



## **Zhongshan SEEMAX Electrical Appliance Co.,Ltd**

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### **PRIVACY AND COOKIE POLICY**

We are Zhongshan SEEMAX Electrical Appliance Co., Ltd, (for purposes of this policy, all of our entities and brands are referred to as “SEEMAX”).

SEEMAX values your privacy. In this Privacy Policy (“Policy”), we describe how we collect, use, and disclose information that we obtain about visitors to this website, as well as our other websites (collectively, the “Site”) and the services available through our Site (collectively, the “Services”). Some features and functionalities (e.g. the ability to make purchases) are not available on all of our websites; please contact us if you have any questions.

By visiting the Site, or using any of our Services, you agree that your personal information will be handled as described in this Policy. Your use of our Site or Services, and any dispute over privacy, is subject to this Policy and our Terms of Service (available on this website), including its applicable limitations on damages and the resolution of disputes. The Terms of Service are incorporated by reference into this Policy.

What Information Do We Collect About You?

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We collect information directly from users, such as when they sign up to receive special offers from us or register for an account with us. We also

collect certain information automatically through your use of our Site or Services.

#### Information You Provide

We collect information that you enter on our Site or provide to us in any other way. We collect information from you when you make a purchase from us, create an account (offered as a convenience to customers but not required), request information, submit a review, or otherwise contact us. The type of information that we collect from you depends on your interaction with our Site and your use of our Services, but may include: full name, mailing address, billing address, telephone number, email address, payment information (for purchases), social media account name, social media account handle, birth month, gender, age range, location data, and any other information that you choose to provide.

#### Information We Collect Automatically

We automatically collect the following information about your device and your use of our Site or Services through cookies, web beacons, and other technologies: your domain name; your browser type and operating system; web pages you view; links you click; your IP address, MAC address, Unique Device Identifiers (UID), and other persistent identifiers; the length of time you visit our Site and or use our Services; and the referring URL, or the webpage that led you to our Site. We use this information to monitor and improve the Site and Services, enhance your online shopping experience and to enable us to provide you with an easier and more personalized experience and level of service. On some of our Sites, we may combine this information with personal information that you have provided to us. Please see the section “How Do We Use Cookies and Other Tracking Mechanisms” below for more information.

#### What About Children On Our Sites?

Our Site and Services are not designed for persons under 18. We do not knowingly collect personal information from children under the age of 13. If we become aware that we have inadvertently received personal

information from a child under the age of 13, we will delete such information from our records.

#### How Do We Use Your Information?

We use the information, including personal information, alone or in combination with other information that we may collect about you, including information from third parties, for the following purposes that are necessary for the performance of the contract between us to provide you with the products or services you requested or that we consider in our legitimate interests:

To allow you to create an account, to fulfill your orders, or otherwise provide our Services to you.

To communicate with you (including via email), such as to respond to your requests/inquiries and for other customer service purposes.

To manage your participation in our loyalty program and provide you with the benefits of the loyalty program.

To better understand how users access and use our Site and Services, both on an aggregated and individualized basis, to maintain, support, and improve our Site and Services, to respond to user preferences, and for research and analytical purposes.

#### Based on your voluntary consent:

To tailor the content and information that we may send or display to you, to offer location customization, and personalized help and instructions, and to otherwise personalize your experiences while using the Site or our Services.

Where permitted, for marketing and promotional purposes. For example, in accordance with applicable law and with your consent, we will use your email address to send you news and newsletters, special offers, and promotions, and to contact you about products or information (offered by us or in conjunction with third parties) we think may interest you. We also may use your information to assist us in advertising our Services on

third party platforms, including websites and through social media. You have the right to withdraw your consent at any time as noted below.

Where permitted, for traditional mail marketing. From time to time, we may use your information for traditional mail marketing purposes. If you do not want to receive mail from us, please log-into your account and change your preferences. If you opt-out of direct mail, we will continue to use your mailing address for transactional and information purposes such as regarding your account, your purchases and your inquiries.

To comply with our legal obligations:

To Protect Us and Others. We release account and other information about you when we believe release is appropriate to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a subpoena; to enforce or apply our Terms of Use, this Policy, and other agreements; to protect our rights, safety, or property, our users, and others; as evidence in litigation in which we are involved; when appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the safety of any person. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

Does Orolay Share The Information It Collects About You?

We may share the information that we collect about you, with third parties worldwide, as follows:

Service Providers/Agents. We disclose your information to third parties, including service providers, independent contractors, and affiliates that perform functions on our behalf. Examples include: fulfilling orders, delivering packages, sending postal mail and email, removing repetitive information from customers lists, analyzing data, providing marketing and advertising assistance, third party advertising and analytics companies who collect browsing information and profiling information and who can provide advertisements which are tailored to your interests, providing

search results and links (including paid listings and links), and credit card links. We only provide these entities with the information necessary for them to perform these services and functions on our behalf. These entities are contractually required to protect your personal information from unauthorized access, use, or disclosure.

**Trading Partners.** Our product lines are offered internationally in conjunction with select international trading partners. Our trading partners' use of your personal information is subject to this Policy.

**Affiliates.** We may disclose the information we collect from you to our affiliates or subsidiaries for their own marketing, research, and other purposes.

**Non-Affiliated Third Parties.** We do not share your personal information with non-affiliated third parties for their own marketing purposes.

We also may share your information in the following situations:

**Business Transfers.** If we are acquired by or merged with another company, if substantially all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company. You will have the opportunity to opt out of any such transfer if, in our discretion, it will result in the handling of your information in a way that differs materially from this Privacy Policy.

**To Protect Us and Others.** We release account and other information about you when we believe release is appropriate to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a subpoena; to enforce or apply our Terms of Use, this Policy, and other agreements; to protect our rights, safety, or property, our users, and others; as evidence in litigation in which we are involved; when appropriate to investigate, prevent, or take action regarding illegal activities, suspected fraud, or situations involving potential threats to the

safety of any person. This includes exchanging information with other companies and organizations for fraud protection and credit risk reduction.

Aggregate and De-Identified Information. We may share aggregate or de-identified information about users with third parties for marketing, advertising, research or similar purposes.

#### How Do We Use Cookies And Other Tracking Mechanisms?

We use cookies and other tracking mechanisms to track information about your use of our Site or Services. Doing so enables us to analyze use of and improve our Site and Services, to enhance your online shopping experience and to offer a more personalized level of service. We may combine this information with other personal information we collect from you. Please [click here](#) for additional information about the specific cookies and other tracking tools that we use on our European Union facing websites.

#### How Do We Use Third Party Analytics And Tracking?

We use automated devices and applications, such as Google Analytics, to evaluate usage of our Site. We also may use other analytic means to evaluate our Site and Services. We use these tools to help us improve our Site, Services, performance and user experiences. These entities may use cookies and other tracking technologies to perform their services.

Google Analytics. This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies, which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. In case of activation of the IP anonymization, Google will truncate/anonymize the last octet of the IP address for Member States of the European Union as well as for other parties to the Agreement on the European Economic

Area. Only in exceptional cases, the full IP address is sent to and shortened by Google servers in the USA. On behalf of the website provider Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage to the website provider. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website.

You can refuse the use of Google Analytics and opt out of having your information used by Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout/>.

An opt-out cookie will be set on the computer, which prevents the future collection of your data when visiting this website. Further information concerning the terms and conditions of use and data privacy can be found at:

<http://www.google.com/analytics/terms/gb.html>

or at [https://www.google.de/intl/en\\_uk/policies/](https://www.google.de/intl/en_uk/policies/).

Please note that on this website, Google Analytics code is supplemented by Google, Inc. ("Google") to ensure an anonymized collection of IP addresses (so called IP-masking).

Facebook, Twitter, and Other Social Media Services. We may also use platforms provided by companies such as Facebook and Twitter to offer you interest-based ads. These platforms allow us to personalize the ads that we display to you through their services. We may convert your email address into a unique value which can be matched by our partner company with a user on their platform to allow us to serve you interest-based advertising to those matched users. Although we do not provide any personal information to these platform vendors, they may gain insights about individuals who respond to the ads we serve. Many of these

platforms provide you with the ability to opt out of or limit the display of these ads. For information on how to do so, please check your account settings on and the information provided by these services.

For more information on how third parties use their own tracking mechanisms and options for opting out of them, please refer to the “What About Third Party Advertisers?” Sections below.

#### What About Third-Party Advertisers?

We use third parties such as network advertisers and other third parties to assist us in advertising, including displaying our advertisements on other websites and through social media platforms; we also may use network advertisers and other third parties to assist us in identifying relevant advertising on our Sites. Network advertisers are third parties that display advertisements based on your visits to our Site as well as other websites. This enables us and these third parties to target advertisements by displaying ads for products and services in which you might be interested. Third party ad network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third party cookies and other technologies are governed by each third party’s specific privacy policy, not this one. We may provide these third-party advertisers with information about your usage of our Site and our services, as well as aggregate or non-personally identifiable information about visitors to our Site and users of our service.

Our systems do not honor browser do-not-track requests, but several of these third parties enable you to opt out of targeted advertising practices. You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative (“NAI”) and the Digital



Advertising Alliance (“DAA”), and in Europe, the European Interaction Digital Advertising Alliance (“EIDAA”). For more information regarding this practice by NAI members and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI, DAA and EIDAA members, please visit their respective websites:

[www.networkadvertising.org/optout\\_nonppii.asp](http://www.networkadvertising.org/optout_nonppii.asp) (NAI),

[www.aboutads.info/choices](http://www.aboutads.info/choices) (DAA), and [www.youronlinechoices.com](http://www.youronlinechoices.com).

Opting out of one or more NAI, EIDAA or DAA member networks (many of which will be the same) only means that those members no longer will deliver targeted content or ads to you. It does not mean you will no longer receive any targeted content or ads on our Site or other websites. You may continue to receive advertisements, for example, based on the particular website that you are viewing. Also, if your browsers are configured to reject cookies when you visit this opt-out page, or you subsequently erase your cookies, use a different computer or change web browsers, your NAI, EIDAA or DAA opt-out may no longer be effective. Additional information is available on NAI’s, EIDAA’s and DAA’s websites accessible by the above links.

#### What About Third-Party Links?

Our Site and Services may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Policy, but instead is governed by the privacy policies of those third party websites. We do not exercise control over such third party websites and are not responsible for the information practices of such third party websites. You access such third party websites or content at your own risk. You should always read the privacy policy of a third party website before providing any information to the website.

#### Am I Allowed To Post To Your Site?

We like hearing from our customers. We invite you to post your comments, such as your reviews of our products, pictures, videos, and

other information that you would like to be available on our Site. If you post content to our Site, all of the information that you post will be available to all visitors to our Site, along with your chosen reviewer name and city/state/country (as applicable). If you post your own content on our Site or Services, your posting may become public and we cannot prevent such information from being used in a manner that may violate this Policy, the law, or your personal privacy.

#### How Secure Is My Personal Information?

We have implemented commercially reasonable precautions to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, in accordance with industry practice and applicable laws. Please be aware that despite our best efforts, no data security measures can guarantee 100% security. While we strive to protect information transmitted on or through our Site and Services, we cannot and do not guarantee the security of any information you transmit on or through the Site and Services, and you do so at your own risk.

You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity, except where otherwise required by applicable law.

#### Can I Access, Update, Correct, Or Delete My Personal Information?

You have the right to access and correct, and in some case delete, the personal information that we hold about you. If you created an account with us, you may access, update, and correct the information that you have submitted to us by logging into your account. If you made a purchase as a guest, or if you would like to delete the information that you submitted to us, please use this form to send your request to us online or contact our

respective Customer Service Departments at the following email addresses:

michael@seemaxfan.cn

As permitted by applicable law, we may retain changed or deleted information for archival purposes. For EU residents, also see the “Special Note for EU Users—Your Rights and Choices” Section below for additional information.

What Choices Do I Have Regarding Use Of My Personal Information?

Above we described how to opt-out of targeted advertising. You also may choose to opt-out of certain emails and direct mail from us. To opt-out of such emails, you may update your preferences by logging into your account or by following the opt-out instructions contained in the e-mails. To opt-out of such postal mail, please contact Customer Service at the applicable email address listed above. You are able to opt out of receiving such marketing and recommendation emails and mail from us, however, you cannot opt out of receiving all emails and mail from us, such as emails about your account, your purchases, or any Services you have requested or received from us. For EU residents, also see the “Special Note for EU Users—Your Rights and Choices” Section below for additional information.

Will You Transfer My Information Outside Of My Home Country?

We will collect, use, and process certain information, including name, email address, mailing address, and credit card information) to provide our services to you. We may transfer this information outside to other countries in which Orolay has an office, including to the United States, which may not have an equivalent level of data protection as in your home country. However, please rest assured that we implement all the necessary and appropriate legal, organizational and technical measures to protect your personal information. Your data also may be subject to access by law enforcement and other government entities, including courts and tribunals in accordance with the laws applicable in those jurisdictions.

Special Note For EU Users

With respect to your personal information, you have the right to:  
request access to and be provided with information on the processing of your personal information;

request corrections of your personal information if such personal information proves inaccurate or incomplete;

request your personal information to be deleted (i) if it is no longer necessary for the purposes described in this Privacy Policy, (ii) should you decide to withdraw your consent where you gave it, (iii) should you object to its processing for direct marketing purposes, (iv) should you identify that it would have been unlawfully processed, (v) should we be under a legal obligation to erase it to comply with EU law or the law of an EU country and always provided we are not under a legal obligation to keep it;

restrict the processing of your personal information (i) if you contest its accuracy; (ii) if the processing is unlawful and you oppose the erasure; (iii) if it is no longer needed for the purposes set out in this Privacy Policy but you require it for the establishment, exercise or defense of a legal claim, (iv) if you object to profiling;

object to the processing of your personal information for direct marketing purposes or to any processing which we would have based on our legitimate interest (e.g. profiling);

receive personal information which you provided to us in a structured, commonly used and machine-readable format and to transmit it to another provider provided it is processed based on your consent or our contract;  
lodge a complaint with your relevant data protection authority.

If you wish to exercise any of your above rights, please reach out to us by any of the ways mentioned in the “Contact Us Regarding Your Information” section.

To manage your choices regarding information collected through cookies, you may also click [here](#).

You may also directly manage some of your personal information by clicking on “My Account” from any page where you can access, correct or

update your choices and settings regarding some of your personal information if you have created an account with us.

With respect to our marketing emails, you can always click on the “Unsubscribe” link at the bottom of any marketing email you receive from us or manage your marketing permissions within “Edit Account” on our websites to opt out of receiving email communications from us in the future.

Your web browser or mobile device may also provide additional tools to allow you to control when your device provides specific categories of information (for example geolocation data or cookies use). Be aware of these tools.

#### How Long Does Orolay Retain My Information?

Your personal information will be deleted when it is no longer necessary for the purpose for which it was collected.

Your information that we need to manage you as our customer will be kept for as long as you are our customer. When you wish to terminate your account, your data will be erased accordingly, unless otherwise required by applicable law. We may have to retain some transactional information for evidentiary purposes according to applicable law.

We will keep consumers information that we use for prospection purposes for no more than [3 years] starting from the date of the last contact originating from the prospect or the end of the business relationship.

We refrain from keeping data collected through cookies and other trackers for more than [13 months] without renewing our notice and or obtaining your consent as the case may be.

Some other data are only kept for the time necessary to provide you with the relevant features of our websites or apps. For example, your geolocation data will not be kept beyond the time strictly necessary to identify your closest store or that you were present at a specific location at a given time, the body measurements you provide will only be processed

during the time necessary to answer your relevant search and provide you with a relevant product reference.

#### How Do I Get In Touch With Orolay?

If you have questions about the privacy aspects of our Services or would like to make a complaint, please contact the applicable Customer Service department via the email addresses listed above.

#### Changes To This Policy

This Policy is current as of the Effective Date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. We will post any changes to this Policy on our Site. If we make any changes to this Policy that materially affect our practices with regard to the personal information we have previously collected from you, we will endeavor to provide you with notice in advance of such change by highlighting the change on our Site or by contacting you at the email address on file.

Orolay respect your privacy and take great care to safeguard information in our possession. Your preferences with regard to how we use your information are our highest priority. Below you will find our Cookies Policy. It explains generally what cookies are, what cookies we use, and what we use them for.

#### WHAT ARE COOKIES?

Cookies (or similar tracking technologies designed for mobile devices) are simple text files stored on your computer or mobile device when you visit certain web pages. A cookie records basic information about your visit, such as your user settings or what pages you have viewed. The website (and potentially other websites) can then recognise this information in the future and can use it to improve your overall experience, for example, by remembering your log-in details, preferences or even recommending certain content.

There Are Four Principle Types Of Cookie, Which Perform Different Functions. The Main Types Are:

1. Essential cookies Some cookies are essential for the operation of a website, and without these cookies the website would not be able to perform certain necessary functions. An example of this is where a shopping website uses cookies to remember products placed into an online shopping basket. Without using these cookies, it would not be possible to shop online.

2. Performance cookies Performance cookies collect information about how a website is used in order to improve the website's effectiveness. Also known as 'analytical' cookies, performance cookies track information such as, which parts of the website have been visited, what links have been clicked and if any errors have occurred. Performance cookies are commonly used to ensure that popular content is displayed more prominently on a website so that users can find the information that they are looking for more quickly.

3. Functionality cookies As the name suggests, 'functionality' cookies are used to deliver specific features or functions on a website. The most common use of functionality cookies is to remember preference settings, or to store log-in details. For example to save you the trouble of inputting your username every time you access a site.

4. Targeting cookies 'Targeting' cookies may be placed by us, or by our advertisers, to store information about the webpages that you have viewed. This allows us and our advertisers to deliver adverts that are relevant to the content you are interested in. These adverts may be displayed on our website or on other sites that you visit. Targeting cookies are also used to operate 'Like' or 'Share' buttons, which users can click to let other people know that they have found a particular webpage useful or entertaining. Other sites (normally social networking sites) will then recognise these cookies and display your shared content to other users.

#### HOW LONG DO COOKIES LAST?

Cookies may stay on your computer or mobile device for different periods of time depending on what they are used for.

Many cookies will only last for the duration of a single visit and will be automatically deleted when the browser is closed down or the computer is turned off. These cookies are known as 'session' cookies. We use session cookies to allow our systems to uniquely identify you during a session or while you are logged into our website. This allows us to process your online transactions and requests and verify your identity, after you have logged in, as you move through our website.

Some cookies (known as 'persistent' cookies) do remain on your device between sessions and allow us to authenticate you and to remember your preferences. Persistent cookies will remain on your computer after you have closed the browser or turned off the computer. We use persistent cookies to track aggregate and statistical information about user activity and to display advertising on our website and on third party websites.

#### WHAT DO WE USE COOKIES FOR?

Orolay does not store personally identifiable information such as credit card details in cookies we create, but we do use encrypted information gathered from them to help improve your experience of the Orolay websites.

#### WE PRINCIPALLY USE COOKIES FOR:

Remember the products you have stored in your basket in case you want to return and purchase them at a later date

Identify you when you sign-in to one of our websites, which enables us to provide customised features and services, such as adding items to your wish list

Keep track of items stored in your shopping basket when you go from one page to another on one of our websites

Conduct research and diagnostics to improve our content, products and services to you

Prevent fraudulent activities

Improve security



Make it easier for you to navigate our websites and services

We also use automated devices and products like Google Analytics to evaluate usage of our website, and to help us improve our website and services. Entities like Google Analytics use cookies and other tracking technologies to perform their services. On our websites, we do not honor browser do-not-track requests for analytics purposes, but you may refuse the use of Google Analytics and opt out of having your information used by Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout/>. To learn more about how we use third party analytics technologies, please review our Privacy Policy found [here](#).

To order products on our UK or Japan based sites, you need to have cookies enabled. If you don't wish to enable cookies, you'll still be able to browse the site and use it for research purposes, but you will not be able to make a purchase.

#### HOW DO I MANAGE COOKIES?

Most Modern Browsers Will Allow You To:

See what cookies you have got and delete them;

Be notified when a cookie is being sent;

Block third party cookies;

Block cookies from particular sites;

Block all cookies; or

Delete all cookies when you close your browser.

Most web browsers are initially set up to accept cookies. You can reset your web browser to refuse all or some cookies or indicate when a cookie is being sent, however, certain features of the Site or Services may not work if you delete or disable cookies.

The links below take you to the 'Help' sections for each of the major browsers so that you can find out more about how to manage your cookies.

If you're not sure of the type and version of web browser you use to access the Internet:

– For PCs: Click on ‘Help’ at the top of your browser window and select the ‘About’ option.

– For Macs: With the browser window open, click on the Apple menu and select the ‘About’ option.

Internet Explorer

<http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-10> (Explorer 10)

<http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-8> (Explorer 8)

Firefox

<https://support.mozilla.org/en-US/kb/cookies-information-websites-store-on-your-computer?redirectlocale=en-US&redirectslug=Cookies>

Google Chrome

<http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>

Opera

<https://help.opera.com/en/latest/web-preferences/#cookies>

Safari

<https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

Safari iOS

<https://support.apple.com/en-us/HT201265>

Android

<https://support.google.com/android/?hl=en>

Blackberry

<https://help.blackberry.com/en/blackberry-classic/10.3.2/help/mwa1334238823957.html>

Windows Phone

<https://support.microsoft.com/en-us/help/10635/windows-phone-change-privacy-and-other-browser-settings>

In addition, we do have relationships with carefully selected and monitored third party suppliers who may also set cookies during your visit

to be used for their own remarketing purposes. These third party cookies and other technologies are governed by each third party's specific privacy policy, not this one. Though our systems do not honor browser do-not-track requests for analytic purposes, several of these third parties enable you to opt out of their use of cookies for their own targeted advertising practices. You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative ("NAI") and the Digital Advertising Alliance ("DAA"), and in Europe, the European Interaction Digital Advertising Alliance ("EIDAA"). For more information regarding this practice by NAI members and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI, DAA and EIDAA members, please visit their respective websites:

<http://optout.networkadvertising.org/?c=1> (NAI),

<http://optout.aboutads.info/?c=2&lang=EN> (DAA),

and [www.youronlinechoices.com](http://www.youronlinechoices.com).

