

# **Privacy Policy**

### 1. THE PURPOSE OF THIS PRIVACY POLICY

- 1.1 This privacy policy ("**Privacy Policy**") is issued by Electrolux (Far East) Ltd. and its related companies (individually or collectively referred to as "**Electrolux**", "we", "our" or "us"). This Privacy Policy applies to the products, services and/or website(s) provided by Electrolux.
- 1.2 Electrolux is committed to protecting your privacy and personal data (as defined in Hong Kong's Personal Data Protection Act ("PDPA"). This Privacy Policy explains how we collect, use, disclose and/or process your personal data. This Privacy Policy should be read in conjunction with the Electrolux Terms and Conditions.
- 1.3 Electrolux reserves the right to amend this Privacy Policy from time to time. We will notify you of any changes to the Privacy Policy by publishing the updated Privacy Policy on our Site at <a href="https://www.zanussi.com.hk/zh-hk/data-protection-policy/">https://www.zanussi.com.hk/zh-hk/data-protection-policy/</a> Please check the Site or send your request by email to customercare@dch.com.hk if you would like to receive the latest updated Privacy Policy. Our "Site(s)" are our websites and online applications.

### 2. WHAT INFORMATION WE COLLECT

- 2.1 Generally, the personal data we collect, use, disclose, process and/or store include your name, address (including email address) and contact details (which may include home, business and mobile phone numbers). It is possible that where a specific product or service is involved, we may collect personal data from you that relates to that particular product, service or warranty repair. The types of personal data that we may collect, use, disclose and/or process as part of our day-to-day operations or in the ordinary course of our business and depending on the nature of interaction with the individual in question and the circumstances in question, include:
  - Full name, personal identification number of individual, mobile/residential telephone number, personal email address and/or residential address;
  - Financial data such as bank account numners and/or credit card details;
  - Photograph, video image or voice recordings of individuals;
  - Age or birth date;
  - Personal product preferences;
  - Products and services an individual may have purchased/enquired about together with any data necessary to deliver, repair and maintain those products and services or to respond to enquiries;
  - Data relating to individuals provided to Electrolux directly through its websites or indirectly through use of Electrolux's websites, through Electrolux's third parties or otherwise;
  - Data provided to Electrolux through its customer service channels, surveys, visits by and to Electrolux's representatives from time to time;
  - Data from access to or usage of Electrolux's premises, facilities and/or resources;
  - Cookies, pixel tags, web beacons, IP addresses and navigational data.
- 2.2 The information that we collect from you when you interact with us online depends on the tasks you complete on the Site, the products or services that you obtain from us and/or your interactions with us. From time to time, you may be able to interact with us anonymously or by pseudonym.
- 2.3 You have no obligation to provide any of the personal data requested by us. However, if you choose not to provide us with certain personal data, we may not be able to deal with your request, and/or provide you with the products or services that depend on our ability to collect, use, disclose or process, or which require, your personal data. We also may not be able to respond to your inquiry or instructions without your personal data.

- (I) BROWSING SITES AND USING OUR PRODUCTS
- 2.4 When you visit and browse through our Site or use our products, we collect data for statistical and maintenance purposes that enables us to evaluate the performance of our Site or products. Such general information includes:
  - the number of users visiting our Site or using our products and the number of pages viewed;
  - the date, time and duration of visits; and
  - · the path taken through our Site.

Such information will not identify you and we will not combine it with any information in a manner whereby we can identify you.

- (II) APPLYING FOR A PRODUCT OR SERVICE, REQUESTING INFORMATION ONLINE OR USING "CONTACT US"
- 2.5 When you interact with us for matters where logically your personal data is required by us in order to deal with your interaction, your request or activity, we would need to obtain personal data from you in order to complete such interaction, such as your online application for our product or services information and/or your registration of our products or services that you had obtained or are obtaining from us ("Product Registration"). When completing the Product Registration process or requesting other product or service information or when using the contact us function on our Site, you may need to complete an online form on the Site. Our online forms will ask you to provide personal data and such personal data will/may be collected, used, disclosed and/or processed by us for one or more of the Purposes (as defined below) and/or any other purposes stated in that form. You will have the right to choose whether or not to provide personal data, although if certain needed personal data is not provided to us, it will mean that we may not be able to deal with your request or transaction in question.
- (III) E-MAILS
- 2.6 You can contact us by e-mail via the link on this Site. In such instances, you have the choice whether or not to provide personal data other than your name and e-mail address.

#### (IV) CHILDREN'S PRIVACY

2.7 The Site is not intended for use by any person below the age of 18. We do not and do not intend to, transact through the Site directly with, nor sell or ship any items ordered through the Site directly to, anyone we know to be under the age of 18. If you are under the age of 18, you should use the Site only with the involvement of and through your parent or guardian and should not submit any personal data to us. By providing any personal data to us, you affirm that you are at least 18 years of age and above and agree to the terms set out in this Privacy Policy.

# 3. HOW WE COLLECT PERSONAL DATA

- 3.1 Electrolux collects personal data in a number of ways, including but not limited to the following instances:
  - when you request information concerning a product of interest to you, make other enquiries or place an order for our products or services;
  - when you interact with us such as through our customer call centres or with our technicians during site visits, or through your access and use of the Site, or our online and telephone services;
  - when you purchase or register warranties for, Electrolux's products and/or service;
  - when you attend an event, enter a competition or participate in a promotion, organised or run by us;
  - when you register your purchase(s) so you can receive all the benefits to which your purchase(s) entitles you;
  - when you enter your personal details on our websites (for example when you sign up to receive our newsletters), when you provide information via fax or over the telephone or in documents such as warranty registration forms;
  - when you register as a member of one of our loyalty clubs or membership programs;

- when you provide feedback on our products or services, or when you complete any application forms, purchase orders, questionnaires or surveys, or participate in our competitions;
- when you engage with us by social media, such as by posting on our Facebook page;
- from third parties such as our related companies, contractors and agents;
- from sources of information which are available to the public;
- from records relating to the use, service and repair of your Electrolux products;
- when you provide us with your personal data; and
- from our other Sites.
- 3.2 Any information which is not capable of identifying you, such as the number of users visiting this Site, is collected through code embedded in the pages of this Site. You are unable to disable the code on these pages.
- 3.3 Other information, such as browser type, is included in a "cookie". Cookies are pieces of information that a website can transfer to an individual's computer hard drive for record keeping. Cookies make using our Site easier by storing information about your choices on a particular website. This will enable you to take full advantage of the services offered to you. The use of cookies is an industry standard utilised by most major websites. Most Internet browsers are set to accept cookies. If you would prefer not to receive cookies you are able to adjust your Internet browser to disable cookies or to warn you when cookies are being used.
- 3.4 We may use cookies to identify you from other users on the Site. As mentioned above, a cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or device. You can block or deactivate cookies in your browser settings. We use log-in cookies in order to remember you when you have logged in for a seamless experience. We use session cookies to track your movements from page to page and in order to store your selected inputs so you are not constantly asked for the same information. The Site uses Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the Site and ways that we can improve your experience. These cookies may track things such as how long you spend on the Site and the pages that you visit so we can continue to produce engaging content. By continuing to use the Site, you are agreeing to the use of cookies on the Site as outlined above. However, please note that we have no control over the cookies used by third parties. For further information on types of cookies and how they work visit www.allaboutcookies.org.
- 3.5 We may use <u>flash cookies</u>. "Flash Cookies" (also called Local Shared Objects or "LSOs") are data files similar to cookies, except that they can store more complex data. Flash Cookies are used to remember settings, preferences, and usage, particularly for video, interactive gaming, and other similar services. We may use <u>web beacons</u>. Web beacons are small graphic images on a web page or in an e-mail that can be used for such things as recording the pages and advertisements clicked on by users, or tracking the performance of e-mail marketing campaigns. We may use <u>analytics tags</u>. If so, we use analytical tags to analyse what our customers like to do and the effectiveness of our features and advertising. They can also help us customize your browsing and shopping experience. We may use information collected through analytical tags or tracked links in combination with your personal data for the Purposes. We may also combine personal data you provide to us with other of your personal data (such as purchase history and demographic information) for the Purposes.
- 3.6 This Site may include hyperlinks that enable you to access a number of other websites and online applications operated by Electrolux or by our related companies. These other Electrolux websites and online applications are subject to their specific Privacy Policy and if there is none, then subject to this Privacy Policy. Where this Site includes hyperlinks to third party websites not operated by Electrolux we recommend that you read the privacy and security provisions relevant to those sites in order that you understand how those organisations will deal with your personal data. We are not responsible for the content or privacy practices of those third party sites.
- 4. PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF YOUR PERSONAL DATA
- 4.1 Electrolux will/may collect, use, disclose and/or process your personal data for one or more of the following purposes:
  - (a) administering, facilitating, processing and/or dealing in any matters relating to your use or access of the Site, including identifying you for login to the Site, our portals and other online services provided by or on behalf of us. Without limiting the generality of the foregoing, if you:

- gain access to or sign in to the Site, using your login credentials of a Social Networking Site, or
- (ii) use any features of a Social Networking Site such as its widgets, plug-ins and browser push notifications, made available to you on our Site,

it may result in information or your personal data being collected or shared between us and the third party. For example, if you use Facebook's "Like" feature, Facebook may register the fact that you "liked" a product and may post that information on Facebook. ("**Social Networking Site**" refers to an online or digital platform owned or operated by a third party, that is used by people to build social networks or social relations, or to interact, with other people, such as but not limited to Facebook, Instagram, Twitter). By your proceeding pursuant to (i) or (ii) above, you consent to such collection, use or disclosure of your personal data;

- (b) monitoring, processing and/or tracking your use of the Site in order to provide you with a seamless experience, facilitating or administering your use of the Site, and/or to assist us in improving your experience in using the Site;
- (c) assessing and processing your request for the purchase of and/or subscription to our products and/or services;
- (d) registering you as a customer of Electrolux and/or to deal with, process and/or administer the account that you may open with us, whether a membership account or otherwise, including to facilitate your transactions or activities on the Site, or your transactions or activities with us, or your registration of a warranty for the Electrolux product(s)/service(s) that you have obtained, have purchased or are using;
- (e) processing payment relating to your purchase of our products and/or services (including but not limited to repair and maintenance works to be carried out on the products):
- (f) administering, facilitating, processing and/or dealing with your relationship with us, any transactions or activities carried out by you on the Site or at our retail stores. This includes processing your application, orders and payment transactions; implementing transactions and the supply of products and/or services to you that you have requested. Without limiting the generality of the foregoing, should you make a purchase to be delivered to a third party recipient, you consent to us disclosing personal data that identifies you, to the said third party recipient (such as but not limited to your name). Further, you acknowledge and agree that delivery of your purchase could involve disclosure of certain personal data about you to bring about delivery of the same such as your name and contact details, which may be disclosed on the cover of the parcel, on an envelope or a delivery related document, as the case may be, which could be seen by third parties who view such parcel, envelope or said document;
- (g) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf including responding to your customer service enquiries and complaints; or responding to or dealing with your interactions with us;
- (h) contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering and/or managing your use of the Site, your membership and/or account with us, your relationship with us or any transactions made by you with us. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages;
- providing services to you as our account holder, as our customer, as a member of our loyalty or other program(s) or when requested by you; dealing with or administering your participation in contests, gamification, social events organized by us;
- (j) sharing or disclosing (at our discretion) your suggestions, comments, feedback or content (including audio, video etc.) (collectively "Feedback") that you provide through Social Networking Sites, to the Site or to us (including at the retail stores), with other users of the Site or with the public, for publicity and/or promotion purposes with a view to marketing or showcasing the business, products or services of Electrolux, and/or to acquiring customers, and/or for the

purpose of providing the public with your Feedback which may be useful for the public's purchasing decision or for the public's information or otherwise. This includes us disclosing your name together with your Feedback. Without limiting the generality of the foregoing, in the above regard, your Feedback and name may/will be published or shared by us on public media platforms such as the newspaper, the Internet, in our (including our affiliates') annual reports (if any) etc., and/or incorporated as part of Electrolux's marketing collaterals/materials or corporate video to be disclosed to the public, and you hereby consent to the same. Do not provide us with Feedback if you do not wish for such Feedback to be disclosed to the public. If you wish to give us your Feedback without it being disclosed to the public, please separately email our Customer Department at customercare@dch.com.hk and head the subject of your email with the word "Confidential";

- (k) understanding your interests, concerns and preferences;
- to comply with or enforce the terms and conditions of any contract or agreement entered into by
  or on behalf of Electrolux (and/or its associated entity) to which Electrolux (and/or its associated
  entity) is otherwise bound or is obliged to observe;
- (m) identifying you and assisting you in your use of our products, services and website services;
- (n) for marketing purpose and in this regard, we would be providing you with marketing, advertising and promotional information, materials and/or documents relating to products, contests, services and/or events (including those of third party organisations with which Electrolux may collaborate with) that Electrolux (including its affiliates/related corporations) or such third party organisations may be selling, marketing, offering, organizing, involved in or promoting, whether such products, services and/or events exist now or are created in the future:
  - (i) by way of postal mail, electronic transmission to your email address(es), push notifications, other forms of in-app notifications or harnessing other technologies (such as geo-location technology) for our mobile application(s) ("App") on your mobile device(s) or other technologies on your computers, and/or through other modes of communication that is not the 3 DNC Modes, in compliance with applicable local data protection law (i.e. the PDPA). You may opt out of this or withdraw from this at any time by sending an email to our Data Protection Officer. For the avoidance of doubt, the application of or your acceptance of or your consent to, this Privacy Policy, constitutes your consent to this subparagraph (i):
  - (ii) if you have separately expressly consented to one or more of the following 3 DNC Modes, by way of the 3 modes of communications of voice calls, text messages or faxes (the "3 DNC Modes") to your Hong Kong telephone number, in compliance with the requirements of applicable local data protection law (i.e. the PDPA); and/or
  - (iii) Notwithstanding (ii) above, regardless that you have not separately provided express consent as aforementioned in (ii) above, Electrolux reserves its right to send a specified fax message (as defined in Hong Kong's Personal Data Protection (Exemption from Section 43) Order 2013) (the "Exemption Order") and/or a specified text message (as defined in the Exemption Order) (i.e. a marketing fax message or marketing text message) to your Hong Kong telephone number, if:
    - (1) there is an ongoing relationship between Electrolux and you and the purpose of the message is related to the subject of the ongoing relationship, pursuant to the requirements and conditions of the Exemption Order; or
    - (2) the law permits.

For the avoidance of doubt, this subparagraph is without prejudice to subparagraph [(r)] below for which you have hereby consented to us contacting you for a survey, which you may subsequently opt out of by sending our Data Protection Officer notice;

(o) carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations (whether Hong Kong or foreign country) applicable to us or our affiliates/associated companies, the requirements or guidelines of governmental authorities (whether Hong Kong or foreign country) which we determine are applicable to us or our affiliates/associated companies, and/or our risk management procedures

- that may be required by law (whether Hong Kong or foreign country) or that may have been put in place by us or our affiliates/associated companies;
- (p) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned; dealing with conflict of interests; or dealing with and/or investigating complaints;
- (q) complying with or as required by any applicable law, court order, order of a regulatory body, governmental or regulatory requirements, of any jurisdiction applicable to us or our affiliates/associated companies, including meeting the requirements to make disclosure under the requirements of any law binding on us or our affiliates/associated companies, and/or for the purposes of any guidelines issued by regulatory or other authorities (whether of Hong Kong or elsewhere), with which we or our affiliates/associated companies are expected to comply;
- (r) complying with or as required by any request or direction of any governmental authority (whether Hong Kong or foreign country) which we are expected to comply with; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (whether Hong Kong or foreign country). For the avoidance of doubt, this means that we may/will disclose your personal data to such parties upon their request or direction;
- (s) conducting research (including customer research), surveys, market surveys, analysis and/or development activities (including but not limited to data analytics, surveys and/or profiling) to improve our services and facilities, or to improve our understanding of your interests, concerns and preferences, in order to enhance any continued interaction between yourself and us connected or in relation to the Site, or improve any of our products or services. Without limiting the generality of the foregoing, we may/will in this regard send you surveys or request a face to face or phone interview survey, by way of email or postal mail;
- (t) storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Hong Kong;
- facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business of Electrolux or that of its affiliates/related corporations;
- (v) to create reports with respect to our transactions with you, and/or producing statistics and research of such transactions for internal and/or statutory reporting and/or record-keeping requirements;
- (w) maintaining and developing our business systems and infrastructure including testing and upgrading of these systems:
- (x) dealing with and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves Electrolux as a participant or involves only a related corporation or affiliated company of Electrolux as a participant or involves Electrolux and/or any one or more of Electrolux's related corporations or affiliated companies as participant(s), and there may be other third party organisations who are participants in such transaction. "business asset transaction" means the purchase, sale, lease, merger or amalgamation or any other acquisition, disposal or financing of an organisation or a portion of an organisation or of any of the business or assets of an organisation;
- (y) anonymization of your personal data. In this regard, you acknowledge that personal data that has been anonymized is no longer personal data and the requirements of applicable local data protection law (i.e. the PDPA) would no longer apply to such anonymized data;
- (z) Electrolux, Electrolux Group Companies' or Electrolux's parent corporation's reporting purposes including but not limited to reporting on Electrolux's business performance ("Electrolux Group Companies" means Electrolux, its affiliates, related corporations and associated companies globally); including producing statistics and research for internal and/or statutory reporting and/or record-keeping requirements, of Electrolux or of its affiliates/related corporations; and/or

(the purposes set out above shall be collectively referred to as the "Purposes").

- 4.2 With respect to the marketing purpose at paragraph **4.1(n)(i)** above, you may notify us at any time that you no longer wish to receive any of these marketing communications and opt out of receiving the particular communication by responding via the channel in which you received the marketing communication, or by contacting us at the contact address given below. If you have installed a mobile application and you want to stop receiving push notifications, you can do so by changing the settings on your mobile phone or in the mobile application.
- 4.3 For the avoidance of doubt, you acknowledge and consent to Electrolux sharing anonymised information with third parties. For the further avoidance of doubt, applicable local data protection law (i.e. the PDPA) does not apply to anonymised data that does not identify an individual and applicable local data protection law (i.e. the PDPA) does not provide you with a right to object to an organisation handling or processing anonymised data.

### 5. HOW YOUR PERSONAL DATA IS STORED, HANDLED AND MANAGED

- 5.1 Electrolux takes great care to protect your privacy. In this regard, we will take reasonable steps to ensure that your personal data is kept confidential and secure, and take reasonable appropriate technical and organizational measures to protect your personal data from unlawful or accidental destruction, accidental loss, unauthorized collection, use, disclosure, access, copying, modification, leakage, damage, alteration or other unlawful forms of processing.
- 5.2 Any information provided to us on the Site is protected using Secure Sockets Layer protocols.
- 5.3 Where we transfer information from our servers to our mainframe computers, we use all reasonable endeavours to ensure that this is done securely Access to our mainframe computers is protected by firewall security systems where required, relative to the risk of the information stored. In addition, the Site carries an Internet Detection System to monitor potential privacy and security threats.
- 5.4 Any information stored in documents or on Electrolux systems is protected from unauthorised access by the use of a number of security procedures including user passwords.
- 5.5 Please be aware that the transmission of data over the internet is never completely secure, and while we aim to use our best efforts to secure and protect the information, we cannot guarantee the security of any information that is provided or transmitted to us by you. Any such provision of information is at your own risk.
- 5.6 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any legal or business purposes.

#### 6. WHEN WE DISCLOSE YOUR PERSONAL DATA

- 6.1 Electrolux may/will need to disclose your personal data to third party organisations outside of Electrolux including to Electrolux's affiliates, and those organisations may be located (and your personal data may be disclosed) overseas and outside of Hong Kong, for one or more of the above Purposes, as such third parties, would be processing your personal data for one or more of the above Purposes. In this regard, you hereby acknowledge, agree and consent that we are permitted to disclose your personal data to such third parties (whether located within or outside Hong Kong) for one or more of the above Purposes and for the said third parties to subsequently collect, use, disclose and/or process your personal data for one or more of the above Purposes. These disclosures are made subject to suitable protection for privacy and confidentiality being in place. The third party organisations to which we would usually disclose your information include:
  - third party organisations who have been retained by Electrolux to assist us in providing services to you including delivery, installation, maintenance and repair;
  - suppliers, agents and other third parties with whom we have commercial relationships, for business, marketing and related purposes including but not limited to those which provide administrative or other services to us such as mailing houses, call centres, telecommunication companies, logistics companies, information technology companies and data centres;
  - market research, marketing and/or telemarketing service providers;
  - our professional advisers, for example, our auditors and lawyers, as well as our insurers;
  - government, regulatory or other organisations to whom we are required to disclose your personal data by law;
  - our related companies, affiliates and product partners, including without limitation where we have received a product complaint or claim, for example, to our contract manufacturers, logistic service

- providers or other third parties in the supply chain, who may be located overseas, depending on where the relevant product or part was manufactured:
- any actual or proposed assignee or transferee of the business of Electrolux, or a merged entity in the event Electrolux is merged to create the said merged entity;
- third parties to whom disclosure by Electrolux is for one or more of the Purposes and such third
  parties would in turn be collecting and processing your personal data for one or more of the
  Purposes.
- 6.2 We may disclose your personal data to overseas members of the Electrolux group of companies (and their partners), who may communicate with you about certain products or special offers, for one or more of the above Purposes.
- 6.3 We may disclose your information to a purchaser or successor entity in connection with the sale of Electrolux or a related body corporate, or a business unit owned by Electrolux or a related body corporate, or the sale of substantially all of the assets of Electrolux or a related body corporate.
- 6.4 Where your personal data is to be transferred out of Hong Kong, we will comply with the requirements of applicable local data protection law (i.e. the PDPA) in doing so. In this regard, this includes taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the PDPA.

## 7. PROVISION OF THIRD PARTY PERSONAL DATA BY YOU

- 7.1 Should you provide Electrolux with personal data of individual(s) other than yourself, you represent and warrant to Electrolux and you hereby confirm that:
  - (a) prior to disclosing such personal data to us, you would have and had obtained consent from the individuals whose personal data are being disclosed to us, to:
    - (i) permit you to disclose the individuals' personal data to Electrolux for the Purposes; and
    - (ii) permit Electrolux to collect, use, disclose and/or process the individuals' personal data for the Purposes, as set out in paragraph [4] above;
  - (b) any personal data of individuals that you disclose to us is accurate:
  - (c) you are validly acting on behalf of such individuals and that you have the authority of such individuals to provide their personal data to Electrolux and for Electrolux to collect, use, disclose and process such personal data for the Purposes; and
  - (d) the terms of this Privacy Policy have been brought to their attention and they are agreeable to the same.

## 8. ACCESSING AND CORRECTING YOUR PERSONAL DATA OR WITHDRAWING YOUR CONSENT

- 8.1 Electrolux takes reasonable steps to ensure that any personal data we collect, disclose and use is accurate and complete, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organisation. However, it is important that you advise us of any changes to your personal data or if there are any errors in the personal data we hold about you. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had initially provided us with.
- 8.2 Subject to certain exceptions allowed by law, everyone who has provided personal data has the right to access or correct that personal data. For security reasons you will be required to put any request for access to or correction of your personal data into writing. You may obtain access to or correction of your own personal data by contacting our Data Protection Officer via the address below. We will need enough information from you in order to ascertain your identity as well as the nature of your request, to deal with your request.
- 8.3 Electrolux may charge you a fee to deal with a request by you to access your personal data in order to cover our reasonable administration costs and will notify you in such an event.
- 8.4 For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within the required timeline under

applicable local data protection law (30 days in the case of the PDPA). Where we are unable to respond to you within the timeline, we will notify you of the soonest possible time within which we can provide you with the information requested. The PDPA exempts certain types of personal data from being subject to your access request.

- 8.5 For a request to correct personal data, once we have sufficient information from you to deal with the request, we will deal with your request in compliance with applicable local data protection law (i.e. the PDPA), including correcting your personal data within the required timeline under local data protection law (30 days in the case of the PDPA). Where we are unable to do so within the said timeline, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request.
- 8.6 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by submitting your request to the email address set out below. We will process your request within a reasonable time from such a request for withdrawal of consent being made, and will subsequently not collect, use and/or disclose your personal data in the manner stated in your request, unless the law or applicable local data protection law (i.e. the PDPA) allows us to. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we may not be able to fulfill the transaction you have entered into with us or continue with your relationship with us, or send you information that you have requested, as examples depending on the circumstances.

#### 9. HOW YOU MAY MAKE A PRIVACY-RELATED COMPLAINT

- 9.1 If you have any concerns about our handling or treatment of your personal data or if you believe that your privacy has been breached, please contact us by writing to our Data Protection Officer at the address below setting out the nature of your complaint.
- 9.2 We will investigate your complaint and endeavour to provide you with our response within a reasonable time of receiving your complaint.

## 10. HOW TO CONTACT US ABOUT THIS PRIVACY POLICY

10.1 If you have any queries relating to our Privacy Policy, or if you wish to request for access to, or correction or deletion of your personal data or to withdraw your consent, please contact or send your request to us at

#### **Data Protection Officer**

Electrolux (Far East) Ltd.

4/F, DCH Building, 20 Kai Cheung Road, Kowloon Bay, Kowloon

E-mail: customercare@dch.com.hk

# 11. GENERAL

- 11.1 Your consent that is given pursuant to this Privacy Policy is additional to and does not supersede any other consents that you provided to Electrolux with regard to processing of your personal data.
- 11.2 For the avoidance of doubt, in the event that applicable local data protection law permits an organisation such as us to collect, use or disclose your personal data without your consent, such permission granted by the law shall continue to apply.

Last Updated: 28 June 2022