

Privacy Policy

Last updated: March 2023

1. We care about your privacy

We care about protecting and respecting your privacy. In order to serve you better and provide you with the best experience on our website, we may collect some personal data about you.

This Privacy Policy will help you understand how we collect and use your personal data, who we share your personal data with, and how you can control the way your personal data is collected and used by us.

If you access or use our website or any services we make available on this website (“**Web Service**”), or register to create an account (“**User Account**”) to use the Web Service, then this Privacy Policy will apply to you.

Sometimes, we may send you a new notice to explain how we may use your personal data in specific situations, and will always give you the choice to opt out of such uses.

2. Who are we?

DFI Retail Group (“**DFI Retail Group**”, “**we**”, “**us**”, “**our**”) operates this website, and is the data user or data controller. Personal data we collect about you will be used in line with this Privacy Policy. DFI Retail Group means the group of companies whose ultimate publicly listed parent company is DFI Retail Group Holdings Limited.

3. How do we collect data?

Your personal data will be provided by you, collected by us or our indirect or direct subsidiaries or affiliates, or captured automatically when you access or use our Web Service. For example, we collect your personal data when you create a User Account, browse or make purchases through the Web Service, and when you send us emails.

4. Are you over 18?

If you are under the age of 18, you must obtain your parent or guardian’s consent to use our Web Service or apply for a User Account.

5. What information do we collect about you?

It may be necessary for you to provide us with certain personal data in order for you to use our Web Service. We will let you know when such data is essential. All other personal data is up to you to provide or not, as you prefer.

(a) Your User Account

If you register for a User Account to use our Web Service, some of the personal data we may collect about you includes:

- your mobile phone number, which we may use to send authentication codes via SMS to verify your identity;
- your full name, gender, month and year of birth, education history, marital status, email address, telephone number. This information helps us provide you with better personalized recommendations, but is not mandatory. You may choose not to provide this information to us. Doing so will not affect the basic functions of the Web Service;
- account status and activities relating to your User Account.

(b) When you make enquiries regarding a job with us

We may ask you to provide personal information when you apply for a job with us via our recruitment website <http://joinus.dfiretailgroup.com>, or when you fill in an application form at one of our stores or recruitment centres, or when you apply through our distribution centres. Some of the personal data we may collect about you for this purpose includes: salutation, full name, nationality, identity and/or passport number, address, telephone number, email address, details of your current employment including name of employer, job title, current salary and salary expectations, details of your education and qualifications, details of your work history including job title, length of service, details of any criminal convictions, details of any bankruptcy declaration, languages and language proficiency and referee details.

(c) When you visit our Web Service

We may use online tracking technology such as cookies, pixel tags, web beacons and other similar technologies (for example, we may use Google Analytics) to automatically collect information about:

- your visits to our Web Service, such as your browsing history, how long you stay on our Web Service, and how often you visit;
- your location information as provided by your mobile phone or other device when you interact with our Web Service, including your IP address and general geographic location (including GPS location and WLAN access point, Bluetooth and other connectivity information); and the device that you use to browse our Web Service (e.g. your operating system, type of device, browser type and version, language preferences, resolution, internet service provider ID (PLMN), mobile application crashes and other system activity, and third party sites you were using before interacting with our services).

You have the right to disable any of these online tracking technologies. To learn more about how we use the above data, please see the section below on **Online tracking technology**.

(d) When we provide additional services

We may offer the additional services described below to better personalize services offered to you and improve your website experience, and request that you provide additional personal information by granting permission for the Web Service to access your devices' location information, camera/webcam, photo album, microphone and address book. If you do not provide the information described below, or revoke permissions granted, your use of the basic functions of the

Web Service will not be affected, however you may not be able to receive the additional services. Please note that your decision to revoke permissions will not affect information previously collected and used based on your prior authorization.

- Personalized recommendation service based on location information. We may collect location information to determine your location to recommend services available in your area. We will only collect information about your geographical location at specific points in time, and will not combine information about your location collected over different points in time to establish a trail of your movement.
- Additional features based on cameras / webcams. You can use this additional feature to complete video shooting, picture taking, QR code scanning and other functions.
- Additional features based on picture uploading. After granting permission for the Web Service to access photo albums on your device, you may use this feature to upload your photos to change your avatar, communicate with our representatives, and for verification purposes.
- Additional features based on voice technology. After granting permission for the Web Service to access the microphone on your device, we may use such voice technology to record your enquiries so we can respond to your requests and otherwise communicate with you and/or interact with you using a service bot.

(e) Other information

We also collect some of your personal data whenever we communicate with you (e.g. email content, contact information, etc.), or when you complete any voluntary surveys and questionnaires we may send you from time to time (e.g. your demographic information and feedback).

6. How do we use your information?

We will only use your personal data for the purposes set out below.

(a) Account administration

To help administer and maintain your User Account, including:

- creating and updating your User Account;
- verifying your identity;
- creating a single profile about you, including combining your information with any other personal data already held by us or any members of the DFI Retail Group;
- providing you with a log-in ID for your User Account to access our Web Service, where log-in is required;
- maintaining, updating, administering and processing a record of your activities on our Web Service;
- completing transactions, including processing or facilitating payments, if applicable;
- sending you updates about new features and benefits relating to our Web Service; and
- enabling features that allow you to personalise your User Account on our Web Service, such as bookmarking your favourite products or brands.

(b) Recruitment enquiries and support

To assist you when you contact us in relation to a job with us, including the following purposes:

- to assess your suitability for a vacancy with us;
- verifying your identity;
- seeking references;
- verifying your employment history, education history and any qualifications;
- performing checks with law enforcement and other authorised agencies.

(c) Marketing

To provide you with marketing and promotional materials ("**Marketing Communications**"), if you choose to receive them. Please see the section on **Direct Marketing** below for more information.

(d) Personalisation

To create personalised Marketing Communications tailored to your interests and preferences, and to provide you with the best possible experience in relation to our Web Service and your User Account. We may also use data analytics tools to conduct profiling and to determine whether our or any DFI Retail Group members' offers, advertisements and promotions are effective, as well as to determine whether you may be interested in new services, or to customise the content and types of offers and services that we present to you.

(e) Optimisation and improvements

We may use your personal data to understand and improve our Web Service, or our partners' operations, or our DFI Retail Group members' operations, through various means, such as the use of analytics tools, research, surveys and feedback forms. This will enable us, our partners, and DFI Retail Group members to enhance services or products, develop new features and benefits, and assess and amend business, marketing and strategic operations and plans.

(f) Legal and administration purposes

We may use your personal data to investigate or handle any incidents, claims or disputes, or as otherwise required by law in connection with your User Account, our Web Service, or as requested by any law enforcement or regulatory authorities, courts or other governmental agencies. We may also use your personal data in relation to any legal proceedings concerning you.

7. Who do we share your information with?

To protect your privacy, we will endeavour to only share with third parties data which has either been aggregated and anonymised or which otherwise does not contain your name or contact details. However, there may be limited circumstances where we will share data (which may include your personal data) with third parties who may or may not be located overseas, as detailed in this section. By using our Web Service, or applying for a User Account, you agree to allow us to share your personal data with third parties and to the cross-border transfer of your personal data in accordance with this section. Regardless of where we store or process your personal data, we are

committed to protecting it and will take reasonable steps to safeguard it in accordance with this Privacy Policy and all applicable laws.

(a) Partners

If you create a User Account with us, your personal data may be shared with our partners to facilitate the processing of payments and delivery, conduct profiling and risk analysis of your User Account, and related services and transactions, as well as for data analytics purposes in order to improve their operations, services or products.

(b) DFI Retail Group

Your personal data may be transferred to any DFI Retail Group members for any of the purposes we have set out above. However, we will not provide your personal data to any DFI Retail Group member in order for them to send you marketing materials regarding their own products and services, unless we obtain your prior consent.

(c) Service providers

Your personal data may be shared with our or any DFI Retail Group members' service providers (including agents and contractors) who process personal data on our behalf to help us administer and operate our Web Service, to conduct identity verification, online recruitment, profiling and data analytics/processing, process payments, conduct marketing activities, to help aggregate and anonymise the personal data, or to carry out any of the purposes set out above. These may include IT vendors, back-office and front-end or ancillary service providers, recruitment agents, call centre operators and marketing agencies, data management and analytics service providers, and customer contact services. Our service providers may contact you on our behalf or on behalf of our DFI Retail Group members, for any of the purposes set out above.

We only use trustworthy service providers, who are under a duty of confidentiality to us and/or our affiliates, and are only permitted to use your personal data in accordance with this Privacy Policy.

(d) Professional advisors and assignees

When necessary, we may share your personal data with our professional advisors, including lawyers, accountants, financial advisors and insurers. Your personal data may also be shared with third parties in connection with any merger, acquisition, consolidation, restructuring, sale of assets, financing or any other similar scenarios involving the transfer of some or all of our business assets.

(e) Government and regulatory authorities

This Privacy Policy is governed by the laws of the Hong Kong Special Administrative Region of the People's Republic of China ("**Hong Kong**"). We strive to handle your personal data in accordance with any data privacy laws that we believe apply to us. Your personal data may be shared with regulatory authorities, courts and other governmental agencies to comply with any legal or regulatory requirements, orders or requests. Any dispute concerning the terms and conditions of this Privacy Policy shall be subject to the exclusive jurisdiction of the courts of Hong Kong.

8. Aggregated and anonymised data

Aggregated or anonymised data that does not include any personally identifiable information may be used by us, our DFI Retail Group members or other third parties for various purposes, including enabling them to better understand customer needs or to improve and adapt their operations, products and services, or for the purposes of industry benchmarking, machine learning, research or analytics.

9. Direct Marketing

If you have consented to receive offers and promotions from us, we may use your personal data to:

- send you Marketing Communications in connection with the latest news, events, updates, contests, promotions, offers; products, services and rewards offered by us, our partners, or our DFI Retail Group members, which relate to our Web Service, reward programmes, retail, clothing, accessories, cosmetics, beauty, healthcare and wellness, personal care, toiletries and medical, baby care, maternity care, insurance, financial, music, sports, lucky draws and contests, food, beverages, dining, travel, transportation, banking, electronics, home, household, textiles, telecommunications, groceries, office and business supplies, technology, outdoor furniture and accessories, furniture, lighting, décor, home accessories, media, e-commerce platforms and facilitators, and publications (“**Marketing Subjects**”);
- analyse your preferences, online behaviour and transactional history in order to gain insights, so that we can customise the content and types of news, events, updates, contests, promotions, offers, products, services and rewards that we present to you via our Web Service or Marketing Communications, social media or other communication means; and
- in conjunction with any seasonal events, send you Marketing Communications in connection with lucky draws and contests or other promotional activities relating to the Marketing Subjects.

We may send you Marketing Communications and market research invitations by email, through your User Account or in-app notifications on your mobile device, when you access the Web Service, or through online banner advertisements, post, telephone or SMS.

Before providing you with Marketing Communications, we will ask for your consent. You can choose at any time not to receive any Marketing Communications from us. Please see the section on Your rights below.

10. Can our partners and affiliates send you marketing materials?

If you have agreed to receive Marketing Communications from us, our DFI Retail Group members or our partners may occasionally act as our service providers and send Marketing Communications on our behalf. However, **we will** not provide your personal data to our DFI Retail Group members or our partners for them to send you marketing materials regarding their own products or services, unless you allow this.

If any of our partners or DFI Retail Group members wish to send you any marketing materials regarding their own products and services directly, then they must obtain your separate consent for this. We are not involved in any marketing done directly by DFI Retail Group members that concerns any reward programmes, or products or services offered or provided by them, or by our

partners that is unrelated to the Web Service. If you agree to receive any marketing materials from our partners or DFI Retail Group members, then please carefully read our respective partners' or DFI Retail Group members' own privacy policies.

11. How do we keep your information secure?

We take the confidentiality and security of your information seriously. We take all reasonable steps, including the implementation of technical and physical security measures, to ensure that all your personal data held by us is kept secure and safe from any loss or unauthorised disclosure, use and modification. All transactions under the terms and conditions of this Privacy Policy are based on the encryption of data exchanged between you and us on our secure Web Service.

12. How long do we keep your data for?

We will keep your personal data only for so long as is necessary to fulfill the purposes outlined in this Privacy Policy, unless the law requires us to keep it for a longer period. Once we no longer need your personal data, we will either irreversibly anonymise or securely delete it on our servers.

If your User Account is inactive for three (3) months or longer, we reserve the right to remove your personal data from your User Account. If you subsequently attempt to log into your User Account, you may need you to re-verify your identify or re-enter your personal details to continue using the Web Service.

13. Your rights

(a) Access and correction

You have the right to access and correct your personal data held by us, at any time, by sending an email to our Data Protection Officer at personaldata@DFIretailgroup.com.

In order to ensure that your personal data is kept as accurate as possible, please notify us at the email address above of any changes to your personal data.

(b) Opt-out of direct marketing

At any time, you can ask us to stop using your personal data to send you Marketing Communications, or you can customise how you would like to receive Marketing Communications from us. You can exercise your rights to do this by:

- changing your settings on your User Account; or
- following the unsubscribe instructions in the Marketing Communications we send to you.

We will stop using your personal data to send you Marketing Communications in accordance with your request. However, we may still send you non-promotional communications such as information concerning the administration of your User Account, and may use non-personally identifiable information collected via cookies and other tracking technology to display marketing information via online advertising banners on websites and apps visited by you.

We are not involved or responsible for any marketing materials sent directly by our partners or DFI Retail Group members that concern any reward programmes, or products or services offered or

provided by them that are unrelated to the functions of the Web Service. If you would like to stop receiving any marketing materials from our partners or DFI Retail Group members, then please contact them directly in order to unsubscribe from their mailing lists.

14. Online tracking technology

Cookies are small text files that are stored on your browser or device by websites, applications, online media and advertisements when you visit a website or mobile application.

We use cookies and other similar identification technologies such as web beacons, ETags and pixel tags on our Web Service, emails and online advertisements for various purposes, including verifying users; remembering user preferences and settings to enhance your experience when you return to our Web Service; delivering relevant content and advertisements based on your preferences, location and usage patterns; monitoring, evaluating and optimising the operation of our Web Service; tracking and measuring the effectiveness of our advertising campaigns; and analysing traffic on our Web Service and the websites of our partners and DFI Retail Group members.

You can exercise your right to choose whether or not to accept cookies by adjusting your browser settings to modify your cookie preferences. Most browsers are set to accept cookies by default, but you are free to remove or block all browser cookies. However, if you turn off your cookies, some of our services may not function properly and you will not be able to receive the most efficient and personalised experience.

15. Links to other sites

Our Web Service may contain links to other third party websites and applications, including those of our partners and our DFI Retail Group members (“**Third Party Sites**”). We do not own or control, and are not responsible for, the privacy practices of those Third Party Sites. We encourage you to remain alert if you follow any links to leave our Web Service, and to review the privacy policies of those Third Party Sites so that you are aware of how your personal data may be collected and used by such third parties.

16. Information you provide about others

Please ensure that you are legally authorized to share with us any information that contains personal data of another person.

17. How do we manage updates to this policy?

From time to time, we may update this Privacy Policy to reflect new technologies, regulatory requirements or any other changes that may be necessary. We will notify you of any updates in accordance with your preference settings and, where required by law, obtain your consent. We will inform you by emailing you at the email address you provided us, and/or by posting a notice of these changes on our Web Service.

18. How to contact us

If you have any questions or comments concerning this Privacy Policy, you can contact our Data Protection Officer at personaldata@DFIretailgroup.com.