

ELECTROLUX DATA PROTECTION POLICY

Applicability

This Electrolux Data Protection Policy (“**Policy**”) applies to Personal Data collected, used and disclosed by Electrolux S.E.A. Pte Ltd (“**Electrolux**”). The Policy is based on current laws and regulations in Singapore. Electrolux may have entered into separate agreements with customers, vendors, partners, employees or other parties containing specific data protection provisions. In those events, the data protection provisions in those agreements shall prevail over this Policy.

Type of Personal Data Collected

Electrolux only collects personal data as may be required by law or that is reasonably essential to conduct Electrolux’s business.

As part of its day-to-day operations, Electrolux may, in the ordinary course of business, collect and hold personal data that may consist of or relate to the following, depending on the nature of interaction with the person (collectively “**Personal Data**”):

- Full name;
- NRIC, FIN or passport identification number;
- Photograph, video image or voice recordings of individuals;
- Mobile/Residential telephone number;
- Personal email address;
- Residential address;
- Age or birth date;
- Profession, occupation, qualifications, job title or designation;
- Information about an individual’s financial position or account particulars;
- Personal product preferences;
- Signature;
- 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 provided to Electrolux relating to individuals who are, may be or have been employed by Electrolux, whether directly or indirectly;
- Information that may help to provide, improve and maintain its products and services;
- Data from access to or usage of Electrolux’s premises, facilities and/or resources;
- Cookies, pixel tags, web beacons, IP addresses and navigational data; or
- Any other data, whether true or not, about an individual who can be identified from that data or from that data and other information to which Electrolux has or is likely to have access.

For the avoidance of doubt, Electrolux only collects sensitive data (such as NRIC, FIN or passport identification number) where strictly necessary, including for employment, related benefits and other human resources purposes. Whenever collected Electrolux shall store such sensitive data in an encrypted manner (if stored electronically) and will not share such data with third parties unless strictly necessary or as required by law.

Collection, Use & Disclosure of Personal Data

Electrolux may collect Personal Data either itself or through a third party engaged by Electrolux which term in this Policy may include any service provider or any Electrolux group entity associated with Electrolux in collecting, handling, storing, dealing, transmitting or processing Personal Data in Singapore or abroad. The ways that Electrolux may collect Personal Data include:

- When individuals purchase, use or inquire about, or register warranties for Electrolux's products and/or services;
- Through individuals' access and use of Electrolux's website, Facebook page and other online and telephone services, including warranty registration and the customer call centre;
- During communications between individuals and Electrolux's representatives and/or third parties, including in connection with employment or similar relationships;
- When individuals complete an application form, purchase order, questionnaire, competition or survey;
- When individuals provide feedback regarding Electrolux's products, services, website, Facebook page or other online or telephone services;
- When individuals participate in Electrolux's workshops, seminars or other events or promotions; and
- Credit agencies.

The Personal Data that Electrolux collects is used for the purposes for which it is collected or for related purposes that would be reasonably expected. Electrolux may, without limitation, use Personal Data for one or more of the following purposes ("**Purposes**"):

- To process, confirm and fulfil customer requests regarding Electrolux products and services or transactions;
- To contact individuals regarding their enquiries, requests and other applications;
- To identify individuals for login to websites, portals and other online services provided by or on behalf of Electrolux;
- For Electrolux's market research, marketing purposes and partner promotions, such as sending updates to customers and other individuals on Electrolux's latest offers and promotions;
- For identification, verification and background screening purposes;
- To conform to legal or regulatory requirements or comply with legal or regulatory processes in Singapore and elsewhere;
- To protect and defend Electrolux's or its affiliates' rights, interests or property;
- 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;
- In connection with obtaining of professional legal advice, conducting of audit and investigations, carrying out of disciplinary actions, managing of risks and crises, monitoring the access to or use of Electrolux's facilities and resources;
- For travel, payment, insurance, medical, security, business continuity and emergency contact purposes; and
- For the provision of references.

Electrolux may disclose Personal Data for one or more of the Purposes pursuant but not limited to the following:

- The disclosure has been agreed between Electrolux and the individual concerned;
- The disclosure is in connection with compliance of any contractual or regulatory obligation, any legal process or regulatory investigation or pursuant to a court order or any valid request from an authority;
- To facilitate Electrolux's or any associated entity's compliance with any laws, rules or regulations;
- To Electrolux's agents, vendors and contractors in Singapore and elsewhere including but not limited to IT facilities and services providers and delivery, repairs and maintenance service providers;
- To marketing partners;
- To financial institutions and other institutions in connection with employment related benefits or products;

- To credit reporting and debt collection agencies;
- To Electrolux's professional advisors;
- To individuals' representatives;
- For registration and/or maintenance of registrations and/or memberships with regulators, authorities, professional bodies and market operators; and
- To update individuals of news, events, incentives and products and services (including those of its third party agents, providers, advisors and customers) from time to time.

As Electrolux sells thousands of products in hundreds of countries, Personal Data may have been previously provided through reply cards, Electrolux call centers, or in some other manner. Failure to register or consent now will not affect the information that has already been provided to Electrolux.

Data Protection Officer

If any individual has any question about Electrolux's data protection processes and practices or wishes to access his/her Personal Data that is in Electrolux's custody or control or to enquire about the use of his/her Personal Data or to request Electrolux to correct any inaccurate Personal Data, he/she may write to Electrolux's Data Protection Officer and Electrolux will respond in accordance with the applicable laws, regulations and/or guidelines. Electrolux may charge a small administrative fee to meet its costs in providing the requested information provided to the extent allowed by law, Electrolux may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by law.

If you have any specific questions, please contact us at:

Data Protection Officer
Electrolux S.E.A. Pte. Ltd.
1 Fusionopolis, #7-10, Galaxis
Singapore 138522

E-mail: DataProtectionSingapore@Electrolux.com

Update of Personal Data

If there is any change in Personal Data that is held by Electrolux, the individual should inform Electrolux within a reasonable timeframe to enable Electrolux to update the Personal Data.

Reasonable Security Arrangements

Electrolux uses appropriate technical measures and processes for safeguarding and protecting Personal Data. Electrolux is committed to implement physical, electronic, and procedural safeguards to protect Personal Data against loss, misuse, damage and unauthorized access, modifications or disclosures. Electrolux continuously reviews and enhances Electrolux's security policies and security measures to consistently maintain a high level of security.

Personal Data Retention

Electrolux retains Personal Data for as long as necessary to fulfil the purposes for which such data was collected, Electrolux's business purposes or as is otherwise required under any other law for the time being in force. However, this is subject to Electrolux's rights and obligations under applicable laws to ensure retention of records which may contain Personal Data as well as to Electrolux's archiving and record retention policies.

Personal Data Transfer

In order to maintain customer and supplier contacts, it may be necessary that Electrolux stores, processes and forwards Personal Data:

- to Electrolux's subsidiaries worldwide; or
- to third parties working on Electrolux's behalf; and

to enable Electrolux to understand and react to customers' needs as quickly and efficiently as possible e.g.:

- to process product or offer enquiries;
- to send customers' ordered products;
- to inform customers about special offers;
- to conduct surveys etc.

In case Electrolux discloses any Personal Data to a third party (including Electrolux's authorized service contractors), such third party will be required to be bound contractually ("**Duty of Confidentiality**") to ensure that they protect the Personal Data in accordance with applicable laws and regulations. This Duty of Confidentiality will not apply to Personal Data shared by Electrolux or through its holding company or other affiliates with any authorities, government agencies, courts and regulators, which is public or as is otherwise mandated or exempt under any Singapore or other law, regulation or order for the time being in force.

Where Electrolux transfers Personal Data outside of Singapore, it will take reasonable steps to ensure that the recipient of such Personal Data has an adequate (equal or higher) standard of protection in place, in accordance with relevant laws and regulations and its policies on cross border data protection.

Notification of Changes and Consent

If there are any changes or amendments to this Policy, Electrolux will post those changes on Electrolux's website so that relevant data subjects are always aware of what Personal Data is collected, how Electrolux uses it, and under what circumstances, if any, Electrolux may disclose it. Electrolux will use Personal Data in accordance with this Policy and any other privacy policy under which the Personal Data was collected. By virtue of this Policy, data subjects agree to collection, use, transfer, disclosure, retention and other processing of her/his Personal Data as described in this Policy.

Before disclosing Personal Data relating to other data subjects to Electrolux, individuals shall ensure that those other data subjects are duly notified of this Policy and undertake and represent they have procured the consent of the other data subjects to the collection, use and disclosure of their Personal Data as described in this Policy.

Withdrawal of Consent

Where an individual does not wish to provide consent or wishes to withdraw his/her consent for the collection, usage and/or disclosure of his/her Personal Data, he/she should contact the Electrolux Data Protection Officer and state his wish. The individual should allow a reasonable period for the withdrawal process to take place. In such case, Electrolux may not be able to provide certain products and/or services effectively or at all. In such case, Electrolux has the right not to provide those products and/or services or to withdraw the products and/or services or otherwise terminate the relationship for which the information was sought from the individual.