

UPDATED: December 2024

WHO THIS APPLIES TO

This policy applies to you **if you attend one of our events or are a model for us** (on one of our courses at a L'Oréal Academy, or elsewhere).

We host events for our own business purposes, such as a new product launch, but also on behalf of others or as part of a competition such as an award ceremony we manage or are involved in. We use models to allow our trainees to practice their skills, and to support us in our general promotional materials.

This policy sets out what personal data we need to use to plan, deliver and follow-up on our events, and what personal data we need to use if you act as a model for us, and the rights you, as an event attendee or model, have over how we use it.

Please read this information carefully. We've included a Glossary at the end to explain some terms. If you have any questions, please contact us using the contact details provided below and let us know you are a model or an event attendee so we can best support you.

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>.

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 and other 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.

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 a Talent Partner of ours then please see our Talent Partner Privacy Policy for details 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, 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.

OUR PRIVACY PROMISES

Our ambition is to be an exemplary *corporate citizen* and we place great value on honesty and clarity. Part of this commitment means safeguarding and respecting your privacy and your choices; this is essential to us. We want you to understand how we use your personal data so you can feel comfortable and confident in sharing it with us.

- 1) We respect your privacy and your choices.
- 2) We make sure that privacy and security are embedded in everything we do.
- 3) We will never sell your personal data.

- 4) We are committed to keeping your personal data safe and secure. This includes only working with trusted partners.
- 5) We are committed to being open and transparent about how we use your personal data.
- 6) We will not use your personal data in ways that we have not told you about.
- 7) We respect your rights and will always try to accommodate your requests as far as is possible, in line with our own legal and operational responsibilities.

We set out below what types of personal data we might collect or hold about you, how we use it, who we share it with, how we protect it and keep it secure, and your rights over our use of it.

Note that not all the information below may apply to you, so please read it in the context of how you have interacted or are working with us.

UNDERSTANDING WHAT PERSONAL DATA WE COLLECT ABOUT YOU AND HOW AND WHY WE USE IT

Below we explain what personal data we collect, why, how we may use it and what our legal basis is for using it.

WHAT IS MEANT BY 'LEGAL BASIS'?

Any organisation using personal data for its own purposes, can only do so if it can rely on a legal basis for doing so. To explain what a '**legal basis**' is – under data protection laws, the legal basis for the processing of your personal data can be:

- **Your consent** – where we ask for your agreement to use your personal data for a specific purpose.
- **The performance of a contract** – where we need to process your personal data to provide you with a service or something under an agreement we have with you or as part of preparing to enter into an agreement with you.
- **Our legitimate interests** – where the use of your personal data is in our legitimate business interests.
- **To comply with a legal obligation** – where we need to use your personal data for our own legal and regulatory compliance reasons (for example to comply with our tax and financial reporting obligations).
- **Where it is in your or another person's vital interests** – For example, if in an emergency we need to use or share your personal data to help you or another individual.

1. WHAT IS PERSONAL DATA & DATA PROCESSING?

The term "**personal data**" refers to any information that may identify you *directly* or *indirectly*. This can include your name, contact details such as your email address, your picture and online and other electronic identifiers such as your IP address and MAC address of your connected device.

What is Data Processing?

It is any use of personal data such as collecting, recording, hosting, sending, organising, structuring, storing, keeping/retaining, adapting/modifying, retrieving, consulting/access, using, disclosing by transmission or otherwise making available or unavailable by erasing/deleting etc.

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

HOW WE COLLECT YOUR PERSONAL DATA

We may collect or receive your personal data directly *from you*, through for example, one of the following means:

- Our information system, via the use of our webmail;

- Our extranet/intranet;
- The applications and software that you use;
- The registration forms or questionnaires that you fill-in; and/or
- The social networks or any other tool made available.

We may also collect your personal data ourselves (e.g. via a CCTV system or badging system or the data generated by the tools we use as part of the management of the event).

When we collect personal data from you, we identify the ***required fields*** (e.g. with an asterisk) as some of the personal data we require from you is mandatory, for example:

- To help us organise the event you are attending or session you are modelling in (e.g. knowing that you will be attending);
- To respond to a request you may have made (e.g. to send you pre-event information, to validate your registration, to make catering arrangements, to appropriately manage any allergies you have); and/or
- To comply with our legal obligations.

If any personal data we hold about you changes (e.g. your address), you must let us know by contacting us at MyPersonalDataUKI@loreal.com, or another method we described to you through the contact we have with you.

3. TABLE SUMMARISING THE PURPOSES, PERSONAL DATA PROCESSED, GROUNDS OF THE PROCESSING AND RETENTION PERIOD APPLIED

Category of personal data we collect	What personal data we may hold about you	How and why we use your personal data and how long for	Our legal basis for using your personal data
Registration details	<p>Registration information, for example:</p> <ul style="list-style-type: none"> • Name; • Email address; • Mobile Number; • Dietary information, details of any allergies you have; • A picture of you; • User Generated Content (e.g. images); • Your feedback/responses to surveys; • A copy of your registration form and any associated terms agreed to; and • CCTV footage and/or event recordings. 	<p>To manage your registration and attendance at an event or at our site/with us for modelling purposes. Where relevant, we keep a copy of the agreement and all model and event attendee registration details we have for you for up to 3 years after the event/modelling session has taken place, and longer if we continue to have a relationship with you to fulfil our legal obligations and/or because we have a legitimate interest to continue to hold it.</p>	<ul style="list-style-type: none"> • The performance of a contract – so you may attend the event you have registered for and opted to be a model for us; and • For our legitimate business interests – such as to help us understand who has attended an event we are involved in or has modelled for us; their background; update the profile we hold about you (where we hold one); share within our L’Oréal Group (please see below for more details); and manage the safety and security of the event/modelling session itself.
Next of Kin	<p>Next of kin details for example:</p> <ul style="list-style-type: none"> • Name; • Mobile Number; and • Their relationship to you. 	<p>To understand who to contact in case of an emergency. We delete this information after the event has taken place or when it is no longer likely to be needed.</p>	<ul style="list-style-type: none"> • Our legitimate interests: in running a safe event or session you are modelling at; and • To protect the vital interest of an individual: to protect your health and safety whilst attending our site/event.
Marketing purposes	<p>Contact information for example, your:</p> <ul style="list-style-type: none"> • Name; • Email address; • Picture; and • Feedback, video, text or other User Generated Content. 	<p>To manage the content created and publish it for advertising purposes, be it for internal or external use. We keep this information for as long as we have a relationship with you and for longer where we have a legal obligation or legitimate interest to continue to hold it.</p>	<ul style="list-style-type: none"> • For our legitimate interests in: (i) promoting the event, our business and our products and services; and (ii) to share with and understand better ways of engaging with you and future models and attendees. • Consent – where we seek your agreement to us sending you direct marketing communications (but we may not always rely on consent to do so).

DATA RETENTION

We will keep your personal data for as long as we need it to provide you with your requested service(s) or to meet our commercial or legal obligations. The table above and following list detail the principles we apply to determine how long we keep your personal data:

- The purpose we hold your personal data for;
- Our legal and regulatory obligations in relation to that personal data, for example any financial reporting obligations;
- Whether our relationship with you is ongoing, for example, if you have an active account with one or more of our brands;
- Any specific requests from you in relation to the deletion of your personal data; and
- Our legitimate business interests in relation to managing our own rights, for example the defence of any claims, or for statistical purposes.

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.

4. AUTOMATED INDIVIDUAL DECISION MAKING, PROFILING & JOINT CONTROLLER ACTIVITY

AUTOMATED INDIVIDUAL DECISION-MAKING

Automated decision making means the ability to make decisions using technology, without human involvement. We may use automated decision-making techniques for the purposes of planning the attendance or seating plan for an event, but any result will always be reviewed by one of our employees.

PROFILING

When we send or display personalised communications or content, we may use a profile we hold about you – ‘Your Profile’ (please see our Glossary below for details). Your Profile is made up of information we have collected from you directly and indirectly via public or other means such as your employer – see the table above for more details. We use Your Profile in an automated way to determine what communications we feel are relevant and tailored to you.

You have the right to object at any time to the use of your personal data for “profiling”. Please see “*Your Rights and Choices*” section below.

JOINT CONTROLLER ACTIVITY

In some cases, for example when we collaborate with our trusted partners (such as an agency we engage to deliver an event), we may be jointly responsible with those partners for the use of your personal data, but we will always agree the respective roles and responsibilities of each party involved, be transparent with you about what we are doing and make sure your rights are not affected.

5. SHARING YOUR PERSONAL DATA

We may share your personal data within L’Oréal and the L’Oréal Group.

Where appropriate, we may share your personal data between our brands to build a central record, keep the information we hold about you up to date (for example, you may have attended an event hosted by more than one of our brands), tailor our communications with you and to run analytics and perform statistics.

Access within the L’Oréal Group will always be controlled on a need-to-know basis, to fulfil our contractual obligation with you, or to allow us to perform any necessary or legitimate functions.

We may also share your personal data in a pseudonymised way (not allowing direct identification of you) with L’Oréal Research & Innovation scientists, including those located outside of your country, for research and innovation purposes.

Your personal data may also be processed on our behalf by our trusted third-party suppliers.

We only provide them with the information they need to perform the service they are providing, require them to keep it secure and tell them to not use it for any other purpose. For example, we may trust third parties to deliver services that require the processing of your personal data to help us provide training, seminars, and events, such as training providers, travel agencies, and catering and event management companies.

We may also disclose your personal data to third parties beyond those that provide services to us, such as:

- If we sell any or part of our business or assets, we may disclose your personal data to the prospective buyer of such business or assets. Your personal data will usually be processed by the buyer acting as the new controller and its privacy policy will govern 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 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 others; and/or
- In other circumstances if we have your consent or we are permitted to do so by law.

We may disclose your personal data to our trusted partners, for example if they are co-creating content with us for an event, then we will each use your personal data for our own purposes and as such your personal data will be used by:

- L'Oréal in accordance with this Privacy Policy; and
- The partner acting also as a controller, and its privacy policy shall govern the use of your personal data for its purposes.

We may share your User Generated Content with our partners so it may be displayed on their website.

6. WHERE WE STORE YOUR PERSONAL DATA AND SECURITY MEASURES WE APPLY

WHERE 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 by, for example, 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](#)) or other recognised mechanism for transfer such as the UK-US data bridge (details on which can be found [here](#)).

SECURITY MEASURES WE APPLY

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. Any transmission is therefore at your own risk.

7. YOUR RIGHTS AND YOUR CHOICES

L'Oréal respects your right to privacy: it is important that you can 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.

Email opt-out

You can opt-out from our email marketing at any time by clicking on the unsubscribe link within the marketing emails you receive from us or by contacting us (see the 'Contact Us' section below). We'll act on your request as quickly as we can, but it can take about 30 days to take effect due to system updates. We will add your email address to our opt-out list to make sure we continue to exclude you from future marketing communications.

Withdrawing your consent

You may also withdraw any consent 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 or erasure of the personal data we hold about you, or to request our use of this information is restricted, as appropriate. You also have the right to object at any time to the use of your personal data for direct marketing purposes, including profiling related to direct marketing.

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.

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 so we can try to resolve any issues or causes for concern you may have.

8. HOW TO CONTACT US & GLOSSARY

HOW TO CONTACT US

If you have any questions or concerns about how we treat and use your personal data, or would like to exercise any of your rights above, please contact us, letting us know you are a model or an event attendee, at MyPersonalDataUKI@loreal.com. We may ask you to prove your identity and provide additional information about your request before processing your request.

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

Data Protection Officer
L'Oréal (UK) Limited
Gateway Central
White City Place
187 Wood Lane
London W12 7SA

GLOSSARY

Some terms in our privacy policy need explaining, we hope these definitions help.

“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'Oréal 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.

“User Generated Content” means your video, photo, post and/or other content posted to social channels and blog posts, including but not limited to: Instagram, Facebook, Twitter, TikTok, Snapchat, YouTube or Google+, blog posts, together with your social media handle, social media user name, profile picture, caption and location information you may have included in your content. We will specify which piece of content we are seeking your consent to use.

“Your Profile” means the profile we build about you, which includes things such as: what you like, dislike, are passionate about and interested in, in addition to the information we know about you through your relationship with us, for example, campaigns you have been part of, events you have attended, your purchase history with us and our history of working together.