

PRIVACY POLICY

Your privacy is important to Anita Couture (“Anita Couture”, “we” or “us”) and we are committed to protecting your personal information according to the EU General Data Protection Regulations (GDPR), UK GDPR and any UK Data Protection legislations. This Privacy Policy (“Policy”) relates to our use of your personal information when you:

- Use our website, microsites or mobile applications and provide us with your personal information, for example by signing up for our newsletters or messages or leaving a review;
- Register for our rewards program;
- Purchase products directly from our website;
- Interact with us through social media, adverts or content on third party websites;
- Interact with us in person by attending a Anita Couture event; and/or
- otherwise engage with us, for example by contacting our friendly customer service team.

This Policy explains who we are; what personal information we collect about you; how we use it (including who we share that personal information with) and your rights and choices regarding your personal information.

This Policy was last updated on 31/12/2022. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided on the website

1. Who is Anita Couture?

Anita Couture is a beauty and fashion brand specializing in cosmetic products which are and suitable for all skin types and premium fashion.

2. What information does Anita Couture collect about me and why?

The personal information that we may collect about you broadly falls into the following categories:

- **Information that you provide directly**

When you engage with Anita Couture we may ask you to share your personal information. We have listed below the categories of personal data we may collect:

- o *Identifiers*

For example, if you create an account, purchase any products, submit a product review, enter a competition and/or contact our customer service team you may provide your first name, last name, date of birth, gender, email address, mailing address and/or telephone number.

When you register for an account, we will also collect information associated with your account such as the date you joined and your order numbers.

o ***Transaction information***

For example, when you place an order and/or contact our customer service department, you may provide your delivery and billing address, credit card type, credit card number and credit card expiration date. We will also collect details of your past orders.

o ***Images and photographs***

For example, if you enter a competition on the website or via social media when you tag us you may provide a photograph of yourself, or if you engage with us via technologies such as AR, face evaluation or other tools.

o ***Your opinions or other information***

For example, if you review the products you have purchased from us or provide information about products and/or cosmetic concerns, and the brands and products you use.

• **Information that we collect automatically**

When you engage with Anita Couture we may use cookies and similar tracking technology to collect the following information about you automatically:

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o ***Internet or other electronic network activity information***

For example, when you visit the website, engage with Anita Couture content or with us digitally, we may collect certain information from your computer, tablet or mobile phone (“Device”) such as your IP address, Device type (i.e. make and model), unique device identification numbers, browser-type and time zone settings.

We may also collect information about how your Device has interacted with us including: the pages accessed and links clicked; how you navigate to and from the website (such as how you scroll over the site, which parts you click and how long you spend on each page); your preferences, the products and/or services that you have viewed or searched for; and crashes, download errors and response times.

o ***Geolocation Data***

For example, when you visit the website, engage with Anita Couture content or with us digitally, we may collect your broad geographic location (e.g. country or city-level location) from your Device.

- - ***Inferences***

For example, when you visit the website, we may use the personal information indicated above to provide you with tailored advertising, content and products that we think you may like. This is described in further detail in the section below marked “How does Anita Couture use my personal information?”.

- ***Information that we obtain from third party sources***

From time to time, we may receive personal information about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us. The types of personal information we collect from third parties includes:

- ***Social Media Partners***

For example, if you ‘log-in’ to the website using a social media log in or use functionality such as “like” or “share” buttons, that social media site may pass information to us, including: the user ID for that third party site, the name, email address and location associated with the user ID and any other information permitted under the privacy policy for that website.

- ***Retailers, distributors and third party brand partners***

For example, where permitted by applicable data protection law and, if applicable, where you have specifically consented, our retailers, distributors and third party brand partners may pass information to us including your first name, last name, email address, postal address, phone number, gender, browsing patterns, geo-location and device identifiers, click through and other cookie data, demographic information including information about your appearance and information in relation to products purchased at their stores (whether on the high-street or online through their own website or a dedicated microsite) and services requested using their websites and/or applications.

- ***Technology partners and market research organizations***

For example, where permitted by applicable data protection law and if applicable where you have specifically consented, our preferred technology partners may share information with us, including your browser patterns, geo-location and Device identifiers.

3. How does Anita Couture use my personal information?

We will use your personal information for the purposes set out in this Policy, which will include:

- **To provide you with the products and services that you have requested** - To administer our relationship with you and to carry out our obligations arising from the relationship between you and us, including internal accounting and administration purposes, to process payment for purchases or other services and to create and manage your account.

- **To verify your identity** - For example we may use your email address to determine if you already have an account with us.
- **For analytics purposes** - For example, we may analyze your personal information including your location, products and/or services requested, age, time zone, IP address and URL visited, against our wider customer base for internal business purposes, such as generating statistics and developing marketing plans, to improve our services and products and the website. We may also aggregate and de-identify your information to create customer segments and share with our affiliates and partners.
- **To provide you with marketing communications that you might be interested in** - If you choose to receive marketing communications from us, we may use your personal information to keep you up to date with our latest products, services, shopping cart abandonment reminders, announcements, upcoming events, sweepstakes, contests and other promotions via our newsletters, emails, or other communications. If you no longer wish to receive these marketing communications, details of how to opt out are described in the section below marked "How do I stop receiving marketing communications?".
- **For tailored advertising** - We, or with third party vendors, may use your personal information to provide you with tailored advertising on third party sites, including Social Sites (defined below in section 8 "What if I access or use a social network or public forum through anitacouture.co.uk These advertisements are either: (i) "contextual" (meaning they are presented due to the webpage that you are viewing); or (ii) "behavioral advertising" or "interest-based advertising" (i.e. where advertisements are shown to you based upon your interests which we have inferred from your information including demographic, geographic and interest-based data). We may use tailored advertising to specifically include or exclude individuals who have registered for our products to ensure that you are provided with information about those products that are most relevant to you. To do this, we may track your browsing activity across different websites, different Devices and/or different applications. We may match your browsing activity on one Device, such as your mobile phone, with your browsing activity on another Device, such as your tablet, to ensure our advertising is tailored to you. If you no longer wish to see tailored advertising, you can amend your cookie preferences by clicking [here](#) to access our cookie management tool. In addition, some third party sites allow you to stop seeing advertisements from specific advertisers on that site, so you should also check your preferences on those websites.
- **For non-marketing communications** - We may use your personal information to communicate with you about important information in relation to your account, the service you have requested or other non-marketing communications. This includes: (i) emailing you to verify your identity when you sign-up; (ii) emailing you where you have requested a password and/or username reset; (iii) notifying you that a particular service has been suspended for maintenance or terminated; (iv) letting you know that we have updated this Policy or our Terms of Use; or (v) letting you know about any products that you have requested or purchased. We will never contact you to ask for your password, please be careful if you receive any communications from people requesting this information.

- **To provide the best service to our customers** - For example, we may use your personal information to process and respond to your questions and/or inquiries.
- **For site optimization and management** - For example we may use your personal information provided to us to:
 - o administer the website;
 - o ensure the security of our networks and of your information;
 - o customize your future visits to the website based on your interests to ensure the most user-friendly online navigation experience;
 - o improve the website and our other digital offerings (including to fix operational problems such as pages crashing and software bugs); and
 - o provide services to our partners such as tools, analyses, data and insights to see how their website or mobile applications are used.
- **For product development and business development purposes** - For example, we will use information we collect from you to improve our products and develop new products.
- **For fraud prevention and detection purposes and to protect and defend the rights and property of Anita Couture, our employees and business partners.**
- **For employment application purposes** - For example, if you contact us in relation to your employment prospects, we will use your personal information to consider you for current and future employment opportunities and to contact you with respect to employment opportunities at Anita Couture that you have expressed an interest in.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4. On what basis can Anita Couture use my personal information in this way?

We are required to satisfy one or more of the reasons set out by applicable data privacy law before we can collect and use your personal information.

Generally, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we will normally rely on the following reasons to collect and use your personal information:

- **Performance of a contract**

Using your information may be necessary for us to perform our obligations under a contract with you or with a view to entering into such a contract. For example, where you have: (i) purchased services and/or products from us, we will need to use your information to provide those services and/or products; or (ii) approached us in relation to employment opportunities, the collection and use of your personal information is necessary to enable us to offer you the job role, process your acceptance of the offer, on-board you as an employee and fulfil our obligations as an employer.

- **Compliance with our legal obligations**

The collection and use of your personal information may be necessary to enable us to meet our legal obligations. For example, to verify your identity and undertake necessary due diligence checks.

- **Pursuing our legitimate interests**

Where such processing is not overridden by your interests or fundamental rights, we are permitted to use your personal information where it is necessary in order to pursue our legitimate interests, for example to operate the website and our other digital offerings, to improve our products and services, content and our other digital offerings or to undertake marketing. We may have other legitimate interests and if appropriate we will make this clear to you at the relevant time.

- **Consent**

In some limited circumstances, we may rely on your consent to collect and use your personal information. For example, we may rely on consent: (i) where you have approached us in relation to employment opportunities and have provided us with sensitive personal information, such as information in relation to your racial and ethnic origin, sexual orientation, religion, physical and mental health, disabilities or trade union membership; or (ii) in relation to the sending of e-marketing or communications.

If we rely on consent, this will be made clear to you at the time we request your information. You can withdraw your consent at any point by using the mechanism provided at the time, or by contacting us using the contact details provided in the section “How do I contact Kyle Skin?” of this Policy.

- **Vital interests**

In some instances, we may need to use your personal information to protect your vital interests or those of another person.

You may not always be required to provide the personal information that we have requested. However, if you choose not to provide certain information, you may not be able to take advantage of some of our services. Any information that is so required is clearly marked as mandatory. If you would prefer that we not collect certain personal information from you, please do not provide us with any such information, or opt out of providing this information where applicable.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

If we collect and use your personal information in reliance on our legitimate interests (or those of any third party), these interests will normally be as set out in this Policy; however, if this changes we will make clear to you at the relevant time what those legitimate interests are.

If you have any questions or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided in the section below marked "How do I contact Anita Couture?"

5. Does Anita Couture share my personal information with anyone?

During the past 12 months, we may have disclosed the categories of personal information listed in the section marked "what categories of personal information does Anita Couture collect about me?" to the following categories of recipients:

- **With our affiliates** – We may make your personal information available to Anita Couture affiliated companies to allow us to provide our products and services to you, for the purposes described in this Policy, or as notified to you when we collect your personal information.
- **With third parties for marketing purposes** - Certain promotions and events may offer you the opportunity to consent to receive marketing communications from our business. If you have given your consent, your personal information may be used by such third party for the purposes stated at the point you enter the event and/or sign-up to receive the promotional updates.
- **With our service providers** - We engage third party service providers to perform functions on our behalf (for example, to support the delivery of our products, or the website). This includes but is not limited to sharing information with the following types of service providers:
 - **advertising providers** - including companies that provide: (i) advertising space for Anita Couture; (ii) the provision of advertising related services, including agencies instructed to make advertising purchases on our behalf , providers of ad-exchanges (a

digital marketplace to buy and sell advertising space) and providers of a demand-side platform (software used to purchase advertising in an automated fashion), such as Message Media from Google;

- ***providers of marketing and customer relationship management databases and data management platforms*** – that enable Anita Couture to manage your information in a safe and efficient manner;
- ***data analysis firms*** – that provide insights and help us to analyze trends using the data that we and they hold;
- ***customer support specialists*** – that provide customer support services on our behalf for Anita Couture products and services;
- ***fulfilment companies*** – this includes companies that manage your orders and ship your products, coordinate email campaigns, sweepstakes, contests or promotions on our behalf;
- ***application development and web-hosting companies*** – to enable us to manage and improve the website;
- ***information technology and related infrastructure providers***;
- ***email delivery providers***; and
- ***audit and professional service providers***.
 - **As part of a business transfer** – Anita Couture may disclose your personal information to an actual or potential buyer (and its agents and advisers) in relation to any actual or proposed divestiture, merger, acquisition, joint venture, bankruptcy, dissolution, reorganization, or any other similar transaction or proceeding.
 - **To comply with laws** – Anita Couture may disclose your personal information to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person; and
 - **To any other person with your consent to the disclosure.**

6. What are my data protection rights?

Depending on where you live and subject to applicable data protection law, you may also have the following rights:

- the right to request access to personal information that we collect, use, disclose and sell, which enables you to receive confirmation as to whether or not we are processing your personal information and access to such personal information.

- the right to change and/or correct inaccurate personal information. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you are a registered user, you can also review, change or correct your postal

address personal information at any time by logging in to your account by clicking the log-in link on the website. You may request that we change, update or deactivate your account by contacting us using the contact details provided in the section below “How do I contact Anita Couture?”.

- the right to block or suppress the processing of your personal information. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- the right to object to our processing of your personal information of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. More information on how to stop receiving direct marketing can be found in the section below marked, “How do I stop receiving marketing communications?”.

- the right to request that we delete your personal information, subject to certain exceptions. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see above), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- the right to request portability of your personal information.

We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- the right to withdraw your consent, if applicable. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

If you exercise any of your data protection rights detailed in this section, we will not discriminate against you and we will not deny you goods or services, charge you a different price or provide you with a lesser quality of goods or services.

If you wish to exercise any of the rights set out above, please contact us using the contact details provided in the section below marked “How do I contact Anita Couture?”.

You may also have a right to lodge a complaint with your local data protection authority or regulator.

If you have any questions or concerns about how we use your personal information, please do not hesitate to let us know.

7. What if I access a third party site through the website?

The website may contain links to or from third party sites. Please be aware that we are not responsible for the privacy practices of such third parties. This Policy applies only to the personal information we collect as described above. We encourage you to read the privacy policies of third party sites you access from links on the website or otherwise visit.

8. What if I access or use a social network or public forum through <https://kyliecosmetics.com/en-gb/>?

Our website may facilitate easy access to certain social networking sites and other websites or services with user-generated content features, such as Facebook, Instagram and Twitter (“Social Sites”). You understand that we do not control such services and are not liable for the manner in which they operate. Please review the Social Sites’ privacy policies if you would like more information about how they collect, use and share your personal information, your privacy rights and how to change your privacy settings.

Our website may enable you to:

- **Access Social Sites:** This may include: access to websites such as a YouTube video; or activation of third party websites when you make a ‘comment’, ‘share’ or ‘like’ something on the Social Site using a third party social network plug-in. In each instance, such third party’s privacy policy will apply to your interaction with that website or service;

- **Submit content to Social Sites:** For reviews, discussion forums, message boards, photographs and other public features (“Public Forums”). We do not restrict the distribution of personal information that you voluntarily disclose in these Public Forums, so please be aware that any information you disclose there may be collected and used by us and others. For this reason, we encourage you to refrain from providing or sharing personal information about yourself in the Public Forums. We cannot prevent third parties from using such information in a way that may violate this Policy or applicable law;

- **Accept certain cookies from the Site** (for example “Facebook Pixels”). These types of cookies help us understand your activity including the Anita Couture content you see, whether or not you have a Social Site account and if you are logged into that account. This information helps us to show you Anita Couture content you might be interested in on the Social Sites and measure the effectiveness of the Anita Couture content.

- **Sign-in to the Site using a Social Site:** For example, for a harmonized user experience.

Signing-in using a Social Site or other third-party account may allow us to access information that you have given the Social Site permission to share. The sign-in feature may also transfer information to the Social Site or third party, such as your username or social media handle, to authenticate you. The Social Site or third party may also automatically collect information such as your IP address, information about your browser and device, and the web page address of the Site. The sign-in feature may also place and read cookies from that third party that may contain a unique identifier the Social Site or other third party assigns to you. The functionality of and your use of the sign-in is governed by the privacy policy and terms of the Social Site.

We may use your personal information to identify you on Social Sites and to show you ads that are more relevant for you. The Social Sites will not share your personal information with other parties and will delete the information promptly after the matching process is complete.

Our use of your personal information in relation to the Social Sites will be as set out in this Policy or as otherwise notified to you. Again, please note that third party sites (including the Social Sites) may be under the control of a third party and we encourage you to familiarize yourself with the privacy policies and terms of use of each third party site.

9. How do I stop receiving marketing communications?

We will only send you marketing communications if you have agreed to this, or if we are otherwise permitted by law. If at any time you decide that you no longer wish to receive marketing communications from us, you may opt out by clicking on the relevant

‘unsubscribe’ link in the emails you receive, by texting STOP in response to any text message or by contacting us using the details found in the section “How do I contact Anita Couture?”

Please note, whilst we will honor your request to stop receiving marketing communications, we will continue to send you service-related communications such as emails confirming purchases through the website.

10. How long does Anita Couture keep my personal information?

We will retain your personal information where we have an ongoing legitimate business need to do so (for example, to provide you with access to the anitacouture.co.uk or other digital offerings, to provide you with a product you have purchased, or to comply with applicable legal, tax, or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

11. Does Anita Couture transfer my personal information to other countries?

In order to provide our services, we may need to transfer and process your personal information internationally (including to destinations outside the country in which you are located).

As a result, your information may be transferred to and/or processed in countries which may not guarantee the same level of protection for personal information as the country in which you reside. However, we have taken appropriate safeguards to ensure that your personal information will remain protected in accordance with this Policy. This includes implementing the European Commission's Standard Contractual Clauses for transfers of your personal information from countries located in the European Economic Area (the “EEA”) and the United Kingdom or equivalent data transfer agreements as required by other applicable data protection laws.

Further information can be provided on request: please contact us using the details found in the section “How do I contact Anita Couture?” We have also implemented similar appropriate safeguards with our third party service providers and partners and further details can be provided upon request.

12. Is my personal information secure?



We understand that you care how your personal information is used and/or shared with others, and we value your trust and seek to safeguard your personal information.

We implement appropriate technical and organizational security measures, including physical, administrative and technical safeguards to protect your personal information from unauthorized access, use and disclosure.

The measures we use to protect your personal information are designed to provide a level of security appropriate to the risk of processing your personal information. However, please be aware that no electronic transmission of information can be entirely secure. We cannot guarantee that the security measures that we have in place to safeguard personal information will never be defeated or fail, or that those measures will always be sufficient or effective.

13. I have entered a contest, promotion or survey – how do I find out more about that?

Anita Couture and its preferred third party service providers or business partners may offer sweepstakes, contests, promotions and surveys (each, a “**Promotion**”).

Where we do this, we will use your personal information as set out in this Policy, or as otherwise notified to you. However, in certain cases, a third party’s privacy policy may apply to any personal information that you provide in connection with such Promotion. Before entering any Promotion, we encourage you to check who is operating the Promotion in question, and the terms, conditions, policies and rules that apply to it.

14. How old do I have to be to use the Anita Couture sites or other digital offerings?

You must be aged 13 or over to use the Anita Couture sites and our other digital offerings.

We take your privacy very seriously and we understand the importance of taking extra precautions to protect the privacy and safety of children who use our products and services. We do not solicit or knowingly collect personal information from children aged 13 and under. If we are made aware that we have received such information, or any information in violation of our policy, we will use reasonable efforts to locate and remove that information from our records.

16. Does this Policy ever change?

We may update or modify this Policy from time to time in response to changing legal, technical or business developments. We will obtain your consent to any material Policy

changes if and where this is required by applicable data protection laws. The date of the most recent version of this Policy will appear at the top of the page.

When we update our Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. For example, we will notify you of any changes to this Policy by posting a new Policy and updating the "last modified" date at the top of this page or by sending the new Policy to you via email, where appropriate.

17. How do I contact Anita Couture?

We have taken great measures to ensure that your visit to the website is an excellent one and that your privacy is respected. If you have any questions, comments, or concerns about our privacy practices and/or would like to submit a privacy request, please contact us either:

- Via email at contact@anitacouture.co.uk