

SEPHORA

PERSONAL DATA AND COOKIE POLICY

Last updated: 7/8/2022

This Privacy Policy explains how TAKEOFF XP, SARL (limited liability company) with capital of €10,000, registered in the trade register under number 832933675, whose registered office is located at 13 rue Général Plessier, 69002 Lyon (hereinafter 'TakeOff'), data controller, uses the personal data it collects from you when you browse the WEBSITE and use the SERVICE to record or view a MESSAGE.

The topics covered in this policy are:

- What data is collected?
- What is the legal basis and purpose of the processing carried out?
- How is my data stored?
- What are my data protection rights?
- What is a cookie?
- What types of cookies are used on the WEBSITE?
- Updates to the Privacy Policy
- Contact

1. DEFINITIONS

The following terms in capital letters will have the meaning given below:

- **CODE:** means the unique code generated automatically and randomly when the GIVER creates a personalized video on the WEBSITE. This CODE must then be recorded by the GIVER on the PRODUCT. The RECIPIENT enters this CODE on the WEBSITE to access the personalized video created by the GIVER.
- **DATA:** means all personal DATA collected while using the SERVICE (including the MESSAGE created by the GIVER).
- **MESSAGE:** means the personalized video created by the GIVER. This MESSAGE is recorded by the GIVER on the WEBSITE after scanning the QR CODE on the PRODUCT.
- **GIVER:** means the person who purchases a PRODUCT and uses the SERVICE to record a personalized video message for a RECIPIENT.
- **PRODUCT:** means some products in the Sephora Collection Christmas 2022 range with a QR CODE. These PRODUCTS are only sold in Sephora stores and on the brand's websites.
- **QR CODE:** means the short response code on the PRODUCTS. The SERVICE can be accessed by both the GIVER and the RECIPIENT through this QR CODE.
- **RECIPIENT:** means the person who receives the PRODUCT and can view the MESSAGE left by the GIVER by entering the CODE.
- **SERVICE:** means the service provided by TakeOff and Sephora allowing the buyer of a PRODUCT to create a personalized video message.
- **WEBSITE:** means the web page accessible at the following URL: www.sephorawishingyou.com. The WEBSITE can be accessed from a computer, phone and/or tablet.

2. What data is collected?

TakeOff collects the following personal data:

- Your video message (image and sound);
- Your IP address;
- Your browsing data.

3. What is the legal basis and purpose of the processing carried out?

TakeOff collects your data to allow for the creation, dissemination and viewing of the MESSAGE. This data is required to provide the SERVICE, and is collected on the basis of your consent. Your browsing data may also be used to compile anonymous statistics on the basis of TakeOff's legitimate interest in order to improve the WEBSITE.

4. How is my data stored?

TakeOff will store your data for a maximum of six months from 1 September 2022. After this period, your MESSAGE will be deleted and all data related to your use of the SERVICE will be destroyed immediately.

5. Who is my data shared with?

The information collected may be shared with some of TakeOff's service providers in order to provide the SERVICE, e.g. AWS for the hosting and storage of your data or the Sephora Group for statistical and analytical purposes.

6. What are my data protection rights?

Pursuant to the General Data Protection Regulation (EU) 2016/679, you have:

- right of access - You have the right to request access and disclosure of your personal data.
- right of rectification - You have the right to request correction of any information you believe is inaccurate.
- right of erasure - You have the right to request deletion of your personal data, under certain conditions.
- right to limit processing - You have the right to request that the processing of your personal data be limited, under certain conditions.
- right to object - You have the right to object to the processing of your personal data, under certain conditions.
- right to data portability - You have the right to request that the data we have collected be transferred to another organization, or directly to you, under certain conditions.

You are reminded that in order to exercise any of the aforementioned rights in relation to your MESSAGE (which will only be used and stored for a strictly limited period), you will need to provide the CODE to enable us to find the video.

If you would like to exercise any of these rights, please email us at support@takeoffxp.com or write to us at TAKEOFF XP - 56 rue Smith - 69002 Lyon

7. Cookies

a) What is a cookie?

Cookies are text files placed on your computer to collect standard Internet connection information and visitor behavior information. When you visit our websites, we may automatically collect information from you through cookies or similar technology.

b) What cookies are used on the WEBSITE?

The WEBSITE uses site usage measurement cookies (Google Analytics), which do not require consent and meet the following cumulative conditions :

- o The purpose of the tracker is strictly limited to measuring use of the WEBSITE
- o The tracker is used only to produce anonymous statistical data
- o Data from this tracker is not cross-referenced with data from other processing activities and is not provided to third parties

o The tracker does not allow comprehensive monitoring of the browsing of site users on various applications or websites

Data from this tracker will be stored for a maximum of six months.

8. Updates to the Privacy Policy

TakeOff may change its Privacy Policy. All users are therefore asked to refer regularly to the latest version available on the WEBSITE.

9. Contact

If you have any questions about the Privacy Policy or the processing of your personal data or if you would like to exercise any of your data protection rights, please email us at support@takeoffxp.com or write to us at TAKEOFF XP - 56 rue Smith - 69002 Lyon