

PERSONAL DATA PROTECTION POLICY

<https://www.sisley-paris.com/en-SG>

Update: September 2024

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 Singapore Personal Data Protection Act 2012 ("PDPA"). SISLEY reserves the right to modify this Personal Data Protection Policy at any time without notice. Your continued use of our website or our services constitutes your acknowledgement and acceptance of such modifications.

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.

1. THE CONTROLLER'S IDENTITY

The controller is the company SISLEY SINGAPORE PTE LTD., a company incorporated and registered in Singapore with company number 2001-04887C whose registered office is at 3 Killiney Road #05-02, Winsland House 1, Singapore 239519 and with VAT registration number 200104887C (hereinafter "SISLEY").

2. WHAT PERSONAL DATA IS COLLECTED AND WHEN?

All information enabling you to be directly or indirectly identified is "personal data".

SISLEY generally do not collect your personal data unless (a) it is provided to SISLEY voluntarily by you directly after (i) you have been notified of the purposes for which the data is collected, and (ii) you have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

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 monitoring 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 <https://www.sisley-paris.com/en-SG/> (hereinafter the "Site").
- You subscribe to SISLEY newsletters.
- You create your account on the Site.
- You place an order on the Site 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 better monitor 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. You may also request for erasure where SISLEY is able to remove it.

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 Site. It is particularly intended for:

- Managing and tracking orders (lawful basis: consent / contract), where applicable prevention, detection and management of fraud or unpaid debts (lawful basis: legitimate interests of Sisley).
- Managing and monitoring commercial relations (lawful basis: consent / contract).
- Managing customer opinions on purchased products, services, and content (lawful basis: legitimate interests of Sisley).
- Managing and monitoring customer accounts (lawful basis: consent / contract).
- Managing SISLEY SMS or Newsletter subscriptions (lawful basis: consent).
- Conducting initiatives aimed at loyalty (lawful basis: consent / contract), finding potential customers, promotions (lawful basis: consent) and customising various communications (digital, email, paper, sms) from SISLEY (lawful basis: legitimate interests of Sisley).
- Conducting telemarketing campaigns (lawful basis: consent).
- Compiling sales statistics (lawful basis: business improvement purposes / legitimate interests of Sisley).

In compliance with the PDPA, SISLEY may collect, use or disclose your personal data without your consent for the legitimate interests of SISLEY or another person. In relying on the legitimate interests exception of the PDPA, SISLEY will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.

4. HOW LONG IS THE DATA KEPT?

SISLEY will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

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 provisions in force or for a period that does not exceed the duration of its commercial management or however long the purposes defined by SISLEY require.

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 provisions.
- 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.
- The data relating to your identity documents is kept for one year, where collected with regard to the right to access, rectification, withdraw consent.

SISLEY is an international group headquartered in France and, for operational and technical reasons, we draw your attention to the fact that your data is generally stored for a period of three years from the last contact/purchase.

At the end of this three-year period, we may contact you again to find out if you wish to continue receiving commercial offers. If you do not give an explicit, affirmative answer, your data will either be deleted, rendered anonymous, or archived in accordance with the applicable provisions.

5. WHO ARE THE RECIPIENTS OF THE DATA?

Your data may be sent to SISLEY SINGAPORE PTE LTD., 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.

If requested by the authorities, SISLEY may be required to transmit your personal data in accordance with applicable regulations.

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 being distorted, damaged, or accessed by unauthorised third parties.

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 SINGAPORE?

Your data may be transmitted to countries outside Singapore 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 ensure that the recipients provide a standard of protection at least comparable to the protection under the PDPA or that the transfer is otherwise in accordance with the PDPA.

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-SG/use-of-cookies/>

9. WHAT ARE YOUR RIGHTS?

In accordance with the PDPA, you may exercise the following rights in respect of your personal data by sending:

- An email through the "Contact us" section of the Site.
- A letter with a photocopy of your ID to the following address: SISLEY SINGAPORE PTE LTD., 3 Killiney Road #05-02, Winsland House 1, Singapore 239519.

Withdrawal of consent: Where the processing is based on your consent, you also have the right to withdraw this consent at any time, by submitting your request in writing or via email, without prejudicing the lawfulness of the processing based on this consent made before its withdrawal. Upon receipt of your written request to withdraw your consent, SISLEY may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for SISLEY to notify you of the consequences of SISLEY acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within 10 business days of receiving it. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

Access and correction: You may make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you.

Please note that a reasonable fee may be charged for an access request. If so, SISLEY will inform you of the fee before processing your request.

SISLEY will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

SISLEY generally relies on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data.

You also have the right to a complaint with the competent supervisory authority.