

# Privacy Policy

**Thal Limited** recognizes the importance of safeguarding your privacy and personal data and we want our stakeholders to understand how we use and protect it. This Personal Data Privacy Policy ("Privacy Policy") describes the general practice on how we collect, access, store, transfer, use, handle, share and process the Personal Data we may collect from you ("**Use**"). In this Policy, "**we**", "**us**", "**our**" refers to Thal Limited and to, associated entities and affiliates and our and their respective employees.

This Privacy Policy applies to data collected by us. It is intended for individuals and entities interacting with our business in any capacity and through any mode. This includes our customers, vendors, suppliers, visitors to our websites and to our offices across Pakistan, users of our systems and applications, including employees ("**Users**"). This policy is not, however, a contract and does not create any legal rights and obligations. In cases where the Company has entered into contractual agreements with its international customers and suppliers, the terms of such contracts will govern the relationship, including any privacy and personal data related provisions and obligations.

By engaging with and conducting business with the Company, including accessing our websites and systems, you accept, acknowledge and provide your voluntary consent to the retention, use, transmission and sharing of any Personal information and data, including identity related information along the lines specified in this Privacy Policy.

## **Personal Data we may collect/ receive:**

Categories of Personal Data we may collect/receive depends upon your interaction with the Company and the information shared with us.

## **Although many of the following will not apply to you, Personal Data received or collected by the Company may include but not be limited to:**

1. **Personal identity information:** such as full name, date and place of birth, gender, age, nationality, ethnicity, religion, city of residence, Computerized National Identity Card (CNIC), NTN No. /STRN/STN, biometrics;
2. **Contact information:** email addresses, mailing address, mobile, phone and fax numbers, social network/media handles;
3. **Job Applicant/ Employee Information:** information submitted at the time of applying for job, through any platform including but not limited to
4. information on your CV, education and employment history, marital status, institutional and government affiliations, household information, background check information, data related to health and vaccinations, payroll information etc.;

5. **Financial Information:** Debit and credit card statements in relation to official business purposes, employee financial and taxation information;
6. **Transaction Information:** inquiries and purchase history for our products and services, information that assists us in identifying the best products and services for you and feedback about our products and services, including information entered on our websites or obtained during market research;
7. **Account log in Details:** Company official account login information including IDs, account status, system identifiers, IP addresses;
8. **Device Information:** information from computer, mobile, and electronic devices used while connecting to our systems and network, data regarding your internet and browsing interactions, search history, browser type, operating system, employee device details, location information and other usage data;
9. **Other Information:** information entered on service provider/ customer software applications used/ provided by the Company, CCTV footage

**Note:** We will never request sensitive financial information, such as bank login details or passwords through any mode or means. Please be cautious of any unsolicited requests for such information from any source.

### **How we use the information we collect (“Purposes”):**

We collect your information and may use your Personal Data for our legitimate and relevant interests, general commercial and business purposes, fulfilling contractual purposes, enhancing our services and interactions with you, for personalizing your user experience. We may also employ your data in accordance with legal requirements and to ensure compliance with laws and obligations, as well as to safeguard both physical and online security, while also protecting the safety and rights of individuals.

### **How we share your information:**

Information relating to you, including your personal data may be shared with our associated entities and within our group and with third party organizations, including our authorized agents, contractors, business partners, and service providers, both locally and internationally or as required under law or by regulatory authorities. Such sharing may be for operational purposes, completion of tasks, business purposes, under contractual obligations, legal matters and when using service provider software and services.

### **Data Retention and Information Security:**

In the case of job applicant and intern data, such information shall be retained in our system for any potential future job opportunities. The duration for which data is retained is determined based on a range of factors, including, the nature and duration of our ongoing relationship with you, the period during which you use our

services, any applicable limitation periods, and compliance with relevant legal, regulatory or audit obligations.

We invest in information security technologies and use reasonable electronic, practical and procedural security measures to safeguard your Personal Data. While we take reasonable steps and precautions to protect your information, you accept there is no security measure that guarantees Personal Data security, particularly during internet data transmission, and we cannot guarantee data security. By engaging with us, you understand, acknowledge and voluntarily accept the potential risk that your personal data may be impacted in the event of a data security breach, and you hereby voluntarily release us from liability in the event of any breach.

We strongly encourage you to always exercise caution and diligence when using and transmitting information over the internet, particularly when sharing personally identifiable information, such as CNIC details. It is not always possible to trace the source of a breach, particularly for information which is commonly shared by individuals with many entities, such as CNIC numbers and pictures, credit card details, phone numbers, residential addresses etc. You understand and acknowledge that the Company cannot and will not be held responsible for any damages resulting from the misuse of your data.

### **Your Privacy rights:**

We strongly recommend that you thoroughly read and understand this Privacy Policy, and familiarize yourself with your privacy rights before interacting with the Company. Although we make third parties with whom information is shared aware of our Privacy Policy, our Privacy Policy does not extend to how third-parties handle your Personal Data.

In case you wish to know, access, request correction or amendment of your Personal Data or to withdraw consent for its processing we will extend our reasonable best efforts to comply with such requests. However please note that we may not be able to fully comply with requests for deletion or edits in certain circumstances, and where we are legally or otherwise required to retain information for business purposes.

Please note, that by electing to proceed and interact or continue to interact with us in any capacity and through any mode you will have consented to the collection, access, storage, transfer, transmittal, retention, use, handling, sharing and processing of your data including your identity information in accordance with our Privacy Policy. If you choose not to provide or consent to the collection and processing of your data, we may be unable to provide you with the requested services.

**Cookies:**

Cookies are files/small pieces of data that are used by websites to identify your computer and for record keeping purposes. Our company websites, online services and advertisements may use cookies, session cookies, and track IP addresses to better recognize, customize and improve visitors' use of websites, to store your data and to store technical information related to your interactions with our website.

**Changes to our Privacy Policy:**

We may update our Privacy Policy from time to time, and any changes will become effective immediately when we post the revised policy online. We encourage you to periodically check our website(s) to review the updated Privacy Policy.

**Links to other websites:**

Our websites may contain links to third-party sites, plug ins, pop-ups or other online services. Please note, the Company is not responsible in any manner whatsoever for the privacy or security practices of any other website and other online services. Please carefully review data protection/privacy policy for each third-party website or other online service you may use/access before entering any Personal Data.

**How to contact us:**

If you have any questions about this Privacy Policy or concerns, please email us at: [info@thalpackaging.com](mailto:info@thalpackaging.com) or you may write to us at: 5<sup>th</sup> Floor, HOH Building, 3 JCHS., Main Shahrah-e-Faisal, Karachi, 75350, Sindh, Pakistan.