

PRIVACY POLICY

The purpose of this Privacy Policy (the "Policy") is to describe how Little Smets S.à.r.l, a Luxembourg company with registered office at 262 route d'Arlon, L-8010, Strassen, Luxembourg, company number B24325 and VAT number LU 13 18 59 50 ("SMETS"), processes personal information about its clients and prospects in order to provide you with the best possible service.

SMETS, as described in this Policy (hereinafter: "We", "Our", or "Us") collects, stores, processes, uses and discloses personal information about you in connection with your use of SMETS website, your use of our connected products (if and when available), or when you visit our stores or visit our social media pages, in your jurisdiction.

1. WHAT TYPE OF PERSONAL INFORMATION DO WE COLLECT?

For the purposes described in this Policy, SMETS may collect the following categories of personal information:

- Identification and Contact information (such as name, address, phone number or e-mail address), when you are willing to provide them for instance to sign up for an online account or newsletter or fill out a customer information card in store, to participate in an event, to make a purchase, or ID information necessary when you request a VAT-refund or a "click and collect" service in store.
- Payment information: for instance credit card details, bank account numbers, Paypal account details or other payment details which you must provide to receive products or services you have ordered from us.
- Demographic information like your gender and birthday.
- Your image when you visit our stores (as CCTVS are in place), or Your voice when you call SMETS Clients Services (since your call may be recorded)
- Preferences and interests which you choose to disclose in the course of your privileged contacts or encounters with our client advisors (which may include your preferences about our collections or other luxury brands, your size, your lifestyle, or basic information on your family circle)
- Information, which may include health information, related to possible adverse effect caused by cosmetic products.
- Information you submit or post in a public space, on our social media pages or our website, for example for a product review.
- Information about your purchases online or in stores. This could include the products you purchased and their prices.
- If you use our website, we may collect information about the browser you are using, and your browsing behaviour.
- We may also collect information posted on third party websites or social media platforms about SMETS products and services, when necessary for the purposes defined hereunder.

Your personal information is collected either directly from you (e.g., if you create an account on our website or make a purchase or otherwise interact with our client advisors in stores or with our SMETS Client Services), or from you passively (e.g., when using tracking tools like browser cookies), or from third parties (e.g. through social media platforms).

If you choose not to submit any personal information when requested to perform a contract or when required by law, you will not be able to receive the product or service you ordered or otherwise register on our website or other media.

2. HOW DO WE USE YOUR PERSONAL INFORMATION?

We use the information described above for the purposes specified at the time of collection or hereafter in this Policy:

- To improve our understanding of your interests and concerns, and to improve our understanding of your use of our products: we may use your information to make our website and products/services better. We may use your information to customize your experience with Us and to tailor our marketing activities to fit your needs and interests as we believe that it is also in our legitimate interest to better serve you and respond to your needs.
- To process your order, respond to your requests or questions, and manage your complaints: for example, we use your information to process your order and deliver your products. Or, we may use your information to send you information you requested, or to communicate with you about your account or our relationship: we may contact you about changes to the Site or about service updates. We may also contact you about feedback or about this Policy or website terms. In such case, your information is processed to perform the contract we have with you.
- For security purposes: we may use information to protect Our company, Our customers, Our associates, and Our website against fraud, theft or any wrongdoing which may affect our activity as it is our legitimate interest to ensure the security of our activity online and offline.
- For anti-counterfeiting purposes, and fight against illegal resale channels in violation of SMETS general terms and conditions of sale.
- For marketing purposes: we may use your information to contact you, subject to your consent when applicable, about new products and special offers we think you will find valuable.
- For analytics purposes, we may use your information to analyse the e-reputation of SMETS or Our products and to measure the effectiveness of our online or offline campaigns or events, as it is our legitimate interest to preserve SMETS image and optimize our marketing campaigns.
- Other purposes: we use information to maintain transaction and other business records for legal, administrative and audit purposes. We also use information to meet legal, insurance and processing requirements.

3. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We do not disclose or otherwise share your personal information We collect, except:

- With Our parent and affiliated companies within SMETS Group of Companies: only authorized personnel with a need to know have access to the information, for purposes of internal audit, billing or administrative.
- With service providers and agents who perform services on Our behalf: for example, We share information with providers that help Us operate our website. We may also share personal information with service providers that help Us communicate on social networks.
- Subject to your consent, with Our business partners: for example We will share information with third parties who jointly sponsor an event, collaboration or promotion with Us.
- With any third party as part of any business restructuring or reorganization (including dissolution or liquidation). This includes if We are merged of all or part of Our business or assets are transferred, assigned or sold.
- When We are required to do so by law or when it is necessary to comply with applicable law: for example We might share information to respond to a court order.

4. TRACKING TOOLS AND USE OF COOKIES

We may collect certain information through cookies, web beacons and other automated means. A cookie is a text file which is stored in a dedicated area of your device's hard drive, for instance when you visit online service, when you read an email or while installing or using a mobile app. A cookie allows its sender to identify the device on which it is stored during the period of validity of consent, which does not exceed 13 months.

What type of cookies do we use?

Some cookies may be functional to collect information which will allow Us to facilitate your browsing such as languages preferences, memorizing log-in, or saving the content of your shopping basket or wish list.

Other cookies also collect information on your behavior by collecting referring URLs (where our visitors come from, which banners they clicked on and which directed them to our website), pages accessed, times of website visits. Such information will allow Us to enhance our website, have a better understanding of the products and services you would prefer, and offer you more personalized communications and/or more personalized content on our website.

We also use cookies for web analytics to measure the website activity and determine the areas of the website which are the most visited, hence improving visibility of our content.

We use cookies to ensure security of online transactions/purchases through device fingerprinting, which allows to identify certain aspects of the equipment used to place an order.

Our website may contain third party cookies (delivered by advertising agencies, analytics providers, etc.) enabling them to collect browsing information on your Devices, including to measure the efficiency of our advertising campaigns on third party websites. Third party cookies are subject to said third party privacy policies. We hereby inform you about the purpose of these cookies and how you can manage them, to the extent we are aware thereof.

We may include in our website the possibility to share content with third parties or to let other persons know you browsed our website. Such is the case for instance of "Like" and "Share" functionalities offered by social network platforms ("Facebook", "Twitter", etc).

Social networks which offer these functionalities may identify you even though you do not use these functionalities on our website. Indeed, such functionalities allow social network platforms to track information about your browsing on our website whenever your social network account is active while browsing our website.

We do not control how these platforms collect your personal data while you are browsing our website. We invite you to read the Privacy policies of these social networks to find out how they use information they collect (including for advertising purposes) through these buttons. These Privacy policies should provide you information about how to manage your preferences on your social networks account.

Acceptance of cookies

Except for functional or security cookies, the use of cookie on a Device depends on the user's choice, which can be made and modified freely and at any time.

You can manage cookies by setting your browser to accept or reject cookies on your Device. Settings that you make may change your internet browsing capacity and may sometimes alter your ability to access to certain services that require the use of cookies.

Such is also the case if we or one of our business partners can no longer recognize the type of browser your Device is using such as language, display settings or country of connection. We cannot be held liable for the minimized access to our services as a result of cookies you previously deleted or rejected.

How to manage cookie settings in your browser?

Each browser has its own cookie management system, as described in the “Help” menu of your browser, where you will be provided with all necessary information about how to set your preferences.

For Microsoft Internet Explorer 8.0 and more:

1. Go to "Tools" menu, then "Internet Options"
2. Click on "Confidentiality"
3. Select your preferred level of confidentiality

For Mozilla Firefox:

1. Go to "Tools" then "Options" menu
2. Click on the "Privacy" settings
3. Select your preferred option on the "Cookie" menu

For Opera:

1. Go to "Files" > "Preferences"
2. Click on "Privacy"
3. Select your preferred options

For Android browser:

1. Click on the upper right button
2. Go to "Settings" then "Privacy & security menu"
3. Select your preferred option

For Dolphin Browser on Android:

1. In the Menu, go to "More" then "Settings"
2. Select the "Privacy & security settings" menu
3. Select you preferred option in the "cookies" menu

For Safari on iOS:

1. In the "Settings" app, go to "Safari" menu
2. Go to "Accept cookies" entry under "Privacy"
3. Select your preferred option

For Google Chrome:

1. Click the Chrome menu on the browser toolbar
2. Select “settings” then click “show advanced settings”
3. In the "Privacy" section, click the “Content settings” button
4. In the "Cookies" section, you can change cookies settings

If you share your Device with other people and the Device operates several browsers, we cannot guarantee that personalized services and advertisement designed to match your personal use of the Device (if such personalized services and advertisement are available) will correspond to your own use and rather than someone else’s.

5. TRANSFERRING YOUR PERSONAL INFORMATION

We collect about you may be transferred to, stored and processed in countries where a SMETS entity is located to ensure you may benefit from better services wherever you visit us and for the purposes defined in this Policy. These countries are Luxembourg and Belgium.

We may also transfer your personal information to the service providers involved in the maintenance of our website or social media or any other tool used for the processing of our clients or prospects information.

Some recipients may be located in third countries which are considered as not providing the same level of data protection as the EU country in which you provided your information.

When we transfer your information, we will protect and provide adequate protection for the transfer of your personal information to recipients in those countries by entering into data transfer agreements based either on the European Commission standards clauses (as they may be revised or replaced by the EU Commission) with such data recipients or the EU/US Privacy Shield as it may be revised or replaced, or any other valid transfer mechanisms that may be available in the future.

You can obtain a list of the relevant third countries and copy of these safeguards upon request.

6. RETENTION PERIOD

Your personal information will not be kept in a form that allows you to be identified for any longer than is reasonably considered necessary by SMETS for achieving the purposes for which it was collected or processed or as it is established in the applicable laws related to data retention periods.

The data retention term of Your personal data collected by Us is determined per purpose of data processing according to the following criteria:

- Data collected for the specific purposes defined in Article 2 will be stored only:
 - For three (3) years since our last contact, if You are a prospect (i.e. you have not made any purchase with Us but You are interested by SMETS)
 - For the duration of your commercial relationship with SMETS and 10 years thereafter, if You are a client (ie You have made a purchase of Our products or services)
- Your personal data will then be archived to be used: in the event of a litigation or dispute for the statute of limitation term applicable to the related purpose;
- If a judicial action is initiated, the personal information may be stored until the end of such action, including any potential periods for appeal, and will then be deleted or archived as permitted by applicable law;
- Your personal data are then anonymized or deleted

7. YOUR RIGHTS

You may request access to the personal information we maintain about you. If you request such access, we will provide you with all the information as required by law on the purposes of the processing, categories of data processed, categories of recipients, data retention term, etc.).

You may also obtain a copy of any personal information that We hold about you in our records in a format compatible and structure to allow you to exercise your right to data portability when the processing is based on your consent or on the performance of an Agreement between you and Us. You can also provide general or specific instructions on how your personal data should be processed and may be used, after your death. You may also request that We correct, amend, erase, any information which is incomplete, out of date or inaccurate.

You can request the deletion of your Personal information (i) if your personal information is no longer necessary for the purpose of the data processing, (ii) you have withdrawn your consent on the data processing based exclusively on such consent, (iii) you objected to the data processing, (iv) the personal information processing is unlawful, (v) the personal information must be erased to comply with a legal obligation applicable to SMETS. SMETS will take reasonable steps to inform the other entities of the SMETS group of such erasure.

You can request the restriction of the processing (i) in the event the accuracy of your personal information is contested to allow SMETS to check such accuracy, (ii) if you wish to restrict your personal information rather than deleting it despite the fact that the processing is unlawful, (iii) if you wish SMETS to keep your personal information because you need it for your defense in the context of legal claims (iv) if you have objected to the processing but SMETS conducts verification to check whether it has legitimate grounds for such processing which may override your own rights. You also have the right to lodge a complaint with the competent supervisory authority.

You can contact us at e-shop@smets.lu. When your information processing is based on your consent (for instance when you accept to receive communication materials), You may withdraw any consent you previously provided to Us at any moment, without affecting the lawfulness of processing based on your consent before withdrawal.

When your information is processed to pursue our legitimate interests, you may object to such processing, if Our legitimate interest may be overridden by your interests and freedom. To exercise these rights, please contact us at: e-shop@smets.lu, and we will respond.

8. PROTECTING YOUR PERSONAL INFORMATION

We will provide an adequate level of protection for the personal data and make sure that appropriate technical and organizational security measures are in place to protect the personal information (including education and training of relevant personnel) against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of processing.

However, to the extent that the Internet is not completely secure, we cannot guarantee that any of your personal information stored or sent to us will be completely safe. We encourage you to use caution when using internet to access our website or social media.

9. CHILDREN

Our website is not directed to children. We do not knowingly collect personally identifiable information from children without permission from a parent or guardian, unless permitted by applicable law.

You must be at least sixteen years old to provide Us with your personal information and eighteen years old to engage in transactions on our store or website. By engaging in transactions with us, you affirm that you are at least eighteen years old and are fully able to enter into and be legally bound by such transactions

If we are notified (by contacting Us at "Contact Us") or learn that a minor has submitted personal data to us through our media or otherwise, we will delete such personal information.

10. THIRD PARTY SITES

We may link to third party sites or services. We do not control and which are governed by their own privacy policy. This Policy does not apply to those third party sites. We strongly advise you to check the privacy policies of all third party sites you visit to find out how they are treating your personal information.

11. CHANGES TO THIS POLICY

Our Policy may change from time to time to reflect changes in our processing of your personal information. We will notify you of any material changes as required by law. We will post an updated copy on the Site.

12. CONTACT US

If you would like Us to update the information We have about you or your preferences, or if you have any questions about the protection of your personal information please contact Us by email at e-shop@smets.lu.