



Privacy Policy

1st November 2018.

Basic Policy

Built on a foundation of security and trust, “the wings within ourselves” help to fulfill the hopes and dreams of an interconnected world.

OCS CMB will always offer a safe and hospitable service in accordance with the above ANA Group Mission Statement.

Within the OCS’s business operations, our customers’ personal information is essential in order for us to provide fully satisfactory services. We recognize the importance of the information received from our customers, and make every effort to take the utmost care in handling such information.

In order to have our customers utilize OCS with a sense of safety and trust, we educate our executives and employees thoroughly about laws and company regulations related to personal information, and have established our company’s structure to include measures for safety, thereby doing our utmost for appropriate management and use of each customer’s personal information.

■ Chapter 1: Handling of Personal Information at OCS

1. Introduction

The Privacy Policy explains how personal information obtained by OCS CMB from customers is utilized. Please read this Privacy Policy carefully when using OCS’s services and products. Your use of OCS’s services and products will be deemed to mean you have fully understood and agreed to this Privacy Policy.

2. Scope of Application

The Privacy Policy will apply when customers use OCS’s services and products.

3. Purpose of Using Personal Information

OCS CMB utilizes personal information obtained from customers for the following purposes:

- (1) Acceptance of offer, provision and communication with respect to OCS’s services and products.
- (2) Guidance, provision, and management of other services and products offered by OCS CMB.
- (3) All operations incidental or related to the above (1) – (2).



- (4) Implementation of questionnaires concerning services and products offered by OCS CMB.
- (5) Development of new services and products.
- (6) Guidance, operation, management and information provision for various events and campaigns.
- (7) Notification of services and products offered by OCS CMB.
- (8) Guidance, operation and management of services, products, various events and campaigns of ANA and ANA Group companies and partner companies, as well as provision of various information.
- (9) Response to inquiries and requests.

4. Acquisition of personal information

OCS CMB will obtain the following personal information by fair and appropriate means for the purpose of achieving the previously mentioned purposes.

- (1) Personal information provided to OCS CMB by the customer to apply for OCS's services, etc., the customer's name, sex, date of birth, address, telephone number, fax number, email address, business contact, mailing address and other information.

OCS CMB will never obtain and use information of a sensitive nature to the customer (hereinafter, "sensitive information"), such as information on race, beliefs, social standing, history of illness, crime records, and history of having suffered harm from a crime, unless required by laws and regulations or by the consent of the customer.

5. Choice by the customer

As a rule, OCS obtains personal information at the volition of the customer. Customers may experience disadvantages if they refuse to provide their personal information, such as being unable to make use of the various services provided by OCS CMB, or being unable to receive campaign notices and other OCS CMB information because some of the functions of OCS CMB's system become inoperable and thereby unavailable. Please note that customers may change their contact information at any time they wish, in a manner designated separately by OCS CMB.

6. Disclosure and provision of information to a third party

OCS CMB will not disclose or provide customers' personal information to any third parties except under the following circumstances.

Also, customers' personal information including sensitive information will not be disclosed or provided to third parties under any circumstances, unless allowed by laws and regulations or by consent of the customer.



Note that provision of information to data-sharing partners and business-entrusted companies is not deemed to constitute disclosure or provision to third parties.

- (1) Customer consent has been obtained.
- (2) Disclosure or provision is required within the scope allowed by laws or regulations.
- (3) Disclosure is required to protect human life, health, or property in cases where obtaining customer consent is difficult.
- (4) Disclosure is required to cooperate with the public affairs of national or local governments, and when obtaining customer consent is likely to hinder the administration of public affairs.
- (5) Disclosure or provision of information as statistical data (in a form whereby the customer cannot be identified).
- (6) Provision of information as a result of the succession of business due to a merger, company split, transfer of business or otherwise.
- (7) Provision of information in accordance with the procedures based on laws and regulations, under the condition that the following information can be easily checked by the customers themselves through the OCS website, etc., and that the customers have not declared their wish to refuse provision of their information.
 - 1) The purpose of obtaining information is to provide such information to a third party.
 - 2) Specific personal data items to be provided to a third party.
 - 3) The means by which such personal information is provided to a third party.
 - 4) Provisions of information will be suspended upon the customers' request.
 - 5) Methods for accepting requests from customers.

7. Data sharing

OCS CMB will share customer information as follows:

(1) Scope of Data Sharing

OCS CMB Group Companies

(2) Purpose of use by the user

- 1) For development of new services and products, etc.
- 2) For notification of products and services by direct mail, etc.
- 3) For delivery and transfer to relevant company in the event of an inquiry, application for use or other request from a customer regarding products and services provided by OCS CMB Group companies.
- 4) For appropriate and smooth fulfillment of other transactions with customers, etc.

(3) Personal information items to be shared

Customer number, customer name, sex, date of birth, address, telephone number, fax number, email address, business contact (name of company, department, title, address, telephone and fax numbers), sex, mailing address, content of transactions etc.



(4) **Party responsible for management of personal information**

Capitol Overseas Courier Service (Private) Ltd.,

8. Business entrustment

In providing products and services to customers, OCS CMB may entrust part of its business operations to third parties to which personal information may also be disclosed to the extent required to achieve the purpose of the entrustment. In these cases, OCS CMB will implement all appropriate measures in managing and supervising such third parties to safeguard the handling of customers' personal information, including establishing agreements on the handling of such personal information.

9. Transfer to outside of Sri Lanka

If OCS provides customers' personal information to third-party business operators outside of Sri Lanka, including business-entrusted companies and data-sharing partners, OCS CMB will take necessary and appropriate measures in keeping with laws and regulations.

10. Management of personal information

In receiving customers' personal information, OCS CMB will manage such information according to the strictest standards and take the utmost care to prevent leaks, loss, or alterations thereof. OCS CMB ensures that the board members and employees are properly trained regarding appropriate handling to safeguard the security of information identifying individual customers. An appropriate retention period for personal information will be established in accordance with the purpose for which such information is used. After the purpose of the information has been achieved, OCS CMB will dispose of the information in question by appropriate methods.

11. Request about handling of Personal Information

If OCS CMB receives a request from a customer, submitted in the manner specified, for the disclosure, correction, deletion, addition, discontinuance, or erasure (hereinafter, "disclosure, etc.") of the customer's personal information stored in a database held by OCS, the request will be handled as follows, within a reasonable timeframe and scope, after confirming that the request was submitted by the customer himself/herself.

(1) **Request for disclosure:**

Personal information items will be disclosed in accordance with the customer's request.

(2) **Request for correction, deletion, or addition:**

Correction, deletion, or addition of personal information will be undertaken to the extent possible after conducting a due review of the request.



(3) Request for discontinuance or erasure:

The use of personal information items designated by the customer will be discontinued, and the relevant information erased if so desired, in accordance with the submitted request. However, please note that such requests may prevent customers from being provided with services that they had utilized, or may impede the provision of services in accordance with their wishes. Please agree to the occurrence of such disadvantages before making the request.

OCS CMB may not be able to fulfill the customers' requests if compliance with such requests would seriously impact OCS CMB's business operations, or result in a violation of laws and regulations.

12. Method for submitting request for disclosure, etc.

The method for submitting requests for disclosure, etc., or notification of purpose of use of personal information (hereinafter, "requests for disclosure, etc.") received by OCS CMB from customers, is as follows.

Please send your request by postal mail to the address below.

Capitol Overseas Courier Service (Private) Ltd.,
633, Sirimavo Bandaranaike Mawatha, Colombo 01400. Sri Lanka.

Attention: Personnel Administration.

13. Modification of the Privacy Policy.

OCS CMB may make modifications to this Privacy Policy. If modifications are made, details will be posted on the OCS website (www.ocscmb.com), so please be sure to carefully read the contents of any changes that have been made.

■ Chapter 2: Handling of personal information of EEA residents at OCS CMB.

Besides Chapter 1, Chapter 2 also shall be applied to the handling of personal information of persons residing in the European Economic Area (hereinafter referred to as "EEA") based on the REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive "95/46/EC". In the event that any provisions of this chapter contradict those of chapter 1, the provisions of this chapter shall prevail.

1. Introduction

A guardian's consent or permission must be obtained in the event that a customer under the age of 16 uses OCS CMB's service and consents to this Privacy Policy. The data



subject's consent to the OCS CMB's Privacy Policy must be obtained in the event that a person such as a family member applies for OCS CMB's service on behalf of the data subject.

2. Request about handling of Personal Information

If OCS CMB receives a request from an EEA resident, submitted in the manner specified, in respect of his/her customer's personal information held by OCS CMB, the request will be handled as follows, within a reasonable timeframe and scope in addition to Chapter 1, Article 11 (Request about handling of Personal Information). OCS CMB will handle such request after confirming that the request was submitted by the customer himself/herself.

(1) Request for withdrawal.

Personal information will be deleted or suspended in accordance with the customer's request, wherever possible and appropriate, after due review of the request. However, please note that such requests may prevent customers from being provided with services that they had utilized, or may impede the provision of services in accordance with their wishes. Please agree to the occurrence of such disadvantages before making the request.

(2) Request for data portability.

A copy of the personal information held by OCS CMB will be provided in accordance with the customer's request, wherever possible and appropriate, after due review of the request.

(3) Objection to data processing.

The use of personal information will be suspended, wherever possible and appropriate, after due review of the request.

(4) Method for submitting request.

Customers may submit above by the method provided in Chapter 1 Article 12. Customers may use the following forms for submission.

3. Transfers

OCS CMB may provide the customers' personal data to third parties, such as its affiliates, cloud vendors and its outside contractors, etc. to implement the purposes of use specified above. Since countries located outside the EEA (including, without limitation, Sri Lanka & Japan the same shall apply hereafter) are among the locations of third parties to whom OCS CMB will disclose the personal data of the customers, the customers shall be deemed as having consented to the following matters by consenting to the Privacy Policy:



- (1) In the case that the country in which the third party is located is outside the EEA, such country does not have the same data protection laws as the EEA, many of the rights provided in the EEA to the data subjects of the data will not necessarily be provided.
- (2) The customers' personal data may be provided for the purposes specified above to the subsidiaries and affiliates of OCS CMB or third parties outside the EEA.

4. Change of purposes of use of personal data.

In the case of a change to the purposes of use of customers' personal information, OCS CMB will announce the revised Privacy Policy in advance on OCS CMB's website (www.ocscmb.com).

5. Lodging a complaint with an authority

Customers have the right to lodge a complaint on the processing of their personal data with the data protection authority having jurisdiction over their residence. Please use the following URL to contact the authority having jurisdiction over your residence: (http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080)

(as of November 2018)