

# L'Oréal Talent Privacy Policy

L'Oréal's ambition is to be an exemplary *corporate citizen* to help make the world a more beautiful place. We place great value on honesty and clarity and we are committed to building a strong and lasting relationship with our visitors, candidates and future hires based on trust and mutual benefit. Part of this commitment means safeguarding and respecting your privacy and your choices. Respecting your privacy is essential to us. This is why we set out "Our Privacy Statement" and our full Privacy Policy below.

## Our privacy statement

- 1) We respect your privacy and your choices.
- 2) We make sure that privacy and security are embedded in everything we do.
- 3) We do not send you marketing communications unless you have asked us to. You can change your mind at any time.
- 4) We never offer or sell your data.
- 5) We are committed to keeping your data safe and secure. This includes only working with trusted partners.
- 6) We are committed to being open and transparent about how we use your data.
- 7) We do not use your data in ways that we have not told you about.
- 8) We respect your rights, and always try to accommodate your requests as far as is possible, in line with our own legal and operational responsibilities.

For more information about our privacy practices, below we set out what types of personal data we may receive from you directly or from your interaction with us, how we may use it, who we may share it with, how we protect it and keep it secure, and your rights around your personal data. Of course, not all situations may apply to you. This Privacy Policy gives you an overview of all possible situations in which we could interact together.

The more you interact with us, the more you let us know you and the more we are able to offer you tailored services.

When you share personal data with us or when we collect personal data about you, we use it in line with this Policy. If you have any questions or concerns about your personal data, please contact us at [HR-dataprivacy@loreal.com](mailto:HR-dataprivacy@loreal.com).

## Who we are

L'Oréal S.A. is responsible for the personal data that you share with us, as well as each entity of the L'Oréal Group that interacts with you as your potential future employer. When we say "L'Oréal", "us", "our" or "we", this is who we are referring to. L'Oréal is the "data controller" for the purposes of applicable data protection laws.

L'OREAL SA, 41 rue MARTRE, 92117 CLICHY, FRANCE

Represented by Mr Jean Paul AGON

## What is personal data

"Personal data" 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). This means that personal data includes things like email/home addresses/mobile phone, usernames, profile pictures, career preferences and, user generated content, 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.

## What data do we collect from you and how do we use it?

As a potential future employer, L'Oréal believes that you, as a visitor of our websites, candidate, or future hire, are at the heart of what we do. We love hearing from you, learning about you, and creating and delivering career-related experiences that you enjoy. And we know that many of you love talking to us. From initial career-related communication to recruitment and integration, we use various tools and applications to facilitate and personalize

your experience, in compliance with the applicable regulations. At each step, there are many ways that you might share your personal data with us, and that we might collect it.

## How do we collect or receive your data?

We might collect or receive data from you via our websites, forms, apps, devices, L'Oréal Talent pages on social media or otherwise. Sometimes you give this to us directly (e.g. when you create an account, when you contact us), sometimes we collect it (e.g. using cookies to understand how you use our websites/apps) or sometimes we receive your data from other third parties.

When we collect data, we indicate the mandatory fields via asterisks where such data is necessary for us to:

- Provide you with the service you have asked for (e.g. to provide you with a newsletter); or
- Assess your application for a position within the L'Oréal Group; or
- Answer to a request that you have sent us (e.g. to send you information about the progress of your application); or
- Manage the recruitment and/or integration process (e.g. to identify you as a candidate for a job in our Application Tracking System); or
- Comply with legal requirements.

As a candidate applying to a L'Oréal job, if you do not provide the data marked with an asterisk, this may affect our ability to review your application or the outcome of the recruitment process.

We set out further details in the table below, explaining:

- 1) ***During what interaction your data may be provided or collected?*** This column explains what activity or situation you are involved in when we use or collect your data. For example, whether you are applying to job, signing up to a newsletter, or browsing a website/app.
- 2) ***What personal data may we receive from you directly or resulting from your interaction with us?*** This column explains what types of data we may collect about you depending on the situation.
- 3) ***How and why we may use it?*** This column explains what we may do with your data and the purposes for collecting it.
- 4) ***What is the legal basis for using your personal data?*** This column explains the reason we may use your data.

Depending on the purpose for which the data is used, the legal basis for the processing of your data can be:

- Your **consent**;
- Our **legitimate interest**, which can be:
  - **Improvement of our services**: more specifically, our interests to help us better understand your needs and expectations and therefore improve our services, websites / Apps / devices for our candidates' benefit.
  - **Securing our tools**: to keep tools used by you (our websites/Apps/devices) safe and secure and to ensure they are working properly and are continually improving.
- The **performance of a service**: more specifically to perform the services you request from us;
- **Legal grounds** where a processing is required by law.

Information overview on your interactions with us and their consequences on your data

<p><b>ONLINE BROWSING</b></p> <p>Information collected by cookies or similar technologies (“<b>Cookies</b>”*) as part of your browsing on L’Oréal Talent website/apps and/or on third-party website/apps. For information on specific Cookies placed through a given website/app, please consult the relevant cookie table.</p> <ul style="list-style-type: none"> <li>• <b>Data retention duration: after 6 months of inactivity</b></li> </ul> <p>* Cookies are small text files stored on your device (computer, tablet or mobile) when you are on the Internet, including on L’Oréal Group’s websites.</p>		
<p><b>What personal data may we receive from you directly or resulting from your interaction with us?</b></p>	<p><b>How and why we may use your data ?</b></p>	<p><b>What is the legal basis for using your personal data?</b></p>
<p>Depending on how much you are interacting with us, those data may include:</p> <ul style="list-style-type: none"> <li>• Data related to your use of our websites/apps:</li> <li>• Where you came from;</li> <li>• Pages you looked at;</li> <li>• Videos you watched;</li> <li>• Content you click on or tap;</li> <li>• Jobs you search for;</li> <li>• Your location;</li> <li>• Duration of your visit;</li> <li>• Jobs you selected to create your basket.</li> </ul> <p>Technical information:</p> <ul style="list-style-type: none"> <li>• IP address;</li> <li>• browser information;</li> <li>• device information.</li> </ul> <p>A unique identifier granted to each visitor and the expiration date of such identifier.</p>	<p>We use Cookies, where relevant, with other personal data you have already shared with us (such as previous visits, or whether you’re signed up to our email newsletters) to:</p> <ul style="list-style-type: none"> <li>• Allow proper functioning of our website/apps: <ul style="list-style-type: none"> <li>○ proper display of the content;</li> <li>○ creation and remembering of a cart;</li> <li>○ creation and remembering of your visit;</li> <li>○ interface personalisation such as location;</li> <li>○ parameters attached to your device including your screen resolution, etc.;</li> <li>○ improvement of our websites/apps, for example, by testing new ideas.</li> </ul> </li> <li>• Ensure the website/app is secure and safe and protect you against fraud or misuse of our websites or services, for example through performing troubleshooting.</li> <li>• Run statistics: <ul style="list-style-type: none"> <li>○ To avoid visitors being recorded twice;</li> <li>○ To know users’ reaction to our content and campaigns;</li> <li>○ To improve our offers;</li> <li>○ To know how you discovered our websites / apps.</li> </ul> </li> <li>• Send you recommendations or content based on your Profile and interest</li> <li>• Display our website / apps in a tailored way</li> <li>• Allow sharing our content on social media</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Legitimate interest</b> to ensure we are providing you with websites/apps, content and communications that are working properly and are continually improving for cookies that are (i) essential for the functioning of our websites/apps, (ii) used to keep our websites/apps safe and secure.</li> <li>• <b>Consent</b>, for services tailored for you</li> </ul>

<p><b>NEWSLETTER SUBSCRIPTION</b></p> <ul style="list-style-type: none"> <li>• <b>Data retention duration:</b> When registering as a candidate , you may chose to opt-in to Newsletters. In that case, your opt-in will stay until : <ul style="list-style-type: none"> <li>○ you decide to opt-out,</li> <li>○ or after max 6 months if you are not a candidate</li> <li>○ or when your candidate profile is removed (see data conservation for candidates).</li> </ul> </li> </ul>		
<p><b>What personal data may we receive from you directly or resulting from your interaction with us?</b></p>	<p><b>How and why we may use your data ?</b></p>	<p><b>What is the legal basis for using your personal data?</b></p>
<p>Depending on how much you are interacting with us, those data may include:</p> <ul style="list-style-type: none"> <li>• Email address;</li> <li>• Name and surname;</li> <li>• Personal description or preferences;</li> <li>• Social media profile (where you use social login or share this personal data with us).</li> </ul>	<p>To :</p> <ul style="list-style-type: none"> <li>• Send you marketing communications (where you have asked us to) which may be tailored to your preferences (incl. location and favourite career area);</li> <li>• Run analytics or collect statistics.</li> <li>• Keep an up to date suppression list if you have asked not to be contacted;</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Consent</b>, to send you career-related communications</li> </ul>
<p><b>SIMILAR JOB ALERT SUBSCRIPTION</b></p> <ul style="list-style-type: none"> <li>• <b>Data retention duration:</b> When registering as a candidate , you may chose to opt-in to similar job alert subscription. In that case, your opt-in will stay until: <ul style="list-style-type: none"> <li>○ you decide to opt-out ,</li> <li>○ or after max 6 months if you are not a candidate</li> <li>○ or when your candidate profile is removed (see data conservation for candidates).</li> </ul> </li> </ul>		
<p><b>What personal data may we receive from you directly or resulting from your interaction with us?</b></p>	<p><b>How and why we may use your data ?</b></p>	<p><b>What is the legal basis for using your personal data?</b></p>
<p>Those data may include:</p> <ul style="list-style-type: none"> <li>• Email address;</li> <li>• Browsing history</li> </ul>	<p>To :</p> <ul style="list-style-type: none"> <li>• Send you job openings (where you have asked us to) which may be tailored to the job offers you have interacted with;</li> <li>• Run analytics or collect statistics.</li> <li>• Keep an up to date suppression list if you have asked not to be contacted;</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Consent</b>, to send you communications about jobs newly available</li> <li>• <b>Legitimate interest</b>, to tailor our job related communications</li> <li>• <b>Legal Grounds</b>, to keep your details on a suppression list if you have asked us not to send you any alrt anymore</li> </ul>
<p><b>SIGNING IN WITH YOUR LINKED IN PROFILE, FOR JOB BROWSING</b></p> <ul style="list-style-type: none"> <li>• <b>Data retention duration:</b> after 3 months of inactivity</li> </ul>		
<p><b>What personal data may we receive from you directly or</b></p>	<p><b>How and why we may use your data ?</b></p>	<p><b>What is the legal basis for using your personal data?</b></p>

<b>resulting from your interaction with us?</b>		
<p>When you decide to log-in using your LinkedIn profile, we have access to your "Basic Profile" information, notably:</p> <ul style="list-style-type: none"> <li>• First name</li> <li>• Family name</li> <li>• Headline</li> <li>• Location</li> <li>• Industry</li> <li>• Summary</li> <li>• Most recent item you have shared on LinkedIn</li> <li>• Specialties</li> <li>• Positions</li> <li>• Profile picture</li> </ul> <p>See the complete description of your Basic Profile information <a href="#">here</a>.</p>	<p>To:</p> <ul style="list-style-type: none"> <li>• To tailor our services for you: <ul style="list-style-type: none"> <li>◦ to get a more personalized browsing experience</li> <li>◦ to provide you with job recommendations or content based on your LinkedIn profile;</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• <b>Consent</b>, to tailor our job and content recommendations, and ensure you receive the most relevant experience.</li> </ul>
<p><b>CANDIDATE ACCOUNT CREATION AND MANAGEMENT, WHEN APPLYING TO A JOB OR A PROGRAM</b></p> <p>Information collected during the creation of an account on L'Oréal Talent websites/apps, through a social media login, or physically.</p> <ul style="list-style-type: none"> <li>• <b>Data retention duration: maximum 2 years depending on countries</b></li> </ul>		
<b>What personal data may we receive from you directly or resulting from your interaction with us?</b>	<b>How and why we may use your data ?</b>	<b>What is the legal basis for using your personal data?</b>
<p>Depending on how much you are interacting with us, those data may include:</p> <ul style="list-style-type: none"> <li>• Name and surname;</li> <li>• Email address;</li> <li>• Address;</li> <li>• Phone number;</li> <li>• Photo;</li> <li>• Birthday or age range;</li> <li>• ID, username, and password;</li> <li>• Preferred language</li> <li>• Work experience / CV</li> <li>• Education history</li> <li>• Personal description or career-related preferences;</li> <li>• Social media profile (where you use social login or share this personal data with us).</li> </ul>	<p>To:</p> <ul style="list-style-type: none"> <li>• Manage your application;</li> <li>• Evaluate your competencies in a recruitment perspective;</li> <li>• Respond to your questions and otherwise interact with you ;</li> <li>• Provide you with similar job opportunities</li> <li>• Allow you to manage your preferences and applications;</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• Send you career-related communications (where you have asked us to) which may be tailored to your "profile" (i.e. based on the personal data we know about you and your preferences);</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• Offer personalized services based on your profile;</li> <li>• Monitor and improve our websites/apps;</li> <li>• Run analytics or collect statistics;</li> <li>• Secure our websites/apps and protect you and us against fraud.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Performance of a contract</b> To provide you with the service you requested (e.g. create an account, complete an application, or apply to a specific program organized by L'Oréal Talent).</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• <b>Consent</b> To send you career-related communications.</li> </ul> <hr/> <ul style="list-style-type: none"> <li>• <b>Legitimate Interest</b> To ensure our websites/apps remain secure, to protect them against fraud, and to help us better understand your needs and expectations and therefore improve our services.</li> </ul>

<b>RECRUITMENT PROCESS</b> <ul style="list-style-type: none"> <li>• <b>Data retention duration: maximum 2 years depending on countries</b></li> </ul>		
<i>What personal data may we receive from you directly or resulting from your interaction with us?</i>	<i>How and why we may use your data ?</i>	<i>What is the legal basis for using your personal data?</i>
Depending on how much you are interacting with us, those data may include: <ul style="list-style-type: none"> <li>• Name and surname;</li> <li>• Email address;</li> <li>• Address;</li> <li>• Phone number;</li> <li>• Photo;</li> <li>• Birthday or age range;</li> <li>• ID, username, and password;</li> <li>• Marital status and family information;</li> <li>• Personal interests;</li> <li>• Preferred language;</li> <li>• Application letter;</li> <li>• Recommendations;</li> <li>• Work experience / CV;</li> <li>• Education history;</li> <li>• Personal description or career-related preferences;</li> <li>• Social media profile (where you use social login or share this personal data with us);</li> <li>• Possible video and chat with a bot in a recruitment perspective;</li> <li>• Financial information.</li> </ul>	To: <ul style="list-style-type: none"> <li>• Organize the recruitment process, assessments, interviews;</li> <li>• Share data within the L’Oreal Group to people involved in your recruitment process;</li> <li>• Evaluate your competencies in a recruitment perspective;</li> <li>• Respond to your questions and otherwise interact with you ;</li> <li>• Provide you with similar job opportunities;</li> <li>• Reimburse potential expenses linked to the recruitment process.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Consent</b> To provide you with the service you requested (e.g. organize the recruitment process, assessments, interviews).</li> </ul>
<b>GAMES, CONTESTS (BRANDSTORM etc.) AND OPERATIONS</b> Information collected during a game, contest, and surveys. <ul style="list-style-type: none"> <li>• <b>Data retention duration: maximum 2 years (data visible on Brandstorm platform for 12 months)</b></li> </ul>		
<i>What personal data may we receive from you directly or resulting from your interaction with us?</i>	<i>How and why we may use your data ?</i>	<i>What is the legal basis for using your personal data?</i>
Depending on how much you are interacting with us, those data may include: <ul style="list-style-type: none"> <li>• Name and surname;</li> <li>• Email address;</li> <li>• Phone number;</li> <li>• Birth date;</li> <li>• Gender;</li> <li>• Address;</li> <li>• Personal description or preferences;</li> <li>• Social media profile (where you use social login or share this personal data with us);</li> <li>• Other information you have shared with us</li> </ul>	<ul style="list-style-type: none"> <li>• To complete tasks that you have asked us to, for example to manage your participation in contests, games and surveys, including to take into account your feedback and suggestions;</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Performance of contract</b> To provide you with the service you requested.</li> </ul>
	<ul style="list-style-type: none"> <li>• For statistics purposes.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Legitimate Interest</b> To help us better understand your needs and expectations and therefore improve our services, products and brands.</li> </ul>

<p>about yourself (e.g. via your “My Account” page, by contacting us, or by providing your own content such as photos or a review, or a question via the chat function available on some websites/apps, or by participating in a contest, game, survey).</p>	<ul style="list-style-type: none"> <li>To send you marketing communications (where you have asked us to).</li> </ul>	<ul style="list-style-type: none"> <li><b>Consent</b> To send you direct marketing communications.</li> </ul>
<p><b>ONBOARDING PROCESS</b></p> <ul style="list-style-type: none"> <li><b>Data retention duration: 6 months</b></li> </ul>		
<p><b>What personal data may we receive from you directly or resulting from your interaction with us?</b></p>	<p><b>How and why we may use your data ?</b></p>	<ul style="list-style-type: none"> <li><b>What is the legal basis for using your personal data?</b></li> </ul>
<p>When you decide to accept a job offer, additional data may be needed:</p> <ul style="list-style-type: none"> <li>Identification information for you and your partner</li> <li>Family ID</li> <li>Social Security number</li> <li>Insurances ID numbers</li> <li>Residency permit</li> <li>Bank account number</li> <li>Tax residence</li> </ul>	<p>To:</p> <ul style="list-style-type: none"> <li>Set-up a working contract</li> <li>Organize your integration to L’Oréal</li> </ul>	<ul style="list-style-type: none"> <li><b>Performance of contract</b> To provide you with the service you requested.</li> </ul>
<p><b>User Generated Content</b> Information collected when you submitted some content on one of our platforms or accepted the re-use of content you posted on social media platforms by us. <b>Data retention duration: 2 years</b></p>		
<p><b>What personal data may we receive from you directly or resulting from your interaction with us?</b></p>	<ul style="list-style-type: none"> <li><b>How and why we may use your data ?</b></li> </ul>	<ul style="list-style-type: none"> <li><b>What is the legal basis for using your personal data?</b></li> </ul>
<p>Depending on how much you are interacting with us, those data may include:</p> <ul style="list-style-type: none"> <li>Name and surname or alias;</li> <li>Email address;</li> <li>Photo;</li> <li>Personal description or preferences;</li> <li>Social media profile (where you use social login or share this personal data with us);</li> <li>Other information you have shared with us about yourself (e.g. via your “My Account” page, by contacting us, or by providing your own content such as photos or a review, or a question via the chat function available on some websites/apps).</li> </ul>	<ul style="list-style-type: none"> <li>In accordance with the specific terms and conditions accepted by you: <ul style="list-style-type: none"> <li>To post your review or content;</li> <li>To promote L’Oréal as an Employer.</li> </ul> </li> <li>For statistics purposes.</li> </ul>	<ul style="list-style-type: none"> <li><b>Consent</b> To reuse the content you posted online.</li> <li><b>Legitimate Interest</b> To help us better understand your needs and expectations and therefore improve and promote our services.</li> </ul>



<b>ENQUIRIES</b> Information collected when you ask questions (e.g. through our talent care) relating to your application or participation to a game, contest.		
<b>What personal data may we receive from you directly or resulting from your interaction with us?</b>	<b>How and why we may use your data ?</b>	<b>What is the legal basis for using your personal data?</b>
Depending on how much you are interacting with us, those data may include: <ul style="list-style-type: none"> <li>Name and surname;</li> <li>Phone number;</li> <li>Email address;</li> <li>Other information you have shared with us about yourself in relation to your enquiry.</li> </ul>	<ul style="list-style-type: none"> <li>To answer your enquiries;</li> <li>Where needed, to connect you with the relevant services</li> </ul>	<ul style="list-style-type: none"> <li><b>Consent</b> To process your enquiry.</li> </ul>
	<ul style="list-style-type: none"> <li>For statistics purposes.</li> </ul>	<ul style="list-style-type: none"> <li><b>Legitimate interest</b> To help us better understand our talents' needs and expectations and therefore improve our services.</li> </ul>

### Automated Decision Making

For purposes of securing transactions placed through our websites/apps/devices against fraud and misappropriation, we use third party provider's solution(s). The method of fraud detection is based on, for example, simple comparisons, association, clustering, prediction and outlier detections using intelligent agents, data fusion techniques and various data mining techniques.

This fraud detection process may be completely automated or may involve human intervention where a person takes the final decision. In any case, we take all reasonable precautions and safeguards to limit access to your data.

As a result of automatic fraud detection, you may (i) experience delay in the processing of your order / request whilst your transaction is being reviewed by us; and (ii) be limited or excluded from the benefit of a service if a risk of fraud is identified. You have the right to access information on which we base our decision. Please see "Your Rights and Choices" section below.

### Profiling

When we send or display personalized communications, content, job opportunities, we may use some techniques qualified as "profiling" (i.e. *any form of automated processing of personal data consisting of using those data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's personal preferences, interests, professional experience, skills, economic situation, behaviour, location, reliability, or movements*). This means that we may collect personal data about you in the different scenarios mentioned in the table above. We centralize this data and analyse it to evaluate and predict your personal preferences, skills and/or interests for a position.

Based on our analysis, we send or display communications and/or content tailored to your interests/needs. You have the right to object to the use of your data for "profiling" in certain circumstances. Please see "Your Rights and Choices" section below.

### Who may access your Personal data?

*When you apply for a job, we may share your personal data within L'Oréal Group, in a restricted way.*

Depending on the purposes for which they were collected, and only on a need-to-know basis some of your personal data may be accessed by L'Oréal Group entities worldwide, where possible in a pseudonimized way (not allowing direct identification), and where necessary to provide you with requested services.

Please visit the L'Oréal group website, for further details on the [L'Oréal Group](#) and its [locations](#).

*We may share your personal data for marketing purposes with your consent only.*

We only share your personal data with third parties or entities of the L'Oréal Group for direct marketing purposes with your consent. In this context, your data is processed by such third party, acting as a data controller, and its own terms and conditions and privacy notice apply. You should carefully check their documentation before consenting to the disclosure of your information to that third party.

*Your personal data may also be processed on our behalf by our trusted third party providers.*

We rely on trusted third parties to perform the mission we assigned to them. We only provide them with the information they need to perform the service, and we require that they do not use your personal data for any other purpose. We always use our best efforts to ensure that all third parties we work with keep your personal data secure. For instance, we may entrust services that require the processing of your personal data to:

- Third parties that assist and help us in providing digital services such as web design, social listening, application tracking, CRM, web analytics and search engine, user generated content curation tools;
- Advertising, marketing, digital and social media agencies to help us to deliver campaigns, to analyse their effectiveness, and to manage your contact and questions;
- Third parties that provide us with recruitment-related New Technologies to improve our recruitment process (e.g. online interview system, video, chatbot);
- Third parties that assist and help us in providing IT services, such as platform providers, hosting services, maintenance and support on our databases as well as on our software and applications that may contain data about you (such services could sometimes imply access to your data to perform the required tasks);
- Third parties that help us to ensure the security and monitoring of our premises.

*We may also disclose your personal data to third parties in some specific cases:*

- In the event that we transfer any activity or assets, in which case we may disclose your personal data to the prospective buyer of such activity or assets. If a third party acquires L'Oréal or a part of its assets, your personal data relating to those assets will be considered as one of the transferred assets. Where appropriate, in such case, the buyer acting as the new data controller processes your data and its privacy policy governs the processing of your personal data.
- If we are under a duty to disclose or share your personal data in order to comply with a legal obligation, or any circumstances that you have agreed to; or to protect the rights, property, or safety of L'Oréal, our customers, or employees.
- If we have your consent to do so
- Or if we are permitted to do so by law.

*We do not offer or sell your personal data.*

## Where we Store your Personal data

The data that we collect from you may be transferred to, accessed from, and stored at a destination outside the European Economic Area ("EEA"). It may also be processed by staff members operating outside the EEA who work for us or for one of our service providers.

L'Oréal transfers personal data outside of the EEA only in a secure and lawful way. As some countries may not have laws governing the use and transfer of personal data, we take steps to make sure that third parties adhere to the commitments set out in this Policy. These steps may include reviewing third parties' privacy and security standards and/or entering into appropriate contracts (based on the template adopted by the EU Commission).

## How Long Do We Keep Your Personal data

We only keep your personal data for as long as we need it for the purpose for which we hold your personal data, to meet your needs, or to comply with our legal obligations.

To determine the data retention period of your data, we use the following criteria:

- Where you participate in a game, contest, we keep your personal data for the duration of the contest;
- Where you contact us for an enquiry, we keep your personal data for the duration needed for the processing of your enquiry;
- Where you create an account, we keep your personal data until you require us to delete it or after a maximum period of 2 years of inactivity (no active interaction our jobs) defined in accordance with local regulations and guidance;
- Where you have consented to direct marketing, we keep your personal data until you unsubscribe or require us to delete it or after a period of max 6 months of inactivity (no active interaction with L'Oréal Talent) defined in accordance with local regulations and guidance;

- 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 cart cookies or session ID cookies) and for a period defined in accordance with local regulations and guidance.

We may retain some personal data to comply with our legal or regulatory obligations, as well as to allow us to manage our rights (for example to assert our claims in Courts) or for statistical or historical purposes. When we no longer need to use your personal data, it is removed from our systems and records or anonymised so that you can no longer be identified from it.

### Is Your Personal data Secure?

We are committed to keeping your personal data secure, and taking all reasonable precautions to do so. We contractually require that trusted third parties who handle your personal data for us do the same.

We always do our best to protect your personal data and once we have received your personal data, we use strict procedures and security features to try to prevent unauthorised access. As the transmission of information via the internet is not completely secure, we cannot guarantee the security of your data transmitted to our site. As such, any transmission is at your own risk.

### Links to Third Party Sites and Social Login

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.

We may also offer you the opportunity to use your social media login. If you do so, please be aware that you share your profile information with us depending on your social media platform settings. Please visit the relevant social media platform and review its privacy policy to understand how your personal data is shared and used in this context.

### Social Media and User Generated Content

Some of our websites and Apps allow users to submit their own content. 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. We are not responsible for any actions taken by other individuals if you post personal data on one of our social media platforms and we recommend that you do not share such information.

## **Your rights and choices**

L'Oréal respects your right to privacy: it is important that you are able to control your personal data. You have the following rights:

<b>Your rights</b>	<b>What does this mean?</b>
The right to be <b>informed</b>	You have the right to obtain clear, transparent and easily understandable information about how we use your personal data, and your rights. This is why we are providing you with the information in this Policy.
The right of <b>access</b>	You have the right to access to the personal data we hold about you (subject to certain restrictions). 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. To do this, please contact us at the details below.
The right to <b>rectification</b>	You have the right to have your personal data rectified if it is incorrect or outdated and/or completed if it is incomplete. To do this, please contact us at the details below. If you have an account, it may be easier to correct your own data via your "My Account" function.
The right to <b>erasure/right to be forgotten</b>	In some cases, you have the right to have your personal data erased or deleted. Note this is not an absolute right, as we may have legal or legitimate grounds for retaining your personal data.

	If you would like us to delete your personal data, please contact us at the details below.
The right to <b>object to direct marketing, including profiling</b>	<p>You can unsubscribe or opt out of our direct marketing communication at any time. It is easiest to do this by clicking on the “unsubscribe” link in any email or communication we send you. Otherwise, you can contact us using contact detail below.</p> <p>If you would like to object to any profiling, please contact us at the details below.</p>
The right to <b>withdraw consent at any time for data processing based on consent</b>	<p>You can withdraw your consent to our processing of your data when such processing is based on consent. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. We refer to the table inserted in section “what data do we collect from you and how do we use it” especially the column “<i>What is our legal basis for processing your data?</i>” to identify where our processing is based on consent.</p> <p>If you would like to object to withdraw your consent, please contact us at the details below.</p>
The right to <b>object to processing based on legitimate interests</b>	<p>You can oppose at any time to our processing of your data when such processing is based on the legitimate interest. We refer to the tables inserted in section “what data do we collect from you and how do we use it” especially the column “<i>What is our legal basis for processing your data?</i>” to identify where our processing is based on legitimate interests.</p> <p>To do so, please contact us at the details below.</p>
The right to <b>lodge a complaint with a supervisory authority</b>	<p>You have the right to contact the data protection authority of your country in order to lodge a complaint against the data protection and privacy practices of L’Oréal.</p> <p>Do not hesitate to contact us at the details below before lodging any complaint with the competent data protection authority.</p>
The right to <b>data portability</b>	<p>You have rights to move, copy or transfer data from our database to another. This only applies to data that you have provided, where processing is based on a contract or your consent, and the processing is carried out by automated means. We refer to the tables inserted in section “what data do we collect from you and how do we use it” especially the column “<i>What is our legal basis for processing your data?</i>” to identify where our processing is based on the performance of a contract or on consent.</p> <p>For further details, please contact us at the details below.</p>
The right to <b>restriction</b>	<p>You have the right to request restriction of our processing of your data. This right means that our processing of your data is restricted, so we can store it, but not use nor process it further.</p> <p>It applies in limited circumstances listed by the General Data Protection Regulation which are as follow:</p> <ul style="list-style-type: none"> <li>the accuracy of the personal data is contested by the data subject (i.e. You), for a period enabling the controller to verify the accuracy of the personal data;</li> </ul>

	<ul style="list-style-type: none"> <li>• the processing is unlawful and the data subject (i.e. You) opposes the erasure of the personal data and requests the restriction of their use instead;</li> <li>• the controller (i.e. L'Oréal) no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defense of legal claims;</li> <li>• the data subject (i.e. You) has objected to processing based on the legitimate interests of the data controller pending the verification whether the legitimate grounds of the controller override those of the data subject.</li> </ul> <p>If you would like to request restriction, please contact us at the details below.</p>
<p>The right to <b>deactivate Cookies</b></p>	<p>You have the right to deactivate Cookies. The settings from the Internet browsers are usually programmed by default to accept Cookies, but you can easily adjust it by changing the settings of your browser.</p> <p>Many cookies are used to enhance the usability or functionality of websites/apps; therefore disabling cookies may prevent you from using certain parts of our websites/apps as detailed in the relevant Cookie Table.</p> <p>If you wish to restrict or block all the cookies which are set by our websites/apps (which may prevent you from using certain parts of the site), or any other websites/apps, you can do this through your browser settings. The Help function within your browser should tell you how.</p>

To deal with your request, we may require proof of your identity.

## Contact

If you have any questions or concerns about how we treat and use your personal data, or would like to exercise any of your rights above, please contact us at [HR-dataprivacy@loreal.com](mailto:HR-dataprivacy@loreal.com)