PERSONAL DATA PROTECTION POLICY
www.neurae.com/en-GB

Update: April 2025

The Company pays particular attention to protecting the personal data that you provide or that it collects.

The Company undertakes every effort to ensure the highest degree of protection of your personal data in accordance with current regulations, particularly the Data Protection Act 2018 and General Data Protection Regulation (EU) 2016/679 of 27 April 2016 (GDPR). The Company reserves the right to update this Personal Data Protection Policy at any time.

This document gives you a better understanding of how the Company protects your personal data and is aimed at users of our website, our consumers and prospects and all our partners.

We invite you to read this document before submitting your personal data and to refer back to it regularly.

1. THE CONTROLLER'S IDENTITY

The controller of the personal data you submit is the company SISLEY UK Ltd., a company incorporated and registered in England and Wales with company number 03499639 whose registered office is at 33 Foley Street, 5th Floor, London, W1W 7TL United Kingdom and with VAT registration number 719 0994 06 (hereinafter the "Company").

2. FOR CONSUMERS, PROSPECTS AND USERS OF NEURAE'S WEBSITE

2.1 WHAT PERSONAL DATA ARE COLLECTED AND WHEN?

All information enabling you to be identified directly (for example, your name) or indirectly (for example, your internal consumer processing code) are "personal data".

More specifically, the Company may collect, save, transfer, and use your personal data relating to:

- Your identity (title, first name, last name, address, phone and/or mobile number, email address, date of birth, signature, identity documents, image, internal processing code enabling the customer to be identified, data about your professional life and your personal interests),
- Managing your orders and monitoring commercial relations (order number, billing and shipping address, payment data and methods, transaction number, purchasing and services history, correspondence and after-sales service, exchanges and reviews from existing and potential customers),
- Your contribution to reviews on products, services, or contents,
- Your participation date and your answers given during the organisation of contests, sweepstakes or every promotional initiative,
- Your well-being data when you use our beauty tools (emotional portrait) and your health data for our cosmetovigilance obligations or services provided in stores,
- Your profile on Social Networks (if you use Social Networks in order to log in or if you provide us with these personal data),
- Your use of our website: connection data, consulted pages, products searched, advertisements on which you clicked on, geolocation, duration of your website's visit,
- Technical information (language, IP address) or browsing information linked to the device.

The Company may collect your personal data especially when:

- You visit the website www.neurae.com/en-GB (hereinafter the "Site"),
- You subscribe to the NEURAE's communications,
- You create your account on the Site,
- You place an order on the Site and answer customer satisfaction surveys,
- You make a purchase or a beauty treatment in store,
- You write to the Company by mail, email, chat, or when you call. This correspondence may be kept by the Company to better monitor the relationship with you and improve its services,

- You use the services and tools of the Company (virtual consultations, Emotion Xplorer),
- You give your review on products, services, or contents,
- You participate in special initiatives (contests, sweepstakes),
- You share content on Social Networks (Instagram, Facebook, LinkedIn, Pinterest, TikTok or YouTube) using the hashtag #neurae or other hashtags that the Company's offers.

At the time of the personal data's collection, the mandatory or optional nature is indicated with an asterisk or any other means.

How is the content you share on Social Networks handled?

When you interact with the Company's profile/pages on Social Networks (Instagram, Facebook, LinkedIn, Pinterest, Tiktok or YouTube) your data are first collected and processed by the Social Network on which you have a profile (which acts as the "Controller" of your personal data). The Company has access to a restricted part of your data held by the Social Network and only processes it if you interact with the Company's accounts and pages on the Social Networks. The Company is a controller of your personal data, independent of the Social Networks. Consequently, the Social Networks and the Company decide autonomously on the purposes and methods of processing your personal data to which they respectively have access.

If you wish to know how the Social Networks process your data, we invite you to read the privacy policies accessible from your profile(s) on the Social Network(s) concerned.

The processing operations carried out by the Company are described below.

If you interact with the Company's account/page/profile on Social Networks, the Company may process the following data deduced from your profile:
- Last name, first name, username and other biographical information, age, gender, as well as information that you have voluntarily made public or shared on the Social Network by means of publications or other features,
- Your activities on the Company page on social networks, such as "likes", comments, public publications, tags and hashtags, content of private messages addressed to the Company.

With regard to your consent to the processing of your data obtained by the Company via your profile on a Social Network, we would like to point out the following:
- The consents concerned are given by yourself when you register on the Social Networks, you can personalize them at any time (however, the Company does not control these operations in any way - they are entirely managed by the Social Networks),
- The data processed by the Company are those made available by the Social Network. Thus, the Company cannot be held responsible in the event of unauthorized disclosure of information by the Social Network or receipt of unwanted advertisements/messages, in violation of the options you have selected.

The data collected from Social Networks will be processed for the following purposes:
- Answering to your posts, requests and questions, carrying out statistical analysis and market research on users who interact with our pages on Social Networks. The legal basis for processing is the Company's legitimate interests in promoting its activities and improving its image as a company,
- To fulfill its legal obligations as well as to meet its obligations relating to the protection of public health, which requires the monitoring, tracking and reporting to the authorities of any information relating to actual or potential adverse reactions related to the use of the Company products. The legal basis for the processing is the obligation to report undesirable effects to the various health agencies and authorities,
- To set up promotional campaigns relating to the Company's activities, products or services using the the Company account on the Social Network, including the sending of advertisements or messages. The legal basis for processing is your consent expressed towards the Social Network,
- With regard to data collected relating to job offers published by the Company's on Social Networks, your data are collected to evaluate and/or establish a professional relationship. The legal basis for processing is the performance of a contract or pre-contractual measures aimed at concluding a contract with you.

If you publish data relating to third parties, it is your responsibility to meet the requirements for collecting information and obtaining consent, in accordance with applicable data protection laws.

The data we collect through Social Networks will be processed mainly electronically and will be stored in our IT systems, in compliance with current data protection laws, including aspects relating to data security and confidentiality, in accordance with the principles of lawfulness and impartiality. Furthermore, data will be kept for as long as is strictly necessary to achieve the specific purposes pursued. In all cases, the criteria used to determine the retention period is based on compliance with the time limits authorised by law and on the principles of minimisation and limitation of data retention.

2.2 WHAT ARE THE PURPOSES?

In general, your personal data are processed for:
- Managing the Site and its quality (legal basis: legitimate interests of the Company),
- Managing and tracking orders (legal basis: performance of a contract),
- Prevention, detection and management of fraud or unpaid debts (legal basis: legitimate interests of the Company),
- Managing and monitoring commercial relations (legal basis: performance of a contract),
- Managing consumer/client service (legal basis: legitimate interests of the Company),
- Managing cosmetovigilance (legal basis: legal obligation),
- Managing consumer reviews on purchased products, services, and content (legal basis: consent),
- Managing and monitoring consumer accounts created on the Site for commercial and marketing activities (legal basis: consent),
- Managing NEURAE communications' subscriptions (phone calls, mail, email, SMS/MMS/RCS, WhatsApp) (legal basis: legitimate interests of the Company or consent),
- Compiling sales statistics (legal basis: legitimate interests of the Company),
- Managing the Company's Masterclasses (legal basis: consent),
- Managing NEURAE's one-to-one personalised beauty consultation and advices (legal basis: legitimate interests of the Company),
- Managing diagnosis (emotional portrait) (legal basis: consent),
- Managing sponsorship or referral program (legal basis: consent),
- Managing purchases and services store (legal basis: consent).

The legitimate interests of the Company consist of:

- The security of our Site and our tools in order to ensure their protection and thus ensure that they operate correctly and are constantly improved,
- The security of transactions to ensure that payments are correctly made and have not been subject to any fraud,
- Improving our personalised communications to help us better understand your needs and expectations, ensure that you benefit from an optimal experience and thus, improve our products and services in your interest. We may use techniques referred to as "profiling" using your personal data in order to analyse them and predict your needs and interests.

3. FOR PARTNERS OF THE COMPANY (SUPPLIERS, SERVICE PROVIDERS, DISTRIBUTORS/ RETAILERS, MEDIA, INFLUENCERS, EVENTS PARTICIPANTS, ETC.)

3.1 **WHAT PERSONAL DATA ARE COLLECTED AND WHEN?**

All information enabling you to be identified directly or indirectly are "personal data".

More specifically, the Company may collect, save, transfer and use personal data relating to:
- Your identity: title, first name, last name, date of birth, address, phone and/or mobile number, email address, signature,
- Your professional life: registration number in a professional register, company, occupation, workplace address, phone and/or mobile number, email address, image, profile on social networks (if you share with us these personal data),
- Your bank details or others financial information,
- Any other information about you that you share with the Company.

The Company may collect your personal data, either directly from you as part of our business relationship or your participation to an event, or through a third party.

3.2 **WHAT ARE THE PURPOSES?**

In general, your personal data are processed for:
- Managing our commercial and media relationship with our partners (legal basis: performance of a contract),
- Organisation of cultural events or external communications to which you are invited (legal basis: consent),
- Prevention, detection and management of fraud or unpaid debts (legal basis: legitimate interests of the Company). Our legitimate interest consist of the security of transactions to ensure that payments are correctly made and have not been subject to any fraud,

- Compliance with our legal obligations relating to the fight against money laundering, terrorism financing and corruption (legal basis: legal obligation).

4. HOW LONG ARE THE DATA KEPT?

We do not retain your personal data for longer than is necessary for the purpose for which it was collected. This means that data in our systems is destroyed, deleted or anonymised as soon as it is no longer required. We take appropriate measures to ensure that your personal data is processed only under the following conditions:

1. For the duration that the data is used to provide you with a service.
2. As required by applicable law, contract, or in consideration of our legal obligations.
3. Only as long as necessary for the purpose for which the data was collected, or longer, if required by contract or applicable law, with the application of appropriate safeguards.

A requirement may particularly exist if the data is still needed to fulfill contractual obligations, to assess and provide warranty or guarantee claims, or to defend against such claims. If the data is no longer required for the fulfillment of contractual or legal obligations, it will be regularly deleted unless its temporary retention is still necessary, especially to meet statutory retention periods. In cases of statutory retention obligations, deletion can only occur after the respective retention period has expired.

Thus:

- Data establishing proof of a right, a contract, or kept under a legal obligation are stored in accordance with the applicable provisions,
- Bank details are deleted once the transaction is completed or stored as evidence in accordance with the applicable provisions, unless you consent to use the "Saved payment cards" option to save your banking data in a secure, encrypted manner. In any case, the security code of your credit card is never kept,
- The data relating to your identity documents are kept for one year with regard to the right to access, rectification, restriction of processing, erasure, data portability or to object.

The Company is an international group headquartered in France and, for operational and technical reasons, we draw your attention to the fact that your data are stored for a period of three (3) years from the last contact/ purchase unless you object or request theirdeletion.
At the end of this three (3) year period, we may contact you again in order to find out if you wish to continue receiving commercial offers. If you do not give an explicit and affirmative answer, your personal data will either be deleted, rendered anonymous, or archived in accordance with the applicable provisions.

5. WHO ARE THE RECIPIENTS OF THE DATA?

Your data may be sent to c.f.e.b. SISLEY (France), other Group's entities and trusted service providers selected for their expertise and acting on behalf of the Company in order to achieve the purposes it defines such as payment, delivery, marketing, or IT service providers.

You will find more information about our service providers in the table below:

NAME OF THE SERVICE PROVIDER	LOCATION	APPROPRIATE SAFEGUARDS FOR THE TRANSFER OF PERSONAL DATA	LINK TO THE PERSONAL DATA PROTECTION POLICY
Adyen Netherlands	Amsterdam, Netherlands	N/A: member of the EEE	https://www.adyen.com/policies-anddisclaimer/disclaimer
Addingwell	Lille, France	N/A: member of the EEE	https://www.addingwell.com/privacy-policy
Apple Pay	Cork, Irland	N/A: member of the EEE	https://www.apple.com/legal/privacy/en-ww/
Awin	Berlin, Germany	N/A: member of the EEE	https://www.awin.com/gb/privacy
Axialys	Courbevoie, France	N/A: member of the EEE	https://www.axialys.com/privacy/
Bambuser	Stockholm, Sweden	N/A: member of the EEE	https://bambuser.com/privacy-policy

Beyable	Paris, France	N/A: member of the EEE	https://beyable.com/app-header-bars/privacypolicy.html
ClinReal	Toulouse, France	N/A: member of the EEE	https://www.clinrealonline.fr/politique-deconfidentialite/
Critéo	Paris, France	N/A: member of the EEE	https://www.criteo.com/privacy/
Google Ireland Limited (YouTube, Google Tag Manager, Google Analytics and Google Ads)	Dublin, Ireland	N/A: member of the EEE	https://business.safety.google/privacy/
Klarna	Stockholm, Sweden	N/A: member of the EEE	https://www.klarna.com/uk/privacy/
LinkedIn	Dublin, Ireland	N/A: member of the EEE	https://www.linkedin.com/legal/privacy-policy
Meta Platforms	Dublin, Ireland	N/A: member of the EEE	https://www.facebook.com/privacy/policy/
One Trust	London, UnitedKingdom	Adequacy decision of the European Commission	https://www.onetrust.com/privacy/
Paypal	Luxembourg, Luxembourg	N/A: member of the EEE	https://www.paypal.com/us/legalhub/paypal/privacyfull
Pinterest	Dublin, Ireland	N/A: member of the EEE	https://about.pinterest.com/de/privacy-policy
Power Reviews, Inc.	Chicago, Illinois, United States of America	Has not joined the Trans-Atlantic Data Privacy Framework: Standard Contractual Clauses have been signed so that an appropriate level of data protection is guaranteed for data processing.	https://www.powerreviews.com/privacy-policy/
Qualifio	Louvain-la-Neuve, Belgium	N/A: member of the EEE	https://qualifio.com/privacy-policy/
Rakuten	Luxembourg, Luxembourg	N/A: member of the EEE	https://www.rakuten.com/help/article/privacy-policy
Reachfive	Paris, France	N/A: member of the EEE	https://reachfive.com/privacy-policy
SalesForce	London, UnitedKingdom	Adequacy decision of the European Commission	https://www.salesforce.com/eu/company/privacy/
Selligent	Paris, France	N/A: member of the EEE	https://www.selligent.com/privacy-policy/
TikTok	Dublin, Ireland	N/A: member of the EEE	https://www.tiktok.com/de/privacy-policy.
Validity	Boston, Massachusetts, United States of America	Has joined the Trans-Atlantic Data Privacy Framework, so that an appropriate level of data protection is guaranteed for data processing.	https://www.validity.com/privacy-policy/

If requested by the authorities, the Company may be required to transmit your personal data in accordance with applicable regulations.

Under no circumstances does the Company sell your personal data to anyone.

6. WHAT IS THE LEVEL OF CONFIDENTIALITY AND DATA SECURITY?

In accordance with best practices on the date hereof, the Company implements all the appropriate technical and organisational measures with regard to the nature of the data and the risks that its processing entails in order to preserve the highest security and the strictest confidentiality of your personal data and, in particular, to prevent it from being distorted, damaged, or accessed by unauthorised third parties.

These measures may include in particularly: contractual terms when using service providers, security measures such as secured and limited access to data, antivirus software, authentication process, firewalls...

Despite all of the confidentiality and security measures implemented by the Company, we draw your attention to the fact that communications via the internet are never totally secure. The Company therefore assumes no liability in case of an internet communication failure or any other case of unforeseen circumstances.

7. WHAT PROTECTION IS THERE WHEN TRANSFERRING DATA OUTSIDE THE UNITED KINGDOM?

In order to fulfil the purposes defined by the Company, your data may be transferred outside the United Kingdom.

This transfer may be based on:

- A decision by the UK Government whereby it recognises that the country receiving the data ensures an adequate level of protection due to its national legislation or international commitments,
- Standard data protection clauses recognised or issued in accordance with the UK data protection act.

Before your data are transferred to these countries, the Company will take all possible steps to obtain the necessary guarantees so your data are protected. For more information, you can contact us as indicated in the section below: “What are your rights?”.

8. WHAT IS THE COOKIE POLICY?

To find out more about our cookie policy, please visit our cookie section: https://www.neurae.com/en-GB/use-of-cookies/.

9. WHAT ARE YOUR RIGHTS?

In accordance with the regulation on personal data protection (particularly the Data Protection Act 2018 and the GDPR), you have a right to access, to rectification, to erasure, to data portability, to restriction or to object to the processing of your personal data, and inform us of your instructions regarding the fate of your data after your death. If the processing is based on your consent, you also have the right of withdraw this consent at any time, without prejudicing the lawfulness of the processing based on this consent before its withdrawal.

You can exercise your rights by sending:

- An email through the "Contact us" section of the Site or,
- A letter with a photocopy of your identity document to the following address: SISLEY UK Ltd., 33 Foley Street, 5th Floor, London, W1W 7TL United Kingdom.

If you consider the answer provided to your request by the Company is not satisfying, you have the right to a complaint with the competent supervisory authority.