

## OVERVIEW

Fmcosmeticsgroup.com is committed to respecting and protecting your privacy. We act in accordance with the requirements of the various privacy and data protection laws applicable in the countries or markets where we operate.

This Privacy Notice explains how we collect, use and share Personal Data pertaining to our customers, Independent Business Partners, job applicants and office and Website visitors (collectively, “**you**” and “**your**”) and explains the rights you have regarding our use of your Personal Data.

## WHO WE ARE AND HOW TO CONTACT US

Fmcosmeticsgroup.com and its affiliates and subsidiaries (“**Fmcosmeticsgroup.com**”, “**we**”, “**us**” and “**our**”) are an international group of companies offering personal care products, nutritional supplements, devices and other goods or services through (i) the Fmcosmeticsgroup.com websites (whether local or global) (each a “**Website**”), (ii) Fmcosmeticsgroup.com apps and tools (the “**Apps**”) and (iii) a network of independent distributors (“**Independent Business Partners**”).

Depending on who you are, your Personal Data are processed by different entities of Fmcosmeticsgroup.com and/or for different purposes.

## WHAT PERSONAL DATA DO WE COLLECT

*Personal Data* is any information that relates directly or indirectly to an identified or identifiable living individual or, where applicable, legal entity. Personal Data may include a name, an (email) address, a telephone number, an IP address, credit card information, preferences, age, gender, occupation, etc.

The Personal Data that we collect, and how we collect it, depends on how you interact with us. For instance, if you are one of our customers, we may collect different types of data compared to when you are a Independent Business Partner. We have included a generic outline of our data collection and processing activities below. This list includes details of processing activities per data subject category.

## A. CATEGORIES OF PERSONAL DATA

General categories of Personal Data that we collect are the following:

- **Contact information:** such as name, title, address, email address and telephone number;
- **Biographical information:** such as gender, birthdate, nationality, photograph or videos containing your image, occupation and information about family life (excluding special categories of data) including family, children, hobbies and interests;
- **Identification information:** such as passport number, permanent resident identification number, social security number, and any other identification details and documents and photocopies of the aforesaid identification documents, to the extent permissible under applicable laws;
- **Registration data:** such as newsletter requests, event/incentive trips registrations, subscriptions, downloads, and username/passwords, data requested in sign-up or registration forms, and related information such as feedback and survey responses;
- **Billing and financial information:** such as bank account details, credit/debit cards details, copy of bank account statement and any information or data required to verify and/or process payment transactions;
- **Product information:** such as your purchase history, details of products that we have sold to you, product returns, preferred products;
- **Special categories of Personal Data:** in limited circumstances we may collect special categories of Personal Data such as data related to racial or ethnic origin or your health;
- **Details regarding your use of Fmcosmeticsgroup.com IT systems and equipment** when you are a Independent Business Partner;

- **Other data:** any other Personal Data you voluntarily provide to us. For instance, when you choose to provide us with Personal Data of your family members when completing our online form that contains a dedicated field for this purpose, or when you contact our customer service.

## **B. PERSONAL DATA WE COLLECT FROM YOU AND WHY**

We collect Personal Data directly from you as follows:

### **I. As a Customer:**

- **When you create a Fmcosmeticsgroup.com account**, we will collect, or ask you to provide your contact information, some biographical information and other relevant information, as well as your communication preferences;
- **When you purchase Fmcosmeticsgroup.com products or services, or return products**, we will collect, or ask you to provide your contact information, billing and financial information and other relevant information;
- **When you register to our newsletter and/or to one of our online services**, we will collect, or ask you provide your contact information and other relevant information including registration data, as well as your communication preferences; and
- **When you otherwise interact with Fmcosmeticsgroup.com**, for instance by contacting our customer service. In this case, we will collect the Personal Data you provide to us at your own initiative and any Personal Data we need to help resolve your query. If you call our call centers, we will record the call.

### **II. As a Independent Business Partner:**

- **When you sign up to become a Fmcosmeticsgroup.com Independent Business Partner**, we will collect, or ask you to provide your financial and business information and other relevant information which may include identification information and additional biographical information;
- **When you purchase Fmcosmeticsgroup.com products or services, or return products**, we will collect, or ask you to provide your contact information, billing and financial information and other relevant information;

- **When you register to our newsletter and/or to one of our online services**, we will collect, or ask you provide your contact information and other relevant information including registration data, as well as your communication preferences;
- **When you register to attend one of our events/incentive trips**, we will collect, or ask you to provide you and your guest's contact and identification information, and other relevant information including biographical information, registration data, billing and financial information;
- **When you use some of our Apps as a logged in Independent Business Partner**, we will also ask you to provide information relevant to the App, which may contain ethnicity and health data if such data is necessary to provide you with the functionality you request using the App;
- **When you report an adverse event case**, we will collect, or ask you to provide your contact information, as well as information regarding the adverse event you suffered which may contain health data;
- **When you use our company IT systems or equipment**, we may collect data related to your use of such equipment; and
- **When you otherwise interact with Fmcosmeticsgroup.com**, for instance by reaching out to us through various communication channels. In this case, we will collect the Personal Data you provide to us at your own initiative and any Personal Data we need to help resolve a query.

## **YOUR OBLIGATIONS**

We expect that you only communicate Personal Data about yourself to us. If you also communicate Personal Data about other people to us, then you must ensure that you comply with any legal obligations that may apply to your provision of the information to us, and to allow us, where necessary, to use, process and transfer that information. In particular, and subject to local applicable laws, if you use a credit card not issued to you, you confirm that the credit cardholder has consented to the use of his/her credit card in relation to your purchase and has agreed that Fmcosmeticsgroup.com may collect, use and disclose his/her Personal Data for the purpose of processing your purchase.

We also expect that the Personal Data that you communicate to us are correct and that, if your Personal Data requires updating, you will promptly inform us.

## **PERSONAL DATA WE COLLECT FROM THIRD PARTIES**

Most of the Personal Data that we collect about you will be information that you provide to us directly. In some circumstances we may also receive Personal Data about you from:

- Independent Business Partners;
- Individuals who provide us with your Personal Data (e.g. your family members);
- regulatory bodies;
- other companies providing services to us.

Some of these third party sources may include publicly available sources of information.

## **HOW WE USE YOUR PERSONAL DATA**

We process your Personal Data based on the following legal grounds, as permitted by applicable law: (i) to fulfill our obligations under a contract with you, or to take steps prior to entering into a contract with you, (ii) to comply with a legal obligation, (iii) when it is in our legitimate business interest to use your Personal Data, or (iv) based on your consent. Our legitimate interests include operating, evaluating and improving our organization; preventing and protecting us and others against fraud, unauthorized transactions, claims and other liabilities; and ensuring compliance with company policies and industry standards. For companies like Fmcosmeticsgroup.com that have global business operations, processing your Personal Data for internal administrative purposes is typically also considered a legitimate interest. As required under law, we have carefully balanced our legitimate business interests against your data protection rights.

## SHARING AND TRANSFERRING YOUR PERSONAL DATA

### A. SHARING PERSONAL DATA

We may disclose your Personal Data to:

- other Fmcosmeticsgroup.com entities, including directors, employees, agents, and representatives thereof for operational, management, administrative, supervisory or evaluative or educational purposes
- lawyers, auditors, financial advisors, and other third party service providers in connection with their services to Fmcosmeticsgroup.com.
- suppliers and service providers including but not limited to shipping and delivery services providers, telecommunication services providers, payment services providers, event organizers, travel agencies and insurance companies;
- a third party in the event that Fmcosmeticsgroup.com sells all or part of its assets to such third party or merges with or is acquired by the third party;
- any applicable regulatory, statutory, governmental or other relevant authorities, agencies or bodies and industry regulators, and any other person to whom Fmcosmeticsgroup.com is compelled, required or permitted to do so by law, rules or regulations, legal process or litigation;
- any person pursuant to any order of a court of competent jurisdiction or comparable legal process.

In addition, if you are a Independent Business Partner or a customer, we may transfer your Personal Data to your upline Independent Business Partners and/or sponsor when we determine it necessary to ensure proper upline support or for Independent Business Partner educational purposes.

In such circumstances, we will take reasonable steps to ensure that any third party recipients have implemented reasonable security mechanisms to protect your Personal Data.

We do not disclose your personal information to third parties for the third parties' own direct marketing purposes. In addition, we do not and will not sell Personal Information to third parties; and in the past 12 months, we have **not** sold your Personal Information to any other entity.

## **B. TRANSFERRING PERSONAL DATA**

We transfer Personal Data to other jurisdictions as necessary for the purposes described in this Privacy Notice, including to jurisdictions that may not provide the same level of data protection as the jurisdiction in which your Personal Data was originally collected. For instance, we may transfer your data to the Poland because our parent companies are located there.

When we transfer your Personal Data to other countries or jurisdictions, we will protect that data as described in this Privacy Notice and in accordance with applicable law. Where required under applicable law, we will put in place binding contractual obligations with the data recipient to safeguard your data protection rights.

Furthermore, we will notify any data transfer and/or data transfer mechanisms to the competent Supervisory Authority where required under applicable law.

With respect to transfers originating from the European Economic Area ("EEA") to the United States and other non-EEA jurisdictions, we implement standard contractual clauses approved by the European Commission, and other appropriate solutions to address cross-border transfers as required or permitted by Articles 46 and 49 of the General Data Protection Regulation.

## **WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL DATA**

You have certain rights regarding how we use and keep your Personal Data. These are:

- **Rectification.** You have the right to require that any incomplete or inaccurate Personal Data that we process about you is amended;
- **Deletion.** You have the right to request that we delete Personal Data that we process about you under specific conditions;
- **Withdrawing Consent.** If you have consented to our processing of your Personal Data, you have the right to withdraw your consent at any time. This does not affect the lawfulness of the processing that was based on your

consent prior to withdrawal. This includes cases where you wish to opt out from marketing messages that you receive from us;

- **Access.** Subject to certain exceptions, you have the right to access and request a copy of the Personal Data we are processing about you, which we will provide to you in electronic form and/or in writing, or verbally where allowed by applicable laws. Where permissible under applicable laws, we may charge you a reasonable fee for this access request;

In addition, if you are in the EEA you have the following rights:

- **Restriction.** You have the right to request that we restrict our processing of your Personal Data under specific conditions (also applicable if you are in Macau);

- **Portability.** You have the right to request that we transmit the Personal Data we hold in respect of you to you or to another data controller under specific conditions;

- **Objection.** Where the legal justification for our processing of your Personal Data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defense of a legal claim.

Where we process your Personal Data for direct marketing purposes, you have the right to object at any time to such processing, including for profiling purposes to the extent that it is related to direct marketing. If you object to processing for direct marketing purposes, we will no longer process your Personal Data for such purposes.

We will respond to any of your requests to exercise these above data subject rights within the period prescribed by applicable laws. At our discretion, we may require you to prove your identity before providing the requested information. This is to ensure that your Personal Data is disclosed only to you. We may not be able to appropriately handle your request if you decide not to provide us with the Personal Data that we need to handle your request. If you are not satisfied with the way we handled your request, or for violations of applicable data protection laws, you may lodge a complaint or file a claim with a competent Supervisory Authority (for example, with the Supervisory Authority in your country or market of residence).

## **YOUR MARKETING CHOICES**

You can control whether to receive direct marketing from us (e.g., which we may send through electronic means, such as promotional emails). In certain markets, you will need to provide us with your consent before receiving marketing. For instance, we may ask you to tick a box indicating to “receive promotional emails” when you sign up as a new customer or Independent Business Partner.

## **CHANGES TO THE PRIVACY NOTICE**

We may update this Privacy Notice from time to time. We will notify you of any significant changes by posting those changes here or by notifying you through other appropriate communication channels we generally use with you. Any changes to this Privacy Notice will be considered effective immediately after the changes are posted on this Website unless otherwise indicated.

As a ↓	We use your Personal Data to ↓	We rely on the following legal grounds to use your Personal Data: ↓
Customer	create and manage your account; process your purchases and manage your product-returns ; communicate with you about your order for a product or service. ↗	to fulfil our contract with you and to comply with legal and regulatory obligations including accounting, tax and data privacy.
	provide news and information services including email briefings and newsletters.	where we have your consent and/or when you have expressed a preference to receive such marketing communications; or where it is in our legitimate interest to provide you with marketing.
	operate suppression lists to ensure that you do not receive communications if you object or unsubscribe.	to comply with our legal obligations.
	do research and development based on aggregate data, including but not limited to statistics about sales, market analysis, development of products and services; to maintain our global databases.	to pursue our legitimate interest in enhancing customer experience, improving our products and services, and general innovation; and in safeguarding and promoting our economic, commercial, social and financial interests, or with your consent, in the performance of the contract we have with you, or where permitted by applicable law.
	to prevent and detect unlawful activities, such as credit card misuse, and for dispute management purposes, for instance when you file a complaint with use about our products or services.	to comply with legal and regulatory obligations, including accounting and tax; and to pursue our legitimate interest in safeguarding and promoting our economic, commercial, social and financial interests and to communicate with you, or in the performance of the contract we have with you.
	maintain security and manage access to our systems, Website and Apps.	to comply with legal obligations, and/or to pursue our legitimate interest in maintaining the security of Website, Apps and networks, or in the performance of the contract we have with you.
	collect insights into how you interact with our services so that we can personalize our communications with you and improve our Website and Apps.	where we have your consent, in the performance of a contract we have with you or to pursue our legitimate interest to deliver our Website and Apps effectively.

Independent Business Partner	create and manage your account and to process your purchases, and to provide any ongoing customer care and support to you and your Independent Business Partner Account.	to fulfil our contract with you and to comply with legal and regulatory obligations including accounting, tax and data privacy.
	process your commission and bonus payments.	to fulfil our contract with you and to comply with legal and regulatory obligations including accounting and tax.
	provide services to you, for instance, (i) sharing information in Fmcosmeticsgroup.com's Business Support Materials, (ii) inviting you to events and send reminders on events venue, date and time, and (iii) organizing success trips and events.	to fulfil our contract with you; or to pursue our legitimate interest to adequately train and incentive our Independent Business Partners or with your consent.
	give recognition to you as a Independent Business Partner, for instance by publishing your name, sales records, picture, pin title, charitable donations you made, etc., at Fmcosmeticsgroup.com events, in Business Support Materials, social media channels, via email, etc.	where we have your consent; or because we have a legitimate interest in promoting our brand and the achievements of our sales force.
	promote our brand, for instance by using on the Website, in marketing materials or in other marketing tools, (i) testimonials given by you during Fmcosmeticsgroup.com's events, or (ii) recording of your appearances and/or performances at Fmcosmeticsgroup.com's event.	where we have your consent; or because we have a legitimate interest in promoting our brand and the achievements of our sales force.
	provide news and information services including email briefings and newsletters.	where we have your consent and/or when you have expressed a preference to receive such marketing communications; or to pursue our legitimate interest to provide you with marketing.
	operate suppression lists to ensure that you do not receive communications if you object or unsubscribe.	to comply with our legal obligations.
	do research and development based on aggregate data, including but not limited to statistics about sales, market analysis, development of products and services; to maintain our global databases.	to pursue our legitimate interest in enhancing customer experience, improving our products and services, and general innovation; and to pursue our legitimate interest in safeguarding and promoting our economic, commercial, social and financial interests, or where permitted by applicable law.

<p>to prevent and detect unlawful activities, such as credit card misuse, and for dispute management purposes, for instance when you file a complaint with use about our products or services.</p>	<p>to comply with legal and regulatory obligations, including accounting and tax; and to pursue our legitimate interest in safeguarding and promoting our economic, commercial, social and financial interests and to communicate with you.</p>
<p>maintain security and manage access to our systems, Website and Apps.</p>	<p>to comply with legal obligations, and to pursue our legitimate interest in maintaining the security of Website, Apps and networks.</p>
<p>collect insights into how you interact with our services so that we can personalize our communications with you and improve our Website and Apps.</p>	<p>where we have your consent, in the performance of the contract we have with you, or to pursue our legitimate interest to deliver our Website and Apps effectively.</p>