



NHT Global Privacy Policy

Last Revised: December 23, 2019

This Privacy Policy (this “Policy”) discloses the privacy practices for NHT Global. It applies to all information collected by NHT Global (the “NHT Global”) through its website and mobile application (the “Site”). For purposes of this Privacy Policy, unless otherwise notified, all references to “NHT Global” include nht-office.nhtglobal.com, [country].nhtglobal.com, nhtglobal.com.hk and the NHT Global mobile application.

We are committed to protecting your privacy when you visit and use our Site. Please read the information below to learn about the information collected in connection with your use of this Site and how it is used. You acknowledge that this Policy is part of our Site’s Terms of Use, and by accessing or using our Site, you agree to be bound by all of its terms and conditions. If you do not agree to these terms, please do not use this Site. We reserve the right to change this Policy at any time. Such changes, modifications, additions or deletions shall be effective immediately upon notice thereof, which will be given by issuing an email to the email address listed by registered users and posting the revised Policy on this page. You acknowledge and agree that it is your responsibility to maintain a valid email address as a registered user, review this Site and this Policy periodically and to be aware of any modifications. Your continued use of the Site after such modifications will constitute your:

- (a) acknowledgment of the modified Policy; and
- (b) agreement to abide and be bound by the modified Policy.

NHT Global reserves the right to modify this privacy policy at any time. To protect your interests, please visit this page periodically to review the current terms of our privacy policy.

1. Types of Information Collected

We collect information that identifies, relates to, describes, is capable of being associated with or could reasonably be linked, directly or indirectly with a particular consumer or household (“personal information”). The type of information we collect depends on how you use this Site. We may collect two types of information about our users:

- (a) Personally Identifiable Information you provide to us voluntarily; and
- (b) Non-Personally Identifiable Information.

Personally Identifiable Information

Refers to information that lets us know the specifics of who you are. We collect several types of personally identifiable information from and about users of our Website, including information you may voluntarily provide us when you:

- (a) register for an account with us, purchase products and services from us, or opt-in to receive newsletters, or other forms of communication.
- (b) Enter sweepstakes or contests sponsored by us.
- (c) Sign up for special offers from select third parties.
- (d) Send email messages or feedback, submit forms or transmit other information by email.
- (e) Submit your credit card or other payment information when ordering and purchasing products and services on our Site.
- (f) Complete a survey. It is completely optional for you to engage in these activities. If you elect to engage in these activities, however, we may ask that you provide us personal information, such as your first and last name, mailing address (including zip code), email address, telephone and facsimile numbers, credit card type and number, credit card security code, and other personal identifying information. Depending

upon the activity, some of the information we ask you to provide is identified as mandatory and some as voluntary. If you do not provide the mandatory data with respect to a particular activity, you will not be able to engage in that activity.

- (g) Through tracking technologies when you access our website including cookies, Web beacons, embedded scripts, browser fingerprinting, ETags or Entity Tags, recognition technologies and location identifying technologies.

Non-Personally Identifiable Information

Refers to information that does not by itself identify you as a specific individual, but which may include information about the computer or device that you used to access the Site, such as:

- (a) IP address
- (b) Geolocation information
- (c) unique device identifiers
- (d) browser type
- (e) browser language or other information of this nature.

We may also collect certain non-personally identifiable information about you based upon how you search and shop through the Site, including which pages you view and products you may order while visiting our Site. For system administration and statistical analysis purposes, this information is compiled and analyzed on both a personal and an aggregated basis to track access to the Site. This information may include the Web Site's Uniform Resource Locator ("URL") that you just came from, which URL you next go to, general geographic location, device type, what browser you are using, internet service provider, date/time of visit information and your Internet Protocol ("IP") address, which tells us the country and state you are searching our Site from. A URL is the global address of documents and other resources on the World Wide Web. At no time, do we disclose Site usage by individual IP addresses.

2. Collection Methods and Use of Information

Collection Methods

We do not collect any Personally Identifiable Information about you unless you voluntarily provide it to us when asked on our Site. You will have the chance to review the information you submit before completing any order, entry form or registration form.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To notify you about changes to our Website or any products or services we offer or provide though it.

Personally Identifiable Information

We use your Personally Identifiable Information to provide our services to you as required by our agreements with you, to resolve disputes and to enforce our agreements with you, including our Site Terms of Use and this Policy. We may also use your Personally Identifiable Information to provide you with a more efficient and customized educational and shopping experience, process your orders, improve our marketing and promotional efforts, statistically analyze Site use, improve our product and service offerings, and enhance our Site's content, layout, and services. We may contact you regarding administrative notices and/or send you occasional emails or regular mail regarding our products, services, special offers and upcoming events that may be of interest to you. If you do not wish to receive this information, please contact us at the address or telephone number listed on our site and we will remove your name from our mailing lists.

Non-Personally Identifiable Information

We use your Non-Personally Identifiable Information to diagnose problems with our servers and software, administer our Site, connect you to the correct ecommerce store for your country and gather and analyze demographic and other statistical information.

3. Release / Share of Information

We do not sell any of your Personally Identifiable Information, including your name, mailing address or email address, to any companies. We do provide some of our services through contractual arrangements with affiliates, service providers and other third parties that require us to share your Personally Identifiable Information to them in order to deliver those services.

Affiliates and Partners

We may share / release your information with our selected partners and affiliates. Your information may be used for offering you promotions, special offers, advertisements and making predictions about your interests, and other materials.

Vendors & Service Providers

We may share / release your information with vendors. For example, share / release your credit card information to the card-issuing bank to confirm payment for products and services purchased on this Site; share / release your address information to the delivery service to deliver products that you ordered. We generally disclose this personal information to others for a business purpose.

NHT Global Distributors or Preferred Customers

We may share and provide other information with other NHT Global Distributors or Preferred Customers; some reports may contain name, country/region, city, rank, positioning, etc.

Legal and Compliance

Occasionally we may be required by law enforcement or judicial authorities to provide Personally Identifiable Information to the appropriate governmental authorities. We will disclose Personally Identifiable Information upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation. We fully cooperate with law enforcement agencies in identifying those who use our services for illegal activities. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

4. Updating and Correcting Information

You may change any of the personal information you have provided to us on this Site by logging into your NHT Office and clicking on "Account". We will only keep your information as long as we need it for the reasons it was originally collected from you. When we no longer need your information for our purposes, we will destroy, delete or erase that information or convert it into an anonymous form.

5. Security of Information

At our Site, you can be assured that we take precautions to protect and secure your Personally Identifiable Information. Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be secure. As a result, while we strive to protect your Personally Identifiable Information, you acknowledge that:

- (a) There are security and privacy limitations of the Internet which are beyond our control.
- (b) All information and data exchanged between you and us through this Site cannot be guaranteed.
- (c) Any such information and data may be viewed or tampered with in transit by a third party.

6. Cookies

When you use our Site, we may store cookies and/or other technologies, such as pixel tags and web beacons, on your computer in order to facilitate and customize your use of our Site. A cookie is a small data text file which a Web Site

stores on your computer's hard drive (if your Web browser permits) for record keeping purposes. Our cookies store your ecommerce store user account information, the country where you are located, and your ecommerce store shopping cart selections so you do not have to select items more than once. The cookies and other technologies make your use of the Site easier, make the Site run more smoothly and help us maintain a secure Site. You are always free to decline our cookies if your Web browser permits, but some parts of our Site may not work properly if you disable our cookies.

7. Links to Third Party Sites

This Policy only applies to information collected from this Site by NHT Global. We may provide hyperlinks to a third-party website ("Linked Site") as a convenience to users of the Site, but NHT Global does not control third-party websites and is not responsible for the contents of any linked-to, third-party websites or any hyperlink in a linked-to website. NHT Global is not responsible for the privacy practices or the content of third-party websites. Once you click on a link to another website – a Linked Site - you are no longer on this Site. This Policy does not apply to the content or privacy practices of any Linked Site. We encourage you to read the privacy statements of each and every website or Linked Site that collects personally identifiable information. You should contact advertisers, other websites or Linked Sites directly if you have any questions about their privacy policies or their use of the information they collect.

8. Email Subscriptions

The Site allows you to subscribe online to receive information via email as it may be posted to the Site. If you no longer wish to receive this email, please email support@nhtglobal.com. You should be aware that information disclosed in email may not be secure or encrypted and thus may be available to others. We suggest that you exercise caution when deciding to disclose any personal or confidential information via email. We will use your email address to respond directly to your questions or comments.

9. Email Policy

We will not share, sell, rent, swap or authorize any third party to use your email address for commercial purposes without your permission.

10. Children's Information

This Site does not knowingly collect, use or disclose Personally Identifiable Information about visitors that we know are under 13 years of age. The Site is not designed or intended for children under the age of 13.

11. Public Postings

You should also be aware that when Personally Identifiable Information is voluntarily disclosed (i.e. your name, email address, etc.) in any public areas on this Site, that information, along with any information disclosed in your communication, can be collected and used by third parties and may result in unsolicited messages from third parties. Such activities are beyond our control and this Policy does not apply to such information. Any submissions to public areas on this Site are accepted with the understanding that they are accessible to all third parties. If you do not want your comments to be viewed by third parties, you are advised not to make any public submissions.

12. User Registration and Password

Ultimately, you are solely responsible for maintaining the secrecy of your password and/or account information. To ensure the effectiveness of your password, we recommend that you do not disclose your user identification or password to anyone. Please be careful and responsible whenever you are online.

13. Information Protection

To prevent unauthorized access, maintain data accuracy, and ensure the appropriate use of information we gather about you, we have taken commercially reasonable steps to protect your information. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure.

14. California Residents

This **Privacy Notice for California Residents** supplements the information contained in our privacy policy above and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this notice. The CCPA provides California residents with specific rights regarding their personal information.

Personal Information We Collect

Our Website collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("**personal information**"). In particular, our website has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category A: Identifiers

Examples: A real name, Internet Protocol address, email address, or other similar identifiers.

Collected: YES

Category B: Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Examples: A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Collected: YES

Category C: Protected classification characteristics under California or federal law.

Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Collected: YES

Category D: Commercial information.

Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Collected: YES

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request a price quote or ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose or sell your personal information, subject to your right to opt-out of those sales (see Personal Information Sales Opt-Out and Opt-In Rights). When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. The CCPA prohibits third parties who purchase the personal information we hold from reselling it unless you have received explicit notice and an opportunity to opt-out of further sales.

We share your personal information with the following categories of third parties:

- Vendors and Service Providers
- Affiliates & Partners
- Government agencies or to protect the rights of our company or others

Sales of Personal Information

In the preceding twelve (12) months, the Company has not sold personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

You have the right to request that we disclose to you:

- a. The categories of personal information we have collected about you;
- b. The categories of sources from which we collect your personal information;
- c. The business or commercial purpose for collecting your personal information;
- d. The categories of third parties with whom we share your personal information; and
- e. The specific pieces of personal information we have collected about you.

You can visit our website Contact Us page at www.nhtglobal.com, call (310) 541-0888 or email us at privacy@nhtglobal.com to request any of these disclosures. You may make up to two requests in any 12-month period.

Exercising Access, Data Portability, and Deletion Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete your personal information from our database. You should be aware, however, that California law allows us to retain your personal information and deny your deletion request under certain circumstances. We will notify you of any denial of your deletion request and the reason for such denial.

We may deny your deletion request if retaining the information is necessary for us to:

- (a) Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- (b) Comply with a legal obligation.
- (c) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by emailing privacy@nhtglobal.com. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is between 13 and 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt-in to personal information sales may opt-out of future sales at any time. To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by visiting the our webpage and sending us a message.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by visiting our website and sending us a message. We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

15. Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

16. Contact Information

If you have any questions about this Policy, the practices of this Site, or your dealings with this Site, please contact us by sending an email to: privacy@nhtglobal.com.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information from consumers:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO