

PERSONAL DATA NOTICE

We are committed to protecting the privacy, confidentiality and security of the personal information we hold by complying with the requirements of Hong Kong's Personal Data (Privacy) Ordinance. We are equally committed to ensuring that all our employees and agents uphold these obligations.

This privacy notice explains what information we gather about you, what we use that information for, the lawful basis on which that information is used and who we give that information to. It also sets out your rights in relation to your information and who you can contact for more information or queries.

1. What this privacy notice covers and who it applies to

- This privacy notice sets out how we will collect, handle, store, share and protect information about you when you engage with us, whether as part of our internal management communications, or as part of our community and stakeholder outreach activities or otherwise.
- This privacy notice applies to personal information collected and/or processed through these internal communications by Jardine Matheson Limited and various of its affiliates, including Jardine, Matheson & Co., Limited ("**Jardine Matheson**", "**we**", "**our**", or "**us**").
- If you have any questions or comments about this policy, please contact privacy@jardines.com.

2. What information do we collect?

We typically collect or obtain your personal information because you give it to us (for example, in the course of your employment, or when you receive or engage with us in relation to these internal communications, or when you complete a form to us). We may also collect:

- detailed identification information (e.g. in addition to name, position and title mentioned above, current employee's address and country of residence);
- electronic identification data (e.g. email address, login information, access rights, badge number, IP address, online identifiers/cookies, log files and connection time).

We also collect or obtain personal information from you because we observe or infer that information about you from the way you interact with us or others. In some cases, we will also collect or have access to personal information about you indirectly from our service providers (e.g. Poppulo, our internal communications platform service provider). For example, in order to improve your experience when receiving internal communications and ensure that it is functioning effectively, we (or our service providers, such as Poppulo) generally use cookies (small text files stored in a user's browser) and web beacons which may collect personal information.

3. How we use information about you

We process personal information about you primarily to communicate and provide internal management news and updates about the Jardine Matheson Group to you. We generally also use personal information for the following purposes:

- to manage and improve any services provided via our internal communications;
- to manage and improve our internal communications (including drawing up statistics on the effectiveness of our internal communications);

- to tailor content of our internal communications to provide you with a more personalised experience and draw your attention to information about the Jardine Matheson Group that may be of interest to you;
- to manage and respond to any request you submit through any channels we offer to you; and
- to help us learn more about you, the internal communications that you receive, and other internal communications that you might be interested in receiving.

The legal grounds we use for processing personal information

We generally use your personal information for the purposes outlined above because:

- the processing is necessary to perform our contractual obligations towards you;
- the processing is necessary for the legitimate interests of Jardine Matheson Group and does not unduly affect your interests or fundamental rights and freedoms;
- the processing is necessary for the performance of a task carried out in the public interest, such as monitoring of the diversity of our workforce to the extent permitted by law; or
- in some cases, where we have obtained your prior consent.

Examples of the 'legitimate interests' referred to above are:

- to benefit from cost-effective services (e.g. we may opt to use certain IT platforms offered by service providers);
- to prevent fraud or criminal activity and safeguard our IT systems, architecture and networks;
- to enable employees within the Jardine Matheson Group to interact with one another; and
- to meet our corporate and social responsibility objectives.

5 Who we disclose your personal information to

5.1 Within the Jardine Matheson Group

We typically transfer personal information to members of our personnel and other companies in the Jardine Matheson Group to complete the purposes indicated in section 3 above. Such other companies of the Jardine Matheson Group will either act as another controller under this notice or will only process personal information on behalf and upon request of the controller.

5.2 Outside the Jardine Matheson Group

We also usually transfer personal information to third parties outside the Jardine Matheson Group to complete the purposes listed in section 3 and 4 above including:

- third party service providers (such as Poppulo), our (IT) systems providers, our hosting providers such as Irasia, our payroll providers, consultants (including lawyers and tax accountants), public relationship advisers and other goods and services providers (such as mobility service providers);
- a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of Jardine Matheson Group's business

or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;

- any national and/or international regulatory or enforcement body or court or other form of tribunal where we are required to do so by applicable law or regulation or at their request; and
- any central or local government department and other statutory or public bodies.

5.3 Transfers outside the European Economic Area

The personal information transferred within or outside the Jardine Matheson Group as set out in sections 5.1 and 5.2, may also be processed in a country outside the European Economic Area ("EEA"), which does not offer the same level of personal information protection as EEA countries.

If your personal information is transferred outside the EEA, we will put in place suitable safeguards to ensure that such transfer is carried out in compliance with applicable data protection rules. To ensure this level of protection for your personal information, Jardine Matheson typically uses a data transfer agreement with the third-party recipient based on standard contractual clauses approved by the European Commission. A copy of these clauses is available here: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.

Further details of the transfers of your personal information outside of your country of residence and the adequate safeguards used by the Jardine Matheson Group in respect of such transfers (including copies of relevant agreements) are available from us by contacting privacy@jardines.com. You can also use this e-mail address to request further information about the entities that comprise the Jardine Matheson Group and the countries in which they operate.

6 How long we keep your personal information

We will only retain personal information for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. In general, although there may be limited exceptions:

- cookies relating to our internal communications will be kept for up to fourteen months from when you last received and opened our internal communications, after which it will be archived for a further seven years before it is permanently removed from our systems; or
- information about your correspondence with us, including through online forms or email correspondence, is kept for seven years, after which it will be archived for a further seven years before it is permanently removed from our systems.

7 Protection of your personal information

We use a range of physical, electronic and managerial measures to ensure that we keep your personal information secure, accurate and up to date. These measures include:

- education and training to relevant staff to ensure they are aware of our privacy obligations when handling personal information;
- administrative and technical controls to restrict access to personal information on a 'need to know' basis;
- technological security measures, including fire walls, encryption and anti-virus software; and
- physical security measures, such as staff security passes to access our premises.

8 Your rights and how to contact us

You have various rights in relation to your personal information. In particular, you have a right to:

- object to the processing of your personal information;
- request a copy of the personal information we hold about you;
- ask that we update the personal information we hold about you, or correct such personal information that you think is incorrect or incomplete;
- ask that we delete personal information that we hold about you, or restrict the way in which we use such personal information; and
- withdraw consent to our processing of your personal information (to the extent such processing is based on consent).

We will honour any requests, withdrawals or objections as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be engaged. If we do not comply with your request, we will explain why.

To exercise any of your rights, or if you have any other questions about our use of your personal information, please e-mail us at privacy@jardines.com. You may also use these contact details if you wish to make a complaint to us relating to your privacy.

If you are unhappy with the way we handled your personal information or any privacy query or request you have raised with us, you also have a right to complain to a data protection regulator in the place where you live or work, or in the place where you think an issue in relation to your personal information has arisen.

9 Changes to this privacy notice

This notice was last updated on 9 January 2019.

It may be subject to amendments. Any future changes or additions to the processing of personal information as described in this notice affecting you will be communicated to you through an appropriate channel, depending on how we normally communicate with you.