L'ORÉAL BENELUX PRIVACY POLICY FOR LOREALISTAR / INFLUENCERS / TALENT PARTNERS

L'OREAL Nederland B.V., registered with the Dutch Chamber of Commerce under nr. 32025040, **www.loreal.com**, having its registered office at Scorpius 141, 2132 LR Hoofddorp, The Netherlands.

WHO THIS APPLIES TO

This policy applies to you **if you are one of our Talent Partners or someone we are considering to become a Talent Partner of ours (a 'Potential Talent Partner').**

You are one of our Talent Partners or a **Potential Talent Partner** if you are an influencer, ambassador, spokesperson, affiliate, consumer advocate and/or expert in your chosen field (for example healthcare professionals such as dermatologists, hairdressers and make-up artists) and, for Talent Partners you are also promoting our company, brands or products, whether that is through:

- the creation or publication of and/or participation of content on your social media account (such as on Instagram, Facebook, TikTok, LinkedIn); or
- attendance at events (such as photo shoots, personal appearances, panel sessions, seminars, press interviews, appointments).

Please note, we require all our Talent Partners and Potential Talent Partners to be 18 years old and over.

We last updated this on July 2025. We added some more detail to explain how we develop and use the profile we build for our Talent Partners and Potential Talent Partners.

WHY THIS MATTERS

Please read this information carefully. We've included a Glossary at the end to explain some terms. If you have any questions, please contact us at dpo.benelux@loreal.com and let us know you are a Talent Partner so we can best support your query.

WHO WE ARE

"L'Oréal Benelux", "L'Oréal", "us", "our" or "we" means L'Oréal Nederland B.V. We are responsible for the personal data that you share with us as we are the "controller" for the purposes of applicable data protection laws.

The L'Oréal family is made up of a number of different brands – you can find out more here https://www.loreal.com/en/our-global-brands-portfolio/.

We are also part of the L'Oréal Group which operates in 140 countries around the world. For details on the L'Oréal Group, please see http://www.loreal.com/group.

WHAT'S NOT INCLUDED

This policy doesn't apply to information about our employees or shareholders. It doesn't cover other companies or organisations (which advertise our products and services and use cookies, tags and other technology) collecting and using your personal data to offer relevant online

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advertisements to you - you should review their cookie and privacy policies before giving them your personal information. Read our cookie policy (available on each of our websites) for information about how we use cookies.

You may also be a consumer or business customer of ours, if so, please see our Consumer Privacy Policy or our Business Customer Privacy Policy for further information on how we use your personal data in that context. If you visit one of our premises or attend one of our events, we will also provide you with information about how we use your personal data to manage your time safely and securely with us on site or at the event.

OUR PRIVACY PROMISES

Our ambition is to be an exemplary *corporate citizen* and we place great value on honesty and clarity and are committed to building a strong and lasting relationship with our Talent Partners, based on trust and mutual benefit.

Part of this commitment means safeguarding and respecting your privacy and your choices; this is essential to us. We want you to understand how we use your personal data so you can feel comfortable and confident in sharing it with us.

1) We respect your privacy and your choices.

2) We make sure that privacy and security are embedded in everything we do.

3) We will never sell your personal data.

4) We are committed to keeping your personal data safe and secure. This includes only working with trusted partners.

5) We are committed to being open and transparent about how we use your personal data.

6) We will not use your personal data in ways that we have not told you about.

7) We respect your rights and will always try to accommodate your requests as far as is possible, in line with our own legal and operational responsibilities.

PERSONAL DATA PROCESSING AT L'ORÉAL

We set out below what types of personal data we might collect or hold about you, how we use it, who we share it with, how we protect it and keep it secure, and your rights over our use of it.

Note that not all the information below may apply to you, so please read it in the context of how you have interacted or are working with us.

WHAT IS MEANT BY 'LEGAL BASIS'?

Whenever we use your personal data, we must have a legal basis to do this. The legal basis for the processing of your personal data can be:

- **Your consent** – where we ask for your agreement to use your personal data for a specific purpose.

- **The performance of a contract** – where we need to process your personal data in order to provide you with a service/something under an agreement we have with you or as part of preparing to enter into an agreement with you.
- **Our legitimate interests** – where the use of your personal data is in our legitimate business interests.
- **To comply with a legal obligation** – where we need to use your personal data for our own legal and regulatory compliance reasons (for example to comply with our tax and financial reporting obligations).

Talent Partner selection and profile and relationship management

Your Profile with us

It is essential to us to only select Talent Partners whose values align with ours. To do this we build a profile about you to check our values align and that the L'Oréal products you are interested in match our promotion plans. This involves us taking a look at your social media content and public profile to see if our values match (i.e. respect, tolerance, inclusion). The profile we build about you includes the information captured through our channel review and the information we know about you through your relationship with us, i.e, campaigns you have been part of and our history of working together ('**Your Profile'**).

We collect this information from different sources depending on how we engage with you – be it as a contracted Talent Partner or as someone who has mentioned our products online and we are considering as a Talent Partner - a Potential Talent Partner.

We collect the information from: you (including questionnaires or surveys you, or your agent acting on your behalf, complete such as our Beauty Profile questionnaire), other L'Oréal Group companies, your agent, a third-party agency working on our behalf including an Affiliate Marketing Platform, our own knowledge and understanding, media coverage, as well as publicly available information such as via your social media account or that of another person or organisation (for example, when you mention L'Oréal products or services on non-L'Oréal pages such as social media platforms or third party agencies).

We also use personal data we gather through **Cookies** and similar technologies (for example, using cookies or built-in disclosure tools on platforms, such as Instagram's Paid Partnership tool, to understand social media reach and engagement) to enrich Your Profile. Sometimes we require your consent to 'drop' the cookie and collect this information – for more information about how we use cookies, please see our cookie policy on our different Brand websites and our Consumer Privacy Policy.

The **personal data we use** includes:

Personal Details:	**Social Media Info:**	**Profile**
First name + Last name	Instagram handle	Beauty interests
Gender	TikTok handle	Reasons to join
Nickname	Product added to TikTok shop Showcase?	Beauty profile for hair, skin, make-up

Birthdate	Youtube handle	
Occupation	Content Type	
Mobile number	Loved Brands	
Mobile Prefix	Most Active Social Media	
Address, city, region, country	Interests	
Language(s)		
Vegan or not		
Dietary requirements if needed for catering		
Identification documentation		

Legitimate business interests - We use Your Profile where it is **in our legitimate interests to do so.** This includes:

I. To improve our products and services and how we engage with our consumers and customers, and they with us – for example, understanding your interactions with them in turn helps us understand our social reach;
II. to build Your Profile and better engage with you in your role as a Talent Partner and/or a Potential Talent Partner including sending you products, product surveys and information about upcoming and existing products, checking your previous and each new post you make online to ensure our values are, and remain, aligned (our 'Values Charter' check);
III. to manage and develop our Talent Partner strategy, understanding what works well and what doesn't so we continuously improve our approach;
IV. to secure, improve and protect: our brands, our consumer and customer trust, develop our Talent Partner strategy and our products, services, tools, infrastructure, websites and platforms; and
V. to prevent fraud or criminal activity (for example, to ensure you do not buy or artificially inflate your follower account e.g. via "paid-for" or "like-for-like" means).

Our Values Charter and Your Profile – our use of automated decision making

We use your publicly available personal data to check our values are aligned. Such checks consist of us (or a trusted partner of ours) assessing Your Profile (see above) to ensure they align with our Values Charter. We evaluate your public social profiles and publicly available information, to assess and predict your behaviour and understand its impact on us such as your suitability for campaigns we are working on now or in the future. We use an algorithm to carry out our values matching analysis, our personnel then review all values match profile output.

Relationship management

We also use the personal data we hold in the profile we build about you (see above) to enter into and/or **fulfil our contractual obligations where we have an agreement with you**. This includes any relationship management communications between us and your agent and/or our agent, paying you, arranging meetings and liaising with your agent and our agent, where applicable.

We may also use Your Profile to invite you to events, seminars and training sessions and share information about our strategy, products and services. We do this as it is **in our legitimate business interests** to maintain an engaged Talent Partner pool, and where it is **part of the contractual terms we have agreed** for you to represent us at such events. We may also do this if you are a Potential Talent Partner too. This may involve us needing to share your personal data with a supplier acting on our behalf or another third party who is hosting the event.

User Generated Content (the posts you create)

We seek your **consent** to use your personal data contained in or associated with your User Generated Content (this is defined in our Glossary, but generally these are the posts you create, like or share online including on social media platforms). This usually includes the use of your name, nickname, social handle, images and Hashtags personal to you. We seek this consent when we enter into a contract with you, this is to allow us to:

- use your User Generated Content now as part of your role as a Talent Partner of ours; and
- permit our future use of the personal data within the User Generated Content for our commercial purposes.

We also use personal data in your User Generated Content where it is in **our legitimate interests** to do so, such as to:

I. improve our products and services and how we engage with our consumers and customers, and they with us;
II. better engage with you in your role as Talent Partner or potential Talent Partner of ours including sending you products, product surveys and building a profile about you so we understand you well; and
III. secure, improve and protect our brands, our consumer and customer trust, develop our Talent Partner strategy and our products, services, tools and platforms.

Whilst we require all User Generated Content to not feature or otherwise contain personal data about an individual other than yourself, if your User Generated Content does contain personal data **relating to another individual**, you are responsible for making sure they are happy with you using their personal data and allowing us to use it.

Legal obligations that apply to us or we may need to respond to, and the vital interests of others we may need to support

We may also be under a **legal obligation** to use the personal data we hold about you (including sharing) Your Profile, our working history together including the terms we have agreed and your User Generated Content, such as in response to a request from a government or law enforcement agency. Where we are compelled to share such information, we may also be subject to confidentiality restrictions which prevent us from informing you of such sharing. But we will otherwise let you know, where we can. Such sharing with a third party may also be because it is in your vital interests, or those of another individual, that we do share that information – again, we will always inform you of such sharing where we are permitted to do so.

We may also need to use your personal data to comply with **legal obligations** placed upon us which are there to protect you and our business against for example, corruption and money laundering checks, but also for general, advertising standards, accounting, and financial record purposes. This may include Your Profile, our working history together including the terms we have agreed and your User Generated Content.

A note on sensitive personal data

The processing of special categories of personal data (or 'sensitive personal data') is limited to data made public by you or a third party on your behalf, or where you have given us consent to use such information. For example, we may need to understand your health, including dietary, requirements when preparing access and catering for an event you are attending. We will always check such requirements with you and you only need provide the information you are comfortable with us using.

PERSONAL DATA PROCESSING ACTIVITIES

Joint controller activity

In some cases, for example when we collaborate with our trusted partners (such as an agency we engage to support our Talent Partner and Potential Talent Partner management activities), we may be jointly responsible with those partners for the use of your personal data, but we will always agree the respective roles and responsibilities of each party involved, be transparent with you about what we are doing and make sure your rights are not affected.

Sharing your personal data

• **We may share your personal data within L'Oréal and the L'Oréal Group -** Where appropriate, we may share your personal data between our brands to build a central record, keep the information we hold about you up to date (for example, you may be a Talent Partner for more than one of our brands), tailor our communications with you and to run analytics and perform statistics.

Access within the L'Oréal Group will always be controlled on a need-to-know basis, to fulfil our contractual obligation with you (such as to pay you), or to allow us to perform any necessary or legitimate functions.

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We may also share your personal data in a pseudonymised way (not allowing direct identification of you) with L'Oréal Research & Innovation scientists, including those located outside of your country, for research and innovation purposes.

Your personal data may also be processed on our behalf by our trusted third-party suppliers - We only provide them with the information they need to perform the service they are providing, require them to keep it secure and tell them to not use it for any other purpose. For example, we may trust third parties to deliver services that require the processing of your personal data as follows:

- To provide digital and e-commerce services such as social listening, loyalty programmes, identity management, reviewing social media and public profiles, ratings and reviews, CRM, web analytics and search engine, community platform management and User Generated Content curation tools;
- As required to deliver a product to you e.g. postal/delivery services;
- To provide us with Talent Partner care/management services and Potential Talent Partner identification services; and/or
- To help us provide training, seminars, and events, such as training providers, travel agencies, and event management companies.

We may also disclose your personal data to third parties beyond those that provide services to us, such as:

- If we sell any or part of our business or assets, we may disclose your personal data to the prospective buyer of such business or assets. Your personal data will usually be processed by the buyer acting as the new controller and its privacy policy will govern the processing of your personal data;
- If we are under a duty to disclose or share your personal data to comply with a legal obligation, or in order to enforce or apply our terms of use/sales or other terms and conditions you have agreed to, or to protect the rights, property, or safety of L'Oréal, our customers, or others; and/or
- In other circumstances if we have your consent or we are permitted to do so by law. o L'Oréal in accordance with this Privacy Policy; and
- The partner acting also as a controller, and its privacy policy shall govern the use of your personal data for its purposes.

We may disclose your personal data to our trusted partners, for example if they are co-creating content with us, then we will each use your personal data for our own purposes and as such your personal data will be used by:

We may share your User Generated Content with our partners so it may be displayed on their website.

HOW LONG WE KEEP YOUR PERSONAL DATA AND HOW WE KEEP IT SECURE

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We will keep your personal data for as long as we need it subject to the different use cases described above. For example, we retain certain personal data for the following periods:

- For the duration of our contractual relationship and for a reasonable period after it ends in case of a query or claim;
- We keep User Generated Content for a reasonable period necessary to achieve the purpose we collected it for (e.g. for the duration of a campaign) and otherwise for a period defined in accordance with local regulations and guidance;
- We keep a copy of Your Profile for as long as we have a legitimate business justification for keeping it, after which we delete it or anonymise it; and
- Where cookies are placed on your browser, they are stored for as long as necessary to achieve their purposes (e.g. statistics on your social media post) and otherwise for a period defined in accordance with local regulations and guidance.

When we no longer need to use your personal data, it is removed from our systems and records, or anonymised so that you can no longer be identified from it.

We are committed to keeping your personal data secure and taking all reasonable steps to do so. We contractually require that trusted third parties who handle your personal data for us do the same. However, as no transmission of information via the internet is completely secure, we cannot guarantee the security of your personal data transmitted to our site although. Any transmission is therefore at your own risk.

WHERE WE STORE YOUR PERSONAL DATA

The data we collect from you may be transferred to, accessed from, and stored at a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our service providers.

Your personal data will only be stored or processed by us or by engaged third parties outside the EEA if this is in accordance with the applicable regulations for the transfer of personal data to countries outside the EEA. This means that we will only transfer your personal data to countries outside the EEA if the European Commission has decided that the third country in question ensures an adequate level of protection, or if other appropriate safeguards are provided.

YOUR RIGHTS AND CHOICES

L'Oréal respects your right to privacy: it is important that you are able to control your personal data. You may have certain rights and choices over the personal data we collect from you. These rights may be limited depending on our rights as a business and/or the legal basis on which we use the data, but we will always explain where this is the case. We will take reasonable steps to verify your identity before granting access or making corrections to the information we hold about you. You may exercise these rights by contacting us using the details provided below.

Email opt-out

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You can opt-out from our email marketing at any time by clicking on the unsubscribe link within the marketing emails you receive from us or by contacting us (see the 'Contact Us' section below). We'll act on your request as quickly as we can, but it can take about 30 days to take effect due to system updates. We will add your email address to our opt-out list to make sure we continue to exclude you from future marketing communications.

Withdrawing your consent

You may also withdraw any consent you previously provided to us at any time by contacting us using the details provided below. This will not affect the lawfulness of our use of your personal data based on your consent before its withdrawal.

Reviewing, correcting, updating, restricting, objecting to our use of or deleting your personal data

You have the right to request access to and correction or erasure of the personal data we hold about you, or to request our use of this information is restricted, as appropriate. You also have the right to object at any time to the use of your personal data for direct marketing purposes, including the profiling we do related to direct marketing and generating and maintaining Your Profile. Please note, if we cannot hold sufficient information in Your Profile, we may have to reconsider your role as a Talent Partner, but we will always explain why.

Other Rights

You have the right to receive, in a structured, commonly used and machine-readable format, the personal data that you have provided to us about you, with your consent or based on your contract with us. You also have the right to have this information transferred to another data controller, where it is technically feasible. You may exercise this right by contacting us using the details provided below. You may also lodge a complaint with a data protection authority about our use of your personal data, but we do ask that you contact us first and try to resolve any issues or causes for concern you may have.

CHANGES TO THIS PRIVACY POLICY

We may make changes this Privacy Policy from time to time. Changes may be due to, for example, amendments to applicable laws, regulations, and industry practices, or due to changes we make to our services. We encourage you to review our Privacy Policy to stay informed.

If we make material changes that may affect your rights, as per the "Your Right and Choices" section above, we may provide additional notice, such as via email or via a notice on our website. If you continue to use our services after we publish or send a notice about any changes to our Privacy Policy, it will mean that you have read and understood the updated Privacy Policy.

CONTACT US

If you have any questions or concerns about how we treat and use your personal data, or would like to exercise any of your rights above, please indicate that you are a Talent Partner of ours and contact us at dpo.benelux@loreal.com or by writing to us at:

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Data Protection Officer

L'Oréal Nederland B.V.

141 Scorpius

2132 LR

Hoofddorp

The Netherlands

GLOSSARY

"**Affiliate Marketing Platform**" means the advertising model we use where we ask third-party publishers (affiliates) online to generate traffic or leads to our products and services under a commercial agreement with us.

"**Anonymised data**" means data which has had all personally identifiable information/personal data removed.

"**Cookies**" are small text files (up to 4KB) created by a website and stored in your (the user's) connected device – either temporarily for that session only or permanently on the hard disk (called a persistent cookie). Cookies help the website recognise you and keep track of your preferences. They can be activated on a L'Oreal or third party website and can track your movement from one website domain to another, depending on their functionality. Some cookies require consent to be 'dropped' and that consent must be sought before they are dropped.

"**Hashtags**" are a words or phrases preceded by a hash sign (#), used within content, for example on social media sites and applications, to identify digital content on a specific topic.

"**IP address**" is a unique string of numbers that identifies each device using the internet or a local network.

"**Personal data**" means any information or pieces of information that could identify you either directly (e.g. your name) or indirectly (e.g. through pseudonymised data). This includes things like email address, social media handles/usernames, images shared of you on social media including your profile picture, personal preferences and shopping habits, User Generated Content, financial information (where we pay you directly), sensitive personal data such as diversity information (such as ethnicity, race, religion) and health information. It could also include unique numerical identifiers like your computer's IP address or your mobile device's MAC address, and other information collected via cookies we, or third parties, use on our or third-party websites.

"**Pseudonymised data**" means a key or code applied which is unique, allowing indirect identification of an individual, such as a unique ID.

"**User Generated Content**" means your video, photo, post and/or other content posted to social channels, including but not limited to: Instagram, Facebook, Twitter, TikTok, Snapchat, YouTube or Google+, blog posts, together with your social media handle, social media

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username, profile picture, caption and location information you may have included in your content. We will specify which piece of content we are seeking your consent to use.

"**Your Profile**" means the profile we build about you, which includes things such as: what you like, dislike, are passionate about and interested in, in addition to the information we know about you through your relationship with us, for example, campaigns you have been part of and our history of working together.

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