

## Privacy Notice

### for Customers, Consumers and Other Business Persons

#### INTRODUCTION

Your privacy is important to LuxBalance Lighting.

We have drafted this Privacy Notice (also referred to as "Notice") in an easy and comprehensible way in order to help you understand who we are, what personal data we collect about you, why we collect it, and what we do with it. Keep in mind that personal data (in this Notice also referred to as "data" or "your data") means any information or set of information from which we are able, directly or indirectly, to personally identify you, in particular by reference to an identifier, e.g. name and surname, email address, phone number, etc.

Please keep in mind that since LuxBalance Lighting is an international company, this Notice may be replaced or supplemented in order to fulfil local requirements, as well as in order to provide you with additional information on how we process your data through specific LuxBalance Lighting products, services, systems or applications.

We strongly encourage you to take some time to read this Notice in full.

If you do not agree to this privacy notice, please do not provide us with your data.

#### WHEN DOES THIS PRIVACY NOTICE APPLY?

This Notice covers how we collect and use your data e.g.

- when you visit or use our consumer and customer-directed websites, applications or social media channels;
- purchase and use our products, services, systems or applications;
- subscribe to our newsletters;
- provide to us your goods or services;
- contact our customer support;
- join our business events;

or otherwise interact with us in your capacity as consumer, business customer, partner, (sub) supplier, contractor or other person with a business relationship with us.

#### WHO IS LUXBALANCE LIGHTING?

LuxBalance Lighting is a people-centric lighting company focused on improving people's lives. We develop, manufacture and apply innovative lighting products, systems and services.

When this Notice mentions "we," "us," or the "Company," it refers to the controller of your data under this Notice, namely the LuxBalance Lighting affiliate with which you had, have or will have a business relationship or that otherwise decides which of your data are collected and how they are used, as well as LuxBalance Lighting Limited. Please note that the LuxBalance Lighting affiliates include the subsidiary companies in which LuxBalance Lighting has control, either through direct or indirect ownership. You may obtain a list of LuxBalance Lighting's affiliates by contacting the LuxBalance Lighting Privacy Office (you will find the contact details in the below section "what are your choices?").

#### WHAT TYPES OF DATA WE COLLECT ABOUT YOU?

Depending on who you are (e.g. customer, consumer, supplier, business partner, etc.) and how you interact with us (e.g. online, offline, over the phone, etc.) we may process different data about you. We may collect your data, for example, when you visit or use our consumer and customer-directed websites, applications or social media channels, purchase and use our products, services, systems or applications, subscribe to our newsletters, download a software update, provide to us your goods or services, contact our customer support, join our business events, participate to our contests, promotions and surveys or otherwise interact with us.

Below you will find an overview of the categories of data that we may collect:

### Information you provide to us directly

Categories of data	Examples of types of data
Personal identification data	Name, surname, title, date of birth
Contact information data	Email, phone number, address, country
Account log in information	Log in ID, password or other security codes
Images and/or videos from which you may be identified	Pictures uploaded into LuxBalance Lighting accounts or otherwise provided to us
Financial data	Credit card data, bank account data

Any other information that you decide to voluntarily share with LuxBalance Lighting or its affiliates Feedback, opinions, reviews, comments, uploaded files, interests, information provided for our due diligence process

Lastly, if you visit our premises, for security reasons we might also record your data through video or other electronic, digital or wireless surveillance system or device (e.g. CCTV).

### Information we collect automatically

When you visit or use our websites or applications, subscribe to our newsletters or otherwise interact with us through our digital channels, in addition to the information you provide to us directly, we may collect information sent to us by your computer, mobile phone or other access device. For example, we may collect:

Categories of data	Examples of types of data
Device information	Hardware model, IMEI number and other unique device identifiers, MAC address, IP address, operating system version, and settings of the device you use to access the services
Log information	Time and duration of your use of our digital channel or product
Location information	Your actual location (derived from your IP address or other location-based technologies), that may be collected when you enable location-based products or features such as through our apps
Other information about your use of our digital channels or products	Apps you use or websites you visit, links you click within our advertising e-mail, motion sensors data Information we may collect from other sources

To the extent permitted by applicable law, in addition to our websites, applications and other digital channels, we may also obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms and other third parties. For example, depending on your social media settings, if you choose to connect your social media account to your LuxBalance Lighting account, certain data from your social media account will be shared with us, which may include data that is part of your profile.

### HOW DO WE USE YOUR DATA?

We may use your data for different legitimate reasons and business purposes.

Below you will find an overview of the purposes for which we may process your data:

Purposes	Examples
Assessment and (re)screening of (potential) Customers, Suppliers and/or Business Partners	Conducting due diligence
Conclusion and execution of agreements	Sales, billing, shipment of products or services, registration to mobile applications or websites, warranty, service communications, account management
Providing support (upon your request)	Providing support via communication channels, such as customer or contact centre support
Direct marketing	Promoting contact with consumers and/or business customers (only in certain countries), email marketing, market surveys, personalizing your experience by presenting products and offers tailored to you (such as on our sites, applications or in other communications)
Security and protection of our interests/assets	Deploying and maintaining technical and organizational security measures, conducting internal audits and investigations, conducting assessments to verify conflict of interests
Compliance with legal obligations	Disclosing data to government institutions or supervisory authorities as applicable in all countries in which we operate, such as tax and national insurance deductions, record-keeping and reporting obligations, conducting compliance audits,

	compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, and managing any internal complaints or claims
Defence of legal claims	Establishment, exercise or defence of legal claims to which we are or may be subject

If we ask you to provide us with your data, but you chose not to, in some cases we will not be able to provide you with the full functionality of our products, services, systems or applications. Also, we might not be able to respond to requests you might have.

#### *HOW DO WE USE YOUR DATA FOR MARKETING?*

LuxBalance Lighting Limited and other relevant LuxBalance Lighting affiliates may send you regular promotional communications about their products, services, events and promotions.

Such promotional communications may use the "LUXBALANCE LIGHTING" brand and may be sent to you via different channels such as: email, phone, SMS text messages, postal mailings, third party social networks.

In order to provide you with the best personalized experience, sometimes these communications may be tailored to your preferences (for example, as you indicate these to us, as we may have inferred from your website visits, or based on the links you click in our emails).

When required by applicable law, we will ask your consent before starting the above activities. In addition, we will give you the opportunity to withdraw your consent (opt-out) at any time.

In particular, you can always opt-out from receiving marketing-related emails by following the unsubscribe instructions provided in each email. If you can sign-in to a LuxBalance Lighting account, you might be given the option to change your communication preferences under the relevant section of our website or application. You can always contact us (you will find the contact details in the below section "what are your choices?") to opt-out from receiving marketing-related communications.

Please note that even if you opt out from receiving marketing communications, you might still receive administrative communications from us, such as technical updates of our products, order confirmations, notifications about your account activities, and other important notices.

#### *ON WHAT LEGAL BASIS DO WE USE YOUR DATA?*

In order to be able to process your data, we may rely on different legal bases, including:

- Your consent (only when legally required or permitted). If we rely on your consent as a legal basis for processing your data, you may withdraw your consent at any time;
- The necessity to establish a contractual relationship with you and to perform our obligations under a contract;
- The necessity for us to comply with legal obligations and to establish, exercise, or defend our self from legal claims;
- The necessity to pursue our legitimate interests, including:
  - o To ensure that our networks and information are secure
  - o To administer and generally conduct business within the Company
  - o To prevent or investigate suspected or actual violations of law, breaches of a business customer contract, or non-compliance with the LuxBalance Lighting General Business Principles or other LuxBalance Lighting policies;
- The necessity to respond to your requests;
- The necessity to protect the vital interests of any person;
- Any other legal basis anyhow permitted by local laws.

#### *WHEN DO WE SHARE YOUR DATA?*

We do not share any of your data except in the limited cases described here.

If it is necessary for the fulfilment of the purposes described in this Notice, we may disclose your data to the following entities:

- LuxBalance Lighting affiliates: due to our global nature, your data may be shared with certain LuxBalance Lighting affiliates. Access to your data within LuxBalance Lighting will be granted on a need-to-know basis;

- Service providers: like many businesses, we may outsource certain data processing activities to trusted third party service providers to perform functions and provide services to us, such as ICT service providers, consulting providers, shipping providers;
- Business partners: we may share your data with trusted business partners so they can provide you with the services you request;
- Public and governmental authorities: when required by law, or as necessary to protect our rights, we may share your data with entities that regulate or have jurisdiction over LuxBalance Lighting.
- Professional advisors and others: we may share your data with other parties including professional advisors, such as banks, insurance companies, auditors, lawyers, accountants, other professional advisors.
- Other parties in connection with corporate transactions: we may also, from time to time, share your data in the course of corporate transactions, such as during a sale of a business or a part of a business to another company, or any reorganization, merger, joint venture, or other disposition of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).

#### *WHEN DO WE TRANSFER YOUR DATA ABROAD?*

Due to our global nature, data you provide to us may be transferred to or accessed by LuxBalance Lighting affiliates and trusted third parties from many countries around the world. As a result, your data may be processed outside the country where you live, if this is necessary for the fulfilment of the purposes described in this Notice.

If you are located in a country member of the European Economic Area, we may transfer your data to countries located outside of the European Economic Area. Some of these countries are recognized by the European Commission as providing an adequate level of protection. With regard to transfers from the European Economic Area to other countries that are not recognized by the European Commission as providing an adequate level of protection, we have put in place adequate measures to protect your data, such as organizational and legal measures (e.g. binding corporate rules and approved European Commission standard contractual clauses). You may obtain a copy of these measures by contacting the LuxBalance Lighting Privacy Office (you will find the contact details in the below section "what are your choices?").

#### *HOW LONG DO WE KEEP YOUR DATA?*

We keep your data for the period necessary to fulfil the purposes for which it has been collected (for details on these purposes, see above section "How do we use your data?"). Please keep in mind that in certain cases a longer retention period may be required or permitted by law. The criteria used to determine our retention periods include:

- How long is the data needed to provide you with our products or services or to operate our business?
- Do you have an account with us? In this case, we will keep your data while your account is active or for as long as needed to provide the services to you.
- Are we subject to a legal, contractual, or similar obligation to retain your data? Examples can include mandatory data retention laws in the applicable jurisdiction, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation.

#### *HOW DO WE SECURE YOUR DATA?*

To protect your data, we will take appropriate measures that are consistent with applicable data protection and data security laws and regulations, including requiring our service providers to use appropriate measures to protect the confidentiality and security of your data. Depending on the state of the art, the costs of the implementation and the nature of the data to be protected, we put in place technical and organizational measures to prevent risks such as destruction, loss, alteration, unauthorized disclosure of, or access to your data.

#### *WHAT ARE YOUR RESPONSIBILITIES?*

We would like to remind you that it is your responsibility to ensure, to the best of your knowledge, that the data you provide us with, are accurate, complete and up-to-date. Furthermore, if you share with us data of other people, it is your responsibility to collect such data in compliance with local legal requirements. For instance, you should inform such other people, whose data you provide to us, about the content of this Notice and obtain their consent.

#### *WHAT ARE YOUR CHOICES?*

We aim to provide you with access to your data. Usually you can autonomously control your data (e.g. by logging in to your account) and update, modify or, if legally possible, delete it. In this case, we strongly encourage you to take control of your data.

You can always contact our Privacy Office if you would like to:

- review, change or delete the data you have supplied us with (to the extent LuxBalance Lighting is not otherwise permitted or required to keep such data);
- object to certain data processing operations (e.g., opt-out from marketing communications);
- receive a copy of your data (in a common machine readable format, to the extent it is required by applicable law);
- ask us any other questions related to the protection of your data in LuxBalance Lighting

The contact details of our Privacy Office are:

- Mail: LuxBalance Lighting - Attn: Privacy Office – Room F & H on 17/F International Industrial Centre , Nos.2-8 Kwei Tei St. Hong Kong Shatin N.T. ; or
- [privacy@designindulgence.com](mailto:privacy@designindulgence.com).

We will do our best to address your request in time and free of charge, except where it would require a disproportionate effort. In certain cases, we may ask you to verify your identity before we can act on your request. If you are unsatisfied with the reply received, you may then refer your complaint to the relevant regulator in your jurisdiction.

#### *HOW DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?*

For more information on how we use cookies and other tracking technologies, read our Cookie Notice (which can be found in the website of the LuxBalance Lighting).

#### *DO WE COLLECT DATA FROM CHILDREN?*

We do not intentionally collect information from children under the age of 16.

- Special note to Children under the age of 16: if you are under the age of 16, we advise that you speak with and get your parent or guardian's consent before sharing your data with us;
- Special note to Parents of Children under the age of 16: we recommend you to check and monitor your children's use of our products, systems, services, applications (including websites and other digital channels) in order to make sure that your child does not share personal data with us without asking your permission.

#### *WHEN WILL THERE BE UPDATES TO THIS PRIVACY NOTICE?*

This privacy notice might change from to time.

The most current version of this Notice will govern our use of your data and can be found in the website of the LuxBalance Lighting.