

## Privacy policy

Ceylon Tea Brokers PLC is a company registered in Sri Lanka bearing company registration number PB 1280 PQ with its registered office at 481 T. B. Jayah Mawatha, Colombo 010, Sri Lanka and is the first stand-alone Tea Broking Company to be listed on the Colombo Stock Exchange. The entity is committed to protecting the privacy and confidentiality in relation to all personal data which is processed during the course of its business operations.

**CTB is committed to safeguarding your personal information, since maintaining data privacy of our stakeholders is of critical importance to us.**

CTB remains committed to ensuring a robust and transparent personal data protection framework. we are committed to protecting the privacy and personal information of our customers, employees, and other stakeholders and we ensure that the personal data which is collected will be handled with care. The privacy policy of CTB covers the following.

- How the personal data of the stakeholders will be handled by CTB which is obtained by the entity through direct contact, over the website, phone call, via email and social media platforms.
- The privacy rights of the data subjects
- The protection afforded by law to data subjects

As a stakeholder of Ceylon Tea Brokers PLC that is engaged through commercial and non-commercial means, by reading this privacy policy we would consider that you have accepted the terms of this privacy policy, and the fact that you have read, acknowledged and understood its contents and consent to the practices described herein. Further your personal data may be processed in accordance with this Privacy Policy. Where consent is required under applicable law, such consent shall be obtained explicitly and in a lawful manner.

### **1. Definitions**

This privacy policy uses a number of definitions which are set out below:

**Personal Data:** any information or data which can be attributed to an individual (directly or indirectly). This includes, but is not limited to, data such as names, addresses, contact details, identification numbers, photographs, biometric data, financial information, and any other data that can be used to identify a person directly or indirectly.

Please note that any form of anonymized data, aggregated data which cannot be directly attributed to an individual will not be considered as personal data.

**Processing or Process:** any operation performed on personal data, including collecting, storing, altering, retrieving, disclosing, making available, erasing, or destroying it. This refers to any activity performed on personal data which is duly collected that covers the entire data lifecycle of data.

**Special Categories of Personal Data:** This refers to any data which provides detailed information related to an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data relating to private life and gender orientation of an individual, personal data relating to offences, criminal proceedings and convictions, or personal data relating to a child.

CTB shall process Special Categories of Personal Data only where such processing is strictly necessary, supported by a lawful basis under the Personal Data Protection Act, No. 9 of 2022, and subject to enhanced technical and organisational safeguards. Where required by law, explicit consent of the Data Subject shall be obtained prior to such processing.

## **2. Important Information**

It should be noted that the website of CTB is not intended for children, and we do not collect data relating to children as a part of our operations. However, any form of information divulged regarding children shall only be collected and processed with the verifiable consent of a parent or legal guardian and strictly for the stated and lawful purpose, in accordance with the Personal Data Protection Act and will strictly be used for the intended purpose only.

It is important that you read this privacy policy in conjunction with any other privacy notice which we may publish from time to time on our website or which we may share on our digital platforms in future

### **Data Controller**

As per the provisions stated in data protection regulations, CTB is designated as the data controller, who is responsible for processing of personal data related to our clients, investors, employees and third-party contractors, as well as any other personal data processed as a part of the operations of the firm. The entity is also responsible for determining when, why and how to process personal data.

### **Contact Details**

Should you have any concerns or queries regarding our privacy policy feel free to reach to us and we will take necessary steps to revert back within a reasonable period of time

**Full name of legal entity:** Ceylon Tea Brokers PLC

**Designation:** Manager – Risk and compliance

**Company address:** 481 T. B. Jayah Mawatha, Colombo 01000

**Email address:** [sachitra@ceylontearbrokers.com](mailto:sachitra@ceylontearbrokers.com)

## **2.1 Duties of data subjects of CTB**

A data subject is any identified or identifiable natural person whose personal data is processed or collected by CTB. To enable CTB to fulfil its data protection obligations effectively, it is essential that individuals who share their personal data with us adhere to the following precautions.

### **Your duty to provide accurate information and inform us of changes.**

It is important to ensure that the personal data which is provided to CTB is accurate, valid and up to date. It is your obligation as well to keep us informed of any changes to your personal data during the progress of your business relationship with us.

### **Your duty to ensure the security of your own personal devices.**

It is important that you are required to ensure the security of the devices used to transfer personal data to CTB as no data transmissions over the internet can be guaranteed as 100% secure. Therefore, we expect that steps are taken to secure all devices against security threats and cyber risks.

Please bear in mind that CTB at any circumstance will not request for personal data or account information by any unsolicited communication channel. Therefore, you are responsible for keeping your personal data and account information secure in situations of unsolicited requests.

### **Obtaining third party consent**

If you share someone else's personal data with CTB, please ensure you have obtained their prior consent and this privacy policy should be brought to their notice.

It is important that any personal data you provide to CTB about someone else is accurate, up-to-date, and truthful, and does not contain any false or misleading information.

### **Taking precautions when visiting third-party links affiliated with CTB website**

Our website may contain links to third-party websites, plug-ins, or applications that are not

controlled or maintained by CTB. By clicking on these links or using these features, you may share personal data with third parties, who will handle your information according to their own terms and privacy policies.

We do not control third-party websites and are not responsible for how they might handle your personal data. We encourage you to review the terms and privacy policies of any third-party sites you visit. CTB is not liable for the actions or security practices of these third parties in relation to any personal data they may collect or process through your interaction with CTB.

### **3. The Data We Collect**

We may process different kinds of data about you and those of third parties which you disclose to us. Such data can be segregated as follows:

We may collect the following types of information from you:

- (i) Personal Data: Information which is provided to CTB that is directly related to an individual such as your name, address, national identification number, date of birth, place of residence, email address, and other contact details.
- (ii) Technical Data: Information about the devices and technology you use to access our website, including your IP address, login details, browser type and version, time zone, location, browser plug-ins, operating system, and platform.
- (iii) Usage Data: Information about how you use our website and services, such as pages visited, actions taken, and interaction patterns
- (iv) Marketing and Communications Data: CTB may also collect data regarding the preferences of the clientele for receiving marketing communications from the entity and third parties, as well as information regarding the preferred communication channels.

#### **Aggregated and Anonymized Data**

When you visit any website or use any of our mobile applications, we may also collect, use, store and share aggregated, anonymized, statistical or demographic data which may be derived from your Personal Data (Aggregated Data and/or Anonymized Data).

While aggregated and/or anonymized Data is not considered personal data, we may use such aggregated and/or anonymized data to conduct data analytics, such as to measure site activity to improve our website and for communications and services. For example, we

may aggregate your usage data to calculate the percentage of users accessing a specific website feature.

However, in case aggregated and/or anonymized data is being used/stored/presented alongside personal data, we will treat such combined data as personal data.

#### **4. Failure to provide Personal Data or provision of inaccurate or false Personal Data**

If CTB is required to collect personal data by law, as per a business relationship/contract or due to a legal obligation and if the requested information is not provided for perusal, we may be unable to process your request in such circumstances or will not be able to even execute a business/commercial relationship with you. In such cases, CTB has the sole right to inform or not provide the services that are being sought.

If we have reason to believe that any personal data provided by you is false, inaccurate, misleading, an act of identity theft, or infringes on the rights of a third party, we reserve the right to refuse the services you request, which could even lead to termination of existing contracts and, where applicable, report the matter to the relevant regulatory authorities.

#### **5. How Your Personal Data is Collected?**

We collect data about you using several methods, including:

##### **1. Direct Interactions:**

You, or someone acting on your behalf, may provide personal data to the organisation when corresponding by post, phone, email, social media, or directly through our website. This includes information provided when giving feedback, submitting complaints, or otherwise interacting with our services.

##### **2. Through the company website:**

There could be instances where the organisation may automatically collect technical data about your device, browsing actions, and patterns when you interact with our website.

##### **3. Through Mobile Applications:**

Future mobile applications which the organisation may develop or is in progress may access device information to provide a better experience and improve services for our customers and stakeholders.

**4. Third Parties and Publicly Available Sources:**

We may receive personal data about you from third parties or public sources, including through personal contacts both within and outside of Sri Lanka.

**5. How We Use Your Personal Data**

CTB processes Personal Data strictly in accordance with the lawful bases recognised under the Personal Data Protection Act, No. 9 of 2022 of Sri Lanka, including consent, performance of a contract, compliance with legal obligations, protection of legitimate interests, and such other lawful bases as may be permitted under applicable law. The most common lawful bases for processing your personal data include:

**1. Legitimate Interests:**

We may process your personal data to support the legitimate interests of CTB in conducting and managing its business, as a part of our operations, ensuring a high standard of service, maintaining a secure experience, and complying with legal requirements. Before processing your data under this basis, we carefully balance our interests against any potential impact the specific data collection could have on the data subject. We commit to not to use your personal data in such a manner that would infringe your rights.

**2. Performance of a Contract:**

We may process your personal data when it is necessary to provide the services or fulfill a contract you have with us. This also includes taking steps at your request before entering into a contract. Your personal data may be shared internally with the marketing team, or with an agent or any other relevant party as needed in order to execute the contractual obligations of CTB.

**3. Compliance with Legal or Regulatory Obligations:**

We may process your personal data to comply with applicable laws, regulations, or legal obligations. This includes responding to requests from government, law enforcement, regulatory, or judicial authorities in connection with national or public security, regulatory compliance, or related inquiries. Personal data of employees will be collected through the entity as a part of fulfilling regulatory obligations and for employee administration purposes.

## Purposes for which we will use your Personal Data

The table below outlines how we may use your personal data and the legal basis for doing so, which may include our legitimate interests.

Please note that this is **not an exhaustive list**. If you need further information or clarification about how your data is used, you can contact us at any time. We will be happy to provide additional details upon request to ensure you fully understand how your personal data is processed.

Purpose of Use	Legal Basis
<b>For brokering services</b> - We use your personal data in order to provide a better service, by responding promptly and accurately to your inquiries. This typically requires the use of certain personal contact information and details regarding the reason for your inquiry.	<ul style="list-style-type: none"><li>▪ Fulfilling contractual obligations</li><li>▪ Our legitimate interests</li></ul>
<b>For circulating marketing related communication and other reports</b> - Upon your consent which is deemed to have been provided at the point of subscription, we use your personal data to provide you with information (e.g. marketing communications and auction notices, weekly auction reports and special reports). This can be done via means such as emails, SMS, phone calls and messaging apps	<ul style="list-style-type: none"><li>▪ With your consent (where required)</li><li>▪ Fulfilling contractual obligations</li></ul>
<b>Third party social networks:</b> your personal data will be revealed when you interact with third party social networking features, such as “Like” functions. While CTB does not aggressively pursue individual targeted advertising campaigns, certain personal data related to you will be stored with us through social media.	<ul style="list-style-type: none"><li>▪ With your consent (where required)</li></ul>
<b>Order fulfillment and delivery management.</b> We use your personal data to contact you and inform you about the status of your orders/contracts by contacting the	<ul style="list-style-type: none"><li>▪ Fulfilling contractual obligations</li></ul>

Purpose of Use	Legal Basis
respective buyers/seller. We will also use your personal data to manage the delivery of the consignment.	<ul style="list-style-type: none"> <li>With your consent (where required)</li> </ul>
<p><b>Facilitating Payments:</b> Personal data will be collected for payment processing such as bank account information.</p>	<ul style="list-style-type: none"> <li>Fulfilling contractual obligations</li> <li>With your consent (where required)</li> </ul>
<p><b>Fraud detection and security purposes :</b> We may monitor your activity through CCTV when you enter the physical premises for identity verification and may provide the footage to the law enforcement agencies if a fraud/theft is detected. We also gather personal data when you visit/leave our warehouses as an additional security precaution.</p>	<ul style="list-style-type: none"> <li>Legitimate interests(security)</li> </ul>
<p><b>Candidate screening and HR purposes:</b> personal data which is mentioned alongside CVs will only be used for candidate screening purposes and the confidentiality of said information will be maintained within the entity. Further, for regulatory purposes personal details of employees will be submitted through the entity to the regulator(e.g.- for EPF and ETF purposes). For employee administration purposes and to fulfill legal obligations certain personal information related to employees will be retained within the organisation.</p>	<ul style="list-style-type: none"> <li>Fulfilling legal obligations</li> <li>For employee administration and recruitment purposes</li> </ul>

### Change of purpose of using personal data

We will take all the reasonable precautions to ensure that your personal data will only be used for the purposes for which we collected it for. CTB will maintain a strict commitment to safeguard your personal data and at any circumstance will not share your personal details with outside organizations for marketing related purposes. However, if at all your personal data is used for any unrelated purpose, you will be informed where such processing requires consent under applicable law, your explicit consent shall be obtained prior to such use by the company.

## **6. Disclosures of Your Personal Data**

There could be instances where personal data is shared with outside entities in relation to the “purposes for which we will use your personal data” enumerated above (under Section 5) with third parties comprising of the following:

### **External Third Parties**

- Government and Regulatory Authorities such as EPF, IRD and labour department requires the submission of personal data and may inquire further into certain personal data of employees on a case by case basis.
- Financial servicing organizations such as banks may have access to certain personal data such as bank account information when transactions are conducted through such banks and the insurance company that is affiliated with CTB will hold on to information regarding the health and family details of employees
- Internal and External auditors may access personal data as part of their routine checks
- HRIS service provider of the organisation may hold employee attendance data and other personal data within their databases

## **8. International Transfers**

Since the entity maintains data backups on cloud platforms through cloud service providers, there could situations where personal data may be held within other jurisdictions, located outside Sri Lanka

In such instances, CTB shall ensure that any international transfer of Personal Data is carried out in compliance with applicable data protection laws and subject to appropriate safeguards, including contractual protections, security measures, or transfers to jurisdictions recognised as providing an adequate level of data protection.

## **9. Data Security**

It should be noted that CTB will take all necessary security precautions to prevent any unauthorized processing or loss of your personal data. Additionally, measures have been implemented that would limit access to personal data only to those that need to know such information. Employees who are responsible for processing of personal data, are subject to a duty of confidentiality, where employee accountability will further ensure improved data security.

Existing processes are being strengthened to detect and address any actual or suspected personal data breaches in case such events occur. As required by applicable law, CTB is under obligation to notify you and the applicable regulator in the event of such a breach. However, CTB will comply with its statutory obligations to notify Data Subjects and the Data Protection Authority of Sri Lanka in the event of a Personal Data Breach, in accordance with applicable law. CTB shall not be liable for breaches arising solely from factors beyond its reasonable control, provided appropriate technical and organisational safeguards were in place.

## **10. Data Retention**

### **How long will my Personal Data be used?**

We will only retain your Personal Data for as long as necessary to fulfil the stated purposes, comply with legal and regulatory obligations, resolve disputes, or enforce contractual rights, after which such data shall be securely deleted or anonymised in accordance with CTB's data retention policies, including for the purposes of satisfying any legal, compliance or reporting requirements.

The appropriate retention periods for personal data that is collected is determined by the amount, nature, and sensitivity of the Personal Data which is collected, the potential risks of harm that could occur from unauthorized disclosure of such Personal Data and any legal commitments or penalties which the company may be exposed for due to not holding your personal data.

Subject to the above, requests can be made to delete your data. There could be circumstances your Personal Data will be anonymized (so that it can no longer be associated with you and you can no longer be identified by it) for internal data analytics in which case we may use this information indefinitely without further notice to you.

## **Your Legal Rights**

You have the following rights in relation to your Personal Data under applicable data protection law:

- Requesting access to your Personal Data.
- Request to correct Personal Data. This enables you to update any incomplete or inaccurate data we hold. Note we may need to verify the accuracy of the new data you provide to us.
- Request the erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data. Note that we may not always be able to comply with such

requests depending on the circumstances. Any requests related to erasure of personal data cannot override any legal obligations and applicable laws related to data retention.

- Object to processing your Personal Data, where you feel that your data rights are being infringed during the course of the business operations of the company
- Request that we restrict the processing of your Personal Data.
- Request the transfer of your Personal Data to you or a third party. We will provide you, or such third party of your choice, the Personal Data in a structured, commonly used, machine-readable format.
- Withdrawal of consent to use your Personal Data. Such withdrawal shall, however, be subject to applicable law and our legal obligations and will not affect the lawfulness of any processing carried out before the withdrawal of your consent. If you withdraw your consent, we may not be able to proceed with providing you with our services and assistance.

If you wish to exercise any of the rights set out above, please reach out to us on the contact information provided above.

**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 is unfounded, unreasonable, repetitive or excessive.

Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you**

We may need to request specific information from you to verify your identity and ensure your right to access Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond.**

We will use all best endeavors to respond to all legitimate requests within twenty-one days.

Occasionally, it may take us longer if your request is particularly complex or you have made a number of requests. We will keep you updated in such case.

## **11. Use of CCTV**

We may use CCTV across our premises and warehouses to ensure the safety of all our customers, patrons, employees, service providers and business partners. In particular, we may use CCTV footage to monitor the behavior of all persons within our premises and where relevant to aid investigations into potential or actual criminal, fraudulent incidents or other incidents of a related nature.

We may share such footage with law enforcement authorities and/or judicial authorities to assist with investigations, proceedings or other legal action.

CCTV footage shall be retained only for a limited period unless required for investigations, legal proceedings, regulatory compliance, or security-related purposes.

## **12. Changes to this Privacy Policy**

We may update or amend this Privacy Policy from time to time and the updated version will be posted on this website. We request that you revisit this website from time to time for updates on the Privacy Policy.

The Privacy Policy may be translated into different languages, and in the event of any inconsistency among the versions, the English version shall prevail.

## **13. Clarifications or Complaints**

If you have any clarifications or complaints about the content of this Privacy Policy or the manner in which your Personal Data is processed, we encourage you to contact us by using the information provided above in this regard.