

COTY CONSUMER ENQUIRY AND ADVERSE EVENT REPORTING PRIVACY NOTICE

This Privacy Notice (“**Notice**”) describes how Coty Inc. and its affiliates and subsidiaries (“**Coty**” “**us**”, “**our**”) collect and use your personal data when you, or a third party on your behalf, contact our Consumer Enquiries team, including to report an adverse event in relation to one of our products.

For the purposes of this Notice, personal information means any information that could be used to directly or indirectly identify a particular individual, as defined under applicable data privacy law.

This Notice also describes your rights and who you should contact if you have any queries or requests. Please read this carefully before providing any personal data. We strongly advise you to also read our website privacy policy which contains more detailed information about our data processing and can be accessed [here](#).

1. HOW TO CONTACT US

If you have any questions about how we handle your personal data, or to make a rights request, please contact our Data Protection Team:

- By phone using one of the following toll-free numbers depending on your location:
 - North America - +1 800 715 4023
 - South America - +55 0800 702 9966
 - Europe –
 - UK - +44 800 028 4177
 - Ireland - +353 800 535 909
 - Germany - +49 800 935 5243
 - France - +33 17 098 4953
 - Italy - +39 0645 212 094
 - Spain - +34 91 787 6484
 - Asia –
 - China - +86 400 898 1919
 - Japan - +81 120 308 168
 - Singapore - +65 800 120 6249
 - Australia - +61 800 021 085
- By submitting your question via the [contact us form](#) and/or
- By sending an email to data_privacy@cotyinc.com

2. WHAT INFORMATION DOES COTY COLLECT ABOUT ME?

We may collect, use, store and transfer personal data about you as follows:

- **Identification and demographic information**, for example your name, address, date of birth, phone number and email address.
- **Details of your enquiry**, for example information you share with us about your view and experience in relation to a product you have used.

- **Product purchase information**, for example the store name and address where you purchased our product and further details about the product purchased.
- **Details of product use**, for example whether you have used the reported product or other/similar products in the past, whether you undertook any allergy/patch testing prior to using the product and other related information about your use of the product.
- **Details of haircare/beauty professionals you may have visited in relation to the product used**, for example where the product was applied by a hair care or beauty professional, their name and salon address and contact details.
- **Details of other products you use**, for example details of any other products you are using at the time you make a report to us.
- **Images and photographs**, for example, any photographs you provide to us showing any symptoms or effects following the use of a product.
- **Health Information**, for example details of any reaction, allergy, symptoms or other effects following the use of the product that you have reported to us, or in relation to similar products you have used, details of any known allergies or other related conditions, details of any medication you are using, whether you consulted a medical professional and details of any diagnoses received.
- **Other related information about you**, for example your skin type and whether you took any activities following the use of the product such as swimming or sunbathing and any other information relating to the use of the product that you choose to provide to us.

3. HOW DOES COTY COLLECT INFORMATION ABOUT ME?

Directly from you - when you contact us to make a general enquiry or to report a suspected adverse event directly to us. This could be by way of your communications with us through our offices or contacting our consumer enquiries teams, via email or social media, via an adverse event reporting form, or if you take part in any consumer testing or product trails at any of our testing locations or salons.

From other third parties - we may also collect personal data about you indirectly from third parties when they contact us on your behalf or report a suspected adverse event that relates to you. This could include reports from your doctor or other healthcare professionals, a distributor or manufacturer of our products, any other entity within our company group (when they receive adverse event information) or any other organisation or person (such as a family member or friend) who makes an enquiry or reports an event on your behalf.

4. HOW DOES COTY USE MY INFORMATION?

We will use your personal information for the purposes set out in this Notice, which will include:

- **Identifying and contacting you** – in order to communicate with you following an enquiry or to identify you in relation to an adverse event(s) you have reported and to communicate with you in relation to the adverse event(s).

- **Collection, examination and storage of suspected adverse event information** – in order to manage and report on adverse events in line with our legal and industry requirements. In order to ensure the ongoing safety of our products.
- **Communicating information about an enquiry or adverse event to relevant parties** – for example where we are required to report on adverse events to our regulators or to another entity within our company group or where we need to liaise within our company group or with another third party to share information to respond to your enquiry.
- **For direct marketing purposes** – for example to market other Coty products and services to you. We will only use your personal data for these purposes where you have given us your specific consent to do so.
- **Defence of legal claims** – if we are required to defend ourselves against any legal claims made in relation to our products.
- **Meeting our internal procedures and requirements** – for example, undertaking audits and compliance reviews.

5. DOES COTY SHARE MY INFORMATION WITH ANYONE?

We may share your personal data within the Coty Inc. group and with external third parties, including:

- **Companies in our group** – we will share personal data with other companies in our group but only where this is necessary for the purposes of assessing and responding to an adverse event report, to ensure we are taking appropriate action to protect health and product safety and where required to respond to an enquiry you have made to us.
- **Third parties that process personal data on our behalf** – third party service providers (such as Cosmetovigilance service providers, providers of our customer contact centre services, data storage providers, data analytics providers and IT technical support) who process personal data as part of providing a service to us, may also have access to your personal data. They will be required to keep your personal data secure and will not be allowed to use your personal data for their own purposes unless they have a specific legal requirement to do so.
- **Third parties that provide us with your personal data when making a report** – third parties (such as doctors or other healthcare professionals, distributors and manufacturers of our products or any person who reports an adverse event on your behalf) may receive personal data from us as we communicate with them about the adverse event report they have made. We will only share your personal data with these parties where we need to do this to meet our regulatory and industry obligations with respect to responding to adverse event reports.
- **Our regulators, health authorities and industry bodies** - where we are required to notify our regulators or health authorities or other industry bodies about adverse events in relation to our products.

- **Law enforcement, government agencies, courts and other official bodies** - where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.
- **To any other person or third party** - where we have your consent to the disclosure.

6. ON WHAT BASIS CAN COTY USE MY INFORMATION IN THIS WAY?

We are required to satisfy one or more of the reasons set out by applicable data privacy law before we can collect and use your personal information.

We rely upon the following reasons to collect and use your personal information

What are the legal grounds?	What are they?
Pursuing our legitimate interests	Where the collection and use of personal information is necessary for the legitimate interests of Coty in managing and responding to general customer enquiries, adverse events, medical information queries, product complaints and our internal business processes.
Compliance with our legal obligations	The collection and use of your personal information may be necessary to enable us to meet our legal obligations. For example, where we are required by law to collect information in relation to reported adverse events and report on adverse events to our regulators.
Reasons of substantial public interest	Where we collect and process personal information, including health information, on the basis of our legal requirements and where the processing of personal data is proportionate to the aim pursued, respects the rights to data protection and provides for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject. For example, to comply with our legal obligations under European, federal and local/national laws to collect, report and act on information received in relation to adverse events.
Exercise and defence of legal claims	Where we collect and process personal information, including health information, to exercise and defend any legal claims in relation to our products.

Consent	<p>In some limited circumstances, we may rely on your consent to collect and use your personal information. For example, where we use your personal data to market other products or services to you or where you have given consent to share your personal data with another individual such as a family member who is acting on your behalf.</p> <p>If we rely on consent, this will be made clear to you at the time we request your information. You can withdraw your consent at any point by using the mechanism provided at the time, or by contacting us using the contact details provided in the section "How to contact us" of this Notice.</p>
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7. WHAT ARE MY DATA PROTECTION RIGHTS?

Under certain circumstances, you have rights under data protection laws in relation to your personal data including the right to receive a copy of the personal data we hold about you and the right to make a complaint at any time to your local data protection authority.

For further information about your rights and how to exercise them, please [click here](#).

8. FOR HOW LONG DOES COTY KEEP MY INFORMATION?

We will retain your information for as long as we have an ongoing legitimate business need in order to respond to customer enquiries and manage our adverse event reporting requirements and our related business processes.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

9. DOES COTY TRANSFER MY INFORMATION TO OTHER COUNTRIES?

As an international entity, in order to provide our services we may need to transfer and process your personal information internationally (including to destinations outside the European Economic Area (the "EEA"), notably throughout the Coty Group.

We may also be required to transfer your personal data to organisations outside the EEA as part of our legal and legitimate business requirements to manage customer enquiries and to report and share information in relation to adverse event reporting.

Where your personal data is shared outside of the EEA, we will ensure that it is processed in line with all relevant local data protection laws.

We have taken appropriate safeguards to ensure that your personal information will remain protected in accordance with this Notice. This includes implementing the European Commission's Standard Contractual Clauses for transfers of your personal information between our group companies. We have implemented similar appropriate safeguards with our third party service providers and where we are required to share information with third party organisations that are based outside of the EEA.

Further information about the appropriate safeguards we have in place can be provided on request: please contact us using the details found in the section "[How to contact us](#)"

10. FURTHER DETAILS

If you are looking for more information on how we process your personal data including on data security, data retention and lawful processing bases, please access our [Coty Privacy Notice](#).