



08.05.18

EEA Notices and Policies

Privacy Notice

#yourdataisyours

We know that you care about your personal data and how it is used, and we want you to **trust** that Dermalogica uses your personal data carefully. This Privacy Notice will help you understand what personal data we collect, why we collect it and what we do with it.

As you read our Notice, please keep in mind that it applies to Dermalogica as defined below.

Please take a moment to familiarise yourself with our privacy practices and let us know if you have any **questions** by sending us an **email** to privacy@dermalogica.co.uk

We have tried to keep this Notice as simple as possible, but if you're not familiar with terms, such as cookies, IP addresses, and browsers, then please read about these **key terms** first.

You have the **right to object** to certain uses of your personal data including the use of your personal data for direct marketing. See what are **your rights** and how you can exercise them here [LINK to your rights section below].

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Global Privacy Office



Who is collecting it?

Any personal data provided to or collected by Dermalogica is controlled by one or more of Dermalogica (UK) Limited, Dermalogica GMBH, UPD Italia S.r.l. and/or Dermalogica LLC and any company directly or indirectly owned and/or controlled by Dermalogica LLC and its related companies that you are interacting with or have a business relationship with (hereinafter referred to as “Dermalogica Group” further details of which can be found [here](#) (the **data controller(s)**).

This Privacy Notice applies to personal data collected by the Dermalogica Group in connection with the services and products we offer. Find out more about us at www.dermalogica.com

Read more...

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This Privacy Notice applies to personal data collected by the Dermalogica Group in connection with the services and products we offer. Find out more about us at www.dermalogica.com

This Privacy Notice also applies to the Dermalogica Group’s marketing content, including offers and advertisements for the Dermalogica Group products and services, which we (or a service provider acting on our behalf) send to you on **third-party** websites, platforms and applications based on your site usage information. These third-party websites generally have their own Privacy Notice and Terms and Conditions. We encourage you to read them before using those websites.

What personal data is being collected?

Personal data means any information that can be used to identify directly or indirectly a specific individual.

You are **not required** to provide the Dermalogica Group the personal data that we request, but if you choose not to do so, we may not be able to provide you with our products or services, or with a high quality of service or respond to any queries you may have.

We may collect personal data from a variety of **sources**. This includes:

- **Personal data you give us directly,**
- **Personal data we collect automatically,** and
- **Personal data we collect from other sources.**

Read more...





Personal data means any information that can be used to identify directly or indirectly a specific individual. This definition includes personal data collected offline (including when you speak to us by phone), direct marketing campaigns, sweepstakes and competitions and online through our websites, applications and branded pages on third-party platforms and applications accessed or used through third-party platforms.

You may be asked to provide your personal data when you are in contact with us. The above-mentioned joint data controllers **may share** this personal data with each other and use it in a manner consistent with this Privacy Notice. We **may also combine** it with other information to improve our products, services, content, and advertising.

You are **not required** to provide the Dermalogica Group the personal data that we request, but if you choose not to do so, we may not be able to provide you with our products or services, or with a high quality of service or respond to any queries you may have.

Ways in which we collect your personal data

We may collect personal data from a variety of **sources**. This includes:

- **Personal data you give us directly.** We collect data about how you use our services and products, such as the types of content you view or engage with, or the frequency and duration of your activities. We also collect personal data you provide us when you sign up for a marketing newsletter, complete a survey or register for an account to buy our products. In so doing, we may ask for personal data, such as your name, gender, date of birth, address, email address, telephone number or credit card details. Some members of the Dermalogica Group may collect “**special categories of personal data**” about you with your explicit consent. For more information on the special categories of data we collect and how we use it, please refer to the relevant section below.
- **Personal data we collect automatically.** We also receive and store certain types of personal data whenever you interact with us online. For example, we use cookies and tracking technologies (to find out more, see our [privacy key terms](#) to obtain personal data when your web browser accesses our websites or advertisements and other content served by or on behalf of the Dermalogica Group on other websites. Your personal data is also collected when you search, buy, post, participate in a contest or questionnaire or communicate with our customer service teams. Examples of the types of personal data we collect include IP address (to find out more see our [privacy key terms](#), device ID, location data, computer and connection information such as browser type and version, time zone setting, browser plug-in types and versions, operating system, and purchase history – which the Dermalogica Group sometimes **aggregates** with similar information from other consumers. During some of your internet browsing on the Dermalogica Group’s websites we may also use software tools to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information, and methods used to browse away from the page. We may also collect technical information to help us identify your device for fraud prevention and diagnostic purposes.
- **Personal data we collect from other sources.** We collect personal data from other sources including our trusted partnerships with third-parties and where we operate the Dermalogica Group accounts on third-party platforms: For example, when you use the “like” functionality on Facebook or the +1 functionality on Google+. Additionally, we receive information about you and other visitors’ interactions with our advertising to measure whether our advertising is relevant and successful. We also collect information about you and your activities from a third-party when we jointly offer services or products, or from third-party data enrichment providers (to find out more see our [privacy key terms](#)) who may deliver insights to the Dermalogica Group about the personal data we hold.





When and why we collect “special categories of personal data”

Certain categories of personal data, such as race, ethnicity, religion, health, sexuality genetic or biometric data are classified as “**special categories of data**” and benefit from **additional protection** under the European data protection legislation.

We **limit** the circumstances where we collect and process these special categories of data.

The Dermalogica Group sometimes collects data related to your health such as allergies, pregnancy or skin type to send you tailored ads and relevant promotions. The Dermalogica Group only collects and uses this personal data where you have provided us with your consent for us to do so. In some instances, you may have requested services or products that do not directly involve the collection of any special categories of data, but may imply or suggest your religion, health or other special categories of data.

To illustrate circumstances where the Dermalogica Group collects and processes special categories of data we have provided the following examples:

- The Dermalogica Group collects data about your skin conditions, including through images of your face. We may also place cookies on the sign-up page which capture this information too. For more information on the Dermalogica Group’s profiling activities, please refer to the relevant section on profiling.
- Similarly, the Dermalogica Group may collect personal data related to **consumers’ allergies** to help deal with consumer product or treatment queries.

How do we protect children’s privacy?

We understand the importance of taking **extra precautions** to protect the privacy and safety of children using the Dermalogica Group products and services.

Most of the Dermalogica Group’s websites are designed and **intended for use by adults**. Where one of our websites is intended for use by a younger audience, we will obtain consent from the person with **parental responsibility** before we collect personal data where it is required by applicable laws and regulations (the age at which consent is necessary varies from Country to Country).

If you are a child under the age where parental consent is required in your Country, you should review the terms of this Privacy Notice with your **parent** or **guardian** to make sure you understand and accept them. If we discover that we have collected personal data from a child without consent from a parent or guardian where such consent should have been obtained, we will **delete** that personal data as soon as practical. Access to certain parts of the Dermalogica Group’s websites and/or eligibility to receive prizes, samples or other rewards are generally limited to users over a certain age.

We sometimes use your personal data to carry out **age verification** checks and enforce any such age restrictions.

What purpose do we use your data for?

We **collect, process** and **disclose** your personal data only for specific and limited **purposes**. For example, to process your **payments**, to assess and handle any **complaints**, to **develop and improve** our products, services,





communication methods and the functionality of our websites, to provide **personalised** products, communications and targeted advertising as well as product recommendations to you.

We also create profiles by analysing the information about your online surfing, searching and buying behaviour and your interactions with our brand communications by building segments (creating groups that have certain common characteristics) and by placing your personal data in one or more segments.

Additionally, the Dermalogica Group processes your personal data also using **automated means**. An automated decision is a decision which is made solely by automatic means, where **no humans** are involved in the decision-making process related to your personal data.

Read more...

We **collect**, **process** and **disclose** your personal data for the following **purposes**:

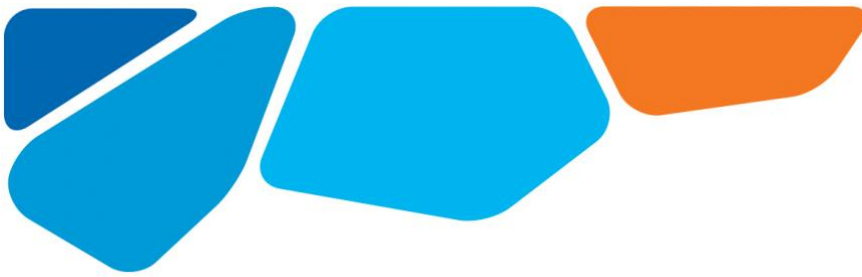
- To process your **payments**, if you purchase our products, to provide you with your **order status**, deal with your enquiries and requests, and assess and handle any **complaints**;
- To process and answer your **inquiries** or to contact you to answer your questions and/or requests;
- To **develop and improve** our products, services, communication methods and the functionality of our websites;
- For the purposes of **competitions** or **promotions** that you have entered;
- To communicate **information** to you and to manage your **registration** and/or **subscription** to our newsletter or other communications;
- To manage our **everyday business needs** regarding your participation in our contests, sweepstakes or promotional activities or request;
- To **authenticate the identity** of individuals contacting us by telephone, electronic means or otherwise;
- For internal **training** and **quality assurance** purposes;
- To understand and assess the **interests**, **wants**, and **changing needs** of consumers, to improve our website, our current products and services, and/or developing new products and services; and
- To provide **personalised** products, communications and targeted advertising as well as product recommendations to you.

When we collect and use your personal data for purposes mentioned above or for other purposes, we will **inform** you before or at the time of collection.

Where appropriate, we will ask for your **consent** to process the personal data. Where you have given consent for processing activities, you have the **right to withdraw your consent** at any time.

In some cases, we rely on **legitimate interest** for processing your personal data. A legitimate interest could exist for example, when you sign up for a loyalty scheme with one of our brands and we use the personal data collected to conduct data analytics to improve our products or services. This ground will only be used where it is necessary to achieve a legitimate interest, for example to assist in the performance of a contract, or to optimise a service, and does not outweigh your rights as an individual. This legal basis will only be relied upon where there is no less intrusive way to process your personal data. We can assure you that if legitimate interest is used as a ground for processing your personal data, we will keep a record of this and you have the right to ask for this information.





Profiling

The Dermalogica Group uses your personal data to build **profiles**. We create profiles by analysing the information about your online surfing, searching and buying behaviour and your interactions with our brand communications by building segments (creating groups that have certain common characteristics) and by placing your personal data in one or more segments. These segments are used by the Dermalogica Group to **personalise** the website and our communications to you (such as showing relevant content to you when you visit our site or in a newsletter to you), and to display relevant offers and advertisements from the Dermalogica Group brand on the Dermalogica Group site, and via third-party websites. The segments can also be used for third-party campaigns on the Dermalogica Group site. The Dermalogica Group profiles your data where you have provided **consent** for us to do so; for example, accepting the setting of cookies on your browser online or signing up for email newsletters from one of our brands.

You can **withdraw your consent** to prevent your personal data being used this way at any time by changing your browser settings, see section of our [Cookie Notice](#) or **unsubscribing** to the use of your email address if you have logged into one of our websites or signed up to any marketing newsletters.

By way of example –

- the Dermalogica Group collects data, with your consent, from:
 - Our websites about what you view and the **way you interact** with our content;
 - Our **digital display advertising** that we serve to you on social platforms and other publisher's websites; and
 - **Forms you fill** in online and send to us about what your interests are.
- We also track the **products you buy** when you click on one of our display adverts and go on to purchase something from a selection of our retail partners.
- If you have asked to receive **emails** or **SMS communications** from us, we track whether you open, read or click on the content to see what you are interested in so that we can give you more content that we think you are more likely to enjoy.
- We use this data to profile your **likes** and **dislikes**. For instance, we may tailor our web content when you visit towards things we think you'll be most interested in for example for your skin fitness plan/ skin analysis.
- Based on this profile information, we may also give you advertising that we think you will **like** and **want to see** as you view content from us or from our network of publishers that we advertise with. Sometimes, with your consent, we may use your current **location** to serve advertising to you that is to do with promotions or events that are happening nearby that we think you might be interested in.
- We may also use information you have provided to **selected third-parties** and **consented to be shared**, like your age, gender, life stage, lifestyle and wider interests to identify people who we think will have similar interests to you and who we believe will be interested in similar advertising.





Automated decision-making

In some instances, the Dermalogica Group processes your personal data using **automated means**. An automated decision is a decision which is made solely by automatic means, where **no humans** are involved in the decision-making process related to your personal data.

We will not make decisions based solely on automated decision making that have significant impact on you. If we do so we notify you and provide you with **clear information** about our decision to rely on automated processing to make our decision and our lawful basis for doing so. For example, the Dermalogica Group processes your personal data using automated means only if it is necessary for the entering into or the performance of a **contract** with you, or when you have given your **explicit consent**.

You have the right **not to be subject** to a decision which is based solely on automated processing and which produces legal or other significant effects on you. In particular, you have the right:

- to obtain **human intervention**;
- to express your **point of view**;
- to obtain an **explanation of the decision** reached after an assessment; and
- to **challenge** such a decision.

Who will it be shared with?

As a global business, the Dermalogica Group shares your personal data **internally** and with **selected third-parties**. For example, we share your personal data with **third-party service providers, other third-parties**, as well as in case of **business transfers** or **legal disclosure**.

Read more...

As a global business, the Dermalogica Group shares your personal data **internally** and with **selected third-parties** in the following circumstances:

- **Third-party service providers.** In order to carry out your requests, respond to your inquiries, fulfil your orders, honour coupons, provide you with samples, enable you to participate in sweepstakes or make various other features, services and materials available to you through our websites we share your personal data with **third-party service providers that perform functions on our behalf**, such as companies that: host or operate the Dermalogica Group's websites, process payments, analyse data, provide customer service, postal or delivery services, and sponsors or other third-parties that participate in or administer our promotions. They have access to personal data needed to perform their functions but may not use it for other purposes. Further, they must process this personal data in accordance with this Privacy Notice and as permitted by applicable data protection laws and regulations.
- **Other third-parties.** Your personal data will also be used by us or shared with our sponsors, advertisers, advertising networks, advertising servers, social media networks, and analytics companies or other third-parties in connection with **marketing, promotional, data enrichment** (to find out more about [our privacy key terms](#) click and other offers, as well as product information).
- **Business transfers.** Your personal data will be used by us or shared with the joint data controllers for internal reasons, primarily for business and operational purposes. As we continue to develop our business, we may sell or purchase assets, subsidiaries or business units. In such transactions, your





personal data generally is one of the **transferred business assets** but remains **subject to the promises made** in any pre-existing Privacy Notice (unless, of course, you consent otherwise). If another entity acquires us, our businesses or substantially all or part of our assets, or assets related to the Dermalogica Group's website, your personal data will be disclosed to such entity as part of the **due diligence process** and will be transferred to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such personal data will be considered an asset of ours and as such it is possible they will be sold or transferred to third-parties.

- **Legal disclosure.** We may transfer and disclose your personal data to third-parties:
 - To comply with a **legal obligation**;
 - When we believe in **good faith** that an applicable law requires it;
 - At the request of governmental authorities conducting an **investigation**;
 - To verify or enforce our "**Terms of Use**" or other applicable policies;
 - To detect and protect against **fraud**, or any **technical** or **security vulnerabilities**;
 - To respond to an **emergency**; or otherwise
 - To protect the **rights, property, safety, or security** of third-parties, visitors to the Dermalogica Group's website, the Dermalogica Group or the public.

International data transfers

The Dermalogica Group shares personal data internally or with third-parties for purposes described in this Privacy Notice.

The Dermalogica Group will only send personal data collected within the **European Economic Area (EEA)** to foreign countries in circumstances such as:

- To follow your **instructions**;
- To transfer it within the Dermalogica Group;
- To comply with a **legal duty**; or
- To work with our agents and advisers who we use to help **run our business** and **services**.

If we do transfer personal data to outside of the EEA, the Dermalogica Group will make sure that it is **protected in the same way** as if it was being used in the EEA. We'll use one of the following safeguards:

- Transfer to a non-EEA Country whose privacy legislation ensures an **adequate level of protection** of personal data to the EEA one;
- Put in place a **contract** with the foreign third-party that means they must protect personal data to the same standards as the EEA; or
- Transfer personal data to organisations that are part of specific agreements on cross-border data transfers with the European Union (e.g., **Privacy Shield**, a framework that sets privacy standards for data sent between the United States and the European countries).





How do we protect your personal data?

The Dermalogica Group takes the **security** of your personal data very seriously. We take every effort to **protect** your personal data from misuse, interference, loss, unauthorised access, modification or disclosure.

Read more...

The Dermalogica Group takes the **security** of your personal data very seriously. We take every effort to **protect** your personal data from misuse, interference, loss, unauthorised access, modification or disclosure.

Our measures include implementing appropriate **access controls**, investing in the latest **Information Security Capabilities** to protect the IT environments we leverage, and ensuring we **encrypt**, (and may in the future **pseudonymise** and **anonymise**) personal data wherever possible.

Access to your personal data is only permitted among our employees and agents on a **need-to-know basis** and subject to strict **contractual confidentiality obligations** when processed by third-parties.

How long do we keep your personal data for?

We will keep your personal data for **as long as we need** it for the **purpose** it is being processed for.

Read more...

We will keep your personal data for **as long as we need** it for the **purpose** it is being processed for. For example, where you make a purchase online with us we will keep the data related to your purchase, so we can perform the specific contract you have entered and after that, we will keep the personal data for a period which enables us to handle or respond to any complaints, queries or concerns relating to the purchase.

Your data may also be retained so that we can continue to **improve your experience** with us and to ensure that you receive any loyalty rewards which are due to you.

We retain the identifiable data we collect directly for targeting purposes for **as little time as possible**, after which we employ measures to **permanently delete** it.

We will actively review the personal data we hold and **delete it securely**, or in some cases **anonymise** it, when there is no longer a legal, business or consumer need for it to be retained.

What are your rights?

Your rights in relation to your personal data how it is processed. You can exercise these rights at any point. We have provided an overview of these rights below together with what this entails for you. You can exercise your rights by sending an **email** to privacy@dermalogica.co.uk

Read more...

Where we process your personal data, you have a number of rights over how the data is processed and can exercise these rights at any point. We have provided an overview of these rights below together with what this entails for you. You can exercise your rights by sending an **email**, to privacy@dermalogica.co.uk

The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. Therefore, we're providing you with the information in this Notice.





- **The right to access and rectification.** You have the right to access, correct or update your personal data at any time. We understand the importance of this and should you want to exercise your rights, please contact us.
- **The right to data portability.** The personal data you have provided us with is portable. This means it can be moved, copied or transmitted electronically under certain circumstances.
- **The right to be forgotten.** Under certain circumstances, you have right to request that we delete your data. If you wish to delete the personal data we hold about you, please let us know and we will take reasonable steps to respond to your request in accordance with legal requirements. If the personal data we collect is no longer needed for any purposes and we are not required by law to retain it, we will do what we can to delete, destroy or permanently de-identify it.
- **The right to restrict processing.** Under certain circumstances, you have the right to restrict the processing of your personal data.
- **The right to object.** Under certain circumstances, you have the right to object to certain types of processing, including processing for direct marketing (i.e., receiving emails from us notifying you or being contacted with varying potential opportunities).
- **The right to lodge a complaint with a Supervisory Authority.** You have the right to lodge a complaint directly with any local Supervisory Authority about how we process your personal data.
- **The right to withdraw consent.** If you have given your consent to anything we do with your personal data (i.e., we rely on consent as a legal basis for processing your personal data), you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). You can withdraw your consent to the processing of your personal data at any time by contacting us with the details provided below.
- **Rights related to automated decision-making.** You have the right not to be subject to a decision which is based solely on automated processing and which produces legal or other significant effects on you. In particular, you have the right:
 - to obtain **human intervention**;
 - to express your **point of view**;
 - to obtain an **explanation of the decision** reached after an assessment; and
 - to **challenge** such a decision.

Further information and advice about your rights can be obtained from the data protection Regulator in your Country.

How do you contact the Dermalogica Group?

The general point of contact for you for any data privacy queries you may have is privacy@dermalogica.co.uk

If you have any **questions** or **concerns** about the Dermalogica Group's Privacy Notice or data processing or if you would like to make a **complaint** about a possible breach of local privacy laws, please do so by sending an **email** <mailto:privacy@dermalogica.co.uk>



Global Privacy Office



When a privacy question or access request is received we have a **dedicated team** which triages the contacts and seeks to address the specific concern or query which you are seeking to raise. Where your issue may be more substantive in nature, more information may be sought from you. All such substantive contacts receive a response. If you are unsatisfied with the reply received, you may refer your complaint to the relevant Supervisory Authority in your Country. If you ask us, we will endeavour to provide you with information about relevant complaint avenues which may be applicable to your circumstances.

How do we keep this notice up to date?

We will **update** this Privacy Notice when necessary to reflect customer feedback and changes in our products and services.

Read more...

We will **update** this Privacy Notice when necessary to reflect customer feedback and changes in our products and services. When we post changes to this statement, we will revise the “**last updated**” date at the top of this Notice. If the changes are significant, we will provide a more prominent **notice** (including, for certain services, email notification of Privacy Notice changes). We will also keep prior versions of this Privacy Notice in an archive for your review.

We **will not reduce your rights** under this Privacy Notice without your consent.

Additional Privacy Terms or Notices

In addition to this Privacy Notice, there may be specific campaigns or promotions which will be governed by **additional privacy terms** or **notices**. We encourage you to read these additional terms or notices before participating in any such campaigns or promotions as you will be required to comply with them if you participate. Any additional privacy terms or notices will be made prominently available to you.

Version: 08th May 2018



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