

PRIVACY POLICY

Sisley-Paris.com

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1. INTRODUCTION

Sisley Cosmetics USA Inc. and its affiliates in the United States (collectively, “Sisley”, “us”, “our” or “we”) are committed to protecting the privacy of your personal information. This Privacy Policy describes what information we collect about you, and what we do with that information, your choices with respect to our processing of your personal information, and our information privacy practices. We urge you to read this Privacy Policy in its entirety before providing your personal information to us.

This Privacy Policy applies to the Sisley website and or applications that link to this Privacy Policy (for example, www.sisley-paris.com) (the “Site”). This Privacy Policy also applies to our collection and use of your personal information when you access or use the Site, contact our customer service team, engage with us on social media, shop at our stores or otherwise interact with us.

2. TYPES OF INFORMATION WE COLLECT

2.1. Personal Information

We collect personal information you provide directly to us. For example, we collect information when you create a profile on our Site, fill out a form, participate in a sweepstakes, contest or promotion, make a purchase, participate in our chat function, apply for a job, communicate with us via third-party social media sites, request customer support or otherwise communicate with us.

The types of personal information we may collect includes, but is not limited to, your name, address (billing and shipping), telephone number(s), birth date, gender, email address, credit or debit card information and billing and account information (or other payment method information), security question answers, commercial information such as your purchase history, Internet or other electronic network activity information, including browsing and search history, where such information is linked to you and other information that you voluntarily provide that is used to identify you.

2.2. Personal Information Collected

When you access or use the Site or otherwise transact business with us, we collect the following categories of information about you (In some cases, the information we collect may fall within more than one category, and in some cases we may collect this information automatically). (a) **Commercial Information:** When you make a purchase or return, we collect information about the transaction, such as product or service details, purchase price, products preferences, and date and location of the transaction; (b) **Payment information,** such as your method of payment and payment card information (including payment card number, expiration date, delivery address and billing address); (c) **Contact information and Demographic information,** such as your name, address, email address, telephone number, loyalty member ID, your age, sex, and gender (some of which may be protected by applicable law). (d) **Log and Usage Information:** We collect

information related to your access to and use of the Site, including the type of browser you use, access time, pages viewed, links clicked, IP address, the page you visited before navigating to our Site or other online identifiers; (e) **User Content**, such as your communications with us and any other content you provide (including photographs, videos, information shared in chat, reviews, survey responses, comments, customer service emails, calls and voice mails, employment-related information such as your resume, employment history, education information, and professional licenses or certifications.)

2.2.1 Information Collected by Cookies and Similar Tracking Technologies. We (and our service providers) use different technologies to collect information, including cookies and web beacons. Cookies are small files sent by us to your computer or device that help us gauge the success of our Site and will track session information such as what pages you access and for how long, which allows us to make upgrades to enhance your experience, including recognizing your preferences to make shopping easier for you and providing you with a customized experience. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that may be used on our Site or in our emails and help deliver cookies, count visits, and understand usage and campaign effectiveness. For more information about cookies and how to disable them, see “Your Choices” below.

2.2.2 Personal Information We Collect from Other Sources. We may also obtain information about you from other sources. For example, if you log into your account from a social media site, we will have access to certain information from that site, such as your name, account information, and friends list, in accordance with the authorization procedures determined by such social media site.

3. HOW WE USE THE PERSONAL INFORMATION WE COLLECT

We use the personal information we collect to: (a) provide, maintain and improve our Site, including to create and manage your online account and provide you with more relevant and personalized content; (b) complete the transactions you request, perform our contractual obligations, and as otherwise anticipated within the context of our ongoing business relationship; (c) detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity; (d) monitor, audit and analyze trends, usage and activities in connection with our Site; (e) display advertisements based on your preferences, interests, and browsing behavior (for more information, see “Advertising and Analytics Services Provided by Others”); (f) communicate with you about products, services, opportunities and events offered by Sisley and our partners and provide news and information we think will be of interest to you (see “Your Choices” below for information about how to opt out of these communications); (g) debug, identify and repair errors that impair the functionality of the Site; (h) comply with our legal obligations; (i) carry out certain reasonable internal activities related to the products you purchase from us or your ongoing relationship with us; (j) facilitate sweepstakes, contests and promotions and process and deliver entries and rewards; (k) answer your questions; and (l) carry out any other purpose described to you at the time the information was collected. Non-Personally Identifiable Information, such as cookies and similar tools, may be used in connection with your use of the Site in order to derive Personally Identifiable Information that we have obtained from you. If any Non-Personally Identifiable Information is linked with Personally Identifiable Information, the linked Non-Personally Identifiable Information will then be treated as Personally Identifiable Information.

4. USER ACCOUNTS

4.1. Security

We may enable you to set up an account with a username and password to access and use certain features of the Site. You agree to provide us with accurate account information and acknowledge that you are responsible for keeping your account login information secret. We will not be responsible for any loss or damage arising from your failure to comply with this requirement.

4.2. Termination

We may in our sole discretion suspend or close your account and terminate your registration at any time and without prior notice, including in the event that you breach any of your obligations set out in this Privacy Policy. We are not obligated to give a reason for termination.

5. SECURITY

We take reasonable administrative, technical and physical measures to help protect personal information from loss.

6. WHEN DO WE SHARE PERSONAL INFORMATION AND WITH WHOM

We may share information about you as follows and as otherwise described in this Privacy Policy:

- With our affiliates and subsidiaries;
- With c.f.e.b. SISLEY (the legal parent of Sisley Cosmetics USA Inc.), located in France;
- With vendors, service providers and consultants that need access to your information in order to perform services for us;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- If we believe your actions are inconsistent with our user agreements or policies, if we believe you have violated the law, or to protect the rights, property and safety of Sisley or others;
- In connection with, or during negotiations for, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company; and
- With your consent or at your direction.

If you use our chat function, please be aware that certain of Sisley's authorized service providers, and c.f.e.b. SISLEY, have simultaneous access to the chat in real time. We may also share aggregated or de-identified information that cannot reasonably be used by third parties to identify you.

7. ADVERTISING AND ANALYTICS SERVICES PROVIDED BY OTHERS

We may allow others to provide analytics services and serve advertisements on our behalf across the Internet and in mobile applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about you about your use of the Site and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of

certain content, deliver advertising targeted to your interests on our Site and other websites, and better understand your online activity. Our Site may use Google Analytics, a web-based analytics service provided by Google, Inc. (“Google”). For more information on how Google uses data when you use our Site or Service, please follow this link: <https://policies.google.com/technologies/partner-sites>. You may be able to opt-out of some or all of Google Analytics features by downloading the Google Analytics opt-out browser add-on, available at, <https://tools.google.com/dlpage/gaoptout>. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit <http://optout.aboutads.info>.

We may also work with third parties to serve ads to you as part of a customized campaign on third-party platforms (such as Facebook, Microsoft or Google). As part of these ad campaigns, we or third-party platforms may convert information about you, such as your email address and phone number, into a unique value that can be matched with a user account on these platforms to allow us to learn more about your interests and to serve you advertising that is customized to your interests. Note that the third-party platforms may offer you choices about whether you see these types of customized ads.

8. YOUR CHOICES

8.1 Account Information. You may update and correct your online account information by logging in to your account or emailing us at customerserviceUSA@sisley-paris.com. If you wish to deactivate your account, please email us at customerserviceUSA@sisley-paris.com, but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

8.2 Cookies. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Site.

8.3 Promotional Communications. You may opt out of receiving promotional emails from Sisley by following the instructions in those emails or by sending an email to customerserviceUSA@sisley-paris.com. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

9. CONTACT INFORMATION

If you have any questions about this Privacy Policy you may contact SISLEY

- by phone at (toll free) 1-855-747-2948,
- by e-mail customerserviceUSA@sisley-paris.com,
- through the contact form on the Site
- or by mail to the following address:
SISLEY COSMETICS USA INC.
19 West 44th St
Suite 514
New York, New York 10036
Attn. Customer Service

10. CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time. We will post the revised policy here, which will be effective as soon as it is posted. We suggest you periodically review this Privacy Policy for any changes. You can determine when this Privacy Policy was last revised by referring to the “Last Updated” legend at the top of this page. By continuing to use the Site following such changes, you will be deemed to have agreed to such changes.

11. YOUR CALIFORNIA PRIVACY RIGHTS

Users of the Site residing in California (“Consumers”) are afforded certain additional rights with respect to the personal information that we collect about them, including the specific pieces of personal information collected, the sources of that information, and the business purposes for its collection. In the previous 12 months we have collected the following categories of personal information from the consumers themselves and by automatic means: identifiers; personal information under the California Customer Records Law (Cal. Civ. Code 1798.81); characteristics of protected classes; commercial information; Internet or other electronic network activity information; electronic, audio, visual or similar information; and inferences made by us. For examples of the precise data points we collect and the sources of such collection please see “Personal Information We Collect” above. We collect personal information for the business and commercial purposes described in “How We Use the Personal Information We Collect” above.

Disclosure of Personal Information: We may share the categories of personal information listed above with third parties as described in the “When Do We Share Personal Information and with Whom” section in order to perform the services requested by the consumers, to comply with applicable law, for our legitimate business purposes, and as otherwise described in the “How Do We Use The Personal Information We Collect” section.

Sale of Personal Information: California law requires that we provide transparency about personal information we “sell,” which for the purposes of the California Consumer Privacy Act (“CCPA”) broadly means scenarios in which we have shared personal information with third parties in exchange for valuable consideration. In the previous 12 months, we have not, and during the period of time that this privacy policy is posted, we will not, sell identifying information of any Consumer, including minors under the age of 16, such as your name, email address, phone number, or postal address. As described above, we do permit our advertising partners to use cookies and other technologies to collect information about you, and those partners use and share those identifiers to show ads that are targeted to your interests. For information about how to opt out of having your web browsing information used for behavioral advertising purposes, please see the “Advertising and Analytics Services Provided by Others” section above.

Your Rights: If you are a California resident, you have the right to request (1) more information about the categories and specific pieces of personal information we have collected, sold and disclosed for a business purpose in the last 12 months, (2) deletion of your personal information, and (3) to opt out of sales of your personal information, if applicable. Finally, you have the right to not be discriminated against by us if you exercise your rights under the CCPA, such as by an increase in price.

You may make these requests by calling 1-855-747-2948 or emailing customerserviceUSA@sisley-paris.com. Once we receive your request, we will verify it by asking you to provide information related to your account and your recent interactions with us. To do this, we will ask the person making the request (“Requestor”) to confirm at least two pieces of information that we have in our files. As the sensitivity of the information being requested goes up, we will ask the Requestor to confirm more pieces of information. If you would like to use an authorized agent to exercise your rights, we may request evidence that you have provided such agent with power of attorney or that the

agent otherwise has valid written authority to submit requests on your behalf. We will do our best to respond to your request within 45 days, but if we need more time, we'll reach out to you as soon as possible and let you know the reason for the delay.

12. FINANCIAL INCENTIVE

We may offer you various financial incentives such as discounts and special offers when you provide us with contact information and identifiers such as your name and email address. When you sign-up for our loyalty program, email list or other discounts and special offers, you opt-in to a financial incentive. You may withdraw from a financial incentive at any time by opting out from our emails or closing your loyalty member account. Generally, we do not assign monetary or other value to personal information, however, California law requires that we assign such value in the context of financial incentives. In such context, the value of the personal information is related to the estimated cost of providing the relevant financial incentive(s) for which the information was collected.

13. CHILDREN AND YOUNG PEOPLE'S INFORMATION

We do not knowingly collect any information from any minors, and we comply with all applicable privacy laws including, but not limited to, the CCPA and the Children's Online Privacy Protection Act ("COPPA") and associated Federal Trade Commission ("FTC") rules for collecting personal information from minors. Please see the FTC's website (www.ftc.gov) for more information. If you have concerns about this Site, wish to find out if your child has accessed our services, or wish to remove your child's personal information from our servers, please contact us at customerserviceUSA@sisley-paris.com. Our Site will not knowingly accept personal information from anyone under 13 years old in violation of applicable laws, without consent of a parent or guardian. In the event that we discover that a child under the age of 13 has provided personal information to us, we will make efforts to delete the child's information in accordance with the COPPA. If you believe that your child under 13 has gained access to our Site without your permission, please contact us at customerserviceUSA@sisley-paris.com.

14. INFORMATION ON PUBLIC AREAS OF OUR SITE

Any information you submit in a public area of our Site – such as on a social media page, user comments, comments on any Sisley blogs, reviews or comments on any ratings or review feature, questions or answers on a question and answer application or other public forum – will not be treated as confidential and may be publicly disclosed. This applies to personal information, so please consider your public postings before doing so. Additionally, information posted on social media pages will be subject to the terms governing those pages and websites.