

THE COSMETICS COMPANY STORE

PRIVACY POLICY

EFFECTIVE DATE: MAY 2018

We respect your concerns about privacy and value the relationship we have with you. This privacy policy describes the types of personal data we collect about our customers, how we use this information, with whom we share it, and the rights of our customers regarding our use of this information. We also describe the measures we take to protect the security of the information, how long we retain it and how our customers can contact us about our privacy practices and how to exercise their rights.

For the purposes of applicable data protection laws, the data controller is Estée lauder cosmetics limited, a company registered in England and wales with company number 659213 and having its registered office at One Fitzroy, 6 Mortimer Street, London W1T 3JJ.

Information we collect

We may obtain personal data about you from various sources. We collect this information when you provide it at one of our stores, over the phone, on our website, via our social media pages, when you download one of our mobile applications (either via apple iOS or android) onto your mobile device or at one of our events. Our products are available for sale at certain third-party retailers. Unless otherwise indicated at the time that you provide your personal data, any personal data collected by these retailers is not provided to us. This privacy policy does not address any data collection by our retail partners. When you visit our website, our social media pages or use services or features of one of our mobile applications, we also collect certain information about your device or usage by automated means, including using technologies such as cookies, web server logs and web beacons.

Information you provide

You may provide personal data to us in a number of ways, such as when you participate in an offer or promotion, when you make a purchase on our website, over the phone or in our stores, via our social media pages or through one of our mobile applications. The types of personal data you provide to us may include:

- Contact information (such as name, postal address, email address and mobile or other phone number)
- Age or date of birth
- Gender
- Username and password, nickname/screen name
- Payment information (such as your payment card number, expiration date, and card security code)
- Shipping and billing information (such as delivery address, and billing address)
- Purchase history
- Product preferences
- Your skin type / skin condition
- Your hair type
- Your physical characteristics and your skincare concerns
- Contact information for friends, family or other people you would like us to send a message to on your behalf (please ensure that you only submit contact information of individuals with whom you have a personal or family relationship and who have consented to receive messages from you or us)
- Information or content you provide (such as photographs, videos, reviews, articles, questions, survey responses and comments)
- Information provided to us through social media networks or one of our mobile applications when you visit our social media pages or use one of our mobile applications (such as your name, profile picture, likes, location, friend list and other information described on the social media network or application sign-up page, or your geo-location details when using one of our mobile applications)

How we use the information

We will use the information you provide to:

- Send you promotional materials or other communications if you so elect
- Provide the products or services you (or your company) have requested and operate features on our website
- Process your payment card transactions and/or gift card transactions
- Create and manage your online account, including access to your online and in-store purchase history
- Create a profile about you based on the information you provided to us in order to tailor our advertisements to your interests, find your appropriate skin or hair care routine and manage the effectiveness of our marketing efforts
- Assist with product selection and replenishment
- Chat with you or respond to your inquiries
- Post your product reviews
- Tailor ads displayed to you on our website and elsewhere to your interests and history with us

- Communicate with you about, and administer your participation in, special events, contests, sweepstakes, loyalty programs, surveys and other offers
- Operate and communicate with you about our social network pages or mobile applications
- Operate, evaluate and improve our business (including developing new products and services; enhancing and improving our services; managing our communications; analyzing our products; performing data analytics and performing accounting, auditing and other internal functions)
- Comply with applicable legal requirements, relevant industry standards and our policies

We also may use the information in other ways for which we provide specific notice at the time of collection. The information collected is necessary for the purposes set forth above. Without this information, you may not be able to take advantage of some of our products or services.

legal basis for our use of the information

We will use the information you provide for the above purposes if:

- It is necessary to perform a contract to which you are party (e.g., to process your payment and deliver the products you have ordered); or
- We have obtained your consent; or if
- We have a legitimate interest in doing so (including a legitimate interest in performing marketing activities, research activities, data analytics, internal administration functions, processing and enforcing legal claims and conducting our business in compliance with all applicable laws, relevant industry standards and our policies).

Information we collect by automated means

When you visit our website, view or click on our online advertisements (including our advertisements on third party websites), visit our social media pages or download and use one of our mobile applications (if applicable), we also collect certain information about your usage or device by automated means or by using technologies such as cookies, web server logs or web beacons. For example, if you use one of our mobile applications, we may collect your ip address, your unique device identifier (or other device identifier) and/or geo-location data in order to offer you certain features or functionalities within that mobile application. As set forth in more detail below, we may also collect information about your usage and browsing habits using various web-based technologies.

For your convenience, our mobile applications (if applicable) may also include functionality that allows you to remain logged-in to the application so that you do not have to re-enter a password each time you want to access the application. If you choose to remain logged-in, you should be aware that anyone with access to your mobile device will be able to access and make changes to your mobile account and may be able to make purchases through your account. For that reason, if you choose to remain logged-in to the application on your mobile device, we strongly recommend you enable the passcode lock

security feature on your mobile device to protect against unauthorized access to and use of your mobile device and your account in the application.

Technologies we use

Cookies are small text files that websites send to your computer or other internet-connected device to uniquely identify your browser or to store information or settings in your browser.

the following types of cookies are set on our website.

INTERNAL COOKIES ESSENTIAL FOR THE SITE TO WORK

We use first-party cookies to help the site work in the best possible manner. You can opt out of receiving these cookies and disable them by adjusting your browser settings. Please note, however, that without these cookies, your user experience may be impacted.

In conjunction with obtaining information through cookies, our web servers may log details such as your operating system type, browser type, domain, and other system settings, as well as the language your system uses and the country and time zone in which your device is located. The web server logs also may record information such as the address of the web page that linked you to our site and the ip address of the device you use to connect to the internet.

To control which web servers, collect this information, we may place tags on our web pages called “web beacons.” These are computer instructions that link web pages to particular web servers and their cookies.

THIRD PARTY WEB ANALYTICS COOKIES

We may use third party web analytics services on our website, such as those of coremetrics, and/or adobe site catalyst and/or google analytics. The service providers that administer these services use technologies such as cookies, web server logs and web beacons to collect information (such as ip address) and use that information to help us analyze how visitors use the site. These vendors may use cookies placed on the site (such as the google analytics cookie) and cookies placed on third-party web sites (such as google advertising cookies), or other third-party identifiers, together, to analyze our site visitors. When you first visit our site, a cookie banner will inform you of the use of these analytics technologies. They will only be used if you accept them or if you continue using the site. You may change your cookie settings at any time to accept or refuse these analytics technologies by clicking on the cookie control tool provided on the site to adjust your cookie preferences. Adjusting your cookie preferences may disable certain functionality on the site, as described below.

You may deactivate the ability of these analytics services to analyze your browsing activities on our website. You can learn more about web analytics services, and exercise your choices with respect to

their collection of information on our website by visiting the site and following the links to the privacy policy.

THIRD PARTY TARGETED ADVERTISING COOKIES

We may also contract with third-party advertising networks that collect ip addresses and other information through the use of cookies, web server logs and web beacons on our website and emails; on third-party websites and emails and on our advertising placed on third-party websites. They use this information to create a profile about you and provide advertisements about products and services tailored to your interests (including for companies not affiliated with us). You may see these advertisements on our website and other websites. This process also helps us manage and track the effectiveness of our marketing efforts. When you first visit our website, a cookie banner will inform you of the use of these marketing technologies. They will only be used if you accept them or if you continue using the site. You may change your cookie settings at any time by clicking on the cookie control tool provided on the site or by visiting the following site: http://www.networkadvertising.org/managing/opt_out.asp and following the opt-out instructions of these advertising networks.

To learn more about interest-based advertising, visit the digital advertising alliance at www.aboutads.info/choices or the network advertising initiative at www.networkadvertising.org/choices.

THIRD PARTY COOKIES INTENDED TO IMPROVE THE INTERACTIVITY OF THE SITE

Our website may also support certain third-party services, including social sharing buttons for Facebook, Twitter, Pinterest and Instagram, tweet lists (twitter) and videos posted on the site (YouTube). These features use third party cookies that are directly set on your device by these services. When you first visit our site, a cookie banner will inform you of the use of these cookies. They will only be used if you accept them or if you continue using the site. You may change your cookie settings at any time to accept or refuse these cookies by clicking on the cookie control tool provided on the site.

Targeted advertising

We may also use third-party platforms, including platforms operated by social networks, such as google, Facebook and Pinterest, to show you interest-based ads. We may convert your email address, telephone number or other information into a unique value which can be matched by those third parties with a user on their platform or with other data they may have collected from you. This matching allows interest-based ads to be delivered on those platforms. To opt-out of these ads, you must change your preferences by clicking on the cookie control tool provided on the website and unselecting the "targeting" setting. These platforms may have their own privacy notices or policies, which we strongly suggest you review.

Information we share

We do not rent lists, sell or otherwise disclose personal data we collect about you, except as described here. We may share your personal data with:

- Our affiliates for the purposes described in this privacy policy.
- Service providers who perform services on our behalf based on our instructions. We do not authorize these service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements. Examples of these service providers include entities that process credit card payments, fulfill orders, and provide web-hosting and marketing services.
- Other third parties with your consent.

In addition, we and our affiliates and other service providers may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity.

We also reserve the right to transfer personal data we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal data you have provided to us in a manner that is consistent with our privacy policy. Following such a sale or transfer, you may contact the entity to which we transferred your personal data with any inquiries concerning the processing of that information.

Text messaging

If you so elect, you may provide your mobile phone number in order to receive text message alerts containing product and event information, cosmetics tips or promotions ("text messages"). We do not charge a fee for you to receive text messages from us, however, your mobile service provider may charge you for sending and/or receiving text messages and air-time, as well as any other standard applicable rates charged by your mobile service provider. If you do elect to receive them and later decide that you would no longer like to receive these text messages, see the "your rights and choices" section below.

Text messages are distributed via third party mobile network providers and, therefore, we cannot control certain factors relating to message delivery or guarantee availability or performance of this service, including liability for transmission delays or message failures. To receive help with text messages, you can call 0800 074 6905.

We may also obtain the date, time and content of your messages in the course of your use of text messages. We will use the information we obtain in connection with our text messages in accordance with this privacy policy.

Push notifications and in-app alerts and updates

When you download one of our mobile applications (if applicable), we may provide you with the option to opt in to receive push notifications from us on your mobile device in connection with that mobile application. These push notifications may include promotional communications regarding our products and services. You may, after downloading the applicable mobile application, opt out of receiving push notifications by adjusting the settings on your mobile device. Opting out of push notifications will not affect other communications you receive from us, such as email communications. You also may receive alerts and updates within our mobile applications regarding our products and services or your accounts with us. To opt out of receiving these alerts and updates, you may uninstall the applicable mobile application from your mobile device.

Your rights and choices

You have certain rights and choices in connection with the personal data we collect from you. To update your preferences, ask us to remove your information from our mailing lists or submit a request, please contact us as specified below.

- **Email opt-out**

You can at any time tell us not to send you marketing communications by email by clicking on the unsubscribe link within the marketing emails you receive from us or by contacting us as indicated below. You also may opt out of receiving marketing emails from us by calling us on 0800 074 6905.

- **Postal mail opt-out**

You can ask us to stop sending you marketing communications by postal mail by following the instructions included in a particular promotion. You can also request that we refrain from sending you promotional postal mail by contacting us as indicated below.

- **Text message opt-out**

In general, in order to stop receiving text messages, you can text stop to the five digit short code for the text messaging program from which you no longer wish to receive message (i.e., the five digit number from which the text messages are being sent). You will then receive confirmation of your opt-out of that text messaging program.

You can ask us to stop sending marketing text messages to a particular phone by using that phone to text the word **tfstop** to 60006. You also can request that we refrain from sending you text messages by contacting us as indicated below.

You can also choose not to receive text messages by calling us on 0800 074 6905 and specifying that you no longer want to receive text messages.

- **Direct Mail phone recording opt out**

In general, in order to stop the recording of your direct mail call please confirm with the direct mail sales representative at the start of your call once you are connected. If you wish for your phone recording to be deleted after the call have been completed please contact our Consumer care team ConsumerCare-UK@gcc.privacy.estee.com

Geo-location information

When you use one of our mobile applications, we may ask you for your geo-location. You may choose not to share your geo-location details by adjusting your mobile device's location services settings. To decline from sharing your geo-location details, follow the instructions on your mobile device on changing the relevant settings; otherwise, please contact your service provider or device manufacturer.

- **Withdrawing consent**

You may also withdraw any consent you previously provided to us at any time with effect for the future by contacting us as indicated below. This will not affect the lawfulness of our use of your information based on your consent before its withdrawal.

- **Reviewing, updating or deleting personal data or restricting or objecting to their use**

Subject to applicable law, you have the right to request access to and rectification or erasure of the personal data we maintain about you, or to request the restriction of our use of this information, as appropriate. You also have the right to object at any time to the use of your personal data for direct marketing purposes, including profiling related to direct marketing. For all other purposes, you may object at any time to the use of your personal data, on grounds relating to your particular situation, in accordance with applicable law. These rights may be limited in some circumstances under applicable law. We may take reasonable steps to verify your identity before granting access or making corrections. You may exercise these rights by contacting us as indicated below.

- **Other rights**

Subject to applicable law, you have the right to receive, in a structured, commonly used and machine-readable format, the personal data that you have provided to us about you, with your consent or based on a contract to which you are party. You also have the right to have this information transmitted to another data controller, where it is technically feasible. You may exercise this right by contacting us as indicated below. You may also lodge a complaint with a data protection authority.

Data transfers

We may transfer the personal data we collect about you to our affiliates and third party service providers to countries other than the country in which the information was originally collected (including the united states), where necessary to fulfill the purposes described in this policy and your personal data may be processed and stored outside of your country of residence. Those countries may not have the same data protection laws as your country of residence and your personal data will be subject to applicable foreign laws. United states laws have not been recognized by the European commission as providing an adequate level of data protection. When we transfer your information to other countries, we will protect that information in the manner described in this privacy policy. We have also implemented appropriate safeguards to ensure such a level of data protection when transferring your personal data, including the conclusion of data transfer agreements incorporating the European commission's standard contractual clauses, and our u.s. service providers are certified to the eu-u.s. privacy shield as set forth by the u.s. department of commerce and the European commission regarding the collection, use and retention of personal data transferred from the European economic area to the united states, or other applicable data transfer mechanisms. You may obtain a copy of these data transfer mechanisms by contacting us as indicated below.

Data retention

We keep the information you provide for the duration of our relationships, plus a reasonable period in order to be able to run regular deletion routines or to take into account the applicable statute of limitation period or if required under mandatory applicable law. If you wish to receive marketing communications, we will keep the information necessary to send you these communications following the end of our customer relationship or following their collection, if you are a prospective customer.

How we protect personal data

We maintain appropriate technical and organizational safeguards to ensure an appropriate level of security of your personal data, in particular to protect your personal data against accidental unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. However, no security system is perfect, and we cannot promise that information about you will remain secure in all circumstances, including the security of your data during transmission to us or the security of data on your mobile device.

Links to other websites

Our website may provide links to other websites for your convenience and information. These websites may operate independently from us. Linked sites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not owned or controlled by us, we are not responsible for the sites' content, any use of the sites, or the privacy practices of the sites.

Updates to our privacy policy

This privacy policy may be updated periodically to reflect changes in our privacy practices. We will post a prominent notice on our website to notify you of any significant changes to our privacy policy and indicate at the top of the policy when it was most recently updated.

How to contact us

If you have any questions or comments about this privacy policy, or if you would like to exercise your rights, please contact us by telephone on: 0800 074 6905 you also may write to: customer care centre, Estée lauder cosmetics limited, constellation house, 3 kites croft business park, Warsash road, Fareham, PO14 4FL.