

L'ORÉAL

PRIVACY POLICY FOR PARTICIPANTS TO THE AWARDS “INSPIRE SKIN CONFIDENCE” ORGANIZED BY L’OREAL ACTIVE COSMETICS INTERNATIONAL

1. PURPOSES OF THIS PRIVACY POLICY

- ***Respect your privacy and your data***

L'Oréal's ambition is to be an exemplary corporate citizen and help build a better world. We therefore give great importance to the principles of honesty and transparency and we are committed to building a strong and lasting relationship with our partners based on mutual trust and interest. Part of this commitment means protecting and respecting your privacy as well as your personal data.

This is why we set out the statements hereunder, and our full Privacy Policy below.

- 1) We respect your privacy and your choices.
- 2) We make sure that privacy and security are embedded in everything we do.
- 3) We do not send you marketing communications unless you have asked us to. You can change your mind at any time.
- 4) We never offer or sell your data.
- 5) We are committed to keeping your data safe and secure. This includes only working with trusted partners.
- 6) We are committed to being open and transparent about how we use your data.
- 7) We do not use your data in ways that we have not told you about.
- 8) We respect your rights, and always try to accommodate your requests, in line with our own legal and operational responsibilities.

For more information, the Privacy Policy below sets out the different types of personal data that we may collect or retain concerning you, the way we can use them, the purposes for which we collect them, the people with whom we can share them, how we protect them and ensure their security, as well as the rights you have regarding this data.

When you provide us with personal data and/or when we collect or generate data about you with our tools, we undertake to process them in accordance with this Privacy Policy.

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2. WHO WE ARE AND WHO IS CONCERNED ABOUT THIS POLICY ?

This Privacy Policy applies to all participants to an event organized by L’Oreal Group or its subsidiaries, such as meetings, shows, exhibitions etc.

❖ Who is the data controller?

ACITVE COSMETICS INTERNATIONAL
inspireskinconfidence@comm-sante.com
62 Quai Charles Pasqua
92300, Levallois Perret
FRANCE.

is responsible for the personal data that you share with us and that it processes.
The terms "L’Oréal", "we" or "us" that we use herein refer to this company

❖ Who is concerned?

Individuals who participate to an event organized within L’Oréal, as:

- Professionals or Partners

3. WHAT IS A PERSONAL DATA & A PROCESSING?

The Privacy Policy for participants to Events applies to all personal data collected, generated and more generally processed by L’Oréal in relation to an event it organized.

❖ The term "personal data" refers to any information that may identify you *directly* or *indirectly* (the "Data").

- *In practice, the data that can identify you directly are:*
 - Your names and surnames,
 - Your email / postal address / phone numbers,
 - Your username,
 - Your birth date,
 - Your picture,
 - The content generated by the employees,
 - Your financial information and
 - Information relating to your education and your career.
- *In practice, the data that can identify you indirectly are:*

- Your IP address,
- The MAC address of your mobile devices,

❖ What is a Data Processing?

Any operation we do or plan to do directly or indirectly with the Data as it includes any operation performed such as collecting, recording, hosting, sending, organizing, structuring, storing, keeping/retaining, adapting / modifying, retrieving, consulting/access, using, disclosing by transmission or otherwise making available, alignment or combination, restriction, erasing/deleting etc.

4. WHICH DATA DO WE COLLECT FROM YOU AND HOW DO WE USE THEM?

❖ How do we collect, generate or receive your Data?

- We may collect or receive your Data directly **from you**, such as through one of the following means :
 - Our information system, via the use of our webmail,
 - Our extra and intranet,
 - The applications and software that you use,
 - The badging system;
 - The video surveillance system;
 - The forms or questionnaires that you fill-in;
 - The social networks or any other tool made available.
- In other cases **we collect your Data ourselves** (e.g. when a video surveillance or badging system is implemented or the data generated by the tools we use as part of the management of the event)
- When we collect Data from you, we identify the **required fields** with an asterisk. Some of the Data we require is mandatory for the following reasons:
 - Organization of the event you are participating to;
 - The answer to a request that you may have sent us (e.g. to send you an information, to validate your registration/subscription to a service);
 - To use certain tools; or
 - To comply with legal obligations.

Failing to provide the required information may have consequences on the performance of the services and tools that we provide you or that are available.

Under no circumstances will we collect your Data via tools that you are not aware of.

- In the event that your personal, or professional situation changes and that requires a modification of your Data, you agree to update them, either directly on the platform as case may be, or by contacting the service identified in paragraph “Contact us” below.

5. TABLE SUMMARIZING THE PURPOSES, DATA PROCESSED, GROUNDS OF THE PROCESSING AND RETENTION PERIOD

You will find in the table below detailed information relating to the following items:

❖ In which context may your Data be collected?

This column lists the activities you are performing or the circumstances when we use or collect your Data. For example, to manage the organization of the event.

❖ Which Data relating to you are we likely to retain?

This column lists the categories of Data that we collect considering the circumstances.

❖ How and why do we use your Data for?

This column explains what we could do with your Data and the purposes of their collection.

❖ On which legal basis do we process your personal data as part of the purpose of the processing?

This column explains the legal basis on which we process your Data, namely:

1. An agreement you may have with L'Oréal (business contract, employment, apprenticeship, internship agreement, etc.); or
2. Our **legitimate interest**, which may be:
 - The safety of the individuals in our premises.
 - The **security of our tools**, to ensure the protection and safety of our tools (websites / applications / devices) and to ensure that they work properly and are constantly improved.
3. **Legal obligations** when the applicable law or regulation requires the processing of the, which is often the case with regard to security.
4. Your consent in a few instances *.

** With regard to processing based on your consent (i.e. processing that do not fall within 1 to 3 above) L'Oréal can ask you at any time to consent to a data processing. Consent-based processing is an integral part of this Policy and will therefore be implemented in accordance with these provisions. You may withdraw your consent for these processing, as explained below under "Your Rights and Your Choices".*

❖ Retention of your Data

This column lists the retention periods for each category of Data and purposes

Information overview on your interactions with us and their consequences on your data

| <i>During which interactions may you provide and we may collect your data?</i> | <i>What personal data may we receive from you directly or resulting from your interaction with us?</i> | <i>How and why we may use your data ?</i> | <i>What is the legal basis for using your personal data?</i> |
|---|---|---|--|
| <p>Account Creation and management</p> <p>Information collected during the creation of an account on L’Oreal Active Cosmetics websites/apps, through a social media login.</p> | <p>Depending on how much you are interacting with us, those data may include:</p> <ul style="list-style-type: none"> • Name and surname; • Email address; • Address; • CV, job title • Photo, video • Birthday or age range; • ID, username, and password; • Personal description or preferences; • Social media profile (where you use social login or share this personal data with us). | <p>To:</p> <ul style="list-style-type: none"> • Manage your participation in the awards • Manage surveys or contests you choose to enter; • Respond to your questions and otherwise interact with you ; • Allow you to manage your preferences; <hr/> <ul style="list-style-type: none"> • Send you marketing communications (where you have asked us to) which may be tailored to your “profile” (i.e. based on the personal data we know about you and your preferences); <hr/> <ul style="list-style-type: none"> • Monitor and improve our websites/apps ; • Run analytics or collect statistics • Secure our websites/apps and protect you and us against fraud; | <ul style="list-style-type: none"> • Consent To participate in the awards selection <hr/> <ul style="list-style-type: none"> • Consent To send you direct marketing communications. <hr/> <ul style="list-style-type: none"> • Legitimate Interest To ensure our websites/apps remain secure, to protect them against fraud, and to help us better understand your needs and expectations and therefore improve our services, products and brands. |
| <p>Newsletter communications subscription</p> | <p>Depending on how much you are interacting with us, those data may include:</p> <ul style="list-style-type: none"> • Email address; • Name and surname; • Personal description or preferences; • Social media profile (where you use social login or share this personal data with us). | <p>To :</p> <ul style="list-style-type: none"> • Send you marketing communications (where you have asked us to) which may be tailored to your “profile” based on the personal data we know about you, and your preferences (incl. location of your favorite store); <hr/> <ul style="list-style-type: none"> • Run analytics or collect statistics. | <ul style="list-style-type: none"> • Consent To send you direct marketing communications. <hr/> <ul style="list-style-type: none"> • Legitimate Interest To tailor our marketing communications, understand their effectiveness, and ensure you receive the most relevant experience; to help us better |

| | | | |
|---|--|--|--|
| | | | <p>understand your needs and expectations and therefore improve our services, products and brands.</p> |
| <p>Online browsing</p> <p>Information collected by cookies or similar technologies (“Cookies”*) as part of your browsing on L’Oréal website/apps and/or on third-party website/apps.</p> <p>For information on specific Cookies placed through a given website/app, please consult the relevant cookie table.</p> | <p>Depending on how much you are interacting with us, those data may include:</p> <ul style="list-style-type: none"> • Data related to your use of our websites/apps: • Where you came from; • Login details; • Pages you looked at; • Videos you watched; • Ads you click on or tap; • Products you search for; • Your location; • Duration of your visit; • Products you selected to create your basket. <p>Technical information:</p> <ul style="list-style-type: none"> • IP address; • browser information; • device information. <p>A unique identifier granted to each visitor and the expiration date of such identifier.</p> | <p>We use Cookies, where relevant, with other personal data you have already shared with us (such as previous purchases, or whether you’re signed up to our email newsletters) or the following purposes:</p> <ul style="list-style-type: none"> • To allow proper functioning of our website/apps: <ul style="list-style-type: none"> ○ proper display of the content; ○ creation and remembering of a cart; ○ creation and remembering of your login; ○ interface personalisation such as language; ○ parameters attached to your device including your screen resolution, etc; ○ improvement of our websites/apps, for example, by testing new ideas. • To ensure the website/app is secure and safe and protect you against fraud or misuse of our websites or services, for example through performing troubleshooting. • To run statistics: <ul style="list-style-type: none"> ○ To avoid visitors being recorded twice; ○ To know users’ reaction to our advertising campaigns; ○ To improve our offers; ○ To know how you discovered our websites / apps. | <ul style="list-style-type: none"> • Legal grounds <p>To keep your details on a suppression list if you have asked us not to send you any direct marketing anymore.</p> <ul style="list-style-type: none"> • Legitimate interest: <p>To ensure we are providing you with websites/apps, advertising and communications that are working properly and are continually improving for cookies that are (i) essential for the functioning of our websites/apps, (ii) used to keep our websites/apps safe and secure.</p> |

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| <p>* Cookies are small text files stored on your device (computer, tablet or mobile) when you are on the Internet, including on L’Oreal Group’s websites.</p> | | <ul style="list-style-type: none"> • To deliver online behavioural advertising: <ul style="list-style-type: none"> ○ to show you online advertisements for products which may be of interest to you, based on your previous behaviour; ○ to show you ads and content on social media platforms. • To tailor our services for you: <ul style="list-style-type: none"> ○ to send you recommendations, marketing, or content based on your profile and interests; ○ to display our websites/apps in a tailored way like remembering your cart or login, your language, the user-interface customization cookies (i.e. the parameters attached to your device including your screen resolution, font preference, etc). • To allow sharing of our content on social media (sharing buttons intended to display the site). | <ul style="list-style-type: none"> • Consent For all other cookies. |
| <p>Enquiries</p> <p>Information collected when you ask questions relating to the awards , our brands, our products.</p> | <p>Depending on how much you are interacting with us, those data may include:</p> <ul style="list-style-type: none"> • Name and surname; • Phone number; • Email address; • Other information you have shared with us about yourself in relation to your enquiry (which may include welfare and health data). | <ul style="list-style-type: none"> • To answer your enquiries; Where needed, to connect you with the relevant services • For statistics purposes. | <ul style="list-style-type: none"> • Consent To process your enquiry. • Legitimate interest To help us better understand our customers’ needs and expectations and therefore improve our services, products and brands. |

6. AUTOMATED INDIVIDUAL DECISION MAKING & PROFILING

❖ *Automated individual decision-making*

L’Oreal does not use automated systems for individual decision-making.

❖ *Profiling*

- Certain techniques that constitute "profiling" (defined as "*any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict certain aspects concerning that natural person's performance at work, economic situations, health, personal preferences, interests, reliability, behavior, location or movement*").
- We do not collect Data for profiling about you in the different scenarios mentioned in the table above.
We study the use of our tools through statistics, but we do not evaluate or predict your personal preferences and / or interest.

7. WHO CAN ACCESS TO YOUR DATA ?

❖ We can share your Data within L'Oréal's Group.

Depending on the purpose for which your Data is processed, any member of the L'Oréal's organization staff of the event, may have access to your Data, provided that :

- They need to have access to your Data,
- If possible, the Data is in a pseudonymized form (not allowing any direct identification), and
- It is necessary as part of your participation process within L'Oréal, or to meet our legal obligations, to prevent fraud and/or to secure our tools, for reasons of physical security, or after having obtained your consent to do so.

This means that we can communicate your Data to our holding company, L'Oréal S.A., and its subsidiaries worldwide.

❖ We decide who has access to your Data for each type of Data

- Your Data is only available to people and employees who need to access to this Data as part of their duties within L'Oréal (e.g.the organization team of the event), as well as the trusted third parties we work with.
- Access rights have been defined internally for this purpose.

❖ Your Data may also be processed on our behalf by trusted service providers.

- We may also share your Data with some of our service providers who need to access to some of your Data to *perform the mission assigned to them by L'Oréal*, including those that are

located outside your country. In this case, L'Oréal imposes strong commitments to these co-contractors regarding the processing, confidentiality and security measures regarding the Data that these service providers access to. Thus, we only provide them the Data necessary to perform the services they have been assigned and we require that they do not use your Data for any other purposes.

- As part of this, your Data may be shared with:
 - third parties that provide us with SaaS solutions and tools to organize your **participation to events, trainings, games, or to manage the services you have opted in.**
 - third parties that provide us studies (quality...)
 - third parties that assist and help us in **providing IT services**, such as platform providers, hosting services, maintenance and technical assistance services for our databases as well as for our software and applications that may contain data relating to you (these providers may sometimes require access to your Data to perform the requested tasks);
 - third parties that provides us with **administrative services**, such as file archiving;
 - third parties that help us to ensure the **security and monitoring of our premises.**

❖ **We may also disclose your Data to third parties in certain specific situations:**

- If we are obliged to disclose or share your Data to comply with a legal obligation, a court or administrative order or decision, or to protect the rights, property or safety of L'Oréal, its customers or employees;
- If you have given your consent to do so; or
- If the law allows us to do so.

We will not give or sell your Data.

8. HOW LONG DO WE RETAIN YOUR DATA?

- We retain your Data ***only for the period necessary to achieve the purpose for which we hold the Data***, to meet to your needs or to fulfill our legal obligations. Generally, most of this Data is retained for ***the duration of the event and its consequences.***
- When we do not need to use you Data, in particular, we delete your Data from our systems and files or anonymize them so that they no longer allow your identification.

- We **may retain certain Data in order to fulfill our legal or regulatory obligations and to allow us to exercise our rights** (e.g. filing a claim before the courts) or for statistical or historical purposes.
- We may fully anonymize your Data and use it to generate statistics and other type of reports.

To know how long your Data can be retained, please refer to the summary table above.

9. WHERE DO WE STORE YOUR DATA AND WHAT SECURITY MEASURES ARE IMPLEMENTED TO PROTECT THEM ?

❖ Location of your Data:

- Your Data may be transferred, accessed to and stored in a country located outside the **European Economic Area** (the "EEA"). They can also be processed by individuals working outside the EEA who work for us or for one of our trusted service providers.
- L'Oréal transfers Data outside the EEA only **in a secure manner and in compliance with the applicable regulations**. As some countries may not have laws governing the use and transfer of Data, we undertake to take all necessary steps to ensure that third parties comply with the terms and conditions set out in this Employees' Policy. These measures may include controlling the standards applied by these third parties as part of data protection and security and / or the execution of appropriate agreements (e.g. the standard contractual clauses adopted by the Commission of the European Union).
- For further information, please contact us as indicated in the "Contact" section below.

❖ Security measures implemented

- We take all **reasonable and useful measures regarding the nature of the Data** and the risks induced by its processing, to preserve the security of the data and, in particular, to prevent them from being distorted, damaged, or that unauthorized third parties have access.
- Our general IT security policy is described in the L'Oréal **IT Policy** that we have implemented and which includes obligations for you as well, since the security of your Data also depends on you.
- In addition, we require **third party service providers who have access to your Data on our behalf, through an agreement, to commit to the same obligations**.

- However, considering that the provision of Data via the Internet is not completely secure, **we cannot guarantee the security of your Data provided via the Internet.**

10. YOUR RIGHTS AND YOUR CHOICES

L'Oréal respects your right to privacy, it is important that you control your Data.

You have the following rights:

- **To be informed:** You have the right to receive clear, transparent, understandable and easily available information about how we use your Data and about your rights. This is the purpose of the information included in this this Policy.
- **Accessing and obtaining a copy:** You have the right to access to your Data that we retain (subject to certain restrictions), and to obtain a copy of such Data.
- **Right to rectify:** You have the right to require that your Data be rectified if it is inaccurate or out of date and / or completed if it is incomplete.
- **Right to object:** You may object, in writing, to the collection and processing of your Data as part of any processing based on our legitimate interests, subject to the applicable legal and regulatory provisions. In case of disagreement, we will have to prove the legitimacy of this treatment for our interests. On the other hand, you cannot oppose the processing of your Data which is essential for the performance of the event or compliance with the Law.
- **Right to erasure and right to be forgotten:** In some cases, you have the right to obtain the erasure or deletion of your Data. This is not an absolute right, as we may be forced to retain your Data for legal or legitimate reasons.
- **Right to withdraw your consent at any time for consent-based data processing:** You may withdraw your consent to the processing of your Data if this processing is based on your consent. Withdrawing your consent does not have consequences on the lawfulness of consent-based processing prior to such withdrawal. For example, you may object to receiving our marketing messages at any time by clicking on the "unsubscribe" link in any email or communication we send you. You can also object to the processing of your image or your voice. You can also contact us at the coordinates below. You can read the table included in the section "*What data do we collect from you and how do we use it?*" and in particular under the column "*On which legal basis do we process your personal data as part of the purpose of the processing?*" to know if our processing is based on your consent.
- **File a complaint before a supervisory authority:** You have the right to file a complaint before the data protection authority of your country to dispute L'Oréal's data protection practices

and respect of privacy. You may contact us at the contact details below before filing any complaint to the relevant data protection authority.

- **Right to Data portability:** You have the right to move, copy or transmit data relating to you from our database to another one. This only applies to the data you have provided, when the processing is based on your consent or an agreement and it is implemented via automated means. You may read the table added in the section "What data do we collect from you and how do we use it?" and in particular under the column "*On which legal basis do we process your personal data as part of the purpose of the processing?*" to know if our processing is based on an agreement or the consent.

- **Right to restriction of processing:** You have the right to request the restriction of your Data processing. This means that the processing of your Data be limited, so that we may retain the Data but not use or process it. This right applies in specific circumstances provided for by the General Data Protection Regulations, namely:
 - the accuracy of the Data is challenged by the data subject (i.e. You), for a period enabling the controller (i.e. L'Oréal) to verify the accuracy of the Data;
 - the processing is unlawful and the data subject (i.e. You) opposes the deletion of the Data and requests the restriction of their use instead;
 - the controller (i.e. L'Oréal) no longer needs the Data for the purposes of the processing, but they are required by the data subject (i.e. You) for the establishment, exercise or defense of legal claims;
 - the data subject (i.e. You) has objected to the processing based on legitimate grounds from the controller (i.e. L'Oréal) pursuant to pending the verification whether the legitimate grounds of the controller (i.e. L'Oréal) override those of the data subject (i.e. You).

To exercise each of the rights listed above, please contact us at the contact details below. We may ask you to prove your identity and provide additional information about your request before processing your request.

11. CONTACT US IF YOU HAVE ANY QUESTIONS OR WISH TO EXERCISE YOUR RIGHTS

If you have any questions or comments about how we process and use your Data, or if you wish to exercise any of your rights listed above, please contact us at the e-mail address, mentioning your subsidiary:

L'Oreal Data protection officer
dpo@loreal.com