

Oriflame Cosmetics Pakistan (Private) Limited (“Oriflame”, “we”, “us”, “our”) are committed to protecting and respecting your privacy.

This Privacy Policy together with our Website Terms of Use and our Code of Ethics and Rules of Conduct (collectively, the “Rules”) and any other documents referred to on it sets out the basis on which any personal data we collect from you or about you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding your personal data and how we will treat it. By providing your data in the Brand Partner Application Form (the “BPAF”) either electronically on [www.oriflame.com.pk](http://www.oriflame.com.pk) or in paper form you are accepting and consenting to the practices described in this Privacy Policy.

We process the data in compliance with applicable law, and the purpose of personal data processing by us is to organize and ensure that we fulfil our obligations and ensure protection of our rights arising from your registration. The processing of the data by us is done pursuant to the rules described below.

Terms not defined in this Privacy Policy shall have the same meanings as given to them in the Terms of the BPAF.

## 1 Information we may collect from you

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We may collect and process the following data about you:

**1.1 Information you give us.** You may give us information about you by filling in forms on our site [www.oriflame.com.pk](http://www.oriflame.com.pk) (“our site”) or by filling in the BPAF/registration form in writing or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to be our Brand Partner, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey and when you report a problem with our site. The information you give us may include your (“Personal Data or Information”):

- name;
- date of birth;
- address;
- e-mail address;
- phone number and mobile phone number;
- unique Brand Partner ID;
- computerized national identity card (CNIC) number;
- national tax number (NTN);
- bank account details; and
- passport number (for the Brand Partners taking part in international conferences).

We hope you will provide us with the Personal Data or Information. However, if you do not want to disclose any part thereof to us, please do not submit it. Please be aware that if you do not provide such information in some cases we will not be able to provide you the service you have requested.

**1.2 Information we collect about you.** We store the history of your purchases, your levels in our Brand Partners’ network structure, your performance, the individuals who became our Brand Partners by your introduction etc.

With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our Customer Experience number.

**1.3 Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

## 2 Uses made of the Information/ Personal Data

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We use information held about you in the following ways:

- to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us including resolving any disputes, collect fees, and troubleshoot problems;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you with the rights, benefits, and entitlements, and other conditions as applicable under the contractual relationship between you and us;
- to comply with other regulations applicable to our cooperation or engagement with you such as tax laws, social security laws, statistical obligations etc.
- to monitor and assure compliance by you with our policies and rules.
- to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. We will only contact you by electronic means (e-mail or SMS, Whatsapp or other social media means) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. We will do so only if you have consented to this. If you change your mind and do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please: select relevant tick box in your user settings on your Account with Us or contact Customer Experience by sending an email to [customerservice.pk@oriflame.com](mailto:customerservice.pk@oriflame.com) or by calling to our helpdesk line at **042-111-674-111**;
- to notify you about changes to our service;
- to ensure that content from our site is presented in the most effective manner for you and for your computer;
- to ensure effective management of the network of our Brand Partners by ourselves but also by other members of our Brand Partners networks (mainly the individual who introduced you);

- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you, this includes performance of the consumer satisfaction and alike studies;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them;
- If you have been registered as an Oriflame Brand Partner before, when you register on this site you also accept that some of your Personal Data or Information may be transferred from the Oriflame entity you have been originally registered with to Oriflame Cosmetics Pakistan (Private) Limited; and
- to respond to requests and legal demands from regulators or other authorities.

### **3 Disclosure of your Information**

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- 3.1** We do not sell, rent or trade your Personal Data or Information.
- 3.2** We may give access to your personal information and allow its processing to the companies being members of our group (ultimate holding company and its subsidiaries) in order to support us in performance of the activities listed above in point 2 (Uses Made of the Information/ Personal data).
- 3.3** We may give access to your Personal Data or Information and allow its processing in strictly defined scope and purpose to selected third parties such as:
- business partners: suppliers and sub-contractors for the performance of any contract we enter into with them or you. This includes among others: carriers, credit collection agencies, factoring services providers, logistics services (such as picking and packing) providers, customer support services providers, third party software developers, etc.
  - other members of our Brand Partners network (primarily to the person who introduced you into our network and your down-line Brand Partners) for the purpose of effective management of our Brand Partners network. If you do not want us to pass your personal information to the other Brand Partners in the network for mentioned purpose, please contact Customer Experience by sending an email to [customerservice.pk@oriflame.com](mailto:customerservice.pk@oriflame.com) or by calling to our helpdesk line at 042-111- 674-111.
  - advertisers and advertising networks that require the data to select and serve relevant advertisements to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, new joint Brand Partners from certain area).

- analytics and search engine providers that assist us in the improvement and optimisation of our site.
- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.
- providers of technical solutions allowing us to send to you our messages (including marketing messages or customer satisfaction surveys when you consented to receive such information) e.g. mass mailing solutions providers, mass texting solutions providers.

We may also disclose your Personal Data or Information to third parties:

- in the event that we sell, buy or in other way transfer any business or assets, in which case we may disclose your Personal Data or Information to the prospective seller, buyer or acquirer of such business or assets.
- if our company or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- if we are under a duty to disclose or share it in order to comply with any legal obligation, or in order to enforce or apply our policies and/or terms of use and/or other applicable agreements; or to protect our rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **4 How and Where we store your personal data**

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All information you provide to us and we collect about you is stored on secure servers. All online payment transactions will be encrypted using SSL technology and will be processed by third party providers. We do not collect or store credit and debit card information for online transactions.

The data that we collect about you may be transferred to, and stored at, a destination in or outside the territory of Pakistan. It may also be processed by staff operating outside the territory of Pakistan who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details, processing of your Success Plan entitlements and the provision of support services. By submitting your Personal Data or Information, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your Personal Data or Information is treated securely and in accordance with this Privacy Policy and applicable law.

#### **5 Duty of care**

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Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site (hereinafter your "Account"), you are responsible for keeping this password confidential. We ask you not to share a password with anyone. If you do share your password with others, you will be responsible for all actions taken in the name of your Account. If you lose control of your password, you may lose substantial control over your Personal Data or Information and may be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason, you should immediately notify us and change your password. We will never ask for your password except during the login process. Our employees are subject to additional requirements in the area of information protection.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data or Information, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## 6 Your rights

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- 6.1 Marketing information.** You have the right to ask us not to process your Personal Data or Information for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms (mainly the BPAF) at the time of joining) we use to collect your data. You can also exercise this right at any time by selecting relevant tick box in the user setting on your Account or contacting our Customer Experience by sending an email to [customerservice.pk@oriflame.com](mailto:customerservice.pk@oriflame.com) or by calling to our helpdesk line at 042-111-674-111.
- 6.2 Access to information. Rectification and deletion.** You have the right to access information held about you and to request its rectification or deletion. You can see, and review most of your Personal Data or Information by signing on to your Account. Thus, it is your responsibility to notify us promptly your Personal Data or Information if it changes or is inaccurate. Upon your request to Oriflame Customer Experience at [customerservice.pk@oriflame.com](mailto:customerservice.pk@oriflame.com) or your Area Manager we will change your Personal Data or Information as requested by you on submission of such documents/ proofs as may be required. We will close your Account as soon as reasonably possible, in accordance with applicable law. We do retain personal data from closed accounts to comply with law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, and take other actions otherwise permitted by law.

## 7 Entrustment of personal data processing – Your Obligations

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As to a member of our Brand Partners network, we entrust you the processing of the personal data of other members of our Brand Partners network on the basis of the below provisions.

We entrust you with personal data processing in the scope and for the purpose defined in the Rules, and you covenant to process these data in the manner ensuring compliance with the requirements contemplated by applicable law, and in particular compliance with rules regarding the processing and protection of the entrusted data.

The sole objective of personal data processing by you is to perform the provisions of the Rules. You are obliged in particular:

- to process the personal data entrusted to you by us only within the objective of data processing specified above and in compliance with applicable law,
- not to take any actions aiming at making the personal data further available in the manner not described herein, unless the commonly binding provisions of law stipulate otherwise,
- You must also ask Customers expressly whether or not they wish to receive commercial communications about our products from you, keep a record of their marketing preferences and respect those preferences, to immediately return the entrusted personal data after termination of your relationship with us (i.e. upon your deregistration as our Brand Partner), and to remove these data from any electronic data carriers on which they were recorded by you for the purpose of achievement of the objective described in above. If you wish to introduce a Customer to become a Brand Partner you may collect certain personal information directly from the Customer. You must strictly follow our procedures for introduction from time to time. You will have the limited right to process that

Customer's personal information only for the purposes of forwarding the personal information to Oriflame and of sending that Customer commercial communications (i.e. communications designed to promote, directly or indirectly, the goods, services or image of a company) subject to certain conditions as described below. Oriflame online tools may allow you to use a Customer's personal information to send commercial communications, strictly subject to the following conditions:

- you must have introduced the Customer to become a Brand Partner, unless otherwise expressly agreed,
- such commercial communications concern only Oriflame Products,
- the commercial communication shall be clearly identifiable as such,
- the communication includes your name and contact details as the sender of the commercial communication and a valid email address at which Customers can reach you to notify you of their preference to opt out of further commercial communications,
- commercial communications must not be sent to Customers that have opted out of receiving them,
- promotional offers, such as discounts, premiums and gifts, where permitted by applicable law, shall be clearly identifiable as such, and the conditions which are to be met to qualify for them shall be easily accessible and be presented clearly and unambiguously, and
- the content of such commercial communications is compliant with the terms of this policy and all applicable law regarding commercial communications.

We reserve the right to audit the methods of protecting the entrusted Personal Data or Information supplied by you. You are obliged to provide us with an opportunity to conduct such an audit immediately after being requested to do so.

You covenant to immediately and correctly answer every question asked by us with regard to processing of Personal Data or Information entrusted on the basis of this Privacy Policy and the Rules, in particular those concerning personal data protection measures applied by you.

We authorize you to process the Personal Data or Information in the scope and for the purpose defined in the Rules, in particular in the IT systems and in a hard-copy form, and also to grant further authorizations to process the data to the persons cooperating with you on the basis of a civil law agreements provided that you will ensure contractually that they will comply with all the requirements with regard to the data processing and protection binding on you and provided that we accept such sub-processor.

It is agreed between us and you that if the files containing personal data are sent between us, such files will be secured during transmission through the public network with cryptographic means of personal data protection.

We shall have the right to terminate your membership or Brand Partner registration if you use the Personal Data or Information in contravention with this Privacy Policy.

We are not liable for your obligations towards the third parties resulting from personal data processing in contravention with this Privacy Policy and the Rules or for your obligations towards the persons authorized by you to process personal data.

## **8 Cookies**

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Our website uses cookies (small files placed on website users' hard drive) to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. We use "cookies" to analyze the flow of information; customize the services, content and advertising; measure promotional effectiveness; and promote trust and safety.

Certain cookies contain Personal Data – for example, by clicking to “remember me” when logging in, a cookie will store the username. Most cookies will not collect information that identifies the user, and will instead collect more general information such as how users arrive at and use systems, or a user’s general location.

We offer certain services that are available only through the use of cookies. Generally, the cookies perform up to four different functions:

### 8.1 Essential Cookies

Some cookies are essential for the operation of the system. For example, some cookies allow us to identify registered users and ensure they can access the whole system. If a registered user opts to disable these cookies, the User may not be able to access all of the content of the system.

### 8.2 Performance Cookies

Other cookies may be used to analyze how the users use the systems and to monitor system performance. This allows us to provide a high quality experience by customizing the offering and quickly identifying and fixing any issues that arise. For example, performance cookies may be used to keep track of which pages are most popular and to determine why some pages are receiving error messages. These cookies may also be used to highlight products or site services that will be of interest to the users based on their usage of the System.

### 8.3 Functionality Cookies

Functionality cookies are used to allow us to remember some users’ preferences.

### 8.4 Behaviourally Targeted Advertising Cookies

We may use cookies to serve the Users with advertisements that are relevant to them and their interests. Oriflame may also use third party cookies in regard of market research, revenue tracking, improving site functionality and monitoring compliance with these terms and conditions and copyright policy.

### 8.5. Google Analytics

We use Google Analytics to understand how visitors engage with our sites and apps. This means that when you visit our website or use one of our mobile applications your browser automatically sends certain information to Google. This includes, for example, the web address of the page that you’re visiting and your IP address. You will find the details of how the Google technology collects and processes data following this link: <https://www.google.com/policies/privacy/partners/>.

If you don’t want the Google Analytics to be used in your browser, you can [install the Google Analytics browser add-on](#). You can find more about the Google Analytics and Google privacy policy [here](#).

**Users are always free to decline cookies** if their browser permits, although doing so may interfere with their use of some of Oriflame Systems. Please find detailed information on how to disable cookies [here](http://www.allaboutcookies.org/manage-cookies/) (<http://www.allaboutcookies.org/manage-cookies/>).

More detail on how businesses use cookies is available [here](http://www.allaboutcookies.org/) (<http://www.allaboutcookies.org/>).

## 9 Changes to our Privacy Policy

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Any changes we may make to our Privacy Policy in the future will be posted on our website and, where appropriate, notified to you by e-mail or otherwise. The amendments will be also available

at our premises. They will be effective as of the publication date. Your use of the site subsequently to the publication of the amended Privacy Policy or a placement of order with us will be deemed acceptance of such changes.

## **10 Contact and complaints**

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Questions, comments, complaints and requests regarding this Privacy Policy are welcomed and should be addressed to our Customer Experience at [customerservice.pk@oriflame.com](mailto:customerservice.pk@oriflame.com) or to the specially designed e-mail address [privacy@oriflame.com](mailto:privacy@oriflame.com) addressed to our grievance officer Mr. Bertrand Rousseau, Group Risk and Compliance Director.

If you believe that we have not complied with this Privacy Policy, you may also write to the address above or call our Customer Experience at 042-111-674-111. Please describe in as much detail as possible the ways in which you believe that this Privacy Policy has not been complied with. We will investigate your complaint promptly.