

Privacy Policy

This Privacy Policy was updated on 01/03/2022

1 - Introduction

Clarins places great importance on the protection of Users' privacy and its obligations in accordance with the legal provisions in force.

This Privacy Policy allows you to understand the principles of data protection applied by Clarins, including how we handle your personal data and our data collection practices. We aim to provide clarification through this policy about the methods through which we collect, use, share, protect and store your information. By submitting your personal data to Clarins, you consent to the provisions of this Privacy Policy.

Clarins Groupe (Middle East) Ltd. whose registered office is Dubai Airport Freezone and Clarins SAS whose registered office is located 9 rue du Commandant Pilot, 92200 Neuilly-sur-Seine, France are joint data controllers for the website www.ae.clarins.com.

Clarins may update this Privacy Policy at any time. The date of the most recent revision will appear on this page. We suggest that you refer back to it on a regular basis.

Please note that by using the website www.ae.clarins.com, or visiting one of our counters in participating retailer stores, you consent to the provisions of this Privacy Policy and authorize Clarins to collect, record, organize, store, use and/or transfer your personal data according to this Privacy Policy.

You hereby provide us with your consent to and agree that, in accordance with the provisions of this Privacy Policy, we may transfer your personal information to third parties and to affiliated companies of Clarins' inside and outside the United Arab Emirates (UAE), including in countries that do not provide the same level of data protection as the United Arab Emirates (UAE).

We may modify this Privacy Policy from time to time. Changes cannot be retroactive. We will provide you with notice if any material changes are made. What constitutes a "material change" will be determined at our sole discretion, in good faith and using reasonable judgment and common sense. Your continued use of our services after notice of change is issued means that you are consenting to the updated terms.

The provisions contained in each paragraph of this Privacy Policy shall apply independently of each of the others and its validity shall not be affected if any of the others is invalid. If any of those provisions is void but would be valid if some part of the provision were deleted or reduced

in scope or time, the provision in question shall apply with the minimum modification necessary to make it valid.

2 - When do we collect your information?

We collect personal information from you when:

- you visit our website;
- you create an account on our website;
- you make a purchase or a reservation on our website or in certain approved points of sale of our distribution network;
- you subscribe to our newsletters;
- you sign up for one of our loyalty programs;
- you participate in special operations, in particular games, competitions, product tests, customers surveys or market researches;
- you share content on social networks such as Instagram, Facebook, Pinterest or Twitter using the hashtag #clarins or other hashtags we offer;
- you contact us, in particular when you call or submit a request or a complaint to our Customer Service teams, or through our Site when you rate or review our products and/or services or when you chat with other visitors in real time;
- you have a consultation or make a purchase in store at one of our counters;
- you have given your consent to third parties to send us personal information about you.

3 - What information do we collect about you?

We consider all information that could identify you directly or indirectly as "personal information". We may mainly collect the following personal information:

- information about your identity, in particular your gender, last name, first names, address, telephone numbers, email address, usernames and passwords, date of birth or age;
- information about your payment method, in particular your credit card number and the expiration date;
- information about our commercial transactions, in particular transaction numbers, history of your purchases, your request or your communications with our Customer Service team, your preferences and interests, your activity on the web or information about one of our loyalty program;
- content information (photos, videos, reviews, comments, etc.);
- information about wellness (beauty concerns, skin type, skin sensitivity, contraindications, etc.) subject to your prior and explicit consent, in particular for cosmetovigilance or when asking for a beauty prescription Clarins or a treatment Clarins in one of our Spas;

- information about your social media accounts (username, caption information, location, etc.), uploads and posts when you share content or use the hashtag #clarins or other hashtags we offer;
- recordings of telephone conversations to offer the best quality of service, in particular for the purpose of staff training and appraisal;
- technical information, in particular your IP address or information about how your device navigates through our website;
- other information you provide when you contact us or we have received from external providers.

Our services are dynamic and we often introduce new features which may require the collection of new information. If we collect materially different personal data or materially change how we use your personal data, we will notify you and modify this Privacy Policy as further elaborated above.

4 - Why is your personal information collected?

Personal information may be collected mainly for the following purposes:

- Website administration and improvement of the quality of service. This processing is necessary for the purposes of the legitimate interest referred to above;
- Processing of your orders (orders, deliveries, invoices, after sales service, etc.). This processing is necessary for the performance of a contract to which you are party;
- Customer Relationship Management (CRM), in particular to help us get to know you better and to provide you with personalized offers about our products and services (in particular by email, by SMS, on social networks or any other medium and by displaying targeted ads on websites and on social networks), to manage your membership to our Loyalty program and to analyse and anticipate market trends in order to best meet your needs. For these purposes, we may perform segmentation operations based on your preferences, interests and purchasing behavior, analyse your browsing and requests on our website or perform any other actions to better qualify our database.
This processing is made with your consent or is necessary for the purposes of the legitimate interest referred to in section 4;
- We use Facebook's "Custom Audience" feature and e-mail re-targeting features, which enables us to create an audience using your customer data such as email addresses and phone numbers. Such processing requires your consent, gained in Facebook's data processing [agreement](#).
- Social interaction. This processing is made with your consent;
- Prevention and detection of fraudulent or other illegal activity. To assist in fraud prevention, investigation and decision-making, we use a real-time fraud detection service that assesses the level of risk associated with each transaction. Categories that could indicate a transaction as fraudulent include for example: Address verification; Card verification; Identity morphing and Bespoke Clarins rules. Depending on the outcome of this data processing we may refuse to enter into a contract with you.

- Managing your request (samples, advice, participation in a promotional operation, complaints, right to access, rectify, oppose and remove, etc.). This processing is necessary to process your request;
- As otherwise permitted by law and/or if we need to notify to you from time to time.

5 – Do we disclose your personal information?

We never sell nor rent your personal information to other companies for marketing purposes.

The personal information we are collecting about you will be used by Clarins SAS and Clarins Middle East Ltd. and are likely to be communicated to other Group companies.

It may also be shared with service providers chosen for their expertise and reliability and acting on our behalf and at our direction (order processing and fulfilment, secure payment, customer service management, maintenance and technical development operations, rate and reviews, analytics, spam prevention, management of digital campaigns and affiliation, etc.). We authorize these service providers to use your personal information only to the extent necessary to perform services on our behalf or to comply with legal requirements and we strive to ensure that your personal information is always protected.

These third parties may be located in or out of the UAE, including in countries that do not provide the same level of data protection as the UAE. In such a case, we will ensure that:

- we obtain your unambiguous consent to share your personal information with these third parties;
- we enter into appropriate data transfer agreements conforming to the Standard Model Clauses established by the European Commission ;
- we comply with Binding Corporate Rules (BCR) approved by competent authorities;
- Finally, we may also transmit your personal information to local authorities if required by law or as part of an investigation and in accordance with applicable regulations.

Any entity which purchases all or part of Clarins, our services and/or products, will have the right to continue to use your data, but unless you agree otherwise, only in the manner set out in this Privacy Policy. For the avoidance of doubt, we may transfer to said entity any and all information obtained from you (pursuant to our legal and contractual rights).

6 - How will we protect the information about you?

We cannot warrant or guarantee the security of any information you sent us. We have undertaken all reasonable security measures to protect ensure your data is secure and prevent it from being accidentally lost, or used, or accessed, altered or disclosed in an unauthorized way, altered or

disclosed. We also regularly review and update such measures to meet new perceived threats that may arise from technological advances.

Clarins takes appropriate technical and organizational measures, in relation to the nature of data and risks, to preserve the security and confidentiality of your personal information and, in particular, to prevent them from being altered, disclosed or transmitted to any unauthorized parties.

This may include practices such as limited access by members of staff who, by virtue of their duties, are authorized to access data, contractual guarantees in case of third-party providers, privacy impact assessments, internal reviews of our practices and privacy policies and/or implementation of physical and/or systematic security measures (secure access, authentication process, backup, antivirus, firewall, etc.).

7 - What is our policy on minors?

This website www.ae.clarins.com is not aimed at minors.

We do not knowingly collect nor process personal information from minors. Assuming we would have knowledge of the collection of personal information from minors without prior authorization from the holder of the parental responsibility, we will take appropriate measures to contact the person and, if necessary, to delete this personal data from our servers and/or those of our service providers.

Anyone with reason to believe we might have information from or about a minor without legal parental or guardian consent should immediately contact us and provide us with the information required in order to address and rectify the matter.

8 – What is our cookies policy?

For more information on our Cookies Policy please click here to review our Cookies policy.

9 - How is the content you share on social networks using our hashtags managed?

You can choose to use our hashtags to tag your content on social networks such as Instagram, Facebook, Pinterest or Twitter.

By using these hashtags, you acknowledge and agree that your content may appear on our website, be accessible to the public and be used to refer to our products or services.

We remind you that the information you share on social networks can be consulted, used and saved by others around the world, particularly in countries without legislation guaranteeing an adequate level of protection of your personal information as defined in your country of residence.

We also draw your attention to the fact that when you submit content using one of our hashtags, your use of social networks is exclusively governed by the general conditions of these social networks. We invite you to read them and to refer to them regularly.

If you no longer want your content to appear on our site, please remove it from the social network or stop using hashtags.

10 - For how long is your data kept?

We strive to keep your personal information only for the time necessary for the purposes set out in this privacy policy and in accordance with the provisions in force.

As a general rule:

- Customer / prospect data will be kept for three years from the date of collection or after the last contact or the end of the commercial relationship, unless it is opposed or requested to be deleted by you. At the end of this three-year period, we may make contact with you again in order to find out whether or not you wish to continue to receive marketing approaches. If no clear positive answer is given by you, your data will be deleted or archived in accordance with the provisions in force.
- Data on credit cards will be deleted after the transaction or archived for evidence purposes in accordance with the provisions in force. Subject to your express consent, banking data may be kept until the expiration date of the credit card. We never store your visual cryptogram.
- Data to prove a right or a contract, or kept under compliance with a legal obligation can be archived in accordance with the provisions in force.
- Recordings of telephone conversations may be kept for up to six months.

If a judicial action is initiated, the above personal information may be kept until the end of such action, including any potential periods of appeal.

11 - What are your rights regarding your personal information and how do you contact us?

If you give us your email address, phone number or mailing address, you may receive emails, calls or periodic messages from us about our products, services or upcoming events. You can unsubscribe at any time from our mailing lists by contacting us at the address below or by following the link "unsubscribe" contained in each of our emails. You can also change your preferences at any time in your account.

In accordance with the provisions in force, you have a right to access, rectification, erasure and data portability of your personal data as well as a right to object and restriction of processing. You can also withdraw your consent at any time. To exercise these rights, you must send us a request by justifying your identity:

- E-mailing a request to the Customer Service team
- By writing to the following address:

CLARINS GROUPE (MIDDLE EAST) Ltd.
DUBAI Airport Freezone
DUBAI
UNITED ARAB EMIRATES

You will be informed of the actions to be taken as soon as possible and in any case no later than one month after your request. However, we reserve the right not to respond to unfounded or vexatious requests.

In accordance with the provisions in force, you can also file a complaint with the competent authority responsible for data protection or lodge an appeal if your data are misused.

Please contact our contact point for data protection in the UAE should you have any questions or comments in connection with this Privacy Policy:

Clarins Groupe (Middle East) Ltd.
DUBAI Airport Freezone
DUBAI
UNITED ARAB EMIRATES

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Director of Human Resources