes

Lancer Container Lines Limited may update privacy policy from time to time. We encourage you to check our website frequently to see the current privacy policy so that you may stay informed of how Lancer is using and protecting your information. Whenever a change to this policy is significant, we will place a prominent notice on this website and provide an updated effective date.

VI. Limitations

We are not liable for breach of security during internet transmission of personal information, including any unintended loss, misuse, alteration or disclosure of such information. Furthermore, notwithstanding anything to the contrary, we will not be responsible for any loss, damage or misuse of personal information, if such loss, damage or misuse is attributable to an event of force majeure or to any reason attributable to you.

We may disclose your personal data in good faith or whenever necessary to comply with a legal obligation or if disclosure was required by any law or by order of any competent court or statutory authority, to protect and defend the legal rights or any Intellectual Property Rights.

VII. Your Specific Obligations

You warrant to us that you will not use the website for any purpose that is illegal or prohibited by these terms of use. You shall not use this website in any manner which could damage, disable, overburden or impair the website or interfere with any other party's use and enjoyment of this website. You shall not modify, copy, distribute, transmit, display, reproduce, publish, license, create derivative works from, transfer, or sell any data, services obtained from our website without our prior consent, directly or indirectly in any medium. Neither these materials nor any portion thereof may be stored in a computer except for personal and non-commercial use.

VIII. Governing law/Jurisdiction

This Privacy Policy shall be governed by the laws of India; and the Courts of Mumbai (India) shall have the exclusive jurisdiction to try any dispute arising thereof.

IX. Question/Contact Information

If you have questions or comments regarding this Privacy Notice Policy, please contact our Data Protection Representative at:

Email: secretarial@lancerline.com



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