

PRIVACY POLICY

<https://www.neurae.com/en-CA/privacy-policy/>

Last updated on April 4, 2024

1. INTRODUCTION

Sisley Cosmetics USA Inc. (collectively, the “Company”, “us”, “our” or “we”) are committed to protecting the privacy of your personal information. This Privacy Policy describes what information we collect about you, and what we do with that information, your choices with respect to our processing of your personal information, and our information privacy practices. We urge you to read this Privacy Policy in its entirety before providing your personal information to us.

This Privacy Policy applies to the Company’s website and applications that link to this Privacy Policy (<https://www.neurae.com/en-CA/> (the “Site”)). This Privacy Policy also applies to our collection and use of your personal information when you access or use the Site, contact our customer service team, engage with us on social media, shop at our stores or otherwise interact with us.

2. CONSENT

By using our Site, requesting services from us, or otherwise providing personal information to us, you are consenting to the collection, use and disclosure of your personal information pursuant to the terms of this Privacy Policy.

You have options for refusing or withdrawing your consent, as described in this Privacy Policy. However, in some cases the law allows or requires us to continue using or disclosing certain pieces of personal information for particular purposes, even after you withdraw consent. Refusing or withdrawing consent may limit our ability to provide products and services to you. For example, if you do not allow us to process your credit card information and name, we may not be able to take your payment and therefore we may not be able to sell a product or service to you.

We may, from time to time, ask you to update your consent to ensure that our files remain accurate and in order to comply with our legal obligations.

3. TYPES OF INFORMATION WE COLLECT

- 3.1. Personal Information. The types of personal information we may collect includes your name, address (billing and shipping), telephone number(s), birth date, gender, email address, credit or debit card information and billing and account information (or other payment method information), security question answers, commercial information such as your purchase history, Internet or other electronic network activity information, including browsing and search history, where such information is linked to you and other information that you voluntarily provide that is used to identify you. These types of personal information and the means we use to collect this information is further detailed below.
- 3.2. Personal Information Collected From You. We collect personal information you provide directly to us. For example, we collect information when you create a profile on our Site, fill out a form, participate in a sweepstakes, contest or promotion, make a purchase, apply for a job, communicate with us via third-party social media sites, request customer support or otherwise communicate with us. When you access or use the Site or otherwise transact business with us, we collect the following categories of information about you (in some cases, the information we

collect may fall within more than one category, and in some cases we may collect this information automatically):

- (a) **Commercial Information:** When you make a purchase or return, we collect information about the transaction, such as product or service details, purchase price, products preferences, and date and location of the transaction;
- (b) **Payment information:** When you make a payment, we collect information such as your method of payment and payment card information (including payment card number, expiration date, delivery address and billing address);
- (c) **Contact information and Demographic information:** We collect information such as your name, address, email address, telephone number, loyalty member ID, your age, sex, and gender (some of which may be protected by applicable law);
- (d) **Log and Usage Information:** We collect information related to your access to and use of the Site, including the type of browser you use, access time, pages viewed, links clicked, IP address, the page you visited before navigating to our Site or other online identifiers;
- (e) **User Content:** We collect user content such as your communications with us and any other content you provide (including photographs, videos, reviews, survey responses, comments, customer service emails, calls and voice mails, employment-related information such as your resume, employment history, education information, and professional licenses or certifications).

We may collect other information that you choose to provide to us, or that we collect with your consent.

- 3.3. **Personal Information We Collect from Other Sources.** We may also obtain personal information about you from other sources. For example, if you log into your account from a social media site, we will have access to certain information from that site, such as your name, account information, and friends list, in accordance with the authorization procedures determined by such social media site.

3.4. Non-personal Information

3.4.1. **Non-personal Information Collected Automatically.** We (and our service providers) use different technologies to collect information, including cookies and web beacons. Cookies are small files sent by us to your computer or device that help us gauge the success of our Site and will track session information such as what pages you access and for how long, which allows us to make upgrades to enhance your experience, including recognizing your preferences to make shopping easier for you and providing you with a customized experience. Web beacons (also known as “pixel tags” or “clear GIFs”) are electronic images that may be used on our Site or in our emails and help deliver cookies, count visits, and understand usage and campaign effectiveness. For more information about cookies and how to disable them, see “Your Choices” below.

3.4.2. It may be possible that non-personal information, such as cookies and similar tools, may be used in connection with your use of the Site in order to derive personally information that we have obtained from you. If any non-personal information is linked with personal

information, the linked non-personal information will then be treated as personal information.

- 3.5. We make reasonable efforts to keep your information accurate, complete, and as up-to-date as necessary, but this will depend in large part on the accuracy of the information that you provide the Company, and how current it is. To update your information, please contact us using the contact information set out in the “Contact Information” section below.

4. WHY WE PROCESS YOUR PERSONAL INFORMATION: PURPOSE LIMITATION

We generally process your personal information that we collect to:

- (a) provide, maintain and improve our Site, including to create and manage your online account and provide you with more relevant and personalized content;
- (b) complete the transactions you request, process payments, perform our contractual obligations, and as otherwise anticipated within the context of our ongoing business relationship;
- (c) request and collect feedback and respond to requests and complaints;
- (d) detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity;
- (e) monitor, audit and analyze trends, usage and activities in connection with our Site;
- (f) display advertisements based on your preferences, interests, and browsing behavior, with your consent where required by law (for more information, see “Advertising and Analytics Services Provided by Others”);
- (g) communicate with you about products, services, opportunities and events offered by the Company and our partners and provide news and information we think will be of interest to you, with your consent where required by law (see “Your Choices” below for information about how to opt out of these communications);
- (h) debug, identify and repair errors that impair the functionality of the Site;
- (i) comply with our legal or regulatory obligations;
- (j) carry out certain reasonable internal activities related to the products you purchase from us or your ongoing relationship with us;
- (k) facilitate sweepstakes, contests and promotions and process and deliver entries and rewards;
- (l) manage our business, including to maintain business records for reasonable periods, enforce our agreements, and collect amounts owing to us; and
- (m) carry out any other purpose described to you at the time the information was collected.

(n)

5. WHERE DO WE PROCESS AND STORE YOUR INFORMATION

The Company may process, store or transfer your personal information in Canada, the United States, or another jurisdiction and may be subject to the laws of that country or jurisdiction which may permit government and national security agencies to access your information in certain circumstances. When we send your information across borders, we take steps to protect your information, including by only send your information to countries that have strong data protection laws. If you have any questions about where your information is being sent, please contact us using the contact information set out in the “Contact Information” section below.

6. USER ACCOUNTS

6.1. Security

We may enable you to set up an account with a username and password to access and use certain features of the Site. You agree to provide us with accurate account information and acknowledge that you are responsible for keeping your account login information secret. We will not be responsible for any loss or damage arising from your failure to comply with this requirement.

6.2. Termination

We may in our sole discretion suspend or close your account and terminate your registration at any time and without prior notice, including in the event that you breach any of your obligations set out in this Privacy Policy. We are not obligated to give a reason for termination.

7. SECURITY

We take reasonable administrative, technical and physical measures to help protect personal information from unauthorized access, use, alteration, and loss, which are appropriate given the sensitivity of the information. Despite these measures, since no system or security measure is completely secure, it is possible that personal information may be lost, stolen or accessed without authorization.

8. WHEN DO WE SHARE PERSONAL INFORMATION AND WITH WHOM

We may share information about you as follows and as otherwise described in this Privacy Policy:

- With our mother company that provide certain services or perform certain corporate functions on our behalf;
- With vendors, service providers and consultants that need access to your information in order to perform services for us, such as website and data hosting, data analysis, payment processing, email delivery services, credit card processing, auditing services, and other services related to the operation of our business;
- With third parties in connection with co-branded campaigns or joint marketing initiatives, or in connection with certain sweepstakes, contests or promotions you may participate in;
- With companies that assist with or deliver our online and email advertisements, such as social media platforms, advertising networks, and advertising technology companies, and to our online and email advertisers and other vendors who may provide cookies or

other similar technologies for use on our website or in our emails, as further described in this Privacy Policy;

- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- If we believe your actions are inconsistent with our user agreements or policies, if we believe you have violated the law, or to protect the rights, property and safety of the Company or others;
- In connection with, or during negotiations for, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company; and
- With your consent or at your direction.

We may also share aggregated or anonymized information that cannot reasonably be used by third parties to identify you.

9. ADVERTISING AND ANALYTICS SERVICES PROVIDED BY OTHERS

We may allow others to provide analytics services and serve advertisements on our behalf across the Internet and in mobile applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about you about your use of the Site and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information. This information may be used by us and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising targeted to your interests on our Site and other websites, and better understand your online activity. Our Site may use Google Analytics, a web-based analytics service provided by Google, Inc. ("Google"). For more information on how Google uses data when you use our Site or Service, please follow this link: <https://policies.google.com/technologies/partner-sites>. You may be able to opt-out of some or all of Google Analytics features by downloading the Google Analytics opt-out browser add-on, available at, <https://tools.google.com/dlpage/gaoptout>. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit <http://optout.aboutads.info>.

We may also work with third parties to serve ads to you as part of a customized campaign on third-party platforms (such as Facebook, Microsoft or Google). As part of these ad campaigns, we or third-party platforms may convert information about you, such as your email address and phone number, into a unique value that can be matched with a user account on these platforms to allow us to learn more about your interests and to serve you advertising that is customized to your interests. Note that the third-party platforms may offer you choices about whether you see these types of customized ads.

10. YOUR CHOICES

10.1.Account Information. You may update and correct your online account information by logging in to your account or emailing us at CustomerCareCA@neurae.com. If you wish to deactivate your account, please email us at CustomerCareCA@neurae.com, but note that we may retain certain information as required by law or for legitimate business purposes. We may also retain cached or archived copies of information about you for a certain period of time.

10.2.Cookies. Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. You can opt-in of non-essential

cookies through the cookie banner on the Site. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Site.

10.3. Promotional Communications. You may opt out of receiving promotional emails from the Company by following the instructions in those emails or by sending an email to CustomerCareCA@neurae.com. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

11. RETENTION

Your personal information will be maintained on our servers or those of our service providers and will be accessible by our authorized employees and service providers who require access for the purposes described in this Privacy Policy. We will retain your information for as long as is necessary to fulfill the purposes described above. In the event that applicable law requires or permits us to keep your personal information for a longer period, we shall continue to employ the same administrative, technical and physical measures to protect it from unlawful access, use, alteration, and loss until we are able to delete it in accordance with applicable law. When personal information is no longer required, we will securely delete or anonymize it in accordance with our data retention policy and applicable laws. We may retain information in an anonymous or aggregated form where that information would not identify you personally.

12. YOUR RIGHTS

You may request access to or correction of your personal information in our custody or control. You may also have the right, in specified circumstances, to object to our use of your personal information or withdraw your consent, to request the deletion of your personal information or restrict its use, to request a copy of the information you have provided to us to use for your own purposes, or to lodge a complaint with a privacy regulator. Your rights are subject to applicable legal restrictions, and we may take appropriate steps to verify your identity before responding to your request. To exercise any of these rights, please contact us using the contact information set out in the “Contact Information” section below.

13. CONTACT INFORMATION

If you have any questions about this Privacy Policy, wish to exercise any of your rights, or have any complaints regarding our privacy practices with respect to your personal information, you may contact our Privacy Officer.

-by e-mail: CustomerCareCA@neurae.com
-through the contact form on the Site
-or by mail to the following address:
SISLEY COSMETICS USA INC.
360 Lexington Avenue
19th Floor
New York, New York 10017
Attn. Customer Service Neurae

14. CHANGES TO OUR PRIVACY POLICY

We reserve the right to modify this Privacy Policy at any time. We will post the revised policy here, which will be effective as soon as it is posted. We suggest you periodically review this Privacy

Policy for any changes. You can determine when this Privacy Policy was last revised by referring to the “Last Updated” legend at the top of this page. By continuing to use the Site following such changes, you will be deemed to have agreed to such changes.

15. CHILDREN AND YOUNG PEOPLE’S INFORMATION

Our Site is not intended for children under 14 years of age. We do not knowingly solicit, collect, or accept personal information from children under 14 years of age. If a child has already provided us with personal information, his or her parent or guardian may contact us using the contact information set out in the “Contact Information” section above.

16. INFORMATION ON PUBLIC AREAS OF OUR SITE

Any information you submit in a public area of our Site – such as on a social media page, user comments, comments on any of the Company’s blogs, reviews or comments on any ratings or review feature, questions or answers on a question and answer application or other public forum – will not be treated as confidential and may be publicly disclosed. This applies to personal information, so please consider your public postings before doing so. Additionally, information posted on social media pages will be subject to the terms governing those pages and websites.

17. LINKS

The Site may contain links to other websites that we do not own or operate. We provide links to third party websites as a convenience to our users. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy policies, notices and terms of use. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, protect and otherwise handle personal information. We encourage you to read the privacy policy of every website you visit.