

## PERSONAL DATA PROTECTION POLICY

[www.sisley-paris.com/en-HK](http://www.sisley-paris.com/en-HK)

Update: March 2021

SISLEY pays particular attention to protecting the personal data that you provide or that it collects.

SISLEY undertakes every effort to ensure the highest degree of protection of your personal data in accordance with current regulations, particularly the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong). SISLEY reserves the right to modify this Personal Data Protection Policy at any time without notice.

This document gives you a better understanding of how SISLEY protects your personal data.

We invite you to read this document before submitting your personal data.

A Chinese version of this Personal Data Protection Policy is available on the Website for reference purposes only. In the event of any conflict between the English and Chinese versions of this Personal Data Protection Policy then the English version shall prevail.

### 1. THE CONTROLLER'S IDENTITY

The controller is the company SISLEY HONG KONG LIMITED, a company incorporated in the Hong Kong Special Administrative Region with limited liability (CR No.: 0764833) whose registered office is at Room 4105, 41st Floor, Lee Garden One, 33 Hysan Avenue, Causeway Bay, Hong Kong (hereinafter "SISLEY").

### 2. WHAT PERSONAL DATA IS COLLECTED AND WHEN?

"Personal data" means any data (a) relating directly or indirectly to a living individual; (b) from which it is practicable for the identity of the individual to be directly or indirectly ascertained; and (c) in a form in which access to or processing of the data is practicable.

More specifically, SISLEY may collect, save, process, transfer, and use personal data relating to:

- Your identity (title, first and last name, address, telephone and/or mobile number, email address, date of birth, internal processing code enabling the customer to be identified).
- Managing orders and commercial relations (placing orders, subscribed service, billing, shipping, payment methods, fraud prevention, product returns, refunds, claims, after-sales service for purchased products, purchasing and services history, loyalty program, correspondence and after-sales service, exchanges and comments from existing and potential customers).
- Initiatives aimed at loyalty, finding potential customers, conducting studies, surveys, product tests and promotions.
- The contribution of people who submit their opinions on products, services, or content.
- The organisation and handling of contests, sweepstakes, and all promotional initiatives (participation date, answers given during the contests and type of prizes offered).
- Technical information (language, IP address) or browsing information linked to the device.

SISLEY may collect your personal data especially when:

- You visit the website [www.sisley-paris.com/en-HK](http://www.sisley-paris.com/en-HK) (hereinafter the "Website").
- You subscribe to SISLEY newsletters.
- You create your account on the Website.
- You place an order on the Website and answer customer satisfaction surveys.
- You write to SISLEY by mail, email, chat, or when you call. This correspondence may be kept by SISLEY to enhance the relationship with you and improve its services.
- You give your opinion on products, services, or content.
- You participate in special initiatives (contests, sweepstakes).
- You share content on social networks such as Instagram, Facebook, Pinterest, or Twitter using the hashtag #sisley or other hashtags that SISLEY offers.

How is the content you share on social networks handled using the hashtags we offer?

You can choose to use the hashtags we offer to tag your content on social networks such as Instagram, Facebook, Pinterest or Twitter. By using these hashtags, you acknowledge and consent that your content may appear on our Website and be used to link to our products or services. We remind you that the information you make public on social networks can be viewed, used and saved by other people around the world, and in particular in countries that do not have legislation guaranteeing adequate protection of your personal information, as defined in your country of residence. We also draw your attention to the fact that when you submit content using one of our hashtags, your use of social networks is exclusively governed by the terms and conditions of those social networks. We invite you to read them and refer to them regularly.

If you no longer want any of your content to appear on our Website, please remove them from the social network or stop using one of our hashtags.

When collecting personal data, the mandatory or optional nature of the data is indicated by an asterisk or other means.

### **3. WHAT ARE THE PURPOSES?**

In general, your personal data helps SISLEY customise and continually improve your shopping experience on the Website. It is particularly intended for:

- Managing and tracking orders, where applicable prevention, detection and management of fraud or unpaid debts .
- Managing commercial relations.
- Managing customer opinions on purchased products, services, and content.
- Managing customer accounts.
- Managing SISLEY SMS or Newsletter subscriptions.
- Conducting initiatives aimed at loyalty, finding potential customers, promotions and customising various communications (digital, email, paper, SMS) from SISLEY.
- Conducting telemarketing campaigns.
- Compiling sales statistics.
- Managing SISLEY masterclasses.

SISLEY will not use your personal data for direct marketing unless your consent (or your indication of no objection to the intended use) is received.

### **4. HOW LONG IS THE DATA KEPT?**

In general, SISLEY keeps your personal data for a period of time that enables it to comply with all legal obligations in accordance with the applicable laws or for a period that does not exceed the duration required for the purposes (including any directly related purposes) specified in clause 3 of this policy, unless any the erasure of such personal data is prohibited by law or it is in the public interest for the data not to be erased.

So:

- Data establishing proof of a right or a contract or that is kept under a legal obligation is stored in accordance with the applicable laws.
- Bank details are deleted once the transaction is completed or stored as evidence in accordance with the applicable provisions, unless you consent to use the "Saved payment cards" option to save your banking data in a secure, encrypted manner. In any case, the security code of your credit card is never kept.

### **5. WHO ARE THE RECIPIENTS OF THE DATA?**

Your data may be sent to c.f.e.b. SISLEY (France) and service providers that are selected for their expertise and on behalf of SISLEY to achieve the purposes it defines such as payment, delivery, marketing or IT service providers.

It may sometimes be passed on to SISLEY's partners for purposes for example in the context of its use of social networks.

Under no circumstances does SISLEY sell your personal data to anyone.

SISLEY may be required to disclose your personal data without your consent upon request or authorisation in accordance with the applicable laws and regulations or by an order of a court.

### **6. WHAT IS THE LEVEL OF CONFIDENTIALITY AND DATA SECURITY?**

In accordance with best practices on the date hereof, SISLEY implements all the appropriate technical and organisational measures with regard to the nature of the data and the risks that its processing entails in order to preserve the highest security and the strictest confidentiality of your personal data and, in particular, to prevent it from unauthorised or accidental access, processing, erasure, loss or use.

These measures may include but are not limited to: limited access to data, contractual terms when using service providers, security measures such as secure access, antivirus software, authentication process, firewalls.

Despite all of the confidentiality and security measures implemented by SISLEY, we draw your attention to the fact that communications via the internet are never totally secure. SISLEY therefore assumes no liability in case of a communication failure or any other case of unforeseen circumstances.

### **7. WHAT PROTECTION IS THERE WHEN TRANSFERRING DATA OUTSIDE HONG KONG?**

Your data may be transmitted to countries outside Hong Kong that do not have an adequate level of data protection for the purposes defined by SISLEY.

Before your data is transmitted to these countries, SISLEY will take all possible steps to obtain the necessary guarantees so your data is protected.

## **8. WHAT IS THE COOKIE POLICY?**

To find out more about our cookie policy, please visit our cookie section: <https://www.sisley-paris.com/en-HK/cookies-policy/>

## **9. WHAT ARE YOUR RIGHTS?**

In accordance with the regulation on personal data protection (particularly the Personal Data (Privacy) Ordinance (Chapter 486 of the Laws of Hong Kong) ("PDPO")), you have rights to access and make correction to your personal data, and to object to the use of your personal data for direct marketing purposes by sending:

- An email through the "Contact us" section of the Website.

- A letter with a photocopy of your ID to the following address: Room 4105, 41st Floor, Lee Garden One, 33 Hysan Avenue, Causeway Bay, Hong Kong.

In accordance with the PDPO, where we receive any data access or correction request, we have the right to charge a reasonable fee for processing the same.

In the event that you have given us the consent for processing your personal data, you also have the right to withdraw this consent at any time without prejudicing the lawfulness of the processing of your personal data based on the consent made before its withdrawal.

You also have the right to file a complaint with the Office of the Privacy Commissioner for Personal Data or other competent supervisory authority.