

## ANJAC GROUP PRIVACY POLICY

The purpose of this privacy policy is to inform you of the methods of collection and processing of your Personal Data by the Anjac Health & Beauty Group and the various [Entities](#) that make it up (hereinafter together the "**Anjac Group**").

The terms "**you**", "**your**" and "**you**" refer to Customers and prospects who have subscribed to Products and Services or who are likely to be interested in our Products and Services, suppliers, End Customers, Users of our Site, Visitors to our premises, our contacts within partner companies as well as Candidates for a position within the Anjac Group (hereinafter, as the case may be, "**you**").

The terms "**we**", "**us**", "**our**" refer to the Group when you visit the Site or the Anjac Group Entities with which you interact, in the context of a commercial relationship, a visit to their premises or during an application for example.

### 1. Definitions

The following capitalized terms shall have the following definition, whether used in the singular or plural:

- 1.1 "**Candidate**" refers to any natural person submitting his or her application, whether spontaneously, in response to a job offer published on our Site or on a partner site (in particular via the FLATCHR platform).
- 1.2 "**Customer**" means any natural or legal person who has subscribed to our Products and Services directly with the Anjac Group.
- 1.3 "**End Customer**" refers to any consumer or professional who uses one of our cosmetic products.
- 1.4 "**Personal Data**" or "**Data**" refers to personal data within the meaning of the Applicable Regulations on the Protection of Personal Data, i.e. any information relating to an identified or identifiable natural person, such as a surname, first name, title, postal address, email address, online identifier (e.g. IP address), profession, diplomas.
- 1.5 "**Entities**" refers to the European companies of the Anjac Health & Beauty Group, the up-to-date list of which can be accessed at the link <https://www.anjac.com/societes>
- 1.6 "**Applicable Personal Data Protection Regulation**" means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of personal data ("**GDPR**") and any applicable national laws relating to privacy and the protection of Personal Data.
- 1.7 "**Products and Services**" or "**Products or Services**" refers to the services, goods, cosmetic products or services offered by an Anjac Group Entity to its Customers.
- 1.8 "**Data Controller**" means the natural or legal person, who, alone or jointly with others, determines the purposes and means of the processing of Personal Data.
- 1.9 "**Site**" means the Anjac Group's website accessible <https://www.anjac.com>
- 1.10 "**Processor**" means the natural or legal person who processes Personal Data on behalf of the Controller in accordance with the instructions given by the Controller.

- 1.11 **"User"** means any natural or legal person who accesses our Site.
- 1.12 **"Visitor"** means any natural person who accesses our premises.
- 1.13 The terms **"data subject"**, **"processing"**, **"processed"**, **"personal data breach"** have the same meanings as in the Applicable Regulations on the protection of personal data.
- 1.14 We are required to process your Personal Data in order to provide you with our Products and Services, to allow the reception, execution and management of orders, to inform you, to manage cases of cosmetovigilance notified by an End Customer if applicable, and more generally to ensure the management and monitoring of our contractual relationship, to ensure the security of our premises and to process your applications. In this context, we are the **"Data Controller"** of your Personal Data.

## 2. How do we collect your Personal Data?

We may collect your Personal Data directly when:

- you access our Site;
- you fill in one or more forms (application for example) on the Site or the website of one of the Entities;
- you submit an application for one of our job offers, either spontaneously or via a partner site;
- communicate with us by email or telephone;
- if applicable, you subscribe to a newsletter from the Anjac Group;
- you are one of the Anjac Group's suppliers;
- you participate in our events (forums, professional meetings, etc.);
- you report to one of the Anjac Group Entities an adverse reaction that has occurred following the use of a Product;
- you ask us a question about a specific Product or Service;
- you report a problem to us or request support;
- you access the premises of one of the Anjac Group Entities.

We may also collect your Personal Data, indirectly, through third parties in the following situations:

- The various Entities of the Anjac Group work closely together and may be required to share your Personal Data in order to offer you consistent and homogeneous Products and Services;

## 3. What treatments do we implement?

- 3.1 We collect different categories of Personal Data about you.

In all cases, we undertake to collect only the Personal Data that is strictly necessary for the purposes pursued by the processing of your Data.

The table below describes the purposes for which your Personal Data is processed and the legal basis used among those authorised by the Applicable Regulations on the protection of personal data, namely:

- 3.1.1 **Performance of a contract:** where the processing of your Personal Data is necessary in order to comply with our obligations under a contract to which you are a party. For example, to manage your supplier account;
- 3.1.2 **Obligation imposed by law :** where we are required to process your Personal Data to comply with a legal obligation, including for the purposes of providing information to a public body or law enforcement authority;
- 3.1.3 **Legitimate interest:** we process your Personal Data if it is in our legitimate interests to do so, in particular in order to manage the business and security of the Anjac Group's premises in accordance with the law, to the extent that such interest does not override your own interests;
- 3.1.4 **Your consent :** In some cases, we ask you for specific permission to process some of your Personal Data, and we process it only for the purposes to which you have consented (e.g. forwarding an application for a position). You have the right to withdraw your consent at any time by contacting us at the following address: [privacy@anjac.fr](mailto:privacy@anjac.fr) or by post at the following address: 20 rue de la Banque 75002 Paris - FRANCE.

| Category of Data                                                                                                                                                                                                                                         | Purpose of the processing                                  | Legal basis                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|--------------------------------------------------|
| Identification data (first and last name of the contact in the company, function of the contact, postal address, professional email address of the contact, professional telephone number of the contact, name of the company, identifier, SIRET, SIREN) | Providing our Products and Services                        | Performance of the contract                      |
|                                                                                                                                                                                                                                                          | Provide Customer Support                                   |                                                  |
|                                                                                                                                                                                                                                                          | Provide supplier support                                   |                                                  |
|                                                                                                                                                                                                                                                          | Marketing, targeted advertising where applicable           | Consent                                          |
|                                                                                                                                                                                                                                                          | Security and fraud prevention                              | Legitimate interest                              |
|                                                                                                                                                                                                                                                          | Improving Our Products and Services                        |                                                  |
| Data provided when submitting an application for a position (first name, last name, contact details, professional background, diplomas, skills)                                                                                                          | Analysis and response to applications                      | Consent                                          |
| Data necessary for the follow-up of the commercial relationship (order number, date and time of the order, quantity ordered)                                                                                                                             | Providing our Products and Services                        | Performance of the contract                      |
|                                                                                                                                                                                                                                                          | Provide Customer Support                                   |                                                  |
|                                                                                                                                                                                                                                                          | Provide supplier support                                   |                                                  |
|                                                                                                                                                                                                                                                          | Research and development                                   | Legitimate interest                              |
|                                                                                                                                                                                                                                                          | Improving Our Products and Services                        |                                                  |
| Financial data (means of payment used and associated number if necessary, bank details, discounts granted, receipts, balances)                                                                                                                           | Providing our Products and Services                        | Performance of the contract                      |
| Data relating to our communications (emails, support messages)                                                                                                                                                                                           | Providing and improving our Products and Services          | Performance of a contract<br>Legitimate interest |
|                                                                                                                                                                                                                                                          | Provide Customer Support                                   |                                                  |
|                                                                                                                                                                                                                                                          | Provide supplier support                                   |                                                  |
| Connection data (browsing history, date and time of connection, IP address, protocol of the User's computer, pages viewed on our Site, preferences, interests)                                                                                           | Providing and Customizing Our Products and Services        | Performance of a contract                        |
|                                                                                                                                                                                                                                                          | Direct marketing and targeted advertising where applicable | Consent                                          |
|                                                                                                                                                                                                                                                          | Improving Our Products and Services                        | Legitimate interest                              |
|                                                                                                                                                                                                                                                          | Audience analysis                                          |                                                  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                                                                      |                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|---------------------|
| Data relating to the Exposed End Customer strictly necessary for the assessment of the adverse health event (Data allowing the indirect identification of the exposed person or identification number of the End Customer concerned, Data relating to the identification of the product concerned, Health Data) and contact details of the notifier, only for the Entities that have been designated as "responsible person" responsible for collecting adverse reactions from marketed products | Process cosmetovigilance declarations on our cosmetic products used by End Customers | Legal obligation    |
| Information about moving around our premises                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Manage and monitor access to our premises                                            | Legitimate interest |
| Images captured by the video surveillance system                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Ensuring the safety of property and people within the Anjac Group's premises         | Legitimate interest |

### 3.2 We may also use your Data:

- In connection with an investigation, pre-litigation or litigation (including where we believe there has been a violation of the Terms and Conditions of Sale, the Terms and Conditions of Purchase, the rights of a third party, or any other activity that would violate our rules, regulations and policies);
- To comply with applicable laws, court orders, or court orders, or more generally to comply with applicable regulations.

## 4. How long is your Personal Data retained?

We keep your Personal Data for a period of time that is necessary and proportionate to the purpose for which it was collected. The main retention periods are summarized in the table below:

| Categories of Data                                | Retention period                                                                                                                                                                                                                                                                                  |
|---------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Data of Customers, prospects and suppliers</b> | Your Personal Data is kept in our databases for the duration necessary to manage our business relationship and for a period of three (3) years after our last contact. After this period, your Data may be archived for a period corresponding to the legal or regulatory limitation periods.     |
| <b>Financial data</b>                             | Your Data relating to the means of payment used for your orders is deleted at the end of the transaction, unless you expressly consent to their retention for your future orders. In any case, we do not keep the three-digit cryptogram of the bank card used to pay for an order if applicable. |

|                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Data of Job/Internship Applicants</b>                                                                                                        | Your Personal Data is kept for 2 years from the last contact at your initiative, then archived for the duration of the statute of limitations under ordinary law.                                                                                                                                                             |
| <b>Site Login Data</b>                                                                                                                          | The information stored in the Users' terminal and allowing its traceability or frequentation (such as logs or connection data) will not be kept for more than 13 months.                                                                                                                                                      |
| <b>Data relating to the exposed person strictly necessary for the assessment of an adverse health event and contact details of the notifier</b> | Your Personal Data is kept in an active database until the closure of the case of cosmetovigilance/materiovigilance or pharmacovigilance as the case may be, and is archived for a period of 10 years from the withdrawal of the Product concerned from the market. At the end of this period, your Personal Data is deleted. |
| <b>Information about moving around our premises</b>                                                                                             | Your Personal Data is kept for a maximum of three (3) months from your visit to our premises.                                                                                                                                                                                                                                 |
| <b>Images captured by the video surveillance system</b>                                                                                         | Your Personal Data is kept for one (1) month from the date it is collected.                                                                                                                                                                                                                                                   |

## 5. Who are the recipients of your Personal Data?

5.1 Your Personal Data is processed by authorised persons and is not transferred to third parties who are not authorised within the meaning of the Applicable Regulations on the protection of personal data. We may share your Data with the following entities:

5.1.1 The authorized services within the Entity concerned : the persons required to process your Personal Data are the members of our internal departments, namely, depending on the type of processing, the sales and marketing department, the departments in charge of purchasing, accounting, support, human resources, IT, research and development, the security of the premises in particular. These persons have access only to the Data that is necessary for them in the context of their duties.

5.1.2 Anjac Group Entities : Anjac Group Entities , operating in the cosmetics, well-being and health sector, are required to share certain Personal Data of Customers, Prospects, Suppliers and Candidates with each other. Your Personal Data may be used by the Entities to provide you with information on products and services related to cosmetics, well-being and health that may be of interest to you, or to offer you a position within the Anjac Group that corresponds to your application. The Anjac Group Entities are subject to the provisions of this Privacy Policy and undertake to follow the same practices.

5.1.3 Third-party suppliers : Third-party suppliers, such as suppliers of components necessary for the production and manufacture of Products and Services or those carrying out studies, supplying products, materials and/or materials may be required to process some of your Personal Data. These third-party providers may, subject to your prior consent, contact you to obtain additional information about you, for example to respond to a request for an opinion that you may have made.

5.1.4 Data Processors : your Data may also be communicated to reliable third-party service providers (IT service providers, payment service providers, customer service and marketing, etc.) generally acting as Data Processors within the meaning of the Applicable Regulations on the protection of personal

data who are likely to access, host and/or process your Personal Data on our behalf, according to our instructions.

5.1.5 Third parties : Our auditors, legal advisors and third-party professionals, such as accountants, court commissioners and recruitment agencies, may process some of your Personal Data. Please note that these third parties are not our subcontractors within the meaning of the Applicable Regulations on the protection of personal data.

5.1.6 Third-party websites : If you have been redirected to our Site from a third-party website, we may share Data about you with those referring websites so that they may, subject to your prior permission, contact you directly by email or mail about their products and services. The use of your Personal Data by these sites is subject to their own privacy policies. The Anjac Group has no control over the way in which these sites process your Data.

5.2 We may also share your Data in response to requests made by courts or tribunals, government or law enforcement agencies, or when necessary to comply with applicable laws and regulations.

5.3 In addition, certain Entities qualified as "*responsible persons*", within the meaning of Article 4 of Regulation (EC) No. 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products, or within the meaning of Regulation (EU) 2017/745 on medical devices or within the meaning of Regulation (EU) No. 520/2012 on medicinal products, are brought in to share your Personal Data in the context of the management of cosmetovigilance/pharmacovigilance or pharmacovigilance cases, i.e. to health professionals participating in your follow-up, to notified bodies in charge of the evaluation of a cosmetic product, a medical device or a medicine, to national public bodies in the context of the exercise of their missions as defined by the applicable regulations as well as to customer services.

## 6. What are your rights regarding your Personal Data?

6.1 In accordance with the Applicable Regulations on the Protection of Personal Data, you have the following rights over your Personal Data:

- **A right of access:** you have the possibility to submit an access request and obtain a copy of your Data;
- **A right to rectification:** you have the possibility to correct the Data concerning you if it is incorrect or incomplete;
- **A right to erasure** of your Data, subject to compliance with our legal obligations;
- **A right to obtain a copy** of the Personal Data we hold in a structured electronic format (right to portability).

You also have the right to object, on legitimate grounds, to the processing of your Data, and to the use of this Data for commercial prospecting purposes.

6.2 If you have any questions, additional information or complaints, you can contact us by sending an email to the following address: [privacy@anjac.fr](mailto:privacy@anjac.fr) or to the address designated by each Anjac Group Entity concerned.

We may ask you to provide us with proof of identity if your request concerns the exercise of one of the rights conferred on you by the Applicable Regulations on the protection of personal data.

The exercise of your rights (in particular your rights to object to or delete Data) must also be reconciled with the legal obligations as well as the legitimate interests pursued by the Anjac Group and the Entity(ies) concerned.

We respond to your requests within one (1) month of receipt, it being understood that this period may be extended by two (2) months depending on the complexity of your request or in the event of an influx of requests at the same time, provided that we inform you.

If we do not respond within a maximum period of three (3) months from your initial request or in the event of a dispute over the exercise of your rights, you have the right to lodge a complaint with the Commission Nationale de l'Informatique et des Libertés on the Authority's website or by post by writing to: CNIL - Complaints Service - 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07.

## **7. Security**

As a Data Controller, we implement reasonable and state-of-the-art technical and organizational measures to ensure the security, integrity and confidentiality of your Personal Data, including to prevent alteration or damage to your Personal Data or access by an unauthorized third party.

## **8. Transfer of your Data to third countries**

We do not transfer Personal Data to countries that do not provide an adequate level of protection without first implementing one of the appropriate safeguards provided by the Applicable Regulations to govern such transfer, in particular by using standard contractual clauses approved by the European Commission.

## **9. Links to Other Websites**

There may be times when our marketing communications contain links to websites belonging to third parties, including our partners.

Our communications may also contain links to the websites of some of the Anjac Group Entities. If you click on any of these links, please note that these sites may have their own privacy policies that apply to the processing that the Group Entities and our partners operate.

## **10. Changes to this Privacy Policy**

This version of the Privacy Policy was last updated on 17/07/2025.

We may update or adapt this Privacy Policy in the future. If necessary, we will notify you of changes to this Privacy Policy through the usual means of communication.



## Anjac Group's Cookie Policy

The purpose of this policy is to provide you with clear and comprehensive information about how we use cookies on our Site.

### 1. What is a cookie?

Cookies are small, often encrypted, text files that are stored on your device's browser or hard drive.

When visiting the Site, information relating to the browsing of the User's terminal may be recorded in cookies and installed on the User's browser. Cookies are used to enable our systems to recognise your device.

### 2. What types of cookies do we use?

- **Technical cookies:** These cookies are strictly necessary for the operation of our Site. They allow you to navigate our Site and use its features. These cookies are deleted as soon as the browser session is closed.

If you have chosen to disable these cookies via your internet browser, access and/or use of our Site may be affected. We advise you to leave them enabled in order to take full advantage of our Products and Services and your browsing on our Site.

### 3. Audience cookies: These cookies allow us to establish audience statistics and measure the number of visitors to our Site. These statistics are necessary for us to ensure the proper functioning of our Site. They allow us to evaluate the number of visitors to our content. The User may decide to disable these cookies on their first visit to our Site. What are the categories of Personal Data collected by cookies?

In order to ensure the proper administration of our Site, we use the Google Analytics solution which collects the following Personal Data:

- Your IP address/location;
- The browser used;
- The operating system used,
- The type of electronic device used;
- Information about your activities on the Site such as connection time, number of visits, pages visited;
- The origin of traffic, the navigation path and the bounce rate.

### 4. What is the legal basis?

The deposit of our cookies on your device is based on our legitimate interest in providing an optimized browsing experience for Users of our Site and in monitoring their traffic.

Regarding trackers that are not strictly necessary for the proper functioning of our Site, we collect, prior to their deposit on your device, your consent via the information banner on our Site allowing you to refuse the deposit of these trackers and to manage your preferences.

### 5. How to manage your cookies?

You can change your cookie preferences at any time by clicking on the "Manage Cookies" tab at the bottom of the page.

You can also object to the use of cookies by configuring your browser. In fact, the Help/Settings section of most browsers tells you how to refuse new "cookies" or obtain a message that notifies you of their receipt or how to disable all "cookies".

**For Chrome** <sup>TM</sup>

<https://support.google.com/chrome/answer/95647?hl=fr&hlrm=en>

**For Safari** <sup>TM</sup>

<https://support.apple.com/fr-fr/guide/safari/sfri11471/mac>

**For Firefox** <sup>TM</sup>

<http://support.mozilla.org/fr/kb/cookies-informations-sites-enregistrent?redirectlocale=fr&redirectslug=Gérer+les+cookies>

**For Opera** <sup>TM</sup>

<http://help.opera.com/Windows/10.20/fr/cookies.html>

**For Microsoft Edge** <sup>TM</sup>

<https://support.microsoft.com/fr-fr/help/17442/windows-internet-explorer-delete-manage-cookies>

You can also choose to disable or delete Similar Data used by software related to your browser, such as Flash cookies, by changing the settings of such software or by visiting the website of the software publisher.

## **6. How long do we keep your Personal Data collected by cookies?**

The Personal Data collected by cookies is kept for a maximum period of two years after it is deposited on your device.

You can also decide to delete cookies before the end of this period in your browser settings by following the instructions above.

## **7. Updating this Cookie Policy**

This Cookie Policy was last updated on 17/07/2025.

We may update this Cookie Policy. If necessary, we will notify you of changes to this Privacy Policy through the usual means of communication.