

## DATA PRIVACY AND PROTECTION OF YOUR DATA – ORBICO BEAUTY (SLOVAKIA)

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### 1. Introduction

Your privacy is important to us, Orbico Group.

In this Privacy Notice, we would like to explain who we are, what personal data we collect about you, why we collect it and what do we do with it in an easy and readable way. Personal data means any data from which we are able, directly or indirectly, to identify you.

Since Orbico Group is a multinational company, this Notice may be replaced or supplemented in order to fulfil local requirements.

Please take time to read this Notice. If you do not agree to it, please do not provide us with your data.

### 2. What does this Privacy Notice cover

This Notice covers how we process your data whenever you interact with us, e.g. when you

- visit any of our websites;
- use our social media channels;
- purchase and use our products and services, systems and applications;
- subscribe to our newsletters;
- provide to us your goods or services, systems or applications;
- contact our customer support;
- join our business events;
- participate to our contests;
- participate to our promotions;
- or otherwise interact with us

as consumer, business customer, partner, (sub) supplier, contractor or other person with a business relationship with us.

"Processing" means any operation performed on personal data, which includes collection, recording, storage, modification or update, retrieval, consultation, use, disclosure by manual and/or automated means.

### 3. What is the data that we collect about you?

Depending on who you are (e.g. customer, consumer, supplier, business partner, etc.) and how you interact with us (e.g. online, offline, phone, etc.) we may process different data about you.

In this notice we cover all possible personal data that we collect from you.

- *Data you provide us directly us*

Categories of data	Examples of data
Personal identification	Name, last name, title, date of birth
Contact information	Email, phone number, address, country
User login data	UserID, password
Images	Pictures uploaded/ provided to us
Financial data	Credit card data, bank account information
Other information	Household information, interests, profession, preferences

- *Data about your use of products and/ or services that we collect automatically -*

In addition to the information you provide to us directly (see above), we may collect information sent to us by your computer, mobile phone or other access device. For example, we may collect:

Categories of data	Examples of data
Device information	Device model, unique device identifier, MAC address, IP-address, operating system version, and settings of the device you use to access, e.g. the websites/ apps/ services
Log information	Time and duration of your use of our digital channel or product
Location information	Your actual location (derived from your IP address or other location-based technologies), that may be collected when you enable location-based products or features such as through social media
Other information	Apps you use or websites you visit, links you click within our advertising e-mail, motion sensors data

- *Information from third-party sources*

We may receive information about you from publicly available sources (as permitted by law) such as public databases, our marketing partners, or social media platforms when you choose to connect to such services. We may combine this information with other information we receive from you.

- *Other*

You may choose not to provide certain types of information to us but doing so may affect your ability to enable certain functionality of the products and/ or services.

In compliance with the law, we will not process data relating to

- racial or ethnic origins;
- political opinions;
- religion or beliefs;
- trade union membership;
- genetic features;
- health;
- sex life;
- criminal convictions or related security measures;
- biometric data;
- genetic data.

If we had to process this type of data, we would always request your prior consent.

#### 4. **How do we use your data?**

We may process your data for different purposes, but only for those which have a legal basis to process the data. Please find below the overview.

Legal basis	Examples of Purpose
Contract/agreements execution	Billing and delivering products and/ or services that you have purchased; Enabling us to reach you for delivering you our products; Registration to mobile applications or websites; Service account management.
Compliance with legal obligations and Public interest	Disclosing data to government institutions or supervisory authorities as applicable in all countries in which we operate, such as reporting obligations, compliance audits, tax deductions, record-keeping and reporting obligations, compliance with government inspections and other requests from government or other public authorities; Establish, exercise, or defend ourselves from legal claims.
Legitimate interests	Administrative communications, such as order confirmations, notifications about your account activities, and other important notices; Providing support upon your request via communication channels, such as customer or contact center support; Security and protection of our interests/assets, such as deploying and maintaining technical and organizational security measures, conducting internal audits and investigations, conducting assessments to verify conflict of interests; Managing any internal complaints or claim.

Orbico may send you communication about our products, services, events and promotions. The communication is

send via different channels: email, phone, SMS, post, social networks. We would like to provide you with the best experience, therefore these communications might be tailored to your preferences (for example, email as your preferred channel of communication with us – you can indicate it yourself or we can understand it based on the links you click in our emails).

When required by law, we will ask your consent before starting the above activities. To give your consent, you can, for example, tick the box for acceptance of receipt of news and promotions or usage of your data for general e-commerce industry trend analytics. We also give you the opportunity to opt-out and withdraw your consent at any time. e.g. unsubscribe email, website preferences upon login or sending a notice to our email address [privacy.orbico beautysk@orbico.com](mailto:privacy.orbico beautysk@orbico.com).

If we ask you to provide us with your data, but you chose not to, in some cases we will not be able to provide you with the full functionality of our products, services, systems or applications. Also, we might not be able to respond to requests you might have.

## **5. When do we share your data?**

To whom the data is disclosed: other Orbico entities, affiliates, service providers, business partners, public authorities, governmental authorities, contractors, others.

When the data is transferred abroad?

Which countries, under which instrument

Your data will be processed by ourselves and other entities within the Orbico Group. In exceptional cases and only to fulfil the above described purposes described above, your data might be shared with following parties:

- Service providers: e.g. outsourcing, we may outsource certain data processing activities to trusted third party service providers to perform functions and provide services to us, such as ICT service providers, consulting providers, shipping providers
- Business partners: they can provide you with the services you request
- Public and governmental authorities: when required by law, or as necessary to protect our rights, we may share your data with entities that regulate or have jurisdiction over Orbico Group.
- Professional advisors such as auditors, lawyers, accountants, other professional advisors.
- Other parties in connection with corporate transactions such as during a sale of a business or a part of a business to another company, or any reorganization, merger, joint venture, or other disposition of our business, assets, or stock (including in connection with any bankruptcy or similar proceeding).
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Your information may also be processed in a destination outside of the European Economic Area. Third parties are limited in their ability to use your information for other purposes than providing services to us and are also required to protect and handle your information in accordance with legal, regulatory and contractual obligations. We take reasonable steps to ensure that we retain information about you only for so long as is necessary for the purpose for which it was collected, or as required under any contract or by applicable law.

## **6. How do we keep/retain your data?**

We keep your data for the period necessary to fulfil the purposes for which it has been collected (see above section “How do we use your data?”). Sometimes we might keep your data longer if required or permitted by law. We determine the period based on the following criteria:

- How long is the data needed to provide you with our products or services or to operate our business?
- Do you have an account with us? Then we will keep your data while your account is active.
- Are we subject to a legal, contractual, or similar obligation to retain your data? Examples can include mandatory data retention laws, government orders to retain data relevant to an investigation, or data that must be retained for the litigation purposes.

## **7. How do we secure your data?**

To protect your data, we will take appropriate technical and organizational measures in line with the applicable data protection and data security laws, including requiring our service providers, business partners or professional advisors to use appropriate measures to protect the confidentiality and security of your data. We put in place measures to prevent risks such as destruction, loss, alteration, unauthorized disclosure of, or access to your data.

**8. Who is responsible for your data?**

Orbico Beauty s.r.o., organizačná zložka with its head office at Kutlíkova 17, Bratislava 5 - 851 02 is responsible for processing the personal data it deems necessary to process. We are therefore the party whom you, as well as the supervisory authorities, The Office for Personal Data Protection of the Slovak Republic (Úrad na ochranu osobných údajov Slovenskej republiky, [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk)) should contact for any questions you may have relating to the way our company uses your data.

For some services, we rely on specialised partners. They therefore have to follow our instructions and adhere to our policy on personal data protection. We ensure that our partners receive only the data that are strictly necessary to perform their contractual duties.

**9. Which legislation applies?**

The protection of your personal data is covered by the Regulation EU 2016/679, also known as the EU General Data Protection Regulation and applicable national data protection law of Sweden. We undertake to comply with our obligations and respect your rights whenever we process your data. If you wish to learn more about this subject, we advise you to visit [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk). Being Orbico a multinational company, this Notice may be replaced or supplemented in order to fulfil local requirements.

**10. Accessing your information**

You are entitled to submit an inquiry to us and be advised about the data we process about you and how we process such data. You are also entitled at any time to withdraw your consent and/ or request any erroneous data to be corrected. Please make your enquiries and requests in writing, sign and send your letter to the address [privacy.orbicobeautysk@orbico.com](mailto:privacy.orbicobeautysk@orbico.com). We will respond promptly and no later than within a month, unless extraordinary complexity would require an extension of the time to respond.

If you have any issues exercising your rights regarding personal data you may

(a) contact the Entity Privacy Manager: [privacy.orbicobeautysk@orbico.com](mailto:privacy.orbicobeautysk@orbico.com)

(b) lodge a complaint with the supervisory authority, The Office for Personal Data Protection of the Slovak Republic (Úrad na ochranu osobných údajov Slovenskej republiky, [www.dataprotection.gov.sk](http://www.dataprotection.gov.sk)).

<b>Applicant Privacy Policy</b>	
<b>Issuer:</b>	Orbico Beauty s.r.o. organizačná zložka
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## 1. General

- 1.1. This Applicant Privacy Policy (hereinafter referred to as “**Applicant Privacy Policy**”) governs the protection of your personal data, as well as your privacy if you applied to a job position in our Company, whether this job position was advertised or not (hereinafter referred to as “**you**”). This Applicant Privacy Policy is issued by **Orbico Beauty s.r.o. organizačná zložka, Kutlíkova 17, Bratislava 5 - 851 02, Reg. No. 318 122 10** (hereinafter referred to as “**Company**” or “**Us**”). We act as the controller of your personal data.
- 1.2. Our range of activities is wide, that’s why we have more privacy policies. This one refers to you as an applicant, but other may apply to you as well (if applying to a job position is not the sole reason of our communication).

## 2. What personal data do we process?

- 2.1. We process your personal data which you provided us with in your job application, as well as your personal data that we collected in the recruitment process i.e. the following data:
  - 2.1.1. Your identification data: Name, last name, address and citizenship;
  - 2.1.2. Your contact data: Phone number, E-mail address;
  - 2.1.3. Information about your education and title;
  - 2.1.4. Information about your age and current and previous work experience;
  - 2.1.5. Information about test results (if testing is done as a part of the recruitment process) and our interviews (summary relevant for the job position we are considering you);
  - 2.1.6. Other data that may be relevant for a job position e.g. certificates and other skills.

## 3. What are the purposes for which we process your personal data?

- 3.1. We process your personal data for the following purposes:
  - 3.1.1. If you applied for a job position, we process your data to find out if you are the right candidate. In such case, the basis for processing your personal data is our legitimate interest;
  - 3.1.2. If we think you might be the right candidate, we process your data in order to make you an offer and enter into the relevant contract. In such case, the basis for processing your personal data is processing necessary for entering into a contract;

- 3.1.3. If you applied for a job position, but we have not made you an offer or you rejected our offer, we might process your data for future job positions in our Company. In such case we will separately notify you about such processing and you will be given the opportunity to object. If you do not object, the basis for our processing of your personal data is our legitimate interest;
- 3.1.4. We might process your personal data for other purposes such as confirming whether the recruitment process was managed fairly and transparently, confirming whether the information you gave us was true, in order to answer to your request or in order to protect our interest in a court or other proceeding. In such case, the basis for our processing of your personal data is our legitimate interest.

#### **4. How do we protect personal data?**

- 4.1. All our personnel accessing your personal data must comply with the internal rules and processes in relation to the processing of personal data to protect them and ensure their confidentiality. They are also required to follow all technical and organisational security measures put in place to protect your personal data.
- 4.2. We have also implemented adequate technical and organisational measures to protect your personal data against unauthorized, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing. These security measures have been implemented taking into account the state of the art of the technology, their cost of implementation, the risks presented by the processing and the nature of the personal data, with particular care for sensitive data.

#### **5. Who has the access to your personal data?**

##### **5.1. *Within the Orbico Group***

- 5.1.1. In limited and necessary instances, we may provide access to personal data by other Orbico companies, to complete the purposes indicated in section above. Access to personal data will only be given to authorised individuals, such as HR managers or IT administrators. Certain executives, managers and employees at other Orbico companies may also have access to certain personal data, only on a need to know basis and if there is a legitimate business purpose.

##### **5.2. *Outside the Orbico Group***

5.2.1. We may also consider it necessary to transfer personal data to third parties outside the Orbico Group to complete the purposes listed in section above, or as may be required by law, including:

- third party service providers, such as our IT systems providers, our hosting providers, cloud service providers, database providers, consultants (including lawyers, tax accountants, labour consultants) and third parties who carry out pre-employment or pre-engagement checks on prospective employees - each of these service providers has signed contracts to protect your personal information and are obligated to only use personal data for the specific purposes stated by Orbico;
- any national and/or international regulatory, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

### **5.3. *Is my personal data transferred to third countries?***

5.3.1. If we transfer your personal data to a third country (outside the EEA or other jurisdiction NOT recognized by the EU Commission as providing the adequate level of protection), we previously request your explicit consent to do so or we sign a contract with a specific party that guarantees the same level of protection, i.e. it contains and applies contractual clauses approved by the EU Commission.

## **6. How long do we keep your personal data?**

- 6.1. Personal data we process based on our legitimate interests are kept as long as there is a legitimate interest and we delete them in a period of one year from when our legitimate interest ceased to exist.
- 6.2. Personal data that we process based on your consent, we keep as long as we have your consent. In the event of withdrawal of your consent, we will delete your personal data in the shortest possible time. If consent is given for a specific period of time, after the expiration of that period, your data will be deleted as soon as possible, within a reasonable time.

## **7. Your rights**

- 7.1. You can exercise your rights (*see below*) by submitting your request to [privacy.orbicobeautysk@orbico.com](mailto:privacy.orbicobeautysk@orbico.com). Please make sure that you (1) enter "*Request of the data subject*" as the title of the message and in the text tell us (2) who you are so that we can identify



you and (3) what right you want to exercise. Upon receipt of the message, we will send you a confirmation that we have received your request.

**7.2.** You can exercise your rights free of charge. However, if you frequently request (for example, if you requested to exercise your rights less than 6 months ago) or excessively request (for example, you are looking for all your personal information in writing) access or transfer of your personal data, we have the right to ask you to settle our costs before carrying out such actions.

**7.3. *Access to your personal data***

You have the right to ask for a confirmation that we process your personal data, as well as access to your personal data we process.

**7.4. *Rectification of inaccurate personal data***

You have the right to request the rectification of your incorrect personal data, as well as the right to have incomplete personal data completed.

**7.5. *Data portability***

You have the right to take over and request the transfer of your personal data (when we process your data based on your consent or for the purpose of entering into the contract).

**7.6. *An objection about the processing or handling your personal data***

You have the right to object to the processing of your personal data, as well as our general manner of handling your personal data.

**7.7. *The right to withdraw the consent***

You are entitled, at any time, to withdraw the consent for the further processing of your personal data – but for the personal data that we process based on your consent (and not when we have different legal basis). The withdrawal does not affect the processing carried out on the basis of the consent prior to its withdrawal.

**7.8. *The right to complaint to the authority***

At any time, you have the right to complain to the competent body for the protection of personal data – [Úrad na ochranu osobných údajov Slovenskej republiky, www.dataprotection.gov.sk](http://www.dataprotection.gov.sk), in relation with processing and protection of your personal data.

**8. *Changes to the Applicant Privacy Notice***



- 8.1. The Applicant Privacy Notice may be subject to amendments (changes, additions or similar). Any future amendments to how we process your personal data described in the Applicant Privacy Notice will be communicated to you through an appropriate channel, depending on how we normally communicate with you. Be sure to check the actual version published on <http://www.orbicobeauty.sk/>.

## 9. Contact

- 9.1. If you have any questions regarding the processing of your personal data or if you believe your privacy rights have been violated, please address your request to the following address:

[privacy.orbicobeautysk@orbico.com](mailto:privacy.orbicobeautysk@orbico.com)

Orbico Beauty s.r.o. organizačná zložka, Kutlíkova 17, Bratislava 5 - 851 02