



JAFRA'S PRIVACY POLICY

1. INTRODUCTION. JAFRA Cosmetics International, Inc. (referred to herein as "JAFRA", "we," "us" and "our"), understands the importance of the privacy of individuals (referred to as "users" and "you") who visit and use our websites or mobile apps, or purchase JAFRA products online. This Security and Privacy Statement (the "Statement") outlines the information JAFRA collects through <http://www.JAFRA.com> and other websites and mobile apps that link to this Statement (the "JAFRA PROPERTIES", individually a "JAFRA PROPERTY"), and how JAFRA will use that information. This Statement represents the sole, authorized statement of JAFRA's practices with respect to the collection of information through the JAFRA PROPERTIES and JAFRA's use and disclosure of such information.

PLEASE NOTE THAT THIS STATEMENT DOES NOT ADDRESS THE PRIVACY PRACTICES OR POLICIES OF THIRD PARTIES WITH WHICH WE MAY SHARE YOUR INFORMATION AS DESCRIBED IN THIS POLICY, INCLUDING JAFRA INDEPENDENT CONSULTANTS.

JAFRA Independent Consultants are independent third-party contractors of JAFRA and are not otherwise affiliated with JAFRA. Although we seek to ensure that JAFRA Independent Consultants honor customers' opt-out requests, treat customer information confidentially and act in accordance with applicable law, our Independent Consultants may have different practices with respect to the collection, use, and sharing of your information.

2. THE INFORMATION COLLECTED. We collect two basic types of information through the JAFRA PROPERTIES: Personal Information and Technical Information.

"Personal Information" (or "PI"), which we may collect as described in the next section, is information that identifies you as an individual - for example, your name, contact information, credit card information, billing address and shipping information. We may also request additional PI if you become or apply to become a JAFRA Independent Consultant, such as your Social Security number, date of birth, and financial information in order to provide payments due to you.

"Technical Information" (or "TI") is information such as demographic information, IP addresses, device identifiers, information about your computer or device, your use of the JAFRA PROPERTIES, and other information that does not reveal your individual identity.

3. PERSONAL INFORMATION (PI). You do not have to provide PI to access the JAFRA Website but you must provide PI (in the form of your Independent Consultant log in information) to access the mobile app. In order for you to take advantage of particular opportunities provided through the JAFRA PROPERTIES (for example, to register for an account with JAFRA, to make a purchase through the JAFRA PROPERTIES, or to work with us as a JAFRA Independent Consultant or become a customer), we may require that you furnish us with PI through the JAFRA PROPERTIES.

We collect PI from and about you in a variety of ways, including when you provide it to us voluntarily. We also collect PI if you connect your account to a third party service, such as a social network or messaging app. JAFRA may also collect PI about you from our Independent Consultants if you have voluntarily provided such information to an Independent Consultant. For example, we may accept shared PI from Independent Consultants' calendars and address books on mobile devices, when Independent Consultants choose to provide this access through our mobile apps. If you use the JAFRA PROPERTIES to forward information to a friend, we will collect the name and contact information you provide for your friend. We may combine the PI we collect with information available from other sources, including information received from promotional partners or other third parties.

4. TECHNICAL INFORMATION (TI). When you visit and interact with the JAFRA PROPERTIES, we and our third party and affiliated service providers who provide certain services (including without limitation website hosting, data analysis, newsletter services, order fulfillment, research and analytics, marketing, and other services of an administrative nature) (such third party and affiliated service providers, collectively our "Service Providers") may collect TI on the JAFRA PROPERTIES (for example, a list of the pages you visit on the JAFRA PROPERTIES) and across other websites and apps over time. TI may be collected automatically through the use of technologies such as cookies, web beacons, and similar technology. Cookies are text files we place in your computer's browser to store your preferences. We use cookies and other technologies to understand and personalize your usage of the JAFRA PROPERTIES, to advertise to you online, and to improve the content and offerings on the JAFRA PROPERTIES. We may also use your TI for secondary forms of communication, such as newsletters, push notifications, and product recommendations, among other things.

5. HOW DO WE USE THE PI AND TI COLLECTED? We may use the PI and TI we collect to provide or improve our services, such as in the following ways:

a. **RESPONDING TO YOUR INQUIRIES, RESOLVING TECHNICAL ISSUES, MARKETING, AND FULFILLING YOUR REQUESTS.** We may use your PI and TI to connect you to a JAFRA Independent Consultant, fulfill your product orders, respond to your inquiries to JAFRA, send you push notifications through an app, resolve technical issues, and fulfill your other requests. For example, we may send you newsletters that you request when you sign up to join our mailing lists or send you information about other items from JAFRA or selected partners that may be of interest to you.

b. **SENDING SERVICING AND TRANSACTIONAL EMAILS.** From time to time, at our sole discretion, we may use your PI and TI to send you emails for servicing and transactional purposes including but not limited to (a) to confirm your registration with the JAFRA PROPERTIES, (b) to confirm a transaction through the JAFRA PROPERTIES, (c) to inform you that we have received your PI, (d) to provide you with information regarding the JAFRA PROPERTIES, or (e) to inform you of changes to this Statement, our Terms and Conditions, or our other terms, conditions, or policies ("Servicing and Transactional Emails").

c. **WORKING WITH YOU AS AN INDEPENDENT CONSULTANT.** If you become, or apply to become, a JAFRA Independent Consultant, we will use your PI and TI to work with you in a variety of ways, including to communicate with you about JAFRA, to process payments to or from you, to ship products to you upon your request, to put you in contact with potential customers, and otherwise to support you in your role as an Independent Consultant.

6. TO WHOM IS THE PI AND TI DISCLOSED? We may disclose the PI and TI we collect in the following ways:

a. **DISCLOSURE TO THIRD PARTIES FOR DIRECT MARKETING PURPOSES.** JAFRA may share your PI with Independent Consultants as directed by you. For example, if you ask to be put in contact with a JAFRA Independent Consultant, place an order through a JAFRA Independent Consultant's online store via the Client Direct Program, or elect to have a JAFRA Independent Consultant deliver products to you, we will disclose your PI to such JAFRA Independent Consultant as directed. If you make a purchase from JAFRA directly, we may also share your PI with one or more Independent Consultants so they can follow up with you. JAFRA Independent Consultants who receive your PI may then use it to contact you about additional offers that may interest you.

b. **SALES/NEVADA PRIVACY RIGHTS.** Nevada residents may submit a request directing us to not sell personal information we maintain about you. If you would like to opt out of such sales under Nevada law, you may contact us at jafra@jafra.com.

c. **DISCLOSING JAFRA INDEPENDENT CONSULTANT INFORMATION.** If you are a JAFRA Independent Consultant, we may disclose certain PI (for example, your name and contact information) and other information to current and potential JAFRA customers who are seeking the assistance of a JAFRA Independent Consultant, to customers who are or who become connected to you, and to other JAFRA Independent Consultants (for example, if you are a "downline" JAFRA Independent Consultant, we may make your PI and other information about you available to your "upline"). If required by law, we will get your consent to such disclosures or allow you to opt out of such disclosures.

d. **ENABLING SERVICE PROVIDERS TO PROVIDE SERVICES.** We may share your PI and TI with Service Providers (or permit them to collect your PI and TI) for the purpose of enabling them to provide services and carry out other business operations on our behalf.

e. **FACILITATING "FORWARD TO A FRIEND" OR MESSAGE FORWARDING FUNCTIONALITY.** If you wish to use a JAFRA PROPERTIES' functionality to send a friend a link to a page on the JAFRA PROPERTIES or forward a message, you may be asked to provide your name and email address, as well as your friend's name and email address, so that we may facilitate your sending of such link or message. Your name and your email address may be disclosed to your friend in such email.

f. **BUSINESS TRANSFERS.** We reserve the right to transfer any and all PI and TI that we collect from users of the JAFRA PROPERTIES to a third party in the event of any potential or actual merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of JAFRA's assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).

g. **AFFILIATES.** We may share your PI and TI with other businesses that are part of JAFRA's corporate family.

h. **OTHER DISCLOSURES.** Finally, notwithstanding any other provision of this Statement or the Terms and Conditions to the contrary, we reserve the right to disclose and use your PI and TI if we believe that we are required to do so: (i) by law; (ii) in response to legal process, for example, in response to a court order or a subpoena; (iii) in response to a law enforcement agency's request; (iv) to enforce the Terms and Conditions or our other terms, conditions, or policies; (v) to protect our operations; (vi) to protect the rights, privacy, safety or property of JAFRA, you or others; and/or (vii) to permit us to pursue available remedies or limit the damages that we may sustain. For example, we may, to the fullest extent the law allows, disclose PI and TI about you to law enforcement agencies to assist them in identifying individuals who have been or may be engaged in unlawful activities.

7. ADDITIONAL DISCLOSURES OF TI AND OTHER INFORMATION THAT DOES NOT IDENTIFY YOU. In addition to the uses and disclosures of TI set forth above, we reserve the right to use TI, and to disclose TI to third parties, for any purpose permitted by law. Likewise, we may use and disclose other information that does not identify you as an individual, such as information that has been aggregated or de-identified, for any purpose.

8. INFORMATION COLLECTED BY THIRD PARTIES. As described above, we may allow selected third party services to collect TI on the JAFRA PROPERTIES. These companies may use technologies, including cookies and web beacons, to collect information about use of the JAFRA PROPERTIES in order to analyze, report on, or customize content or advertising on the JAFRA PROPERTIES or on other sites, or to help us operate and improve the JAFRA PROPERTIES. The JAFRA PROPERTIES may provide links or automatically redirect you to third party websites or apps that do not operate under this Statement. For example, if you click on an advertisement presented on JAFRA PROPERTIES, you may be taken to a website that we do not operate or control. You should review the privacy policies and terms of use offered by all third party websites and apps that you access. These third party websites or apps may independently solicit and collect information from you. On occasion, those third party websites may provide us with information about your use of those websites or apps. PLEASE NOTE THAT THIS STATEMENT DOES NOT COVER THE COLLECTION AND USE OF INFORMATION BY SUCH THIRD PARTIES.

The JAFRA PROPERTIES may include social media tools, such as social networking and blogging tools offered by third parties. If you use these tools to share PI or other information about your use of the JAFRA PROPERTIES, or otherwise interact with social media features on the JAFRA PROPERTIES, those social media companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with JAFRA and/or with the general public. Your interactions with third-party social media companies and the use of their features are governed by the privacy policies of the social media companies that provide those features. We encourage you to carefully read the privacy policies of any social media accounts you create and use.

9. INTEREST-BASED ADVERTISING. We may partner with ad networks and other ad serving providers ("Advertising Providers") who serve ads on behalf of us and others on non-affiliated sites and mobile apps. Some of those ads may be personalized, meaning that they are intended to be more relevant to you based on information Advertising Providers collect about your visits to the JAFRA PROPERTIES and other non-affiliated websites and mobile apps over time on your browser or device, as well as on the browsers or devices associated with it. This practice is known as interest-based advertising ("IBA"). You may visit www.aboutads.info/choices to learn more about this type of advertising and to opt-out of this form of advertising on your browser by companies participating in the DAA self-regulatory program. To learn more about your choices on mobile devices and to opt out of IBA in mobile apps from companies participating in the DAA self-regulatory program, you can download the relevant version of the DAA's AppChoices tool at www.youradchoices.com/appchoices.

When you exercise your choice, data will not be collected or used for IBA on that browser or device. Additionally, data from associated browsers and devices will not be used for IBA on the device where the choice was made. Note that electing to opt out will not stop advertising from appearing in your browser or applications, but it may make the ads you see less relevant to your interests. In addition, note that if you use a different browser or device, or erase your cookies or reset your mobile device identifier, you will need to renew your opt-out choice.

10. SECURITY. We have put in place reasonable physical, electronic and managerial procedures to help us safeguard against unauthorized access to PI and to help maintain data security.

11. OPTING OUT OF CERTAIN JAFRA COMMUNICATIONS. If you would prefer not to receive email messages from JAFRA about new products, specials and other promotions, you may opt out from receiving such messages by following the "unsubscribe" instructions contained in any such emails you have received, or, if you have registered with a JAFRA WEBSITE, you may use that JAFRA PROPERTIES "modify account information" or similar functionality to opt out from receiving such messages. Even if you opt out, we may continue to send Servicing and Transactional Emails.

Please note that we are not able to remove your PI from the databases and other records of JAFRA Independent Consultants and other third parties with which we have already shared your PI pursuant to this Statement. If you wish to cease receiving marketing messages from such a JAFRA Independent Consultant or other third party, please contact such JAFRA Independent Consultant or other third party directly.

12. UPDATING YOUR PI. If you would like to update PI previously provided to us through a JAFRA PROPERTY, you may use that JAFRA PROPERTY'S "modify account information" or similar functionality. You may also call JAFRA'S Client/Consultant Care team at [800-852-3728](tel:800-852-3728).

13. YOUR CALIFORNIA PRIVACY RIGHTS. This section contains disclosures required by the California Consumer Privacy Act ("CCPA") and applies only to "personal information" that is subject to the CCPA. This section applies to both JAFRA Independent Consultants and JAFRA customers (referenced collectively in this section as "consumers").

a. **Personal Information We Collect, Disclose for a Business Purpose, and Sell.** We collect the categories of personal information about California consumers identified in the chart below. As further set forth in the chart below, in the past 12 months, we have disclosed California consumers' personal information to third parties for business or commercial purposes.

b.	Categories of Personal Information	Collected in the last 12 months:	Categories of sources from which information is collected:	Business or commercial purposes for collection, use, and sharing:	Disclosed for business purposes to the following categories of third parties:
	Personal and online identifiers (such as first and last name, email address)	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
	Categories of information described in Section 1798.80(e) of the California Civil Code (such as bank account number, credit or debit card number, and other financial information)	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
	Characteristics of protected classifications under California or federal law (such as age)	Yes, for Independent Consultants	All categories listed below.	All purposes listed below.	All categories listed below.
	Commercial or transactions information (such as records of personal property or products or services purchased, obtained or considered)	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
	Biometric information (such as call recordings)	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
	Sensory information (such as audio or video recordings at events)	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
	Inferences drawn from the above information about your predicted characteristics and preferences	Yes	All categories listed below.	All purposes listed below.	All categories listed below.
	Other information about you that is linked to the personal information above	Yes	All categories listed below.	All purposes listed below.	All categories listed below.

c. **Categories of Sources.** We collect this personal information from the following categories of sources:

- Consumers (including information you provide and information that other customers or Independent Consultants may provide us about you);
- Service providers;
- Social networks;
- Third party messaging applications; and
- Government entities such as tax authorities

d. **Why We Collect, Use, and Share California Information.** We use and disclose the personal information we collect for our commercial and business purposes, as further described in this Privacy Statement. These commercial and business purposes include, without limitation:

- Our commercial purposes, including marketing, advertising, and facilitating transactions.
- Our business purposes as identified in the CCPA, which include:
 - Auditing related to our interactions with you;
 - Legal compliance;
 - Detecting and protecting against security incidents, fraud, and illegal activity;
 - Debugging;
 - Performing services (for us or our service provider) such as account servicing, processing orders and payments, and analytics;
 - Internal research for technological improvement;
 - Internal operations;
 - Activities to maintain and improve our services; and
 - Other one-time uses.

e. **Recipients of California Personal Information.** We disclose the categories of personal information designated above to the categories of third parties listed below for business purposes:

- Service providers;
- JAFRA Independent Consultants;
- Government entities;
- Advertising networks;
- Internet service providers;
- Data analytics providers;
- Operating systems and platforms; and
- Social networks.

For Independent Consultants, we may additionally disclose your personal information to partners, such as event management partners, hospitality partners, recognition service providers, and logistics partners, in order to help you participate in JAFRA conferences, events, commission, trips, incentives, recognition, rewards, and other offerings available to Jafra Independent Consultants.

f. **Your Rights Regarding Personal Information.** California consumers have certain rights with respect to the personal information collected by JAFRA. If you are a California consumer, you may exercise the following rights regarding your personal information, subject to certain exceptions and limitations:

- The right to know the categories and specific pieces of personal information we collect, use, disclose, and sell about you, the categories of sources from which we collected your personal information, our purposes for collecting or selling your personal information, the categories of your personal information that we have either sold or disclosed for a business purpose, and the categories of third parties with which we have shared personal information;
- The right to request that we delete the personal information we have collected from you or maintain about you.
- The right to opt out of our sale(s) of your personal information. We do not and will not sell personal information about you.
- The right to not receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA.

To exercise any of the above rights, please contact us using the following information and submit the required verifying information, as further described below:

- By phone at [1-800-5-JAFRA-5](tel:1-800-5-JAFRA-5)
- By internet at privacyportal-cdn.onetrust.com

g. **Verification Process and Required Information.** Note that we may need to request additional information from you to verify your identity or understand the scope of your request, although you will not be required to create an account with us to submit a request or have it fulfilled. We will require you to provide, at a minimum, your name and email address. If you are an Independent Consultant, we will ask you to provide information listed in your existing account, including but not limited to your password and Consultant ID.

h. **Authorized Agent.** You may designate an authorized agent to make a CCPA request on your behalf through the online portal listed in paragraph (e) above. To do this, you will need to provide verification as stated in paragraph (f) above, and you will need to give your agent written permission to make the request on your behalf.

i. **Minors' Right to Opt In.** We do not and will not sell the personal information of minors under 16 years of age.

14. CONTACTING US. If you have any questions regarding this Statement, please contact us by phone at [800-852-3728](tel:800-852-3728) or email at jafra@jafra.com. Please note that email communications are not necessarily secure. Accordingly, you should not include credit card information or other sensitive information in your email correspondence with us.

15. CHANGES TO THIS STATEMENT. We reserve the right to update this Statement without prior notice, and we will notify you of any material changes by posting the revised Statement online and updating the effective date. Any changes to this Statement will become effective upon posting of the revised Statement on the Internet, accessible through the JAFRA PROPERTIES.