



THE BODY SHOP

Global Privacy Notice for Customers and Website Users

What does this Privacy Notice apply to?

The Body Shop, are fully committed to the responsible collection, use and care of the personal data of its customers and website users. This Global Privacy Notice for Customers and Website Users (“**Privacy Notice**”) provides you with information on how we collect, use, and share personal data through our websites, products, mobile applications, or other sites that display this Privacy Notice.

If you are in a jurisdiction that recognizes the concept of a Data Controller or similar, the Data Controller is the Body Shop entity (including Group of Companies) with which you have a customer relationship. If you have a query about how your Personal Data is being used, you can contact the data controller through the Data Protection Officer (DPO) team [here](#).

Key Definitions

Capitalised terms not otherwise defined in this Notice have the following meanings:

Personal Data means any information relating to an identified or identifiable living individual.

Sensitive Personal Data means any information relating to an individual’s racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, criminal records/history or processing of genetic data or biometric data, data concerning health or data concerning a natural person’s sex life or sexual orientation. Depending on the country you are based sensitive personal data may also refer to personal information that, once leaked or illegally used, may cause harm to natural persons, including but not limited to information on specially designated status, financial accounts, individual location tracking, as well as the personal information of minors or information on social security, driver’s license, state identification, and passport numbers, precise geolocation, combination of email address, debit card, or credit card with security or access code, password, or other credentials allowing access to financial account.

Processing means the use of personal data including collection, recording, organization, structuring, adaptation or alteration, analysis, retrieval, consultation, providing or blocking access to (including remote access), disclosure, dissemination, aligning, copying, transfer, storage, deletion, hosting, combination, destruction, disposal, or other use or handling of personal data.

Data Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. In our company, the ultimate data controller is The Body Shop International Limited.

Third Party means any natural person or legal entity, public authority, agency or any other body other than Data Subject, Data Controller, any vendor, supplier or service provider who solely or jointly process personal data on behalf of the Data Controller and acts on the Data Controller’s instructions.

Data Subject means the identified or identifiable living individual to whom the Personal Data relates.

TBS Group of Companies means the Body Shop International Limited **its owner**, affiliates and subsidiaries.

Personal Data we collect and process

We collect, store, and process your Personal Data in a number of ways including when you:

- Visit our websites, and branded pages and applications through third-party platforms;
- Register an account with us and/or purchase products through our website and/or undertake a live consultation;
- Visit one of our retail stores or counters, including if you register an account with us in store;
- Provide data to our Customer Engagement, our Franchisees, direct marketing campaigns, sweepstakes and competitions;

- Correspond with us across any of our channels (e.g. messaging platforms such as text message, live chat, social media and email); and
- Submit a review regarding our products at our websites, and branded pages and applications.

The following categories of Personal Data are followed by information about their source(s), purpose(s), legal bases and disclosure(s).

Categories of Personal Data	Sub-categories of Personal Data	Examples of Personal Data and their sources	Purposes and legal bases for Personal Data Processing
Personal Data	Basic	<p>Identifiers may include your name, postal and email address, telephone number, gender, date of birth, country/state of residence, title, login information, your consultant/representative ID number, IP address, device identifier or similar other identifiers, beauty profile information.</p> <p>We may get identifiers directly from you when you correspond or communicate with us by phone, e-mail, and online chat, in our store, or otherwise; register or create an account; participate in a contest, sweepstakes or an online survey; sign up for our rewards program or other program or club; sign up for email and/or SMS news and alerts; or use social media to interact with us, or to share something from our websites with others. We may also get identifiers from third parties. like social media platforms, or individuals who purchase goods or services to be delivered to you (such as gifts or gift cards).</p>	<p>We may use these Personal Data to provide and improve the features, products and services you request; for registration, contests and promotions; to enable you to participate in our values related campaigns, petitions and activities (including our loyalty programs); to communicate with you to provide information; to provide personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our Group Of Companies; when we perform our duties in a commercial relationship with you; to provide customer support when you communicate with us; to improve our Sites and Apps, our customer service and support, and the user experience; to contact you via post, telephone or text message with offers relevant to your preferences; to allow you to log in with a social media account and share activities on your social media pages, such as Facebook; to verify your identity; to communicate with you about your account and activities on the Sites; to send notice of changes to any of our websites or policies; for processing of Personal Data needed for the assessment and acceptance of customers or vendors; to deliver relevant advertising; and/or for research.</p> <p>When you review a product on our websites, and/or branded pages and applications used for marketing purposes including reprinting in brochures/other market materials and upon obtaining your consent, where required.</p> <p>Depending on the laws applicable in the country you are based, we will process such Personal Data on the basis of our legitimate interest (where applicable and depending on the country you are based), your consent, for the performance of our commercial relationship with you, or as otherwise permitted by law, as applicable.</p>

Commercial Data	<p>We may obtain information on the products and services that you have shown an interest in or purchased, including product preferences, billing address, shipping address, together with purchase details (products, colour, size, quantity, price), methods of payment and/or any communications we have received about your order or purchase; name, card issuer and card type, credit or debit card number, expiration date, CVV code, and/or billing address; fraud checks or flags raised about your transactions, payment card refusals, suspected crimes, complaints and/or claims.</p> <p>We get this directly from you when you purchase goods and services at any of our retail locations online or in person and in some cases from third parties.</p>	<p>We may use this Personal Data to provide and improve the features, products and services you request; to provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our Group of Companies; to perform all management activities connected with fulfilment of your order, including administrative management of the contract, delivery of goods, payment processing, management of any claims and litigation, and fraud prevention; to validate, confirm, verify, deliver, install, and track your order, including to arrange for shipping, handle returns and refunds, and maintain a record of the purchases you make; to provision products you purchased from us; to provide you offers that may be of interest to you; and/or to deliver relevant advertising.</p> <p>We may also use this data to protect you, other customers and our business against criminal activities and risks, and to make sure we understand and can meet our legal obligations to you and others, and can defend ourselves.</p> <p>Depending on the laws applicable in the country you are based, we will process your Personal Data on the basis of our legitimate interest (where applicable and depending on the country you are based), for the performance of our contract with you, to comply with applicable legal obligations, or as otherwise permitted by law.</p>
Internet or other similar network activity	<p>You can generally visit the website without providing any personal data about yourself. In this case we only collect and store data about your website access which will automatically be transmitted from your browser to us when you access the website.</p> <p>We get this indirectly from you (e.g., from observing your actions on our Sites) or from third parties like data analytics providers. This may include: IP address, MAC address or other unique identifier information (“Device Identifier”) for the computer, mobile device, technology or other device (collectively, “Device”), domain name, browser type and version, browsing history, search history, information</p>	<p>We may use this Data to provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our group of companies; and/or to deliver relevant advertising. We also use this Data to enable the technical delivery of our website's content to your device; to improve our online services and the experience you receive when engaging with us online; as well as for purposes of the technical security of our website.</p> <p>Depending on the laws applicable in the country you are based, we will process your Personal Data with your consent, and/or for the performance of our contract with you, and/or on the basis of</p>

		<p>about your visit (including products viewed, purchased or search for), details of any website which has referred you to our website, application, or advertisement; location and time zone setting, browser plug-types and versions, operating system and platform, page responses times and errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, keystrokes typed, and mouseovers); the amount of time you spend viewing or using the Website and the pages visited, the number of times you return, or other click-stream or site usage data and mouseovers) and methods used to browse away from the page.</p>	<p>our legitimate interests (where applicable and depending on the country you are based) in ensuring the security of the website, optimizing the website and services we offer to you, improving marketing, analytics, or site functionality, or as otherwise permitted by law. In certain jurisdictions you may be able to select your cookies preferences based on consent.</p>
	<p>Preference information and Inferences drawn from other Personal Data</p>	<p>This includes a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behaviour, attitudes, intelligence, abilities, and aptitudes. It also includes information ascertained about you from social media such as your profile picture, likes, location, and product preferences.</p> <p>We receive these inferences indirectly from you (e.g., from observing your actions on our Sites) or from third parties, such as a data analytics provider.</p>	<p>We use such Data to provide and improve the features, products and services you request; to provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our Group of Companies; to contact you via telephone or text message with offers relevant to your preferences; to improve our websites, products and services, customer service, and customer shopping experience; to create a session replay that shows your visit to our site; and/or to deliver relevant advertising or provide you with copies of our newsletter and information about our products, store launches, partnerships and in-store events, to contact you regarding service-related matters. We may use your data to gather feedback from you, to enable you to participate in customer research or focus groups, to inform you about products and commercial opportunities you may be interested in, to improve your experience as a Customer by building a profile of your preferences (including purchasing records) to offer you personalized products and offers; to enable your participation in our promotions, contests, prize draws, and special offers; to improve existing and develop new products and services; and to fulfil our administrative and commercial purposes and interests in activities such as those for security purposes, statistic and marketing analyses, systems</p>

		<p>maintenance, to manage product warranties and refunds.</p> <p>Depending on the laws applicable in the country you are based, we will process your Personal Data on the basis of our legitimate interest (where applicable and depending on the country you are based) and, when required by law, on your consent.</p>
Communication Data	<p>We may collect communication data from various sources, including contact lists, demographic information originally collected from other companies within TBS Group of Companies, and Personal Data legally obtained from other third parties, which may be combined with other information that we collect for the purposes described in this section, including information on your communications with us (e.g. your emails, letters, calls, posts and messages on our social media). This may include communications with Sales Managers, Regional Managers, and/or Beauty Entrepreneurs if they share such communications with us.</p>	<p>We use such Data to provide and improve the features, products and services you request; to provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or our Group of Companies; and/or to deliver relevant advertising.</p> <p>Depending on the laws that apply in your country, we will process your Personal Data on the basis of our legitimate interest (where applicable and depending on the country you are based), for the performance of our contract with you and, when required by law, on your consent.</p>
Other Personal Data we may have collected with your consent	<p>We get this information directly from you. This may include:</p> <p>Information you provide by calling, e-mailing, texting, or chatting online with our team and/or store staff or by responding to surveys or competitions.</p> <p>Information ascertained about you from social media such as your profile picture, likes, general geo-location details when using one of our mobile applications.</p> <p>Other information we have collected from you with your consent.</p>	<p>We use such Data to provide and improve the features, products and services you request; to provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products or the TBS Group of Companies; when we perform our duties in a contract with you; and/or for processing of Personal Data needed for the assessment and acceptance of customers and to assist you to find your nearest store.</p> <p>Depending on the laws that apply in your country, we process your Personal Data on the basis of our legitimate interest (where applicable and depending on the country you are based), for the performance of our contract with you and, when required by law, on your consent.</p>
Video surveillance data (CCTV)	<p>In our stores we operate video-surveillance systems, where we are gathering your personal data as digital images and recording any movement detected by the cameras in the area under surveillance, together with time, date and location.</p>	<p>We use the video-surveillance system and your personal data for the sole purposes of security and access control. The video-surveillance system helps control access to our stores and helps ensure the security of our stores, the safety of our staff and visitors, as well as property and</p>

			<p>information located or stored on the stores.</p> <p>Depending on the laws that apply in your country, we process your Personal Data on the basis of our legitimate interest (where applicable and depending on the country you are based), for ensuring security and access control.</p>
Sensitive Personal Data	Sensitive Personal Data	<p>We limit the circumstances where we collect and process these special categories of data.</p> <p>In some instances, you may have requested services or products that do not directly involve the collection of any special categories of data, but may imply or suggest your religion, health or other special categories of data, such as skin concerns and adverse events from you which may include information on your health and or ethnicity.</p>	<p>We may use these Personal Data to provide products and services you request; for registration, contests and promotions; to provide you with personalized content, information, and to send you brochures, coupons, samples, offers and other information on our products within the TBS Group Of Companies; to confirm your identity as a registered member; for responding enquiries related to the product use; for analytical and demographic purposes; and when we perform our duties in a contract with you.</p> <p>We process such Sensitive Personal Data on the basis of your consent or as otherwise permitted by the laws applicable depending on the country you are based.</p> <p>This Sensitive Personal Data may be shared for business purposes within the TBS Group of Companies and with service providers.</p> <p>Your Sensitive Personal Data will not be used for any additional purposes that are incompatible with the purposes listed above unless we provide you with notice of those additional purposes.</p>

About Third-party sites

You may be able to access our website from a third-party site or vice versa. Your use of third-party websites is governed by the privacy policy of that site. Different terms and conditions and privacy policies may apply. They may send their own cookies or tracking files to your Device, and they may collect your Personal Data for their own purposes. That information is not subject to this Privacy Notice.

Notice of Financial Incentive

In connection with The Body Shop's Love Your Body Club and our Clienteling Program, we may offer financial incentives and/or price or service differences ("Incentives") to participants in exchange for our use of your personal information.

To offer these Incentives, we must track the personal information you provide when you sign up or engage in activities in connection with The Body Shop's Love Your Body Club and Clienteling Program, such as your email address, referral activity, purchase history, and engagement with The Body Shop ("The Body Shop Incentives Program Data"), as described in Terms and Conditions for the [Love Your Body Club](#) and the Clienteling Program.

The value of The Body Shop Incentives Program Data is calculated by determining the approximate additional spending per participant, per year compared to individuals who have not participated in either The Body Shop Love Your Body Club

or Clienteling Program. The value of The Body Shop Incentives Program Data is reasonably related to the costs associated with offering the Incentives. You can register for the programs here <https://www.thebodyshop.com/en-hk/love-your-body-club> and at one of our retail locations, and you can withdraw from or cancel your registration at any time by contacting [here](#).

How long we store your Personal Data

We store your Personal Data processed for the purposes stated in this Notice and for the duration of our business relationship with you. Once our business relationship with you has ended and your data is no longer required for these purposes, we will delete your data, unless your data is required also for other purposes set out in this Privacy Notice, and/or is necessary to fulfil applicable legal or regulatory obligations. We also may store your data for dealing with any complaints regarding our products and services. Our retention periods are being determined as per the legal requirements of the country you are based.

How we share and disclose your Personal Data

As a global Company, we may disclose your Personal Data to:

- TBS Group Of Companies;
- Customers, Sales Leaders and/or Franchisees of The Body Shop, if you have indicated a desire to purchase products this way;
- Third-parties who provide goods or services to help us conduct our business and improve our services;
- External auditors and or legal advisors;
- Other parties to whom we are authorised or required by law to disclose information;
- Law enforcement and other government authorities. To do so, the authority requires an appropriate judicial order or warrant, for which they need to demonstrate that the disclosure of the requested or intercepted information is required. We reserve the right to challenge these requests.

We may share or transfer your Personal Data in the course of any direct or indirect reorganization process including, but not limited to, mergers, acquisitions, divestitures, bankruptcies, and sales of all or part of our assets. Your Personal Data may be shared following the completion of such transaction and/or during the assessment pending transfer (subject to confidentiality requirements). If transferred, your Personal Data will remain subject to this Privacy Notice or a policy that, at a minimum, protects your privacy to an equal degree as this Privacy Notice unless you otherwise consent.

International Data Transfers: We may transfer your Personal Data to our affiliates and subsidiaries or to other third parties, in accordance with applicable local law, depending on the country you are based. We may also transfer your Personal Data from your country or jurisdiction to other countries or jurisdictions in accordance with legal requirements.

- For international data transfers subject to EEA, UK and Swiss law: we primarily use European Union Commission Standard Contractual Clauses.
- For transfers between other jurisdictions, we may rely on other legal mechanisms for international transfers, as appropriate under the relevant law.
- We have also concluded and executed an Intra-Group Agreement to ensure safe and lawful transfers of personal data take place among entities within the TBS Group of Companies, and also among different countries around the world, where such transfers are necessary in the course of business.

We carry out Transfers Impact Assessments to implement supplementary measures to ensure your personal data is processed under the standards that apply to your territory.

Your Sensitive Personal Data will not be used for any additional purposes that are incompatible with the purposes listed above unless we provide you with notice of those additional purposes.

We do not sell your Personal Data or your Sensitive Personal Data, nor do we share it with third parties for cross-context behavioural advertising.

How we protect your Personal Data

We implement comprehensive technical, physical and organizational measures to ensure a level of security appropriate to the risk to the personal data we process and to ensure compliance with applicable legal requirements. These measures are aimed at safeguarding the ongoing integrity and confidentiality of personal data. We evaluate and improve these measures on an ongoing basis.

How we approach to children's privacy

Our websites are designed and intended for adults. We understand the importance of taking extra precautions to protect the privacy and safety of children using The Body Shop products and services.

Where one of our websites may be intended for a younger audience, depending on the country our audiences are based we get consent from a parent or guardian in accordance with the applicable local law. If you learn that a child has, in violation of this Privacy Notice, registered for email newsletters, or otherwise provided their Personal Data, please report it to us using the contact information provided at the bottom of this Privacy Notice. If we become aware that an underage user has provided Personal Data without parental permission, we will terminate that account and delete all Personal Data provided by that user to the extent feasible and as soon as practicable.

Depending on the country you are based, we may use your personal data to carry out age verification checks and enforce any such age restrictions.

Your rights in relation to the processing of your Personal Data

Depending on the country you are based, you may have some or all of the following rights:

- To obtain information on the personal data processed concerning you and to obtain a copy of such data (right of access);
- To obtain the rectification of any inaccurate personal data and, having regard to the purposes of the processing, the completion of incomplete personal data (right to rectification) (please let us know if and to what extent your data stored by us has changed, so that we can rectify or update the respective data);
- If there are legitimate reasons, to request the deletion of the personal data (right to erasure);
- To request the restriction of the processing of the personal data, if the legal requirements are met (right to restriction of processing);
- To withdraw your consent at any time, if the data processing is based on consent, provided that such withdrawal does not affect the lawfulness of the previous processing of your data (consent withdrawal);
- To receive the personal data provided by you in a structured, commonly used and machine-readable format and to transfer this personal data to another controller or, if technically feasible, to have it transferred by us (right to data portability); and
- Not to be subject to a decision based solely on automated processing which produces legal effects concerning you or significantly affects you in a similar way, if the legal requirements are not met (not to be subject to automated processing).
- To object, where applicable law provides, to the processing of your data (right to object):
 - which is being processed for the purposes of our legitimate interests (where applicable and depending on the country you are based) unless such interests outweigh your individual rights; and/or
 - for direct marketing purposes, without any special reason

Depending on the country you are based, *our digital marketing communications may provide unsubscribe or opt-out mechanisms that allow you to modify your communications preferences. Please note that if you opt-out of marketing communications, we may still contact you with non-promotional communications, such as those about ongoing business relations or administrative messages (e.g. updates on online orders).*

In order to exercise your rights, including the withdrawal of your consent, please contact us here. You may also designate an authorized agent to make a request on your behalf. In order to protect your data from unauthorized access or alteration

by third parties, all requests regarding your personal information will be subject to verification of the identity of the requesting individual. We endeavour to respond to a verifiable request within required time frames.

A Data Subject who feels that we are not adhering to this Notice or applicable data protection laws with respect to his or her Personal Data may contact us to register a complaint; submit requests for exercising rights; or address any other issue arising under this Notice. Complaints by any person may also be referred to the DPO team by email [here](#).

Without prejudice to any other remedies, you also have the right to lodge a complaint with a supervisory authority at any time.

Shine the Light Disclosure

California law allows California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please put “Shine the Light” in the “Request Details” portion of your request on the form above or in the subject line, if submitted by e-mail. Note that there are restrictions on the number of times you can exercise some of these rights. You may designate an authorized agent to make a request on your behalf. The agent must provide proof of your authorization. We may deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf. We may need to verify your request before completing it. For example, we may ask you to confirm data points we already have about you. We will only use Personal Data provided in a request to verify the requestor’s identity or authority.

Geolocation Data

If you have previously consented to sharing precise geolocation information with our digital services, you can choose to stop the collection of this information at any time by changing the preferences on your browser or mobile device settings.

Push Notifications/Alerts

If you have permitted one of our mobile applications to send you push notifications or alerts, you can deactivate these messages at any time in the notification settings on your mobile device.

Changes we make

We may update this Notice periodically and will revise the date at the bottom of this Notice to reflect the date when such update occurred. If we make any material changes in the way we collect, use, and/or share the personal information that you have provided, we will endeavour to provide you with notice before such changes take effect, such as by posting prominent notice on our Company website.

Continued use of the website constitutes acceptance of the new Privacy Notice. We encourage you to periodically review this page for the latest information on our privacy practices. Where required to do so by the applicable law depending on the country you are based, we may seek your prior consent to any material changes we make to this Privacy Notice.

In the event of any difference in interpretation or meaning between the English version and any other translation of this Privacy Notice, the English version shall prevail. Please see the English version of this Privacy notice [here](#).

Effective Date: 20/12/ 2023