ORBICO Beauty Kft., 1138 Budapest, Dunavirág utca 2-6 Gateway Office Park 3. 3.emelet
EU VAT: HU23953253
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DATA PRIVACY AND PROTECTION OF YOUR DATA

1. Introduction

Your privacy is important to us, Orbico Group.

In this Privacy Notice, we would like to explain who we are, what personal data we collect about you, why we collect it and what do we do with it in an easy and readable way. Personal data means any data from which we are able, directly or indirectly, to identify you.

Since Orbico Group is a multinational company, this Notice may be replaced or supplemented in order to fulfil local requirements.

Please take time to read this Notice. If you do not agree to it, please do not provide us with your data.
This Privacy notice is valid as of 25th May 2018. It is published on www.orbicobeauty.hu
If case of any questions or demands regarding data privacy and data protection of your data, please kindly send us an email to email address privacy.orbicobeautyhu@orbico.com.

2. What does this Privacy Notice cover

This Notice covers how we process your data whenever you interact with us, e.g. when you

- visit any of our websites;
- use our social media channels;
- purchase and use our products and services, systems and applications;
- subscribe to our newsletters;
- provide to us your goods or services, systems or applications;
- contact our customer support;
- join our business events;
- participate to our contests;
- participate to our promotions;
- or otherwise interact with us

as consumer, business customer, partner, (sub) supplier, contractor or other person with a business relationship with us.
"Processing" means any operation performed on personal data, which includes collection, recording, storage, modification or update, retrieval, consultation, use, disclosure by manual and/or automated means.

3. What is the data that we collect about you?

Depending on who you are (e.g. customer, consumer, supplier, business partner, etc.) and how you interact with us (e.g. online, offline, phone, etc.) we may process different data about you.
In this notice we cover all possible personal data that we collect from you.

- *Data you provide us directly us -*

| Categories of data | Examples of data |
|---|---|
| Personal identification | Name, last name, title, date of birth |
| Contact information | Email, phone number, fax number, address, country |
| Other business data | Name of the company, status (private or business), attribute of business; bank account number |
| User login data | UserID, password |
| Images | Pictures uploaded/ provided to us |
| Financial data | Credit card data, bank account information |
| Other information | Household information, interests, profession, preferences |

- *Data about your use of products and/ or services that we collect automatically*

In addition to the information you provide to us directly (see above), we may collect information sent to us by your computer, mobile phone or other access device. For example, we may collect:

| Categories of data | Examples of data |
|---|---|
| Device information | Device model, unique device identifier, MAC address, IP-address, operating system version, and settings of the device you use to access, e.g. the websites/ apps/ services |
| Log information | Time and duration of your use of our digital channel or product |
| Location information | Your actual location (derived from your IP address or other location-based technologies), that may be collected when you enable location-based products or features such as through social media |
| Other information | Apps you use or websites you visit, links you click within our advertising e-mail, motion sensors data |

- *Information from third-party sources*

We may receive information about you from publicly available sources (as permitted by law) such as public databases, our marketing partners, or social media platforms when you choose to connect to such services. We may combine this information with other information we receive from you.

- *Other*

You may choose not to provide certain types of information to us, but doing so may affect your ability to enable certain functionality of the products and/ or services.

In compliance with the law, we will <u>not</u> process data relating to

- racial or ethnic origins;
- political opinions;
- religion or beliefs;
- trade union membership;
- genetic features;
- health;
- sex life;
- criminal convictions or related security measures;
- biometric data;
- genetic data.

If we had to process this type of data, we would always request your prior consent.

4. <u>How do we use your data?</u>

We may process your data for different purposes, but only for those which have a legal basis to process the data. Please find below the overview

| Legal basis | Examples of Purpose |
|---|---|
| Contract/agreements execution | Billing and delivering products and/ or services that you have purchased;<br>Enabling us to reach you for delivering you our products;<br>Registration to mobile applications or websites;<br>Service account management. |
| Compliance with legal obligations and Public interest | Disclosing data to government institutions or supervisory authorities as applicable in all countries in which we operate, such as reporting obligations, compliance audits, tax deductions, record-keeping and reporting obligations, compliance with government inspections and other requests from government or other public authorities;<br>Establish, exercise, or defend ourselves from legal claims. |
| Legitimate interests | Administrative communications, such as order confirmations, notifications about your account activities, and other important notices;<br>Providing support upon your request via communication channels, such as customer or contact center support;<br>Security and protection of our interests/assets, such as deploying and maintaining technical and organizational security measures, conducting internal audits and investigations, conducting assessments to verify conflict of interests;<br>Managing any internal complaints or claim. |

Orbico may send you communication about our products, services, events and promotions. The communication is

send via different channels: email, phone, SMS, post, social networks. We would like to provide you with the best experience, therefore these communication might be tailored to you preferences (for example, email as your preferred channel of communication with us – you can indicate it yourself or we can understand it based on the links you click in out emails) .
When required by law, we will ask your consent before starting the above activities. To give your consent, you can, for example, tick the box for acceptance of receipt of news and promotions or usage of your data for general ecommerce industry trend analytics. We also give you the opportunity to opt-out and withdraw your consent at any time.

Currently not used, but if personal data is intended to be used for automated decision-making, including profiling, information about the logic shall be provided as well as the significance and the envisaged consequences of such processing for the data subject.

If we ask you to provide us with your data, but you chose not to, in some cases we will not be able to provide you with the full functionality of our products, services, systems or applications. Also, we might not be able to respond to requests you might have.

5. When do we share your data?
To whom the data is disclosed: other Orbico entities, affiliates, service providers, business partners, public authorities, governmental authorities, contractors, others.

Your data will be processed by ourselves and other entities within the Orbico Group. In exceptional cases and only to fulfil the above described purposes described above, your data might be shared with following parties:

- Service providers: we may outsource certain data processing activities to trusted third party service providers to perform functions and provide services to us, such as ICT service providers, consulting providers, shipping providers ;
- Business partners: in case they can provide you with the services you request such as lawyers, accountants, tax advisor and other advisors. In this case those business partner process your data only for our needs;
- Public and governmental authorities: when required by law, or as necessary to protect our rights, we may share your data with entities that regulate or have jurisdiction over Orbico Group.
- Professional advisors such as auditors, lawyers, accountants, other professional advisors.
- Other parties in connection with corporate transactions such as during a sale of a business or a part of a business to another company, or any reorganization, merger, joint venture, or other disposition of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).

Third parties are limited in their ability to use your information for other purposes than providing services to us, and are also required to protect and handle your information in accordance with legal, regulatory and contractual obligations.
We take reasonable steps to ensure that we retain information about you only for so long as is necessary for the purpose for which it was collected, or as required under any contract or by applicable law.

6. How do we secure your data?
To protect your data, we will take appropriate technical and organizational measures in line with the applicable data protection and data security laws, including requiring our service providers, business partners or professional advisors to use appropriate measures to protect the confidentiality and security of your data. We put in place measures to prevent risks such as destruction, loss, alteration, unauthorized disclosure of, or access to your data.

7. How do we keep/retain your data?
We keep your data for the period necessary to fulfil the purposes for which it has been collected (see above section “How do we use your data?”). Sometimes we might keep your data longer if required or permitted by law. We determine the period based on the following criteria:

- How long is the data needed to provide you with our products or services or to operate our business?
- Do you have an account with us? Then we will keep your data while your account is active.
- Are we subject to a legal, contractual, or similar obligation to retain your data? Examples can include mandatory data retention laws, government orders to retain data relevant to an investigation, or data that must be retained for the litigation purposes.

8. Who is responsible for your data?

Orbico Hungary Kft , with its head office at 1138 Budapest, Dunavirág utca 2-6 Gateway Office Park 3. 3.emelet is responsible for processing the personal data it deems necessary to process. We are therefore the party whom you, as well as the supervisory authorities privacy.orbicobeautyhu@orbico.com should contact for any questions you may have relating to the way our company uses your data.
For some services, we rely on specialised partners. They therefore have to follow our instructions and adhere to our policy on personal data protection. We ensure that our partners receive only the data that are strictly necessary to perform their contractual duties.

9. Which legislation applies?
The protection of your personal data is covered by the Regulation EU 2016/679, also known as the EU General Data Protection Regulation and applicable national data protection law of Hungary.
We undertake to comply with our obligations and respect your rights whenever we process your data. If you wish to learn more about this subject, we advise you to visit www.naih.hu.
Being Orbico a multinational company, this Notice may be replaced or supplemented in order to fulfil local requirements.

10. Accessing your information
You are entitled to submit an inquiry to us and be advised about the data we process about you and how we process such data. You are also entitled at any time to withdraw your consent and/ or request any erroneous data to be corrected. Please make your enquiries and requests in writing, sign and send your letter to the address privacy.orbicobeautyhu@orbico.com . We will respond promptly and no later than within a month, unless extraordinary complexity would require an extension of the time to respond.

If you have any issues exercising your rights regarding personal data you may
(a) contact the [Entity Privacy Manager]: privacy.orbicobeautyhu@orbico.com, and/ or
(b) lodge a complaint with the supervisory authority, www.naih.hu