

# L'ORÉAL CANADA PRIVACY POLICY (“Privacy Policy”)

This policy was last updated on June 1<sup>st</sup> 2018

Thank you for visiting our site, which is part of the L'Oréal Canada Inc. family of brands and brand sites (“L'Oréal”, “us”, “our” or “we”). We place great value on honesty and clarity and we are committed to building a strong and lasting relationship with our consumers based on trust and mutual benefit.

As part of this commitment, we have created this policy to provide you with information about how we collect, use, share and protect information collected from our sites, mobile applications and social media pages (collectively called the “Sites”), when you shop in our stores or when you otherwise interact with us. By providing us with your personal information you agree to the terms of this policy.

This policy applies to consumers residing within Canada only that visit our Sites or our stores. Visitors from other countries should visit the L'Oréal/brand site for your part of the world. **This policy does not apply to job applicants.** If you submit a job application through the Sites, your personal information will be governed by a separate policy located on the L'Oréal Careers web site.

To help you navigate through this policy, just click on any of the questions below:

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## **WHAT IS PERSONAL INFORMATION?**

“Personal Information” means any information or pieces of information that could identify you either directly (e.g. your name) or indirectly (e.g. through pseudonymized data such as a unique ID number). In other words, personal data includes things like email/home addresses/mobile phone, usernames, profile pictures, personal preferences and shopping habits, user generated content, financial information, and welfare information. It could also include unique numerical identifiers like your computer's IP address or your mobile device's MAC address, as well as cookies.

Personal Information does not include anonymous or aggregated information that cannot be tracked back to you personally.

## **WHAT INFORMATION DOES L'OREAL COLLECT FROM ME?**

We may collect information that you provide to us directly, information automatically collected and information from third parties. We may combine information that we collect via one method (e.g., a website, our digital advertising) with information that we have collected via another method (e.g., an offline event). We do this to get a more complete view of our consumers, which,

in turn, allows us to serve you better and allow for more customization.

If you submit any personal information relating to other people to us or to our service providers, you represent that you have the authority to do so and to permit us to use the information in accordance with this policy.

➤ **Information that I provide directly**

If you register on a Site, make purchases through a Site or one of our stores, join a loyalty program, enter a contest or promotion, submit a consumer survey, photo, video or product review, sign up to receive emails or other offers or communications, we collect and store the information provided, including Personal Information.

We may also offer you the opportunity to engage with our content through third party social media platforms. L'Oréal's use of social media serves as an extension of its presence on the Internet. Social media account(s) are public and are not hosted on L'Oréal's servers. Users who choose to interact with L'Oréal via social media should read the terms of service and privacy policies of these platforms. Please remember that any content submitted to one of our social media platforms can be viewed by the public, so you should be cautious about providing certain personal data e.g. financial information or address details. L'Oréal is not responsible for any harm that results due to posting personal data on one of our social media platforms.

When you engage with L'Oréal Canada through social media, you may allow us to have access to certain information associated with your social media account (e.g. name, username, e-mail address, picture). We may use this information to confirm your identity and to personalize your experience.

➤ **Information that is collected automatically**

***Mobile Services/Apps:***

Certain of our mobile apps offer opt-in, geo-location services and push notifications. Geo-location services provide location-based content and services, such as store locators, local weather, promotional offers and other personalized content. Push notifications can include discounts, reminders or details about local events or promotions. Most mobile devices allow you to turn off location services or push notifications. If you consent to location services, we will collect information about the Wi-fi routers closest to you and the cell IDs of the towers closest to you to provide location-based content and services.

***Site Usage Information:***

L'Oréal and its third-party service providers may also use a variety of technologies that passively or automatically collect information about how the Sites are accessed and used including but not limited to your browser type, device type, operating system, application version, the pages served to you, the time you browse, preceding page views, and your use of features or applications on the Sites.

### ***Device Identifiers:***

L'Oréal also automatically collects an IP address or other unique identifier information ("Device Identifier") for the computer, mobile device, technology or other device (collectively, "Device") you use to access the Sites or on third party websites that publish our advertising. A Device Identifier is a number that is automatically assigned to your Device by the Device provider when you access a web site or its servers, and our computers identify your Device by its Device Identifier. For mobile devices, a Device Identifier is a unique string of numbers and letters stored on your mobile device that identifies it. We may use a Device Identifier to, among other things, administer the Sites, help diagnose problems with our servers, analyze trends, track users' web page movements, help identify you and your shopping cart, deliver advertising and gather broad demographic information.

### ***Cookies:***

Like many web sites, we use "Cookies," which are data files that are sent through your web browser to your computer when it is used to visit the Sites to facilitate site navigation and to personalize your experience, including tailoring advertisements. Cookies may also be used to associate you with social networking sites like Facebook and Twitter and, if you so choose, enable interaction between your activities on the Sites and your activities on such social networking sites. Note that cookies may be used and linked to other personal data you have shared with us (such as previous purchases or newsletter subscriptions).

If you would prefer not to accept cookies, you can change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; or set your browser to automatically not accept any cookies. However, please be aware that some features and services on our Sites may not work properly because we may not be able to recognize and associate you with your account. In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests. To learn more about cookies, please visit <http://www.allaboutcookies.org>.

### ***Pixels or Web Beacons:***

We use pixel tags or web beacons, which are transparent graphic images placed on a web page or in an email to indicate that a page or email has been viewed or to let your browser retrieve content from another server. These measure the success of our marketing campaigns for example and compile statistics about usage of our sites and services and response rates.

### ***In-Store Analytics:***

We may provide in-store technologies (such as Wi-Fi networks and Bluetooth beacons) to help personalize and improve your shopping experience. These technologies may require the collection of certain information about your mobile device, such as your MAC address or other device identification information and may permit you to submit personal details for increased levels of personalization, such as your interests, shopping preferences, and sizing information.

➤ *Information collected from third parties:*

We may receive information from third party partners, such as marketing and demographic data, offline records and information from an advertiser about your experiences or interactions with them. We may combine such third party data with other information we receive from or about you.

Our websites and Apps may from time to time contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we are not responsible or liable for these policies. Please check these policies before you submit any personal data to these websites.

**WHAT IF I CONNECT TO THE L'OREAL BRANDS' IN-STORE WI-FI SERVICES?**

If you choose to connect to our in-store Wi-Fi services, L'Oréal will receive information about you and your device, including your device's MAC address, IP address, and technical details about your device such as its operating system and device type (including make and model) and technical capabilities. We will also receive information about how you use our Wi-Fi network while you are connected, including the store location, the areas of the store you visit, the names and/or Internet addresses of the websites you visit and the applications you use, and how long you interact with such sites or applications. We collect this information each time you connect to the Wi-Fi services and may associate it with other information we have collected from and about you.

If your mobile device is configured to search for available Wi-Fi networks, we may receive information about your device even if you choose not to connect to our Wi-Fi services.

For your convenience, we may provide you with an option to stay connected to the L'Oréal Inc. Wi-Fi networks. If you choose this option, you will be automatically logged into the Wi-Fi network of any of our Brands' store offering Wi-Fi services, and we may collect the information described above even if you do not actively use your Internet browser or your mobile applications during your time in our store. You can choose to disconnect from the L'Oreal Wi-Fi network at any time through your device's Wi-Fi settings. However, please note that disconnecting from one store's Wi-Fi network will only disconnect you from that network during your current visit. You can opt out of the auto-reconnect feature at any time by visiting <http://www.smart-places.org>.

For full details about our in-store Wi-Fi practices, please see our [Wi-Fi Terms of Use](#).

**WHERE DOES L'OREAL STORE MY PERSONAL INFORMATION?**

Personal Information about you may be maintained and processed on our behalf by our affiliates and other third party service providers inside and outside of Canada including but not limited to the United States. Your Personal Information may be subject to the laws of the countries in which it is stored or used, and those countries may have a different data protection regime than the country in which you reside and under the laws of those other countries, in certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information. By providing us with any personal

information, you consent to the transfer of your Personal Information to other countries, such as the United States, which may have a different privacy regime from your country of residence.

**HOW DOES L’OREAL USE MY INFORMATION?**

Unless otherwise permitted or required by law, L’Oréal shall make reasonable efforts to only collect personal information that is necessary in the following contexts and for the associated purposes:

ACTIVITY	PURPOSE
Account creation and management:	Manage your orders, promotions, surveys or contests you choose to enter; Offer you a loyalty program or personalized services based on your beauty characteristics; and allow you to manage your preferences and enrich your profile.
Newsletter sign up and commercial communications	Send you marketing communications that may be tailored to your “profile” and keep an up-to-date opt-out list if you have asked not to be contacted.
Purchases and order management:	Contact you to finalize your order where you have saved your shopping cart or placed products in your cart without completing the checkout process; Inform you when a product you wanted to purchase is available; Process and follow up on your order including delivering the product to an address you provided; Assist you with the payment for your order or the return of a product you previously purchased; Measure satisfaction; and Manage any dispute relating to a purchase.
Consumer care based on inquiries or shared experiences:	Respond to your questions and otherwise interact with you or connect you with relevant services;
Proper functioning of our websites/apps:	For instance, to maintain a login, remember a shopping cart or personalize an interface (e.g. language, font preference, etc.) through the use of cookies
Profiling and behavioral advertising	To send or display personalized communications or content tailored to your interests/needs
User generated content	To post your review or content to promote our products if you have consented to such publication, or in accordance with the specific terms and conditions accepted by you.
Use of apps and devices	To provide you with the products or services requested, including skin/hair advice and notifications; For research and innovation by

	scientists within L'Oréal Group; and For monitoring and improvement of our apps and devices.
Safety and security	Video surveillance is used at warehouse and store locations to identify/investigate theft or security concerns; To perform studies relating to the safe use of our products; and To perform and follow-up on corrective measures taken as needed due to any undesirable effect or adverse reaction linked to the use of our products
	Protect you and us against fraud, and to meet legal or regulatory requirements imposed upon L'Oréal from time to time.

### **WHY DID I RECEIVE A MARKETING EMAIL AFTER I MADE A PURCHASE IN ONE OF THE L'OREAL BRANDS' STORE?**

To provide you with a seamless customer experience, we keep records of all your transactions with our brands, both online and in-store. For example, if you use a credit or debit card or give the sales associate your email address when you make a purchase in our store, we may associate that information with your online customer account. As described above, we may use information about your purchases to email you about other products and services that we believe may be of interest to you.

### **HOW DOES L'OREAL SHARE MY PERSONAL INFORMATION?**

➤ ***With the family of L'Oreal brands:***

When Personal Information is collected by one of our L'Oréal Canada Inc. brands, we may share that information with our affiliates and other L'Oréal Canada Inc. brands.

➤ ***With the public when the information is on public forums:***

You may disclose Personal Information when you post content to our websites, in-store technologies or other public forums, such as our brands' media pages, blogs and online product reviews. Any information that you disclose through these services will become public.

➤ ***With third parties providing services on behalf of L'Oréal:***

We share your Personal Information with third parties that perform functions on our behalf (or on behalf of our partners) such as service providers that host or operate our Sites, provide analytics and site usage information, process transactions and payments, fulfill orders or provide customer service, loyalty program administration, redemption; advertisers; sponsors or other third parties that participate in or administer our promotions, contests, sweepstakes, surveys or provide marketing or promotional assistance.

➤ ***With third parties to whom you have provided consent:***

While on our Sites, you may have the opportunity to opt-in to receive information and/or marketing offers from another party, or to otherwise consent to the sharing of your information with a third party, including social networking sites such as Facebook or Twitter. If you agree to have your Personal Information shared with a third party, your Personal Information will be disclosed to the third party and will be subject to the privacy policy and business practices of that third party.

If you connect your Facebook account to a L'Oréal brand account, we will make available and/or share your Facebook user name and your Facebook profile picture to other users of that brand. Users may be able to view your profile and shopping activity on the brand Sites and your activities may be automatically shared to both your friends on Facebook and with your Facebook friends on the Sites. We will disclose your Personal Information when you have elected to share your activity to Facebook. Personal (?)Information shared to Facebook will be connected with the Facebook account you log in with. Facebook's use of such information and any information it collects from your use of or on its service is governed by Facebook's privacy policy but our use of this information is governed by this present Privacy Policy. You understand and agree that you need to consult both privacy notices to amend or delete Personal Information which has been provided to Facebook. If you do not wish for such use of data to take place, you should not agree to share your activity to Facebook and/or adjust your settings to deactivate such sharing. You understand information no longer shared on Facebook may continue to be publicly available to other users of this Site.

➤ ***For business transfers:***

We may share information with other entities and affiliates of the L'Oréal Group, our parent company, on a need-to-know basis to prevent fraud, for research and innovation, to improve our products and services, for internal audit, management, promotional or administrative purposes including defending and bringing legal actions.

As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or our assets, or assets related to the Sites, Personal Information, usage information, and any other information that we have collected may be disclosed to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

➤ ***When legal disclosure is required:***

We may transfer and disclose information, including your Personal Information, Usage Information and Device Identifier, (including IP address), to third parties to comply with a legal obligation or when we believe, upon reasonable grounds, the disclosure is necessary to protect the rights or safety of an identifiable person or group.

➤ ***To process or store the information in a foreign jurisdiction:***



Your Personal Information may be transferred to a foreign jurisdiction to be processed or stored by L'Oréal or its service providers, including data hosting providers. Such information may be provided to law enforcement or national security authorities of that jurisdiction upon request, in order to comply with foreign laws.

## **WHAT ABOUT LINKS TO OTHER WEBSITES?**

Our Sites may contain links to third party sites that are not owned or operated by L'Oréal. This includes links from advertisers, sponsors and/or partners that may use our logo(s) as part of a co-branding or co-marketing agreement. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. These other sites may send their own cookies or other tracking technologies to your Device, they may independently collect data or solicit Personal Information and may or may not have their own published privacy policies. You should also independently assess the authenticity of any site which appears or claims that it is one of our Sites (including those linked to through an email or social networking page). The Sites may make available chat rooms, forums, message boards, and news groups. Remember that any information that you disclose in these areas becomes public information and is not subject to the provisions of this Privacy Policy.

## **WHAT ARE MY RIGHTS AND CHOICES REGARDING MY PERSONAL INFORMATION?**

- *You can opt out from receiving promotional communications*

L'Oréal and its brands want to communicate with you only if you want to hear from us so we will only send you promotional communications if you've requested them. If at a later date you prefer not to receive promotional information, such as information about special offers and sales events, from one or more of our brands, you can let us know by contacting our customer service as described in the section entitled, "[How do I contact L'Oréal?](#)", below or you can follow the "unsubscribe" link provided in promotional emails or text messages sent to you.

If you unsubscribe from promotional communications from a brand, you may continue to receive transactional and account-related messages from the brand and promotional communications from the other brands you have not unsubscribed to.

- *You can opt out of targeted advertising*

L'Oréal licenses technology to serve advertisements on its own Sites and within its content as that content is served across the Internet. In addition, L'Oréal may use third parties to serve advertisements on the Sites and around the web, measure the performance of the Sites and the viewing of our content, and provide analytics services. These ad network providers, advertisers, sponsors, and/or analytics service providers may set and access their own cookies, pixel tags and similar technologies on your Device and they may otherwise collect or have access to information about you, including usage information. We and our network advertisers may target advertisements for products and services in which you might be interested based on your visits to both the Sites and other web sites or based on location data, from your Device. We may use a variety of companies to serve advertisements.

If you want to opt-out of the use of your information for select ad targeting, you can visit this

site: <http://youradchoices.ca/choices>, or by setting up “Do Not Track” options available through your browser. We also occasionally provide your personal information to trusted advertising partners for the purpose of presenting you with targeted ads on behalf of L’Oréal. You can request that your Personal Information not be shared with our advertising partners by contacting [privacy\\_canada@loreal.com](mailto:privacy_canada@loreal.com)

Visit our [Cookie Table](#) to learn more about the use of cookies by L’Oréal for usage tracking and targeted advertising.

- *You can opt out of text/sms message*

If you choose, you can provide your mobile phone number to receive text message alerts containing product and/or event information, product tips or promotions that may be sent using automated dialing systems (“Text Messages”). You agree that by providing your mobile phone number you expressly consent to receive automated marketing Text Messages from us to the mobile phone number provided. Consent is not required to purchase goods or services. Message and data rates will apply and you should check the rates of your mobile carrier. You can opt out from further text marketing communications by texting STOP to the SMS number used by L’Oréal to contact you.

We may share your mobile phone number with service providers with whom we contract to assist us with the above activities, but we will not share your mobile phone number with third parties for their own purposes without your consent. You acknowledge that Text Messages are distributed via third party mobile network providers and, therefore, we cannot control certain factors relating to message delivery. You acknowledge that, depending on the recipient's mobile carrier, it may not be possible to transmit the Text Message to the recipient successfully; nor is content available on all carriers. We do not claim or guarantee availability or performance of this service, including liability for transmission delays or message failures.

- *You have the right to be informed*

You have the right to obtain clear, transparent and easily understandable information about how we use your Personal Information and your rights (subject to applicable legal restrictions). This is why we are providing you with the information in this policy.

- *You have the right to access your Personal Information*

Upon a detailed written request, L’Oréal will, in a timely manner and in accordance with the legal timeframe, afford you a reasonable opportunity to review your Personal Information as contained in our files (subject to applicable legal restrictions). In order to safeguard and prevent fraudulent access to personal information, we may take steps to verify your identify or your legal representative before granting access. We may charge a reasonable fee taking into account the administrative costs of providing the information. Requests manifestly unfounded, excessive or repetitive may not be answered to.

- *You can ask that your Personal Information be changed or deleted*

You have the right to have your personal data rectified if it successfully proven to be incorrect or

outdated and/or completed if it is incomplete.

- *You can challenge L'Oréal's compliance*

You have the right to contact our Privacy Officer (see details below) in order to lodge a complaint against the data protection and privacy practices of L'Oréal.

#### **HOW LONG DOES L'OREAL STORE MY PERSONAL INFORMATION FOR?**

L'Oréal retains Personal Information only as long as it is deemed necessary, to fulfill the purposes identified or as required by law. Keep in mind that the retention period for Personal Information may extend beyond your relationship with us. We use the following criteria to determine retention periods:

- Where you purchase products and services or participate in a promotional offer, we keep your Personal Information for the duration of our contractual relationship with you;
- Where you contact us for an enquiry, we keep your personal data for the duration needed to process your enquiry;
- Where you create an account, we keep your Personal Information until you require us to delete it or after a period of inactivity;
- Where you have consented to direct marketing, we keep your personal data until you unsubscribe or require us to delete your information; and
- Where cookies are placed on your computer, we keep them for as long as necessary to achieve their purposes (e.g. for the duration of a session for shopping cart cookies or session ID cookies).

Personal Information no longer necessary or relevant for the identified purposes or no longer required to be retained by law, shall be securely destroyed, erased or made anonymous.

#### **DOES L'OREAL PROTECT CHILDREN'S PRIVACY?**

L'Oréal takes seriously its obligations under the *US Children's Online Privacy Protection Act* and *Quebec's Consumer Protection Act*. The Sites are not directed to children under 13. We do not knowingly collect, use or disclose personally identifiable information from anyone under 13 years of age. If we determine upon collection that a user is under this age, we will not use or maintain his/her Personal Information without the parent/guardian's consent. If we become aware that we have unknowingly collected personally identifiable information from a child under the age of 13, we will make reasonable efforts to delete such information from our records.

We strongly recommend that minors 13 years of age or older ask their parents for permission before sending any information about themselves to anyone over the Internet and we encourage parents to teach their children about safe internet use practices.

#### **IS MY PERSONAL INFORMATION SECURE?**

L'Oréal maintains reasonable safeguards to protect personal information against loss, theft, unauthorized use, disclosure, copying or destruction and when transferring information for processing and requires third parties providing services on our behalf to do the same.

No method of transmitting or storing data is 100% secure. As a result, although we strive to protect your Personal Information, we cannot guarantee the security of any information you transmit to us through or in connection with L'Oréal websites. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem in order for L'Oréal to resolve the issue in a timely manner. Also keep in mind that e-mail is not a secure form of communication so never send sensitive personal information to us via e-mail.

#### **HOW DO I CONTACT L'OREAL?**

If you have any questions about this policy, L'Oréal's privacy practices, or would like to access your personal information, please contact:

Privacy Officer  
L'Oréal  
1500 Robert-Bourassa, Suite 600  
Montreal, QC, Canada  
H3A 3S7  
[privacy\\_canada@loreal.com](mailto:privacy_canada@loreal.com)

\* NOTE: We cannot guarantee the security of e-mail communications over the Internet.

#### **IS MY PERSONAL INFORMATION PROCESSED ONLY IN CANADA?**

The Sites are governed by and operated in, and in accordance with the laws of Canada, and are intended for the enjoyment of residents of Canada. Country or region specific web sites are available for L'Oréal brands and products around the world. L'Oréal makes no representation that the Sites are governed by or operated in accordance with the laws of any other nation. By using the Sites, or providing us with any information, you (a) acknowledge that the Sites are subject to the laws of Canada, (b) consent to the collection, processing, maintenance and transfer of such information in and to Canada and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where you reside and/or are a citizen, and (c) waive any claims that may arise under those laws.

#### **WILL THIS POLICY BE UPDATED AND IF SO, HOW WILL I KNOW?**

We may change information on the Sites and/or this policy, at any time without prior notice to you, and any changes will be effective immediately upon the posting of the revised policy on the Sites. L'Oréal will use your personal information in a manner consistent with the policy in effect at the time you submitted the information, unless you consent to the new or revised policy. We encourage you to periodically review this page for the latest information on our privacy practices. You can tell if the policy has changed by checking the revision date that appears at the top of this policy.