

L'ORÉAL'S (UK) LTD RESEARCH & INNOVATION VOLUNTEERS AND SURVEY RESPONDENTS PRIVACY POLICY

WHO THIS APPLIES TO AND HOW YOU WILL HEAR ABOUT US

This policy applies to you if you participate in one of our clinical trials or a survey we conduct – our 'Research and Innovation activity'.

When it comes to clinical trials and surveys, it is difficult for us to be fully transparent as to our collection and use of your personal data from the start – often, for us to be sure of getting an unbiased result we have to remain anonymous to you – you will most likely have heard us being referred to as 'the client' or 'the manufacturer'. You will have engaged directly with our clinical lab provider or research agency throughout the process – they will process your personal data, as described in this Policy, on our behalf, sharing insights and results with us as appropriate. We will let you know about our role as soon as practical after the survey or trial has completed.

Please note, we require all our clinical trialists and survey participants to be at least 18 years old.

We last updated this in March 2025.

WHY THIS MATTERS

L'Oréal's ambition is to be an exemplary corporate citizen to help make the world a more beautiful place. We place great value on honesty and clarity and we are committed to building a strong and lasting relationship with you based on trust and mutual benefit. Part of this commitment means safeguarding and respecting your privacy and your choices. Respecting your privacy is essential to us. This is why we set out "Our Privacy Promise" and our full Privacy Policy below.

We set out below what types of personal data we may receive from you, direct or from an agency acting on our behalf, how we may use it, who we may share it with, how we protect it and keep it secure, and your rights around your personal data. Of course, all situations may not apply to you. This Privacy Policy gives you an overview of all possible situations in which we could interact together. We've included a Glossary at the end to explain some terms. Please read this information carefully.

If you have any questions, please contact us at dpofficeruki@loreal.com and let us know you are a clinical trialist or survey respondent so we can best support your query.

WHO WE ARE

"L'Oréal", "us", "our" or "we" means L'Oréal (UK) Limited. We are responsible for the personal data that you share with us as we are the "controller" for the purposes of applicable data protection laws.

The L'Oréal family is made up of a number of different brands – you can find out more here <http://www.loreal.co.uk/>.

We are also part of the L'Oréal Group which operates in 140 countries around the world. For details on the L'Oréal Group, please see <http://www.loreal.com/group>. Our Group company name is L'Oréal SA, a public limited company registered with the RCS of Paris under number 632 012 100, 14 rue Royale, 75 008 Paris, France.

WHAT'S NOT INCLUDED

This policy doesn't apply to information about our employees or shareholders. It doesn't cover other companies or organisations (which advertise our products and services and use cookies, tags, pixels and other online website technology) collecting and using your personal data to offer relevant online advertisements to you - you should review their cookie and privacy policies before giving them your personal information. Read our cookie policy (available on each of our websites) for information about how we use cookies and other online website technology.

You may also be a consumer or business customer of ours, if so, please see our Consumer Privacy Policy or our Business Customer Privacy Policy for further information on how we use your personal data in that context. If you are also an employee of ours, then please also see our Employee Data Protection Notice available via our intranet. If you visit one of our premises or attend one of our events, we will also provide you with information about how we use your personal data to manage your time safely and securely with us on site or at the event.

WHAT IS PERSONAL DATA?

"Personal data" means any information or pieces of information that could identify you either directly (e.g. your name) or indirectly (e.g. through pseudonymised data such as a unique ID number). This means that personal data includes things like postal/email addresses, cell phone numbers, photos, skin/hair characteristics, opinions and comments on tested products, content generated during studies, information related to your beauty/well-being. It could also include unique numerical identifiers like your computer's IP address or your mobile device's MAC address, as well as cookies.

WHAT DATA DO WE COLLECT FROM YOU AND HOW DO WE USE IT?

To improve our knowledge and better meet the expectations and needs of our consumers, we carry out research and innovation activities concerning cosmetics and hair care products and/or cosmetic, beauty or dermatological devices or services, with the possible support of our partners. This can range from a clinical trial where individuals participate to test our products and services through to a consumer insights survey where consumers are interviewed, provide written responses or videoed feedback on our or our competitors' products or the beauty sector more generally.

Our research and innovation activities are based on quantitative and qualitative results and may involve scientific work and on other information you provide us with. For all these reasons, there are many ways you might share your personal data with us, and that we might collect it, and that the personal data we collect (or a partner collects on our behalf) may range from health information (such as skin reaction you may have had), contact information, details about your ethnicity and race, skin and hair type, pictures and video footage and views and suggestions as to how we can improve. Whatever data we ask for, it will be for the purpose of ensuring we can appropriately assess and review our products and services, as assessed under the trial or survey.

HOW DO WE COLLECT OR RECEIVE YOUR DATA?

Please find more details on the following in the table below:

- 1) **In what situations may your personal data be provided or collected?** This column lists the activities you engage in, or the situations you find yourself in, when we use or collect your

personal data. For example, when you register to be a volunteer on one of our panels, or when you answer a questionnaire to participate in a study or trial.

- 2) **What personal data can we obtain directly from you or because of your interaction with us?** This column indicates which types of data we are likely to collect depending on the situation.
- 3) **How and why can we use them?** This column explains what we can do with your personal data, and for what purpose we collect the data for.
- 4) **What is the legal basis for the processing of your personal data?** This column explains why we may use your data according to the purpose for which it is collected.
 - Your **consent** where you have agreed that we may use it. Please note, we may be described as the 'client' or similar by the agency or team carrying out the product trial for us, rather than by our name – this is to help prevent bias arising in the survey or trial.
 - Our **legitimate interest** that may consist in:
 - **The improvement of L'Oréal research, the improvement of our products and services**, and more generally for our commercial interests. More specifically, this involves helping us to better understand the needs and expectations of our consumers, to better evaluate the effectiveness and tolerance of our products and, thus, to improve our knowledge, our research tools and services, Internet websites/applications/devices, products and brands.
 - **The securing of our tools**, to ensure the protection and safety of the tools that you use (our internet websites/applications/devices), and to ensure that they function correctly and are constantly improved.
 - **The performance of a contract**, where we have an agreement with you to use your personal data for certain purposes. Here we may be the data controller, but you may only interact with the agency or product trial team which is acting on our behalf.
 - **Legal obligations**, whenever legislation requires data to be processed.

Overview of information about your interactions with us and their impact on your personal data

In which context is your personal data collected?	What personal data may we hold about you?	How and why can we use them?	What is our legal basis for processing your personal data?
<p>Volunteer panel / trialist registration</p> <p>Data collected through connection to the website https://evaluationproduits.loreal.fr</p>	<p>Such personal data may include:</p> <ul style="list-style-type: none"> • First name and surname • Gender • E-mail address • postcode • Phone number • Date of birth • ID, Username and password • Consumer habits, beauty routine • Skin/hair characteristics, some of which may reveal ethnicity • Physical characteristics that may include health data: scars, cosmetic surgery (yes/no), dermatological treatment (yes/no) • Membership of a social security scheme (yes/no) • Availability for test appointments • Bank details (IBAN) - where payment is being made as a part of the trial or for participation in the panel 	<p>We use this information to:</p> <ul style="list-style-type: none"> • Create, manage and, if necessary, delete your volunteer account • Include you in the L'Oréal panel of study volunteers or trialists • Determine your ability to carry out tests of cosmetic and hair products and services adapted to the characteristics of your skin/hair and your availability • Ensure that in case of medical service, no cash advance will be required from you • Manage the payment of study benefits • Send SMS reminders for the finalisation of your panel registration 	<ul style="list-style-type: none"> • Contract performance (account creation, volunteer panel participation, sending reminders and meeting invites and information such as what to bring with you and what to share with us as part of the trial) • Consent (notably for the collection and processing of sensitive personal data/Special Category Personal Data) • Legitimate interests (notably for any security questionnaires and/or sharing any results, as necessary, within our Group family of companies, and sending details of further studies you may wish to take part in - unless you have asked us not to)
<p>Volunteer panel management</p>	<ul style="list-style-type: none"> • First name and surname • ID • Phone number • Test appointment schedule • Test participation history • Bank details (IBAN) 	<ul style="list-style-type: none"> • Manage the list of volunteers authorised to participate in potential studies or tests • Manage the payment of volunteer remuneration 	<ul style="list-style-type: none"> • Contract performance

<p>Conduct of studies and of cosmetics products and services tests and evaluate the results (clinical studies, consumer studies with or without product application)</p> <p>This data can be collected by a variety of means: interviews, online questionnaires, use of devices that may or may not be connected to a smartphone or other device, internet platforms, biological samples, etc.</p>	<p>Depending on the nature of the test or study and the objectives pursued:</p> <ul style="list-style-type: none"> • First name and surname • ID • Title • Marital status • Gender • Number of children • Email address • Social handle (@name) or alias • Postal address, geolocation, • Phone number ; • Appointment schedule for tests • Photography (all technologies including medical imaging), video, voice recording • Date of birth/age • Username and password • Consumer habits • Beauty profile: description of eyes, name of beauty profile, beauty, hygiene and well-being routine • Profession, occupational group • Gestures, ways of using cosmetic products • Behavioural data, personal preferences • Data to measure efficacy, tolerance, feelings, emotions, satisfaction (e.g. capture of physiological data or cognitive bias through a device/mobile phone) • Ethnic data such as skin/hair characteristics • Health data: pathologies, medical treatments, individual and family medical history, biological samples, 	<ul style="list-style-type: none"> • Suggest studies according to the inclusion/non-inclusion criteria defined for each study (check your suitability) • Demonstrate product performance and tolerance • Consider environmental factors affecting study results • Better understand the needs and expectations of our customers to improve our products and services • Conduct of statistical analysis • Send appointment details and reminders • Evaluate and improve the performance of concepts, processes, algorithms, equipment, and devices used in our L'Oréal products and services, and in our research and innovation, marketing and general business activities • Training and learning L'Oréal's algorithms • Conduct of statistical analysis 	<ul style="list-style-type: none"> • Legitimate interest (notably for the profiling of trialists and panelists to check whether they are appropriate for the study, analytics and product strategy review purposes as provided and informed by the survey/trial results) • Consent (notably for the collection and processing of sensitive personal data/Special Category Personal Data)
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	<p>biological analyses, genetic sample (hair RNA study)</p> <ul style="list-style-type: none"> • Opinions and comments, emotions, and reactions of all kinds to the tests • Availability for test appointments • Other, depending on the specifics of the study 		
<p>Ensure the safety of our products in compliance with the legislation</p> <p>Data collected when you report an undesirable effect or a suspected undesirable effect likely to be linked to the use of a product or equipment used by yourself, one of your relatives, or one of your customers if you are a beauty professional (e.g. hairdresser or beautician) or healthcare professional.</p>	<ul style="list-style-type: none"> • Contact details of the person reporting the event: name and surname, e-mail address, home phone number, postal address • Adverse event case identification number • Product(s) or material(s) / device(s) used and method(s) of use • Title/profession • Date of birth/age • Skin/hair characteristics • Photographs • Pathologies, medical treatments, individual and family • Medical and/or hospital treatment 	<ul style="list-style-type: none"> • Monitor and prevent any adverse effects linked to the use of our products • Carry out and follow up on corrective actions taken, when necessary. • Conduct of statistical analysis 	<ul style="list-style-type: none"> • Legal obligation (to monitor the adverse effects of cosmetic products) • Legitimate interest (notably for statistical analysis and product strategy review purposes as provided and informed by the survey/trial results)
<p>Data collected when you exercise your rights regarding your personal data.</p>	<p>This personal data may include:</p> <ul style="list-style-type: none"> • First and last name • Telephone number • E-mail address • Postal address • Any other information you have given us about yourself in connection with your request 	<ul style="list-style-type: none"> • Respond to the exercise of your rights • Conduct of statistical analysis 	<ul style="list-style-type: none"> • Legal obligation

AUTOMATED DECISION-MAKING

L'Oréal does not use fully automated individual decision-making systems for its research and innovation activities.

For information, fully automated individual decisions are decisions made about a person by means of algorithms applied to his or her personal data, without any human being intervening in the process.

PROFILING

L'Oréal does not use profiling techniques to analyse or predict your personal preferences, interests, financial situation, behavior, location, health, reliability or movements.

WHO MAY ACCESS YOUR PERSONAL DATA?

We may share your personal data within the L'Oréal Group in order to comply with our legal obligations, prevent fraud and/or secure our tools, improve our products and services or after obtaining your consent.

Depending on the purposes for which your personal data was collected, and only if necessary, part of your personal data may be accessible to L'Oréal Group entities worldwide, if possible in a pseudonymised form (not allowing direct identification).

We may also share your personal data, if possible, in pseudonymised form, with scientists in L'Oréal's Research & Innovation division, including those outside your country, for research and innovation purposes.

If permitted, we may also share some of your personal data, including the ones collected through cookies, to harmonise and update the information you provide to us, to produce statistics based on your characteristics and to tailor our communications.

Your personal data may also be processed on our behalf by trusted service providers.

We use trusted third parties to carry out a range of operations on our behalf. We only provide them with the information they need to carry out the service. We may, for example, ask to provide us services that require the processing of your personal data to:

- Third parties who assist us in collecting the information required for our consumer panels and studies and in analysing the results, such as personal data analysts, search engines, CROs (Clinical Research Organisations), public or private research organisations or medical analysis laboratories;
- Third parties we need to supply and deliver products to you, in particular for test purposes, such as postal and delivery services; and
- Third parties who assist us and help us provide IT services, such as platform providers, hosting services, maintenance and technical support services for our databases as well as for our software and applications that may contain data about you (these services may sometimes require access to your data in order to perform the tasks requested).

We may also disclose your personal data to third parties:

- If we sell any business or assets, in which case we may disclose your personal data to the prospective buyer of such business or assets. If L'Oréal or a part of its assets is acquired by a third party, personal data held by it about its customers relating to those assets is one of the transferred assets. Where appropriate, in such case, the buyer acting as the new data controller processes your data and its privacy policy governs the processing of your personal data;
- If we are under a duty to disclose or share your personal data to comply with a legal obligation, or in order to enforce or apply our terms of use/sales or other terms and conditions you have agreed to; or to protect the rights, property, or safety of L'Oréal, our customers, or employees;
- If we have your consent to do so; and/or
- Or if we are permitted to do so by law.

We may share your personal data with our partners:

If we are conducting the study in collaboration with a partner (e.g. a study co-managed with a scientific research institute), we (L'Oréal) and the partner(s) will each process your personal data for our own purposes – we will do this as independent controllers of the data. This means we are each responsible for how we use your personal data. In such cases, your data will be used by:

- L'Oréal in accordance with this Policy; and
- the partner also acting as data controller under its own terms and conditions and in accordance with its own personal data protection policy.

If we consider ourselves 'joint controllers' we will explain this to you.

We do not sell your personal data.

WHERE DO WE STORE YOUR PERSONAL DATA?

Your personal data may be transferred to, accessed in, and stored at, a destination outside the United Kingdom ('UK') and/or Ireland. It may also be accessed by our employees operating outside these countries who work for us, the L'Oréal Group, or for one of our service providers.

Where L'Oréal transfers personal data outside of the UK and Ireland, this will be done in a secure and lawful way. As some countries may not have laws governing the use and transfer of personal data, we will take steps to ensure that third parties adhere to the commitments set out in this Privacy Policy e.g. reviewing their privacy and security standards and contracting with them on appropriate contractual terms.

When we transfer your personal data outside of the UK and/or Ireland, we:

- review and/or enter into appropriate contracts (including adding the European Commission's standard contractual clauses (available [here](#)) which may include the UK's Addendum to the standard contractual clauses (available [here](#)); or
- rely on the applicable UK Government or European Commission's, for transfers from the UK and EU (Ireland) respectively, adequacy decision(s) which has found the third country to which we may transfer your personal data offers an adequate level of data protection (copies of adequacy decisions available [here](#) and [here](#)).

HOW LONG DO WE KEEP YOUR PERSONAL DATA ?

We will keep your personal data for as long as we need it subject to the different use cases described in the Policy above. For example, we retain certain personal data for the following periods:

- For the duration of our contractual relationship and for a reasonable period after it ends in case of a query or claim;

- If you participate in a study, we store your personal data for a maximum of 10 years from the end of such study;
- If you start registering to our volunteer panel without finalising the registration, we will keep your personal data for 1 month;
- If you complete your registration as panelist, we will store your personal data for the duration of your registration, unless we have justification to retain (some) of it for longer to support our research and analysis findings;
- If you send us a request, we will keep your personal data for as long as is necessary to process your request;
- If you create an account, we keep your personal data for a maximum of 24 months in case of an inactive account or until you ask us to delete it; and/or
- Where cookies are placed on your browser, they are stored for as long as necessary to achieve their purposes (e.g. statistics on your social media post) and otherwise for a period defined in accordance with local regulations and guidance.

When we no longer need to use your personal data, it is removed from our systems and records, or anonymised so that you can no longer be identified from it.

We are committed to keeping your personal data secure and taking all reasonable steps to do so. We contractually require that trusted third parties who handle your personal data for us do the same. However, as no transmission of information via the internet is completely secure, we cannot guarantee the security of your personal data transmitted to our site although. Any transmission is therefore at your own risk.

IS YOUR PERSONAL DATA SECURE?

We are committed to keeping your personal data secure and taking all reasonable precautions to do so. We contractually require that trusted third parties who handle your personal data for us do the same.

We always do our best to protect your personal data and once we have received your personal data, we use strict procedures and security features to try to prevent unauthorised access. As the transmission of information via the internet is not completely secure, we cannot guarantee the security of your data transmitted to one of the sites used, especially for volunteer recruitment and/or study implementation.

YOUR RIGHTS AND CHOICES

L'Oréal respects your right to privacy: it is important that you are able to control your personal data. You may have certain rights and choices over the personal data we collect from you. These rights may be limited depending on our rights as a business and/or the legal basis on which we use the data, but we will always explain where this is the case. We will take reasonable steps to verify your identity before granting access or making corrections to the information we hold about you. You may exercise these rights by contacting us using the details provided below.

Withdrawing your consent

You may also withdraw any consent you previously provided to us at any time by contacting us using the details provided below. This will not affect the lawfulness of our use of your personal data based on your consent before its withdrawal.

Reviewing, correcting, updating, restricting, objecting to our use of or deleting your personal data

You have the right to request access to and correction, objecting to our use of or erasure of the personal data we hold about you, or to request our use of this information is restricted, as appropriate.

Other Rights

You have the right to receive, in a structured, commonly used and machine-readable format, the personal data that you have provided to us about you, with your consent or based on your contract with us. You also have the right to have this information transferred to another data controller, where it is technically feasible. You may exercise this right by contacting us using the details provided below. You may also lodge a complaint with a data protection authority about our use of your personal data, but we do ask that you contact us first and try to resolve any issues or causes for concern you may have.

CONTACT

If you have any questions or comments about the way in which we process and use your personal data, or if you wish to exercise any of your rights mentioned above, please contact us at the following e-mail address dpofficeruki@loreal.com or by writing to us at:

Data Protection Officer
L'Oréal (UK) Limited
Gateway Central
187 Wood Lane
London W12 7SA
United Kingdom

Please include in your email/letter that you are contacting us as a volunteer or trialist.

If you would like to get in touch with our Data Protection Officer, please also contact us at dpofficeruki@loreal.com.

GLOSSARY

Some of the terms used in our privacy policy need explaining.

“Affiliate Marketing Platform” means the advertising model we use where we ask third-party publishers (affiliates) online to generate traffic or leads to our products and services under a commercial agreement with us.

“Anonymised data” means data which has had all personally identifiable information/personal data removed.

“Cookies” are small text files (up to 4KB) created by a website and stored in your (the user’s) connected device – either temporarily for that session only or permanently on the hard disk (called a persistent cookie). Cookies help the website recognise you and keep track of your preferences. They can be activated on a L’Oreal or third party website and can track your movement from one website domain to another, depending on their functionality. Some cookies require consent to be ‘dropped’ and that consent must be sought before they are dropped.

“IP address” is a unique string of numbers that identifies each device using the internet or a local network.

“Pseudonymised data” means a key or code applied which is unique, allowing indirect identification of an individual, such as a unique ID.