INFORMATION CLAUSE FOR EMPLOYEES L'ORÉAL POLSKA

Controller

We kindly inform You, that the Controller of Your personal data is L'Oréal Polska Sp. z o.o., with its registered seat at Warsaw, Grzybowska 62 (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: <u>personal-da@loreal.com</u> 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 act of 26th June 1974 Labour Code 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 Polska promotion;
- disclosure of personal data to entities providing group insurance, medical care, sport, cafeteria and shop for employees services;
- sending information on the use of the My One Cloud employee portal on the e-mail address provided by the employee, including sending automatic notifications about the availability of a new document RMUA or PIT (personal tax information);
- support for the meal financing program;
- managing employee satisfaction and commitment surveys;
- 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 Polska promotion;
 - ✓ In order to disclose personal data to entities providing optional group insurance, medical care, sport, cafeteria and shop for employees services;
 - ✓ sending information on the use of the My One Cloud employee portal on the e-mail address provided by the employee, including sending automatic notifications about the availability of a new document RMUA or PIT (personal tax information);
 - ✓ support for the meal financing program;
 - ✓ support for employee's satisfaction and commitment surveys.

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 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 Baltic SIA.
- 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. In this case, the Company will guarantee the legally required personal data protection measures, which may be: a) transfer of data to an entity located in a third country, for which a decision has been issued declaring an adequate

level of protection, as required by Article 45 of the GDPR, b) transfer of data carried out on the basis of a data transfer agreement with a third party based on the Standard Contractual Clauses adopted by decision of the European Commission, c) the transfer of data carried out of the adopted binding corporate rules referred to in Article 47 of the GDPR. The person whose data is transferred in the above-mentioned case has the right to obtain a copy of the information on the safeguards in place, which can be obtained by contacting the Company's designated DPO.

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 compliant 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.

INFORMATION CI.A FOR EMPLOYEES KOSMEPOL SP. Z O.O

Controller

We kindly inform You, that the Controller of Your personal data is Kosmepol Sp. z o.o., with its registered headquarter at Kanie (05-805), Warszawska 21 (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: <u>dane-osobowe@loreal.com</u> 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; including the use of the image on ID badge;
- ensuring the safety of employees working in solitary workplaces (lone worker)providing assistance in health or life-threatening situations, including ensuring the proper use of the work tools provided to the employee (a dedicated mobile phone operating the System);
- 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, training and learning materials) and for Kosmepol promotion;
- disclosure of image and voice for the purposes related to the performance of work efficiency research and for the purposes related to ergonomic, health and safety measurements at the workplaces;
- disclosure of personal data to entities providing group insurance, medical care, sport, cafeteria and shop for employees services;
- support for the meal financing program;
- managing the employee satisfaction and commitment surveys;
- 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 GOPR);
- legitimate interests of the controller (art. 6 (1) letter f) of the GOPR), i.e. for instance:
 - ensuring security at the Company's premises, where the legitimate interests is to ensure security, including the use of the image on ID badge;
 - ensuring the safety of for employees working in solitary workplaces (lone worker) ("Lone workers"), where the
 legitimate interest is to detect an emergency situation and organize an efficient first aid action in the case of an
 emergency;
 - ✓ 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 for employees potential;
 - ✓ 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 GOPR), 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); and Kosmepol promotion;
 - ✓ In order to disclose personal data to entities providing optional group insurance, medical care, sport, cafeteria and shop for employees services;
 - ✓ In order to disclose of Your image and Your voice for the purposes related to the performance of work efficiency research and for the purposes related to ergonomic, health and safety measurements at the workplaces;
 - ✓ support for the meal financing program;
 - ✓ support for employee's satisfaction and commitment surveys.

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 law.

Where processing of personal data is based on Your consent, the Controller will store Your data until Your consent is revoked, in the case of work efficiency studies par the period necessary to conduct the work efficiency study, then the recordings containing your personal data will be deleted.

The Company will stop process personal data on the basis of its legitimate interests, if you object to the processing for these purposes. Data of the location the person working in solitary workplaces (lone worker) in will be processed - for a period of 14 days from the occurrence of the emergency. In the event that the monitoring reports constitute evidence in legal proceedings or the Controller has learned that they may constitute evidence in the proceedings, the 14 days period may be extended until the proceedings are legally concluded.

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

- Third parties with relation to fulfilment of Your 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 others contractors, 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 Commissions 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.

Your personal data can be transferred to entities established outside European Economic Area (EEA), it. In third countries. The European Commissions 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 binding corporate rules (BCR), thus ensuring adequate safeguards as regards the protection of privacy and rights and freedoms of the data subject. The copy of these BCR can be obtained from the controller.

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 compliant 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: dane-osobowe@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.

INFORMATION CLAUSE FOR CONTRATORS KOSMEPOL SP. Z O.O

Controller

We kindly inform You, that the Controller of Your personal data is Kosmepol Sp. z o.o., with its registered headquarter at Kanie (05-805), Warszawska 21 (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: <u>dane-osobowe@loreal.com</u> 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 contractors contract, its execution and termination;
- activities related to possible liability of the contractor or damage liability including establishing and pursuing possible claims;
- 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, training and learning materials) and for Kosmepol promotion;
- ensuring security on the premises of the Company, including the use of the image on ID badge;
- ensuring the safety of employees working in solitary workplaces (lone worker) providing assistance in health
 or life-threatening situations, including ensuring the proper use of the work tools provided to the employee
 (a dedicated mobile phone operating the System);
- disclosure of image and voice for the purposes related to the performance of work efficiency research and for the purposes related to ergonomic, health and safety measurements at the workplaces;
- disclosure of personal data to entities providing group insurance, medical care, sport, cafeteria and shop for employees services;
- support for the meal financing program;
- managing contractor satisfaction and commitment surveys;

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

- necessity for concluding and performing of the contract, including exercising rights and fulfilling obligations contractor vis-à-vis Kosmepol (art. 6 (1) letter b) of the General Data Protection Regulation of 27th April 2016, hereinafter referred to as 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, including the use of the image on ID badge;
 - ensuring the safety of contractors working in solitary workplaces (lone worker) ("Lone workers"), where the legitimate interest is to detect an emergency situation and organize an efficient first aid action in the case of an emergency:
 - ✓ 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 contractors;
- ✓ in the framework of the development management data can be used for profiling enabling optimal use of the contractors 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 contractor 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 contractor
 - ✓ In order to disclose Your image for the purpose of internal and external communication (e.g. electronic e-mail, intranet, Skype)and Kosmepol promotion;
 - ✓ In order to disclose of Your image and Your voice for the purposes related to the performance of work efficiency research and for the purposes related to ergonomic, health and safety measurements at the workplaces;
 - ✓ In order to disclose personal data to entities providing optional group insurance, medical care , sport, cafeteria and shop for employees services and others contractors ;
 - ✓ support for the meal financing program;
 - ✓ support for employee's and contractor's satisfaction and commitment surveys.

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 law.

Where processing of personal data is based on Your consent, the Controller will store Your data until Your consent is revoked, in the case of work efficiency studies par the period necessary to conduct the work efficiency study, then the recordings containing your personal data will be deleted.

The Company will stop process personal data on the basis of its legitimate interests, if you object to the processing for these purposes. Data of the location the person working in solitary workplaces (lone worker) in will be processed - for a period of 14 days from the occurrence of the emergency. In the event that the monitoring reports constitute evidence in legal proceedings or the Controller has learned that they may constitute evidence in the proceedings, the 14 days period may be extended until the proceedings are legally concluded.

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
- ✓ Third parties with relation to fulfilment of Your 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 the 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 Commissions 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.

Your personal data can be transferred to entities established outside European Economic Area (EEA), it. In third countries. The European Commissions 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 binding corporate rules (BCR), thus ensuring adequate safeguards as regards the protection of privacy and rights and freedoms of the data subject. The copy of these BCR can be obtained from the controller.

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 compliant 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: dane-osobowe@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.