

INFORMATION CLAUSE FOR EMPLOYEES

Controller

We kindly inform You, that the Controller of Your personal data is L'Oréal Baltic SIA, with its registered address in Riga, 12 Citadeles street, and it's legal branches in Lithuania and Estonia (hereinafter referred to as: "Controller" or "the Company").

Data Protection Officer

The Controller has designated data protection officer (DPO), which can be contacted to e-mail address: personal-da@loreal.com in all matters concerning Your personal data.

Purposes and legal basis of data processing

Your personal data are processed for the following purposes:

- entering into the employment contract, its execution and termination;
- fulfilling the obligations deriving from the applicable Labour legislation and its implementing acts, including keeping and archiving employee personal files;
- carrying out activities related to the obligations and responsibility of the employee, non-competition clause, professional qualification of the employee, including trainings;
- personnel management, planning and analysing of the employment, management of assets given to the employee, payment and management of remuneration, assigning tasks, employees assessment;
- efficiency management, including profiling for statistical and development purposes;
- development management, including profiling for statistical and business related purposes;
- activities related to possible disciplinary liability of the employees, liability of the employee for damage against the employer, liability of the employee for employer assets, including establishing and pursuing possible claims;
- fulfilling obligations deriving from the law provisions on: social insurance, health insurance, taxes, work accidents, work social fund, accountancy, general defence obligation and other obligations due to the law provisions;
- organisation and financing of the additional perks for employees, as well as to family members or partners of employees (for instance life group insurance, health insurance, benefit system);
- ensuring security of the Company premises;
- ensuring information protection and keeping professional secrecy;
- financial, administrative and IT services, including creating and maintaining of accounts in IT systems as well as enabling telework;
- ensuring cooperation and communication on the capital group level and with the external entities that provide services to the Company, including global scale cooperation (for instance corporate books, planning and analysis of the employment);
- disclosure of image in the course of internal and external communication (e.g. electronic mail, intranet, Skype) and for L'Oreal Baltic promotion;
- disclosure of personal data to entities providing group insurance, medical care, sport and shop for employees services;
- disclosure of personal data to entities authorised on the basis of law, as well as to the entities, that data have to be disclosed to, in order to use special rights provided for in the labour law by the employees.

The legal basis for the processing of Your personal data is:

- necessity for concluding and performing of the employment contract, including exercising rights and fulfilling obligations of the employee or of the employer (art. 6 (1) letter b) of the General Data Protection Regulation of 27th April 2016, hereinafter referred to as the “GDPR”)
- law provisions – with relation to obligations deriving from those provisions, including labour law, social insurance, health insurance, tax, work accidents, work social fund, accountancy, general defence obligation (art. 6 (1) letter c) of the GDPR);
- legitimate interests of the controller (art. 6 (1) letter f) of the GDPR), i.e. for instance:
 - ✓ ensuring security at the Company’s premises, where the legitimate interests is to ensure security;
 - ✓ exchange of information on employees employed by the entities belonging to the same capital group – L’Oreal group, including corporate books, planning and analysing of the employment), where the legitimate interests is to enable global scale cooperation and fulfilment of the internal administrative purposes of the group;
 - ✓ development and HR management, including professional development (also on the group level), where the legitimate interests is taking care of the highest possible professional level of the management and other employees;
 - ✓ in the framework of the development management data can be used for profiling enabling optimal use of the employees potential;
 - ✓ transmitting personal data with relation to perks (insurance, sport, other), where the legitimate interests of the controller is to ensure the best working conditions for employees;
- Your consent, where the scope of personal data is broader than in law provisions (art. 6 (1) letter a) of the GDPR), i.e. among others:
 - ✓ In order to participate in optional courses/ trainings organised by the employer;
 - ✓ In order to disclose Your image for the purpose of internal and external communication (e.g. electronic e-mail, intranet, Skype/Teams); and L’Oreal Baltic promotion;
 - ✓ In order to disclose personal data to entities providing optional group insurance, medical care , sport, cafeteria and shop for employees services;

Data retention periods

Your personal data will be stored for the employment period and after that for the period required by labour law or other specific law provisions, e.g. accountancy law, tax law, social insurance and archiving law.

Where processing of personal data is based on Your consent, the Controller will store Your data until Your consent is revoked.

The Company will stop process personal data on the basis of its legitimate interests, if you object to the processing for these purposes.

Data recipients:

Your personal data can be disclosed to:

- ✓ Other entities from the L’Oreal Group for internal administrative purposes, i.e. L’Oreal SA, L’Oreal Polska Sp.z.o.o.
- ✓ Third parties with relation to fulfilment of Your employee obligations, which include entities occupying with: common HR service, providing trainings and vocational trainings, recruitment and HR management, IT infrastructure support and maintenance, legal advisory, analysis of users behaviour, order handling, compliance verification (audits), trainings and developments – whereas such entities process personal data as subcontractors, on the basis of agreement with employer and exclusively on its instructions, i.e. for instance:

- independent external representatives, service providers, suppliers, partners, distributors, postal and operational services providers, providers of documentation management services;
- ✓ third parties offering perks for employees, such as group insurances, other benefits, as well as entities participating in organisation of the business trips;
 - ✓ law enforcement and other public authorities, where it derives from law provisions.

Data transfer outside EEA

Your personal data can be transferred to entities established outside European Economic Area (EEA), i.e. in third countries. The European Commission has not adopted adequacy decision, with relation to these countries, stating that they ensure adequate level of personal data protection in the meaning of European personal data protection provisions. Personal data will be transferred to aforementioned entities on the basis of standard contractual clauses adopted by the European Commission, thus ensuring adequate safeguards as regards the protection of privacy and rights and freedoms of the data subject. The copy of these clauses can be obtained from the controller.

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You have:

- ✓ right of access to Your personal data, their rectification, erasure or limiting their processing;
- ✓ right to object to process Your personal data, where the legal basis of processing is the legitimate interests of the Controller. In particular You have right to object to processing for the purpose of profiling;
- ✓ where the processing is based on Your consent, right to withdraw it at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.
- ✓ right to data portability, i.e. to receive from the Controller Your personal data, in a structured, commonly used and machine-readable format where Your personal data are processed for the purpose of concluding and performing the insurance contract or on the basis of consent. You can transmit received personal data to another controller.
- ✓ Right to lodge in a complaint with The President of Personal Data Protection Office if You feel that processing of Your personal data infringes the GDPR provisions.

In order to exercise aforementioned rights please contact the Controller or data protection officer to the e-mail address: personal-da@loreal.com.

Information whether the provision of personal data is required and on consequences of failure to provide such data

The provision of personal data is necessary, where it is required by the law provisions. The consequence of failure to provide such data will be lack of possibility to conclude employment contract. Provision of other personal data is voluntary, and the consequence of failure to provide such data will be lack of possibility of fulfilment of aforementioned purposes.