PRIVACY POLICY

At Cyclax trading as Three Pears Limited we’re committed to protecting and respecting your privacy with regards to anyone using our website.

This Policy explains when and why we collect personal information about people who visit our website(s), how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you’re happy with any changes. By using our website, you’re agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to Jez Owers, Three Pears Limited, Station Road, Rowley Regis, Warley, West Midlands B65 0JY Tel: 0121 559 5351 Email: sales@threepears.co.uk

HOW DO WE COLLECT INFORMATION FROM YOU?

We obtain information about you when you use our website(s) for example, when you complete the contact form and/or when you complete the site registration form

We collect your data when you enter a competition, when we seek your views or comments on the services we provide, or notify you on changes to our services.

We may collect your data when we send you communications which you have requested and that may be of interest to you.

WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?

The personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when. If you make a purchase from us, your credit card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

USE OF ‘COOKIES’ WEBSITE RECORDING

Like many other websites, the Three Pears Limited website(s) use cookies. ‘Cookies’ are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, we use cookies to store your country preference. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

**Main Cookies used on our site**

**Google Analytics**

These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

For more information on Google Analytics’ privacy policy visit here – <http://www.google.com/analytics/learn/privacy.html>

**Google Maps**

These are Google Maps third party cookies, which are unique identifiers to allow traffic analysis to Google Maps.

HOW IS YOUR INFORMATION USED?

**We may use your information to:**

* Contact you regarding queries raised in the contact form;
* Progress an order you have submitted and send you information directly related to this;
* Carry out our obligations arising from any contracts entered into by you and us;
* Deal with entries into a competition;
* Seek your views or comments on the services we provide;
* Notify you of changes to our services;
* Send you communications which you have requested and that may be of interest to you.
* These may include information about campaigns, appeals, other fundraising activities, promotions of our associated companies goods and services;
* Process a grant or job application.

We review our retention periods for personal information on a regular basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems for as long as is necessary for the relevant activity, or as long as is set out in any relevant contract you hold with us.

WHO HAS ACCESS TO YOUR INFORMATION?

We will not sell or rent your information to third parties.

We will not share your information with third parties for marketing purposes.

**Third Party Service Providers working on our behalf**:

We may pass your information to our third party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process donations and send you mailings).

However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond the company for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, or if we’re under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

YOUR CHOICES

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about our exciting products and services, then you can select your choices by ticking the relevant boxes situated on any relevant form on which we collect your information.

We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. We will not contact you for marketing purposes by post if you have indicated that you do not wish to be contacted.

You can change your marketing preferences at any time by contacting us by email: sales@threepears.co.uk or tel: 0121 559 5351

HOW YOU CAN ACCESS AND UPDATE YOUR INFORMATION

The accuracy of your information is important to us. You have the right to request a copy of the information we hold about you so that you can ensure its accuracy. You can do this by the following methods:

Send an email to sales@threepears.co.uk and request the information held about you;

Jez Owers

Three Pears Limited

Station Road, Rowley Regis, Warley, West Midlands B65 0JY

RIGHT TO ERASURE

GDPR introduces a right for individuals to have personal data erased. The right to erasure is also known as ‘the right to be forgotten’. Visitors / users of this site have the ability to have a copy of all records of their personal data and to ask for such data to be erased.

You can ask for a copy of your data and ask for erasure by the following methods:

Send an email and request the information held about you or ask for erasure;

Send an email to sales@threepears.co.uk and request the information held about you;

Jez Owers

Three Pears Limited

Station Road, Rowley Regis, Warley, West Midlands B65 0JY

We will ask for proof of identity before and data can be shared or erased. We will respond to any requests for erasure within 1 month or receipt of the request.

Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it’s treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

PROFILING

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and reduce fraud and credit risk.

LINKS TO OTHER WEBSITES

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website‚ so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

16 OR UNDER

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under‚ please get your parent/guardian’s permission beforehand whenever you provide us with personal information

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Transferring your information outside of Europe

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside the European Union (“EU”). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EU. These countries may not have similar data protection laws to the UK. By submitting your personal data, you’re agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the EU, your information may be transferred outside the EU in order to provide you with those services.

Review of this Policy

We keep this Policy under regular review. This Policy was last updated in February 2019.

**Last Modified: 24th May 2018**

## Introduction

Your privacy is important to Coty Inc. and its affiliates and subsidiaries ("**Coty**", "**us**", "**our**") and we are committed to protecting your personal information. This Privacy Notice ("**Notice**") relates to our use of your personal information when you:

* Interact with us through social media or adverts and content on third party websites (collectively “**Coty Content**");
* Use our:
	+ Websites, microsites, or mobile applications;
	+ Services delivered by via voice activated devices and/or new technologies, such as virtual reality and augmented reality;

displaying this Notice (collectively, "**Coty Sites**");

* Otherwise engage with us, for example by contacting Customer Services or consumer affairs, attending an education event, tradeshow or other Coty event.

This Notice explains who we are; what information we collect about you; how we use it (including who we share that information with); our use of cookies; and your rights and choices regarding your personal information. Unless otherwise defined in this Notice, capitalized terms used in this Notice have the same meaning as in our [**Terms of Use**](http://coty.com/terms-use).

The relevant Coty entity that is responsible for your personal information will be the Coty entity that you provided your personal information to; however as we may share your personal information within our group, other Coty entities may also use your information in accordance with this Notice.

For further information about the Coty entities who act as a controllers of your personal information, please [**click here**](https://privacy.coty.com/en_gb/#contact): ("**Controller List**"). [**Our associated brands can be found here**](https://www.coty.com/brands) (the “**Coty** **Brands**"). Activities of any company (including some Coty Brands) not listed in the Controller List will not be governed by this Notice. For those Coty Brands, you should refer to that third party's privacy notice for more information about how it uses your personal information.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided in section "[**How do I contact Coty?**](https://privacy.coty.com/en_gb/#contact)" of this Notice.

## Quick links

**We encourage you to take the time to review this Notice in full to make sure you are fully informed. However, if you only want to access a particular section of this Notice, then you can click on the relevant link below to jump to that section:**

* [**Who is Coty?**](https://privacy.coty.com/en_gb/#who-is-coty)
* [**What information does Coty collect about me and why?**](https://privacy.coty.com/en_gb/#what-does-coty-collect)
* [**How does Coty use my information?**](https://privacy.coty.com/en_gb/#how-does-coty-use)
* [**On what basis can Coty use my information in this way?**](https://privacy.coty.com/en_gb/#what-basis-is-it-used)
* [**Does Coty use cookies and other similar technologies?**](https://privacy.coty.com/en_gb/#does-coty-use-cookies)
* [**Does Coty share my personal information with anyone?**](https://privacy.coty.com/en_gb/#does-coty-share)
* [**How do I stop receiving marketing communications?**](https://privacy.coty.com/en_gb/#stop-marketing-communications)
* [**What are my data protection rights?**](https://privacy.coty.com/en_gb/#what-are-my-rights)
* [**For how long does Coty keep my information?**](https://privacy.coty.com/en_gb/#how-long-does-it-coty-keep-data)
* [**Does Coty transfer my information to other countries?**](https://privacy.coty.com/en_gb/#transfer-to-other-countries)
* [**Is my information secure?**](https://privacy.coty.com/en_gb/#secure)
* [**What if I access a website through a Coty Site?**](https://privacy.coty.com/en_gb/#third-party-sites)
* [**What if I access or use a social network or public forum through a Coty Site?**](https://privacy.coty.com/en_gb/#social-network)
* [**I have entered a contest, promotion or survey – how do I find out more about that?**](https://privacy.coty.com/en_gb/#promotions)
* [**How old do I have to be to use the Coty Sites or other Coty digital offerings?**](https://privacy.coty.com/en_gb/#age-restrictions)
* [**I am a Salon Owner – is there anything else I need to know?**](https://privacy.coty.com/en_gb/#salon-owner)
* [**Does this Notice ever change?**](https://privacy.coty.com/en_gb/#change)
* [**How do I contact Coty?**](https://privacy.coty.com/en_gb/#contact)

## 1. Who is Coty?

Coty is a world leading beauty company, making cosmetic, skincare, fragrances, hair color and styling brands. Our three divisions – Luxury, Professional Beauty and Consumer Beauty – are home to iconic global brands and much loved regional brands. Luxury is focused on prestige fragrances and skincare; Professional Beauty is focused on servicing salon owners and professionals in both hair and nail; and Consumer Beauty is focused on mass color cosmetics, mass retail hair coloring and styling products, body care and mass fragrances.

Our purpose at Coty is to [**Celebrate and Liberate the Diversity of Your Beauty**](https://www.coty.com/our-story/the-purpose-of-coty). We believe the beauty of humanity lies in the individuality of its people; that beauty is at is best when authentic; and beauty should make you feel happy, never sad. As a challenger in beauty, Coty is focused on bringing you new digital solutions to celebrate and liberate the diversity of your beauty in fun, convenient and informative ways, such as voice-activated technology and mixed reality.

## 2. What information does Coty collect about me?

The personal information that we may collect about you broadly falls into the following categories:

* **Information that you provide directly**

When you engage with Coty, either online or in person, we may ask you to provide us with personal information about you. For example, we may ask you to provide us with your contact details to register an account with us, to sign up to receive our newsletters or information about our products or events; and/or to submit enquiries to us. You may also provide us with your personal information in other ways, such as if you contact us in relation to employment opportunities; purchase products or request free samples from us; communicate with us through social media or our customer services teams; join a loyalty scheme or reward program, participate in our promotions, or interact with us at tradeshows or our other events. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point when we ask you to provide it; however we may collect:

* + Identification information, for example your first name, last name, email address, postal address, date of birth, phone number, gender, country of residence, lifestyle/interests, appearance, style, login name, password, answers to security questions;
	+ Transaction information, for example details regarding your transactions with us, including information about the purchases you made and the date and time that you made the purchase;
	+ Images and photographs, for example if you submit a picture to a competition, the Coty Sites or to social media and tag Coty or a Coty Brand, or when you engage with Coty via technologies such as AR, face evaluation or other tools;
	+ Health Information, with your explicit consent, for example information related to product usage and medical history (such as heart rate, skin condition and other features) which may be provided as part of voluntary consumer research, product development and trials; and/or
	+ Your opinions or other information, for example if you review the products you have purchased from us, provide information about products and/or cosmetic concerns, and the brands and products you use or if you provide us with your CV when exploring your employment prospects with us.
* **Information that we collect automatically**

When you visit the Coty Sites, engage with Coty Content or with us digitally, we may collect certain information automatically from your computer, tablet or mobile phone (a “**Device**"). In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect from you automatically may include information like your IP address, Device type (i.e. make and model), unique device identification numbers, browser-type, time zone settings, broad geographic location (e.g. country or city-level location) and other technical information. With your consent, some of the Coty Sites may also collect your precise location information from your Device to provide location based services. You may change your preferences at any time by adjusting the settings on your Device.

We may also collect information about how your Device has interacted with us, including the pages accessed and links clicked, how you navigate to and from the Coty Sites and Coty Content (such as how you scroll over the Coty Sites and Coty Content, which parts you click and how long you spend on each page), your preferences, the products and/or services that you have viewed or searched for, crashes and download errors and response times.

Some of this information may be collected using cookies and similar tracking technology, as further explained under in section "[**Does Coty use cookies and other similar technologies?**](https://privacy.coty.com/en_gb/#does-coty-use-cookies)" below.

* **Information that we obtain from third party sources**

From time to time, we may receive information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclosure your personal information to us.

The types of information we collect from third parties includes:

* + **Our social media partners**, for example if you ‘log-in’ to our Coty Sites using a Social Site (as defined in the "[**What if I access or use a social network or public forum through a Coty Site?**](https://privacy.coty.com/en_gb/#social-network)" section of this Notice), that Social Site may pass information to us, including: the user ID for that third party site, the name, email address and location associated with the user ID and any other information permitted under the privacy policy for that website. We may also share information about you to that social networking site regarding your login. More information about accessing or using a Social Site can be found in the section "[**What if I access or use a social network or public forum through a Coty Site?**](https://privacy.coty.com/en_gb/#social-network)"
	+ **Our retailers, distributors and third party brand partners**, for example our retailers, distributors and third party brand partners may pass information to us including your first name, last name, email address, postal address, phone number, gender, browsing patterns, geo-location and device identifiers, click through and other cookie data, demographic information including information about your appearance (including hair color, hair characteristics; and hair-care routine) and information in relation to products purchased at their stores (whether on the high-street or online through their own website or a dedicated microsite) and services requested using their websites and/or applications.
	+ **Our technology partners and market research organizations**, for example where permitted by applicable data protection law our preferred technology partners may share information with us, including your browsing patterns, geo-location and device identifiers.

## 3. How does Coty use my information?

We will use your personal information for the purposes set out in this Notice, which will include:

* **To provide you with the products and services that you have requested**, to administer our relationship with you and to carry out our obligations arising from the relationship between you and us, including internal accounting and administration purposes, to process payment for purchases or other services and to create and manage your account.
* **To verify your identity**, for example we may use your date of birth to determine that you are old enough to use our services, or your email address to determine if you already have an account with the relevant Coty Site.
* **To provide a personalized service**, for example we use your information to provide you with personalized recommendations for our products that we think you might like, tailor Coty Content to better suit your interests or, at your request and where available, to offer personalized and customized products . We will also use your personal information across the Coty Sites to provide a seamless user experience.
* **For analytics purposes**, for example we may analyze your information including your location, products and/or services requested, age, time zone, IP address and URL visited, against our wider customer base for internal business purposes, such as generating statistics and developing marketing plans, to improve our services and products, the Coty Sites and Coty Content. We may also aggregate and de-identify your information to create customer segments and share with our licensees and partners.
* **To provide you with marketing communications that you might be interested in**, for example, if you choose to receive marketing communications from us, we may use your information to keep you up to date with our latest products, services, surveys, announcements, upcoming events, sweepstakes, contests and other promotions and competitions via our newsletters, emails, or other communications. If you no longer wish to receive these marketing communications, details of how to opt out are described in the section “[**How do I stop receiving marketing communications?**](https://privacy.coty.com/en_gb/#stop-marketing-communications)"
* **For tailored advertising**, for example we, or with third party vendors, may use your information to provide you with tailored advertising on third party sites, including Social Sites. These advertisements are either: (i) “contextual" (meaning they are presented due to the webpage that you are viewing); or (ii) “behavioral advertising" or “interest based advertising" (i.e. where advertisements are shown to you based upon your interests which we have inferred from your information including demographic, geographic and interest-based data). We may use tailored advertising to specifically include or exclude individuals who have registered for our products and services to ensure that you are provided with information about those products or services that are most relevant to you. To do this, we may track your browsing activity across different websites, different Devices and/or different applications. We may match your browsing activity on one Device, such as your mobile phone, with your browsing activity on another device, such as your tablet, to ensure our advertising is tailored to you. If you longer wish to see tailored advertising, you may be able to amend your cookie preferences (see: section: "[**Does Coty use cookies and other similar technologies?**](https://privacy.coty.com/en_gb/#does-coty-use-cookies)"). In addition, some third party sites allow you to stop seeing advertisements from specific advertisers on that site, so you should also check your preferences on those websites.
* **For non-marketing communications**, for example we may use your personal information to communicate with you important information in relation to your account, the service you have requested or other non-marketing communications. This includes: (i) emailing you to verify your identity when you sign-up; (ii) emailing you where you have requested a password and/or username reset; (iii) notifying you that a particular service has been suspended for maintenance or terminated; (iv) letting you know that we have updated this Notice or our [**Terms of Use**](http://coty.com/terms-use); or (v) letting you know about any products or services that you have requested or purchased. We will never contact you to ask for your password. Please be careful if you receive any communications from people requesting this information.
* **To provide the best service to our customers and consumers**, for example, we may use your personal information to process and respond to your questions and/or inquiries
* **For site optimization and management**, for example we may use your personal information provided to us to:
	+ administer the Coty Sites, Coty Content and our other digital offerings, including the services and products offered through those Coty Sites;
	+ ensure the security of our networks and of your information;
	+ customize your future visits to the Coty Sites and our other digital offerings based on your interests to ensure the most user-friendly online navigation experience;
	+ improve the Coty Sites and our other digital offerings (including to fix operational problems such as pages crashing and software bugs); and
	+ provide services to our partners such as tools, analyses, data and insights to see how their website or mobile applications are used.
* **For product development and business development purposes**, for example we will use information we collect from you to improve our products and develop new products.
* **For fraud prevention and detection purposes and to protect and defend the rights and property of Coty, our employees and our business partners.**
* **For employment application purposes**, for example, if you contact us in relation to your employment prospects we will use your personal information to consider you for current and future employment opportunities and to contact you with respect to employment opportunities at Coty that you have expressed interest in.

## 4. On what basis can Coty use my information in this way?

We are required to satisfy one or more of the reasons set out by applicable data privacy law before we can collect and use your personal information.

Generally, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally rely on the following reasons to collect and use your personal information:

|  |  |
| --- | --- |
| **What are the legal grounds?** | **What are they?** |
| Performance of a contract | Using your information may be necessary for us to perform our obligations under a contract with you or with a view to entering into such a contract. For example, where you have: (i) requested services and/or products from us, we will need to use your information to provide those services and/or products that you have requested; or (ii) approached us in relation to employment opportunities, the collection and use of your personal information is necessary to enable us to offer you the job role, process your acceptance of the offer, on-board you as an employee and fulfil our obligations as an employer. |
| Compliance with our legal obligations | The collection and use of your personal information may be necessary to enable us to meet our legal obligations. For example, if you are a business customer we need to process your information to verify your identity and undertake necessary due diligence checks. |
| Pursuing our legitimate interests | Where such processing is not overridden by your rights, we are permitted to use your personal information to pursue our legitimate interests, for example to operate the Coty Sites and our other digital offerings, to improve our products, the Coty Sites and our other digital offerings, to undertake marketing, or otherwise to help us achieve our purpose to [**Celebrate and Liberate the Diversity of Your Beauty**](https://www.coty.com/our-story/the-purpose-of-coty). We may have other legitimate interests and if appropriate we will make this clear to you at the relevant time. |
| Consent | In some limited circumstances, we may rely on your consent to collect and use your personal information. For example, we may rely on consent: (i) where you have approached us in relation to employment opportunities and have provided us with sensitive personal information, such as information in relation to your racial and ethnic origin, sexual orientation, religion, physical and mental health, disabilities or trade union membership; or (ii) in relation to the sending of e-marketing or communication from different brands within the Coty group.If we rely on consent, this will be made clear to you at the time we request your information. You can withdraw your consent at any point by using the mechanism provided at the time, or by contacting us using the contact details provided in the section “[**How do I contact Coty?**](https://privacy.coty.com/en_gb/#contact)” of this Notice. |
| Vital interests | In some instances, we may need to use your personal information to protect your vital interests or those of another person. |

You may not always be required to provide the personal information that we have requested. However, if you choose not to provide certain information, you may not be able to take advantage of some of our services. Any information that is so required is clearly marked as mandatory. If you would prefer that we not collect certain personal information from you, please do not provide us with any such information, or opt out of providing this information where applicable.

If we ask you to provide personal information to comply with a legal requirement or to perform a contact with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), these interests will normally be as set out in this Notice; however if this changes we will make clear to you at the relevant time what those legitimate interests are.

If you have any questions or need further information concerning the legal basis on which we collect and use your personal information, please contact our Data Protection Team. Details for how to contact our Data Protection Team can be found in the section “[**How do I contact Coty?**](https://privacy.coty.com/en_gb/#contact)"

## 5. Does Coty use cookies and other similar technologies?

When you access the Coty Sites, view or interact with Coty Content or otherwise communicate with us digitally, Coty and our partners may place small data files on your Device, known as "cookies", to collect and use personal information about you, including to serve interest-based advertising. Learn more about cookies and other similar technologies, including how to amend your cookie settings by referring to our [**Cookie Policy**](https://www.coty.com/cookie-policy). Please note that we do not respond to or honor “do not track" (a/k/a/ dnt) signals or similar mechanisms transmitted by web browsers.

When you: (i) sign-in to our Coty Sites using a Social Site or other websites; (ii) access Social Sites using the Coty Sites or other websites; and/or (iii) submit content to Social Sites or other websites using a Coty site, that Social Site or other website may use cookies and similar technologies to collect data about user behavior for their own purposes. This use of cookies is in line with that third party’s own cookie policy, over which we have no control.

Please see section “[**What if I access or use a social network or public forum through a Coty Site?**](https://privacy.coty.com/en_gb/#social-network)" for further information.

## 6. Does Coty share my personal information with anyone?

We may disclose your personal information to the following categories of recipients:

* **Within the Coty Group:** We may make your personal information available to other entities within the Coty Group, including those entities listed [**on our website**](https://www.coty.com/brands), to allow us to provide our services to you, for the purposes described in this Notice, or as notified to you when we collect your personal information.
* **With third parties for marketing purposes:** Certain promotions and events sponsored by Coty, or certain portions of the Coty Sites, may offer you the opportunity to consent to receive marketing communications from Coty’s business partners such as Coty’s licensors or promotion co-sponsors. If you have given your consent, your information may be used by such third party for such purposes;
* **With our service providers:** Coty engages third party service providers to perform functions on Coty’s behalf (for example, to support the delivery of our products, or the Coty Sites). This includes but is not limited to sharing information with the following types of service providers:
	+ advertising providers – including companies that provide: (i) advertising space for Coty; (ii) the provision of advertising related services, including agencies instructed to make advertising purchases on behalf of Coty, providers of ad-exchanges (a digital marketplace to buy and sell advertising space) and providers of a demand-side platform (software used to purchase advertising in an automated fashion), such as DoubleClick from Google;
	+ providers of marketing and customer relationship management databases and data management platforms – that enable Coty to manage your information in a safe and efficient manner;
	+ data analyses firms – that provide insights and help us to analyze trends using the data that we and they hold;
	+ customer support specialists – that provide customer support services on our behalf for Coty’s products and services;
	+ fulfillment companies – this include companies that coordinate email campaigns, sweepstakes, contests or promotions on our behalf;
	+ application development and web-hosting companies – to enable the Coty Sites to be hosted on the internet;
	+ information technology and related infrastructure providers;
	+ email delivery providers; and
	+ audit and professional service providers.
* **As part of a business transfers:** Coty may disclose your personal information to an actual or potential buyer (and its agents and advisers) in relation to any actual or proposed divestiture, merger, acquisition, joint venture, bankruptcy, dissolution, reorganization, or any other similar transaction or proceeding
* **To comply with laws:** Coty may disclose your personal information to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person; and
* **To any other person with your consent** to the disclosure.

## 7. What are my data protection rights?

Subject to applicable data protection law, you may also have the following rights:

* The right to request access to personal information, which enables you to receive confirmation as to whether or not we are processing your personal information and access to such personal information
* The right to change and/or correct inaccurate personal information or to request that we delete your personal information in certain circumstances
* The right to block or suppress the processing your personal information
* The right to object to our processing of your personal information (including any processing for direct marketing purposes). More information on how to stop receiving direct marketing can be found in the section marked, “[**How do I stop receiving marketing communications?**](https://privacy.coty.com/en_gb/#stop-marketing-communications)"
* The right to request portability of your personal information
* The right to withdraw your consent, if applicable. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent
* Under California law, if you are a resident of California, you may request and obtain from us once a year, free of charge, information regarding our disclosure (if any) of your personal information to third parties for marketing purposes in the preceding calendar year.

You can exercise these rights by contacting us using the information provided in the section “[**How do I contact Coty?**](https://privacy.coty.com/en_gb/#contact)" of this Notice. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws and we may require reasonable documentation to verify your identity prior to granting your request.

If you have any questions or concerns about how we use your personal information, please do not hesitate to let us know. You also have the right to lodge any complaints with a relevant supervisory authority.

## 8. How do I stop receiving marketing communications?

We will only send you marketing communications if you have agreed to this, or if we are otherwise permitted by law. If at any time you decide that you no longer wish to receive marketing communications from us, you may opt out by clicking on the relevant ‘unsubscribe’ link in the email you receive, by sending us an **email**, or by contacting us using the contact details in section "[**How do I contact Coty?**](https://privacy.coty.com/en_gb/#contact)" of this Notice. Please Note, whilst we will honor your request to stop receiving marketing communications, we will continue to send you service-related communications such as emails confirming purchases through the Coty Sites and keep your information for record keeping purposes.

## 9. For how long does Coty keep my information?

We will retain your information where we have an ongoing legitimate business need to do so (for example, to provide you with access to the Coty Sites or other digital offerings, to provide you with a product you have purchased, or to comply with applicable legal, tax, or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## 10. Does Coty transfer my information to other countries?

As an international entity, in order to provide our services we may need to transfer and process your personal information internationally (including to destinations outside the European Economic Area (the “**EEA**") and the UK), notably throughout the Coty Group and to the jurisdictions in which those entities are based [**listed on our website**](https://www.coty.com/brands). This means that when we process your personal information we may process it in any of these countries.

As a result, your information may be transferred to and/or processed in countries which may not guarantee the same level of protection for personal information as the country in which you reside. However, we have taken appropriate safeguards to ensure that your personal information will remain protected in accordance with this Notice. This includes implementing the European Commission's Standard Contractual Clauses for transfers of your personal information between our group companies, which require all group companies to protect personal information that they process from the EEA in accordance with European Union data protection law.

Further information can be provided on request: please contact us using the details found in the section “[**How do I contact Coty?**](https://privacy.coty.com/en_gb/#contact)" We have also implemented similar appropriate safeguards with our third party service providers and partners and further details can be provided upon request.

## 11. Is my information secure?

We understand that you care how your personal information is used and/or shared with others, and we value your trust and seek to safeguard your personal information.

We implement appropriate technical and organizational security measures, including physical, administrative and technical safeguards to protect your personal information from unauthorized access, use and disclosure. To ensure the security of your personal information, we communicate our privacy and security guidelines to all Coty employees and enforce privacy safeguards within our company.

The measures we use to protect your personal information are designed to provide a level of security appropriate to the risk of processing your personal information. However, please be aware that no electronic transmission of information can be entirely secure. We cannot guarantee that the security measures that we have in place to safeguard personal information will never be defeated or fail, or that those measures will always be sufficient or effective.

## 12. What if I access a website through a Coty Site?

As described above, the Coty Sites may contain links to and from other third-party websites and services (collectively, “Third Party Sites") that are not controlled and operated by us.

Please be aware, we have no control over the content, policies or actions of these Third Party Sites. Your use of these Third Party Sites is at your own risk and we do not accept any responsibility or liability for the privacy practices of these Third Party Sites. We encourage you to read the privacy policies and terms of use of each Third Party Site to which you link from the Coty Sites.

## 13. What if I access or use a social network or public forum through a Coty Site?

The Coty Sites may facilitate easy access to certain social networking Third Party Sites and other websites or services with user-generated content features, such as Facebook, Instagram and Twitter (“**Social Sites**"). You understand that we do not control such services and are not liable for the manner in which they operate.

The Coty Sites may enable you to:

* **Access Social Sites**: this may include: access to websites such as a Coty Brand’s YouTube video; or activation of third party websites when you make a ‘comment’, ‘share’ or ‘like’ something on the Coty Sites using a third party social network plug-in. In each instance, such third party’s privacy policy will apply to your interaction with that website or service;
* **Submit content to Social Sites**: for reviews, discussion forums, message boards, photographs and other public features (“**Public Forums**"). We do not restrict the distribution of personal information that you voluntarily disclose in these Public Forums, so please be aware that any information you disclose there may be collected and used by Coty and others. For this reason, we encourage you to refrain from providing or sharing personal information about yourself in the Public Forums. Coty cannot prevent third parties from using such information in a way that may violate this Notice or applicable law;
* **Sign-in to the Coty Site using a Social Site**: for example, for a harmonized user experience. Signing-in using a Social Site or other third-party account may allow us to access information that you have given the Social Site permission to share. The sign-in feature may also transfer information to the Social Site or third party, such as your username and password, to authenticate you. The Social Site or third party may also automatically collect information such as your IP address, information about your browser and device, and the web page address of the Coty Site. The sign-in feature may also place and read cookies from that third party that may contain a unique identifier the Social Site or other third party assigns to you. The functionality of and your use of the sign-in is governed by the privacy policy and terms of the Social Site.

Our use of your personal information in relation to the Social Sites will be as set out in this Notice or as otherwise notified to you. Again, please note that Third Party Sites (including the Social Sites) may be under the control of a third party and we encourage you to familiarize yourself with the privacy policies and terms of use of each Third Party Site.

## 14. I have entered a contest, promotion or survey – how do I find out more about that?

Coty and its preferred third party service providers or business partners may offer sweepstakes, contests, promotions and surveys (each, a “**Promotion**") through a Coty Site.

Where we do this, we will use your personal information as set out in this Notice, or as otherwise notified to you. However, in certain cases, a third party’s privacy policy may apply to any personal information that you provide in connection with such Promotion. Before entering any Promotion, we encourage you to check who is operating the Promotion in question, and the terms, conditions, policies and rules that apply to it.

To learn more about the terms and conditions that apply to Promotions being run by Coty, please refer to our Promotion Terms and Conditions.

## 15. How old do I have to be to use the Coty Sites or other Coty digital offerings?

You must be aged 13 or over to use the Coty Sites and our other digital offerings.

We take your privacy very seriously and we understand the importance of taking extra precautions to protect the privacy and safety of children who use Coty’s products and services. We do not solicit or knowingly collect personal information from children aged 13 and under. If we are made aware that we have received such information, or any information in violation of our policy, we will use reasonable efforts to locate and remove that information from our records.

## 16. I am a Salon Owner – is there anything else I need to know?

Specific provisions apply to Salon Owners that use our Coty Sites and our other digital offerings– these are described below.

Each time you submit information relating to a ‘new client’, ‘member of staff’ or other personal data, please make sure that the relevant individual: (i) is over the age of 13; (ii) is aware that you will be sharing their details with us and our processing in accordance with this Notice; and (iii) has, if applicable, consented to receiving marketing communications from us and our affiliates.

You may only share these details with us when using a Coty Site and/or our other digital offerings where you have made those individuals aware of our Notice and how we will use their personal information. If we become aware that you have submitted personal information to a Coty Site and;/or any of our other digital offerings without permission, we will delete the information from our records

## 17. Does this Notice ever change?

We may update or modify this Notice from time to time in response to changing legal, technical or business developments. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws. The date of the most recent version of this Notice will appear at the top of the page.

When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. For example, we will notify you of any changes to this Notice by posting a new Notice and updating the “last modified" date at the top of this page or by sending the new Notice to you via email, where appropriate.

## 18. How do I contact Coty?

If you have any questions regarding our practices or how we handle your information, please contact our Data Protection Team by sending an email to **data\_privacy@cotyinc.com** or by post to the Data Protection Team, Commercial Legal Department, Coty Inc., 20 Eastbourne Terrace, London, W2 6LE, United Kingdom.

Contact details for each of the Coty entities can be found here:

**Coty Austria GmbH** Technologiestr.10 / Wienerberstr. 41 Wien, AT 1120 Contact us: **data\_privacy@cotyinc.com**

# **COOKIE USE YARDLEY**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

There are instances where we may use cookies to gather information regarding our services in a mathematical collection for our website and our advertisers.

Any information collected will not have any identifying data. It is statistical data about our visitors and how they have used our site.  No personal details will be shared that could identify you.

We may assemble information about your common internet use with a cookie file.  When used, the cookies are downloaded to your computer automatically.  The cookie is stored on the hard drive, with transferred information.  The data sought by the cookie helps us improve our website and any service offered to you.

Below are the cookies we use.

\_utma
\_utmb
\_utmc
\_utmz

These cookies are used to collect information about how visitors use our site. They are provided by Google Analytics. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

frontend

This cookie is used to acknowledge your visit to our site. It does not store any information about you, just that you've been to the site so the server knows if you return to the site in the future. From this cookie we cannot tell who you are, where you accessed the site from or where you went to after visited us. Commonly these cookies are called "Session Cookies" and are server generated. They automatically expire when you leave the site.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, visit [www.allaboutcookies.org](http://www.allaboutcookies.org/).

To opt out of being tracked by Google Analytics across all websites visit [http://tools.google.com/dlpage/gaoptout](http://tools.google.com/dlpage/gaoptout).