



## PRIVACY POLICY

Last update: March 2021

Shiseido is committed to building strong and lasting relationships with its customers based on trust and transparency. In accordance with this philosophy, the protection of your Personal Data (“**Data**” i.e. any information about you) is essential to us and we wish to inform you via this Privacy Policy of how we collect and process this Data.

This Privacy Policy (“**Policy**”) explains how we use the Data we may collect when you interact with us either via the Virtual Shopping Service (hereinafter referred to as the “**Services**”) or offline, when you visit our store, and how we ensure the protection of this Data.

Privacy and data protection information notices or consent requests will, if necessary, be communicated to you in specific situations not covered in this Policy where Shiseido may process your Data.

We hope the following sections will answer any questions you may have but if not, please do get in touch with us via [this form](#).

### 1. Who is the controller of your Data?

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The Beauté Prestige International branded store sells various cosmetic and fragrance brands that are a part of the Shiseido Group’s brand portfolio.

Beauté Prestige International, Shiseido’s European headquarters based in Paris, France, whose trade name is Shiseido EMEA, and/or its affiliate Shiseido UK Ltd, are the controllers of your data.

This means that Shiseido EMEA and/or Shiseido UK Ltd determine for what reasons (i.e. the purposes) your Data is processed as well as the resources (i.e. the means) allocated to such processing and are responsible for the processing of your Data.

Shiseido UK Ltd runs our local operations in the United Kingdom and Shiseido EMEA is in charge of leading our ecommerce, customer relations and marketing efforts in Europe, in the UK and in Switzerland.

### 2. What Data do we collect and from what sources?

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Depending on how you interact with us (online, offline, by phone, etc.), we may collect from you various categories of Data, which are described in more details below.

#### **a) Data you provide to us**

You may provide the following categories of Data when you interact with us for instance when you use our Virtual Shopping Services, in our store, or when you participate in one of our promotional operations, etc.

- **Identification information:** this includes information such as your name, surname, age or age range, title, date of birth, general geographic location (e.g., postcode or city and state), etc.

- **Contact information:** this includes any information that would allow us to personally contact you, such as your home address, billing address, your email address, or your phone number (home, mobile), etc.
- **Order and product information:** this includes details of the products you have ordered, the date and time of your orders and searches and the shops you prefer to visit, etc.
- **Habits and preferences:** this includes any information related to your preferences and interests such as your favorite products, lifestyle information, your concerns in terms of beauty and care, etc.
- **Payment and transaction-related information:** this includes any information that you use to make a purchase, such as your payment card details. Payments made via the Virtual Shopping Service are made through our payment gateway providers, ADYEN. Please note that we do not have access to the payment details you provide to these providers which operate autonomously. For more information please refer to the relevant service providers privacy policy.

**User-generated content and posts:** this refers to any content (suggestions, testimonials, surveys or other any other feedback) that you voluntarily share with us about your experience in using our products or services.

- **Information on adverse events:** this might include information on your allergies, intolerances and other health-related information, which might be related to our products, that you provide to our customer service. Please note that we only use this information in accordance with our legal obligations to follow-up on adverse events reported to us by our customers (in accordance with EU Regulation on cosmetic products no.1223/2009 as transferred under UK law and amended by The Product Safety and Metrology etc. (Amendment etc.) (EU Exit) Regulations 2020 dated 11 December 2020.).
- **CCTV:** your image may be recorded on CCTV when you visit our store. We might have to use it for security reasons. We regularly delete the footage unless an incident or alleged incident requires investigation or action.

### 3. On which grounds do we process your Data?

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We generally use your Data on the basis of the following grounds:

- **The performance of the contract we have with you:** in certain circumstances, we need your Data to execute our contractual obligations. For example, if you buy products through our Virtual Shopping Service, we need your name and contact details so we can communicate with you and deliver the products you ordered. If you do not provide your Data, we will not be able to provide you with the requested products and services;
- **Your prior consent:** in certain cases, we may ask for your consent before using your Data. For instance, we will always ask for your permission to send you promotional communications;
- **Compliance with a legal obligation applicable to us:** sometimes we have to collect and use your Data in order to comply with our own legal obligations. For example, tax laws require us to keep trace of invoices related to your purchases;
- **Our legitimate interests:** this is a legal term which means we have a good and fair reason to use your Data and we do so in ways which do not hurt your rights and interests.

#### 4. For what purposes do we use your Data?

We may collect, use and disclose your Data for the main following purposes:

For what purpose do we use your Data?	What Data do we use?	On which ground?
<b>Manage your orders or participation</b>		
	•	
<b>Manage your product orders</b>	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> <li>• Transaction-related information</li> </ul>	Performance of the sales contract with you
<b>Manage your participation in one of our promotional operations</b> (game-contests, sample operations, promotional offers...)	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> </ul>	Your prior consent
<b>Offer you quality services in store</b>		
<b>Create and manage your personal profile</b> to offer you personalised services and advices in store, according to your preferences	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> <li>• Habits and preferences (might include information related to your allergies)</li> </ul>	Your prior consent
<b>Manage your appointments with us</b> (with your beauty consultants, make-up sessions, tutorials and events, etc.)	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Habits and preferences</li> </ul>	Your prior consent
<b>Manage cabin treatments</b>	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> <li>• Habits and preferences (might include health related data)</li> </ul>	Your prior consent
<b>Manage your registration to our loyalty programs</b>	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> </ul>	Your prior consent
<b>Manage distance selling</b> (click & collect, orders by phone, etc.)	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> <li>• Transaction-related information</li> </ul>	Performance of the sales contract with you
<b>Interacting with you</b>		
<b>Manage promotional communications</b> (via email,	<ul style="list-style-type: none"> <li>• Identification and contact information</li> </ul>	Your prior consent

SMS or phone), either because you consented to receive our promotional offers or to exchange with your beauty consultants in store	<ul style="list-style-type: none"> <li>• Order and product information</li> <li>• Habits and preferences</li> </ul>	
<b>Interact with you when you contact us via our customer service or via any other channel</b> (online chat, email, text message, telephone help line for any reason, compliments, feedback or a request, etc.)	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> <li>• User-generated content</li> </ul>	Your prior consent
<b>Manage your comments and reviews on our products</b>	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> <li>• User-generated content</li> </ul>	Your prior consent
<b>Assess your satisfaction</b>	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> <li>• Habits and preferences</li> <li>• User-generated content</li> </ul>	Our legitimate interest
<b>Manage adverse events notifications</b>	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> <li>• Habits and preferences</li> <li>• Information on adverse events including health-related information and pictures of you and those you might send us</li> <li>• User-generated content</li> </ul>	Your prior consent  Compliance with a legal obligation applicable to us
<b>Manage your requests on your Personal Data</b>	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• User-generated content</li> </ul>	Compliance with a legal obligation applicable to us
<b>Others</b>		
<b>Performing analysis and statistics</b>	<ul style="list-style-type: none"> <li>• Order and product information</li> <li>• User-generated content</li> <li>• Habits and preferences</li> </ul>	Our legitimate interest
<b>Exercise our legal rights in case of litigation or legal proceedings</b>	<ul style="list-style-type: none"> <li>• Identification and contact information</li> <li>• Order and product information</li> <li>• Information on adverse events</li> <li>• User-generated content</li> </ul>	Our legitimate interest
<b>Managing video surveillance in our shops</b>	<ul style="list-style-type: none"> <li>• CCTV images</li> </ul>	Our legitimate interest

## 5. Profiling

To have a better overall understanding of you as a customer, we may combine information about you gathered across various channels, such as your shopping history, your preferences, etc.

This helps us to propose you products and advices that are most relevant to your interests at particular times, by email (where we have your consent) or when visit our store.

You can object to these "profiling" operations at any time by contacting us. Please refer to the "Your rights and choices" section.

## 6. With whom do we share your Data?

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Depending on the type of Data and purpose of processing, access may be granted to the following authorized persons:

- **Other Shiseido affiliates and group entities:** your Data may be shared with the other affiliates of the Shiseido group, other than Shiseido UK Ltd, who are involved in our customer relationship management. In particular, your Data may be shared with our regional headquarters, Shiseido EMEA, which is located in France.
- **Third party vendors and providers:** your Data may be accessible to selected third parties vendors or providers acting on our behalf and our instructions, for the needs of the purposes described above in section 4. For example, our transporters will need to access your Data to deliver the products you ordered, our marketing campaign providers will need to access your Data to send you the relevant communications, our maintenance providers might need to access your Data in case of technical incident, etc.

In any case, we require such third parties to:

- ✓ be subject to strict contractual data protection and confidentiality obligations;
  - ✓ undertake to comply with all applicable data protection laws and exclusively for the purposes specified in the contract with have with them;
  - ✓ implement appropriate technical and organizational security measures designed to protect the integrity and confidentiality of your Data.
- **Public and judicial authorities:** we might need to share your Data with public authorities when the law requires us to do so. For instance, we might be requested to provide invoices to tax or financial authorities, or to provide information related to adverse events linked to the use of our products to health authorities. We might also need to share your Data with judicial authorities in the event of a litigation.
  - **Our professional advisers:** we also may share your Data when necessary with our professional advisers, such as our accountants, auditors, lawyers, insurers, etc.
  - **Potential acquirers and other stakeholders involved in our business transfers:** we might share your Data in the event of an acquisition, merger, sale, corporate restructuring. In this context, the acquirer will act as the new controller of your Data.

In any case, please rest assured that we only grant access to your Data on a need-to-know basis, and that such access is limited to the Data that is strictly necessary to perform the purpose for which such access is granted. **We will never rent, trade or sell your Data to third party companies.**

## 7. Where may we transfer your Data?

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Shiseido is a multinational organization with affiliates, vendors and partners located in many countries around the world. For that reason, Shiseido may need to share your Data with entities located in other jurisdictions, in countries which may not be regarded as providing the same level of protection as the jurisdiction you are based in.

Shiseido EMEA, our European headquarters which is in charge of leading our ecommerce, customer relations and marketing efforts in Europe, in the UK and in Switzerland, is located in France. As a consequence, your Data is transferred to France.

They may also be shared with our American and Japanese affiliates, which are notably in charge of the overall management of our group customer relationship management system.

In any cases Shiseido ensures that adequate safeguards, as required under the applicable data protection legislation, are in place. Such safeguards include:

- Adequacy decisions released by the European Commission, provided that they are recognised under UK law;
- The European Commission's Standard Contractual Clauses also recognised under UK law as providing an appropriate safeguard for restricted transfers from the UK;
- Our providers' Binding Corporate Rules ("BCR")

For more information about the transfer of your Data, you can contact our Data Protection Officer (please refer to the "Your rights and choices" section).

## **8. How do we protect your Data?**

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We know how much data security matters to all our customers and take all appropriate steps to protect your Data from unauthorized access, alteration, disclosure, or destruction. We pay particular attention to sensitive data, especially payment card data, allergy or intolerance data.

## **9. How long do we retain your Data?**

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We will retain your Data for the period necessary to fulfil the purposes outlined in this Policy (see section 4).

The criteria used to determine such retention periods include:

- the length of time we have an ongoing relationship with you;
- whether there is a legal obligation to which we are subject imposing or authorizing us to keep you Data.

## **10. Data about Children**

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Our Virtual Shopping Service are not directed to anyone under 16 years of age. We do not solicit or collect any type of information from a person known to be under the age of 16.

If we become aware that we have accidentally collected information from a child, we will remove that information from our records as soon as feasibly possible.

## **11. Your rights and choices**

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In accordance with the applicable data protection law, you have the right to request:

- Access to the Data we hold about you;
- The correction of your Data if they are incomplete or inaccurate;

- The erasure of your Data, in the cases provided by law. Please note that in some cases, we may be obliged to retain your Data anyway, for legal or legitimate reasons;
- The interruption of the use of your Data by withdrawing your consent at any time where our “lawful basis” is consent, or by objecting to the use of your Data where our “lawful basis” is our legitimate interests and that we have no legitimate overriding interest;
- The restriction of the use of your Data, in the cases provided by law;
- To obtain a copy of the Data you provided us, in a commonly used format, to transmit it to another data controller, in the cases provided by law.

To exercise your rights or for any further questions related to the use of your Data, please contact our Data Protection Officer:

- Via our online contact form at: <https://privacy.emea.shiseido.com>
- Via our postal address: Data Protection Officer  
Shiseido EMEA  
56 A, rue du Faubourg St Honoré  
75008 Paris  
France

Please note that to process your request, we may ask you a proof of identity.

If you feel that your Data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your Data, you have the right to lodge a complaint with your local data protection authority.