

Privacy & Cookie Policy

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Molton Brown Limited, 130 Shaftesbury Avenue, London, W1D 5EU ("**Kao Company**" or "**we**" or "**our**") and each of its affiliates and subsidiaries in the EMEA region collectively, the "**Kao Group**") takes data privacy seriously. This Privacy Policy informs the users of www.moltonbrown.com.cy and any other Kao Company-owned websites or mobile applications on which this Privacy Policy is displayed ("**Website**") how we, as controller within the meaning of the General Data Protection Regulation ("**GDPR**") collect and process the personal data and other information of such users in connection with their usage of the Website. Note that other Kao Group websites or mobile apps may be governed by other privacy policies.

With N&M Beautyberry Co. Ltd, a company registered in Cyprus having its registered office at 24, Solonos Michaelides, 1035, Nicosia, Cyprus and any sub-processors (both located within or outside of the EU/EEA) engaged by N&M Beautyberry Co. Ltd, may receive the personal data to process such data under the appropriate instructions (the "Additional Processor") for the purposes mentioned above. The Additional Processor will be subject to contractual obligations to implement the appropriate technical and organisational security measures to safeguard the personal data and to process the personal data as instructed.

Categories of Personal Data and Processing Purposes - *What personal data do we process about you and why?*

Metadata

You may use the Website without providing any personal data about you. In this case, we will collect only the following metadata that result from your usage of the Website: browser type and version, operating system and interface, website from which you are visiting us (referrer URL), webpage(s) you are visiting on our Website, date and time of accessing our Website, and internet protocol (IP) address.

Your IP address will be used to enable your access to our Website. The metadata, including the shortened IP address, will be used to improve the quality and services of our Website and services by analysing the usage behavior of our users.

Account

If you create an account on our Website you will be asked to provide the following personal data about you: name, gender (salutation), date of birth, postal address, email address, telephone number, selected password for your account, payment details, invoicing and delivery address and your preferences in receiving marketing from us (voluntary). We process such personal data for purposes of account administration, answering your queries or information requests, providing desired products or services, providing you with marketing materials where you have provided consent for us to do so, to the extent permitted by applicable law, analysing your interests for marketing purposes, improving our Website according to usage patterns, and for technical administration or other purposes to which you have agreed.

Product Orders

If you order a product via our Website we collect and process the following personal data about you:

name, gender (salutation), postal address, email address, telephone number, payment details, invoicing and delivery address, type and amount of product, purchase price, order date, order status, product returns, customer care requests, and your preferences in receiving marketing from us (voluntary). We process such personal data for purposes of carrying out the contractual relationship and the product order, providing customer care services, compliance with legal obligations, defending, establishing and exercising legal claims, providing you with marketing materials where you have provided consent for us to do so, to the extent permitted by applicable law, and analysing your interests for marketing purposes.

Competitions

If you participate in a competition, we collect and process the following personal data about you: name, gender (salutation), postal address, email address, telephone number and selection as winner. We process such personal data for purposes of carrying out the competition, informing the winner, delivering the prize to the winner, carrying out the event, and providing you with marketing materials where you have provided us consent to do so, to the extent permitted by applicable law, and analysing your interests for marketing purposes.

Newsletter

If you request to receive our newsletter, we collect and process the following personal data about you: name, email address, date of birth (optional), gender (optional) and, your preferences in receiving marketing communications (voluntary). We process such personal data for purposes of providing the newsletter and other marketing materials to the extent permitted by applicable law and where you have provided us consent to do so, and analysing your interests for marketing purposes.

Contact Us

On our website, we offer you the opportunity to contact us via a contact page. For this we need the following personal data from you: email name, telephone number (optional), address (optional), date of birth (optional) and gender (optional). The personal data that you provide us in the context of this contact request will only be used to answer your inquiry and for the technical administration thereof. The transfer to third parties does not take place. Your personal data will be deleted as soon as we have processed your request or you revoke the consent you have given.

2. Processing Basis and Consequences - *What is the legal justification for processing your personal data and what happens if you choose not to provide it?*

We rely on the following legal grounds for the collection, processing, and use of your personal data:

- your consent to the processing of your data for one or more specific purposes (as detailed in Section 1) ; or if
- we have a legitimate interest in doing so (including but not limited to) a legitimate interest in performing marketing activities, research activities, data analytics, internal administration functions, processing and enforcing legal claims and conducting our business in compliance with all applicable laws, relevant industry standards and our policies).

The provision of your personal data is not required by a statutory or contractual obligation. The provision of your personal data is not necessary to enter into a contract with us or to receive our services/products as requested by you. The provision of your personal data is voluntary for you.

Not providing your personal data may result in disadvantages for you, for example, you may not be able to receive certain products and services. However, unless otherwise specified, not providing your personal data will not result in legal consequences for you.

Categories of Recipients and International Transfers - *Who do we transfer your personal data to and where are they located?*

We may transfer your personal data to third parties for the processing purposes described above as follows:

- **Within the Kao Company:** Our parent entity, the Kao Corporation, in Japan and each of its affiliates and subsidiaries (each affiliate or subsidiary including us referred to as "**Kao Company**"; collectively, the "**Kao Group**") within the global [Kao Group](#) may receive your personal data as necessary for the processing purposes described above. Depending on the categories of personal data and the purposes for which the personal data has been collected, different internal departments within the Kao Company may receive your personal data. For example, our IT department may have access to your account data, and our eCommerce and sales departments may have access to your account data or data relating to product orders. Moreover, other departments within the Kao Company may have access to certain personal data about you on a need to know basis, such as the legal department, the finance department or internal auditing.
- **With data processors:** Certain third parties, whether affiliated or unaffiliated, may receive your personal data to process such data under appropriate instructions ("**Processors**") as necessary for the processing purposes described above, such as website service providers, order fulfilment providers, customer care providers, marketing service providers, IT support service providers, and other service providers who support us in maintaining our commercial relationship with you. The Processors will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the personal data, and to process the personal data only as instructed.
- **Other recipients:** We may transfer - in compliance with applicable data protection law - personal data to law enforcement agencies, governmental authorities, judicial authorities, legal counsel, external consultants, or business partners. In case of a corporate merger or acquisition, personal data may be transferred to the third parties involved in the merger or acquisition. We will not disclose your personal data to third parties for advertising or marketing purposes or for any other purposes without your permission.

Any access to your personal data is restricted to those individuals that have a need-to-know in order to fulfill their job responsibilities.

International transfers. The personal data that we collect or receive about you may be transferred to and processed by recipients that are located inside or outside the European Economic Area ("**EEA**").

- For recipients located outside of the EEA, some are certified under the EU-U.S. Privacy Shield and others are located in countries with adequacy decisions and, in each case, the transfer is thereby recognised as providing an adequate level of data protection from a European data protection law perspective.
- Other recipients might be located in countries which do not adduce an adequate level of protection from a European data protection law perspective. We will take all necessary measures to ensure

that transfers out of the EEA are adequately protected as required by applicable data protection law.

- With respect to transfers to countries not providing an adequate level of data protection, we will base the transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission or by a supervisory authority, approved codes of conduct together with binding and enforceable commitments of the recipient, or approved certification mechanisms together with binding and enforceable commitments of the recipient.

You can ask for a copy of such appropriate safeguards by contacting us as set out in Section 7 below.

Retention Period - *How long do we keep your personal data?*

Your personal data will be retained as long as necessary to provide you with the services and products requested. Once you have terminated the contractual relationship with us or the competition has been completed or otherwise ended your relationship with us, we will remove your personal data from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it (unless we need to keep your information to comply with legal or regulatory obligations to which the Kao Company is subject--e.g., taxation purposes).

We may retain your contact details and interests in our products or services for a longer period of time if the Kao Company is allowed to send you marketing materials. Also, we may be required by applicable law to retain certain of your personal data for a period of 10 years after the relevant taxation year. We may also retain your personal data after the termination of the contractual relationship if your personal data are necessary to comply with other applicable laws or if we need your personal data to establish, exercise or defend a legal claim, on a need to know basis only. To the extent possible, we will restrict the processing of your personal data for such limited purposes after the termination of the contractual relationship

Your Rights - *What rights do you have and how can you assert your rights?*

Right to withdraw your consent: If you have declared your consent regarding certain collecting, processing and use of your personal data (in particular, regarding the receipt of direct marketing communication via email, telephone/SMS and postal), you can withdraw this consent at any time with immediate effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal. Please contact us as stated in Section 7 below to withdraw your consent. Further, you can object to the use of your personal data for the purposes of marketing without incurring any costs other than the transmission costs in accordance with the basic tariffs.

Additional data privacy rights: Pursuant to applicable data protection law, you may have the right to: (i) request access to your personal data; (ii) request rectification of your personal data; (iii) request erasure of your personal data; (iv) request restriction of processing of your personal data; (v) request data portability; and/or (vi) object to the processing of your personal data (including objection to profiling).

Please note that these aforementioned rights might be limited under the applicable local data protection law. Below please find further information on your rights to the extent that the GDPR applies:

- **Right to request access to your personal data:** You may have the right to obtain from us confirmation as to whether or not personal data concerning you is being processed, and, where that is the case, to request access to the personal data. This access information includes – inter alia – the purposes of the processing, the categories of personal data concerned, and the

recipients or categories of recipient to whom the personal data have been or will be disclosed. However, this is not an absolute right and the interests of other individuals may restrict your right of access. You may have the right to obtain a copy of the personal data undergoing processing free of charge. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

- **Right to request rectification:** You may have the right to obtain from us the rectification of inaccurate personal data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete personal data completed, including by means of providing a supplementary statement.
- **Right to request erasure (right to be forgotten):** Under certain circumstances, you may have the right to obtain from us the erasure of personal data concerning you and we may be obliged to erase such personal data.
- **Right to request restriction of processing:** Under certain circumstances, you may have the right to obtain from us restriction of processing your personal data. In such case, the respective data will be marked and may only be processed by us for certain purposes.
- **Right to request data portability:** Under certain circumstances, you may have the right to receive the personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from us.
- **Right to object:**
Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data by us and we can be required to no longer process your personal data. Such right to object may especially apply if we collect and process your personal data for profiling purposes in order to better understand your interests in our products and services or for direct marketing. If you have a right to object and you exercise this right, your personal data will no longer be processed for such purposes by us. You may exercise this right by contacting us as stated in Section 7 below. Such a right to object may, in particular, not exist if the processing of your personal data is necessary to take steps prior to entering into a contract or to perform a contract already concluded. If you no longer want to receive direct marketing via email, telephone/SMS, and postal, you need to withdraw your consent as explained at the start of Section 5.

To exercise your rights, please contact us as stated under Section 7 below. You also have the right to lodge a complaint with the competent data protection supervisory authority.

Cookies and other tracking technologies

This Website uses cookies and other tracking technologies.

What is a cookie?

A cookie is a small text file a web portal installs on your computer, tablet or smartphone when you visit the portal. Cookies can help us in many ways, they make it for example possible for the portal to remember certain entries and settings (e.g. login info, language, font size and other display preferences) for a specific period of time so you do not have to re-enter this information every time you visit and navigate the portal., for example, by allowing us to tailor a Web site to better match your interests or to store your password to save you having to re-enter it each time. Furthermore, when you visit our website you may notice some cookies that aren't related to us. If you go on to a web page that contains

embedded content, you may be sent cookies from these websites.

If cookies aren't enabled on your computer you will still be able to browse www.moltonbrown.com.cy, but your experience will be limited and you may not be able to add items to your bag and buy them.

Using your web browser's settings you can view the cookies on your computer, remove all or some cookies and set rules on when to allow and not allow cookies to be set

We don't control the setting of these cookies, so we suggest you check the third-party websites for more information about their cookies and how to manage them. If you do not wish to receive cookies, please configure your Internet browser to erase all cookies from your computer's hard drive, block all cookies or to receive a warning before a cookie is stored.

For more information on how to manage cookies in your particular web browser we recommend you visit www.aboutcookies.org

How we use cookies and for which purpose:

The Cookies used on the Molton Brown Website are categorised using the categories in the ICC UK Cookie Guide. Here is a list of the main cookies we use and what we use them for.

Category 1: Strictly necessary cookies.

For those type of cookies that are strictly necessary, no consent is required.

Name of cookie	Domain	Purpose of cookie	Expiration Date
JSESSIONID (Sitzung), cmTPSet, criteo_write_test (1 Tag), cto_tld_test (1 Tag), tms_VisitorID (559 Tage) tms_wsip (1 Tag) userPrefLanguage (18145 Tage) cookies.js (Sitzung), notFirstTime (Sitzung), sessionConf (session)	www.moltonbrown.com.cy	These cookies are required to make the core functionality of the website to work. It ensure that your shopping selections are carried through your journey by preserving your states across page requests.	see name of cookie box

Category 2: Google Analytics, Google Signals, performance and statistics cookies.

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website will be

transmitted to and stored by Google on servers in the United States.

In case IP-anonymization is activated on this website, your IP address will be truncated within the area of Member States of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional cases the whole IP address will be first transferred to a Google server in the USA and truncated there. The IP-anonymization is active on this website.

Google will use this information on behalf of the operator of this website for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing them other services relating to website activity and internet usage.

The IP-address, that your Browser conveys within the scope of Google Analytics, will not be associated with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website.

You can also opt-out from being tracked by Google Analytics with effect for the future by downloading and installing Google Analytics Opt-out Browser Add on for your current web browser:
tools.google.com/dlpage/gaoptout.

As an alternative to the browser plug-in and especially for mobile browsers, please click on the following link to set an opt-out cookie. This opt-out cookie prevents detection by Google Analytics within this website. <http://www.moltonbrown.co.uk/data-protection-policy/?google-analytics-opt-out=true>

We also use the web analysis service, Google Signals. Via Google Signals, Google provides us with reports on cross-device user numbers, as well as different groups of users, based on different device combinations. In order to do so Google uses the data of users who have activated the option “personalized advertising” in their Google account settings. Google Signals can only be used with activated IP anonymization. As a result, your IP address will be abbreviated by Google within the member states of the European Union or in other states that have ratified the Convention on the European Economic Area prior to its transmission to the United States. Thus, no conclusions can be drawn as to the identity of a single user.

You can object to the collection of your data via Google Signals, at any time via disabling “personalised advertising” in your Google Account: <https://support.google.com/ads/answer/2662922?hl=en>

Additional information on how Google handles personal data in its advertising network can be found here: [Advertising and Privacy](#)

Name of cookie	Domain	Purpose of cookie	Expiration Date
APISID, HSID, NID, SAPISID, SID, SSID, SIDCC	google.co.uk / google.com	Various unique identifiers. Google set a number of cookies on any page that includes a Google Map or YouTube Video. While we have no control	Most of the cookies expire 10 years after your last visit to a page containing a Google Map.

		over the cookies set by Google, they appear to include a mixture of pieces of information to measure the number and behaviour of Google Maps users.	
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Category 3: Advertising, marketing & 3rd party cookies.

These cookies are used to deliver adverts that are relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaigns. They are usually placed by advertising networks with the website operator's permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

Name of cookie, Domain, Purpose of cookie, Expiration Date

Name of cookie	Domain	Purpose of cookie	Expiration Date
Tuuid, tuuid_lu, um, umeh	360yield.com	This Third Party tracking allows our media owners to better understand user profiles and enables them and us to tailor our adverts to make them more relevant to our customers' needs.	up to 3 months
Tluid	3lift.com	Used to present the visitor with relevant content and advertisement - The service is provided by third party advertisement hubs, which facilitate real-time bidding for advertisers. This domain is owned by TripleLift, a USA based business providing programmatic native advertising services.	3 months
na_id, ouid, uid	Add this	Add this creates a unique, machine-generated user ID. Add This, which is owned by Clearspring Technologies, uses the user ID to make it possible for the user to share content across social networks and provide detailed statistics to various providers. The Add This cookie is	1 year

		<p>“dropped” when an end user visits a publisher site that uses the Add This Website Tools. Certain consent tools allow for cookies to be suspended (or “not dropped”) if the user has not consented to cookies on the site. Geolocation, is used to help providers determine how users who share information with each other are geographically located (state level). If your intent is to disable the services you need to read and follow instructions https://datacloudoptout.oracle.com/</p>	
anj, uuid2	Adnxs.com	Registers a unique ID that identifies a returning user's device.	3 months
TDCPM, TDID	Adsrvr.org	Purpose of these cookies is to allow for optimisation of performance of advertising on other websites as well as to understand what advertising converts on the website and track web browsing behaviour.	1 year
APID, IDSYNC	Advertising.com	<p>Collects information on visitor behavior on multiple websites. This information is used on the website, in order to optimize the relevance of advertisement. Identifies if the cookie-data needs to be updated in the visitor's browser - This is determined through thir d-party ad-serving-companie.</p> <p>1 year</p>	1 year
c, tuuid, tuuid, tuuid_lu	Bidswitch.net	Regulates synchronization of user identification and exchange of user data between various ad services.	1 year
MUID, MUIDB	Bing.com	Used widely by Microsoft as a unique user ID. The cookie enables user tracking by synchronising the ID across many Microsoft domains.	1 year
anj, uuid2	Bluekai.com	Registers anonymized user data, such as IP address, geographical location, visited websites, and what ads the user has clicked, with the purpose of optimizing ad display based on the user's movement on websites that use the same ad network.	179 days

CMDD, CMID, CMPRO, CMPS, CMRUM3, CMST	Casalemedia.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded, with the purpose of displaying targeted ads	CMPRO, CMPS 3 months CMID, CMRUM3 1 year CMST, CMDD 1 day
Uid	Criteo.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded, with the purpose of displaying targeted ads.	1 year
IDE, test_cookie	DoubleClick.net	Used by Google DoubleClick to register and report the website user's actions after viewing or clicking one of the advertiser's ads with the purpose of measuring the efficacy of an ad and to present targeted ads to the user	test_cookie 1 day IDE 1 year
tms_VisitorID, tms_wsip, newsPopUp	Fresh Relevance	<p>tms_VisitorID - This cookie is used to identify each shopper and attributes site interactions to them. The cookie is set to expire after 80 weeks, which is extended each time the shopper visits the site. If they don't return to the site within that period, the cookie will be automatically deleted.</p> <p>tms_wsip - This is a housekeeping cookie set to expire after 30 minutes and works in conjunction with the tms_VisitorID cookie to capture shopper activity.</p> <p>newsPopUp - This is the default cookie used by PopOver SmartBlocks to suppress a PopOver x days after it is last seen, where x is configurable for each PopOver. The duration is also the same value as x.</p>	
Ayl_visitor	Omnitagjs.com	This cookie registers data on the visitor. The information is used to optimize advertisement relevance.	29 days
i	Openx.net	This domain is owned by OpenX. The main business activity is:	1 year

		Advertising. This cookie registers anonymized user data, such as IP address, geographical location, visited websites, and what ads the user has clicked, with the purpose of optimising ad display based on the user's movement on websites that use the same ad network.	
Criteo	Outbrain.com	This cookie is currently under review and its purpose is being assigned. Once complete, this description will be updated accordingly.	29 days
Opt_out	Postrelease.com	This cookie is currently under review and its purpose is being assigned. Once complete, this description will be updated accordingly.	1 year
KRTBCOOKIE_#, PUBMDCID, PugT	Pubmatic.com	This domain is owned by Pubmatic. It operates an advertising exchange platform where online publishers can sell targeted advertising space to media buyers using real time bidding. This cookie registers a unique ID that identifies the user's device during return visits across websites that use the same ad network. The ID is used to allow targeted ads. If your intent is to disable pubmatic services you need to read and follow instructions.	29 days PUBMDCID 3 months
rlas3, pxrc	Rlcdn.com	Collects anonymous data related to the user's visits to the website, such as the number of visits, average time spent on the website and what pages have been loaded, with the purpose of displaying targeted ads	2 months
Stx_user_id	Sharethrough.com	Sets a unique ID for a specific visitor. This ID can be used to recognize the visitor upon re-entry and implement any preference choices made. The cookie also allows the website to track the visitor on multiple websites for marketing purposes.	1 year
UID uid-bp	Ads.stickyadstv.com	Unique user ID that recognizes the user on returning visit	UID 1 year uid-bp 29 days

t_gid, taboola_usg, taboola_vmp	Taboola.com	This cookie gives a user a User ID that is used for attribution and reporting and keeps track of user segmentation.	1 year
TapAd_DID, TapAd_TS, TapAs_TTD_SYNC	Tapad.com	Used to determine what type of devices (smartphones, tablets, computers, TVs etc.). This domain is owned by Tapad Inc. a US based company that provides technology to track users across devices to enhance targeting capabilities.	2 months
Tt_viewer	Teads.tv	This domain is owned by Teads, a video advertising marketplace company, specialising in native advertising on video.	1 year
AWSELB	Crieo-partners.tremorhub.com	Load Balancing Cookie: Used to map the session to the instance.	1 day
B	Yahoo.com	Collects anonymous data related to the user's website visits, such as the number of visits, average time spent on the website and what pages have been loaded. The registered data is used to categorise the users' interest and demographical profiles with the purpose of customising the website content depending on the visitor.	1 year

Controlling cookies

You can manually manage and/or delete these cookies. You can delete all of the cookies stored on your computer and you can set up most browsers in such a manner that the archiving of cookies is prevented in the first place.

However, if you do this, you may have to manually adjust some settings every time you visit and live with the impairment of some of the functions

Questions and Contact Information

For further information and to exercise your statutory rights according to section 5, please go to www.kao.com/global/en/EU-Data-Subject-Request.

Changes to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, regulatory or operational requirements. We will notify you of any such changes, including when they will take effect, by updating the "Last revised" date above or as otherwise required by applicable law.

Your continued use of our Website after any such updates take effect will constitute acceptance of those changes. If you do not accept updates to this Privacy Policy, you should stop using our Website.