

## US PRIVACY POLICY

We appreciate the importance of your trust and have set forth this Privacy Policy to explain how The Body Shop (“we”, “us”, or “our”) collects, protects, shares and uses your information as part of our technology platforms, including, without limitation, our company websites, web pages, sponsored social media platforms, mobile sites and mobile apps (the “Sites”), or that you provide to us through other means. Your use of the Sites constitutes your acceptance of this Privacy Policy and your consent to the practices described.

### INFORMATION COLLECTED

#### Information You Provide

We may collect Personal Information (information that can be used to identify you as an individual) such as your name, email, telephone number, home address, demographic information (such as zip code, age), or payment information (such as account or credit card number) that you provide when you interact with us.

Some examples are when you:

- Correspond or communicate with us by phone, e-mail or otherwise;
- Register or create an account on the Sites;
- Participate in a contest, sweepstakes or an online survey;
- Use our Sites to buy goods;
- Sign up for our rewards program or other program or club;
- Sign up for email and/or SMS news and alerts; or
- Use social media to interact with us, or to share something from our Sites with others.

#### Information We Collect Automatically

Each time you visit the Sites, we may automatically collect certain types of information. Some examples of automatic information we may collect are as follows:

- Your IP address, MAC address or other unique identifier information (“Device Identifier”) for the computer, mobile device, technology or other device (collectively, “Device”) you use to access the Sites. A Device Identifier is a number that is automatically assigned to your Device when you access a web site or its servers, and our computers identify your Device by its Device Identifier. We may use a Device Identifier to, among other things, administer the Sites, help diagnose problems with our servers, analyze trends, track users’ web page movements, help identify you and your shopping cart, and gather broad demographic information for aggregate use.
- Your operating system, your browser type, device type, operating system, application version, the pages served to you, the time you browse, preceding page views, your use of features or applications on the Sites, the web page from which you came, your web browser software, the type of handheld or mobile device used to link to the web page, and the language and time zone settings on your web browser.
- We may collect a record of your activity or your “clickstream” while visiting the Sites.
- Some of our mobile applications also may collect geo-location information, including from the GPS function on your mobile device. We may use this information in a variety of ways, including to determine which of our store locations may be closest to you, provide promotional offers, and to offer products and services to you. You can opt-out of sharing your geo-location information by changing the settings on your mobile device. If you choose to opt-out, it may disable certain features of our mobile applications.



- We may collect any information you enter, share or that can be obtained from your use of our apps, games, contests, or promotions.

### **INFORMATION FROM THIRD PARTIES**

We may receive information about you from third parties that feature our products or promotional offers if you opt-in to receive information from us. You may also choose to participate in a third party application or social media site through which you allow us to collect (or the third party to share) information about you, including Usage Information and Personal Information. We may also receive information about you from outside records from third parties, such as marketing related or demographic information to enhance our ability to tailor our content, products and services that we believe may be of interest to you. We may supplement the information we collect about you through the Sites with such information from third parties in order to enhance our ability to serve you, to tailor our content to you and/or to offer you opportunities to purchase products or services that we believe may be of interest to you. If we combine such data with information we collect through the Sites, such information is subject to this Privacy Policy unless we have disclosed otherwise.

### **INFORMATION USE**

We may use the information about you for the purposes described in this Privacy Policy or disclosed to you on the Sites. For example, we may use information about you to:

- Respond to your questions and requests;
- Provide you with access to certain areas and features of the Sites;
- Verify your identity;
- Fulfill product purchases;
- Communicate with you about your account and activities on the Sites
- Send notice of changes to any Site or The Body Shop policy;
- Tailor content, advertisements, and offers we provide you;
- Improve the Sites and/or for internal business purposes;
- Allow you to log in with a social media account and share activities on your social media pages, such as Facebook
- Process applications and transactions;
- Share customer information with third parties to perform services on your behalf; and
- To comply with our legal obligations, policies and procedures, including compliance with relevant industry standards and the enforcement of our Terms and Conditions.

The Body Shop may also use information about you to analyze and manage its businesses. Aggregate or combined data is collected from online and offline facilities and may be used to enhance the ability of The Body Shop to communicate with you and to support business functions such as internal business processes, marketing, authentication, customer service, fraud prevention, and public safety and legal functions.

### **INFORMATION SHARING**

We do not rent or sell your Personal Information with nonaffiliated companies or their employees, except to provide products or services you have requested, when we have your permission, or under the following circumstances:

Third Parties Providing Services On Our Behalf



US PRIVACY POLICY

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We may share your Personal Information with third parties that perform functions on our behalf (or on behalf of our partners) such as service providers that host or operate our Sites, analyze data, process transactions and payments, fulfill orders or provide customer service; advertisers; sponsors or other third parties that participate in or administer our promotions, contests, sweepstakes, surveys or provide marketing or promotional assistance. Your Personal Information may also be used by us or shared with our subsidiaries, affiliates, sponsors, partners, advertisers or other third parties to provide you with product information and promotional and other offers to help maintain and operate the Sites or for other reasons related to the operation of our business, including but not limited to the fulfillment of purchases, promotional offers, and administering contests.

These service providers are granted access to some or all of your Personal Information as necessary and may use cookies (as defined below) or other automatic collection technology on our behalf. The service providers are contractually restricted in the ways they may use your Personal Information.

**Your Agreement To Have Your Personal Information Shared.** While on the Sites, you may have the opportunity to opt-in to receive information and/or marketing offers from someone else, or to otherwise consent to the sharing of your information with a third party, including social networking sites such as Facebook or Twitter. If you agree to have your Personal Information shared with a third party, your Personal Information will be disclosed to the third party subject to the privacy policy and business practices of that third party. For example, if you connect your Facebook account to your The Body Shop account, we will make available and/or share your Facebook user name and your Facebook profile picture to other users of the Sites. Users may be able to view your profile and shopping activity on the Sites and your activities may be automatically shared to both your friends on Facebook and with your Facebook friends on the Sites. We will disclose your Personal Information when you have elected to share your activity to Facebook. Information shared to Facebook will be connected with the Facebook account you log in with. Facebook's use of such information and any information it collects from your use of or on its service is governed by Facebook's privacy policy and our use of information is governed by this Privacy Policy. You understand and agree that you need to consult both privacy policies to amend or delete Personal Information which has been provided to Facebook. If you do not wish for such use of data to take place, you should not agree to share your shopping activity to Facebook and/or adjust your settings to deactivate such sharing. You understand information no longer shared on Facebook may continue to be publicly available to other uses of this Site.

**Business Transfers.** As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or our assets, or assets related to the Sites, Personal Information, Usage Information, and any other information that we have collected about the users of the Sites may be disclosed to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

**To Comply with Laws.** We may transfer and disclose information, including your Personal Information, Usage Information and Device Identifier (including IP address) to third parties to comply with a legal obligation; when we believe in good faith that the law requires it; at the request of governmental authorities conducting an investigation; to verify or enforce our Terms of Use or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety, or security of third parties, visitors to our Sites or the public.

**With Other Parts of Our Business and Our Business Partners.** Personal Information collected by any part or department of our business will be used in accordance with this Privacy Policy and may be shared with other parts or departments of our business and with our business partners, including third parties, for use in accordance with this Privacy Policy.



### COOKIES POLICY

Like many Web sites, we use "Cookies," which are data files placed on a Device when it is used to visit the Sites to facilitate site navigation and to personalize your experience, including tailoring advertisements. Cookies may also be used to associate you with social networking sites like Facebook and Twitter and, if you so choose, enable interaction between your activities on the Sites and your activities on such social networking sites. We also use cookies for "Refer a friend" programs or reward offers that you may participate in. We use cookies to track the account sending the referral and to track whether the "friend" registers or makes a purchase so that the referrer can receive its reward or offer. We, or our vendors, may place cookies or similar files on your Device for security purposes, to facilitate site navigation and to personalize your experience while visiting our Sites (such as allowing us to select which ads or offers are most likely to appeal to you, based on your interests, preferences, location, or demographic information). If you would prefer not to accept cookies, you can change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; or set your browser to automatically not accept any cookies. However, please be aware that some features and services on our Sites may not work properly because we may not be able to recognize and associate you with your account. In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.

We or our partners may also use Flash cookies (also known as Local Stored Objects) or other similar technologies. A Flash cookie is a small data file placed on a computer using Adobe Flash or similar technology that may be built into your computer or downloaded or installed by you to your computer. We use these technologies to personalize and enhance your online experience, facilitate processes, and personalize and store your settings. Flash cookies may help our website visitors to, for example, set volume preference associated with a video experience, play games and perform surveys. They help us improve our Sites by measuring which areas are of greatest interest to customers. They may be recognized by other sites or by our marketing or business partners. Flash cookies are different from browser cookies and the cookie management tools provided by your browser may not remove Flash cookies. Visit

[http://www.macromedia.com/support/documentation/en/flashplayer/help/settings\\_manager.html](http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html) to learn how to manage privacy and storage settings for Flash cookies. If you disable Flash cookies or other similar technologies, please be aware that you may not have access to certain features and services that make your online experience more efficient and enjoyable.

**Pixel Tags or Web Beacons:** We also use web beacons or pixel tags, which are transparent graphic images placed on a web page or in an email and indicate that a page or email has been viewed or tell your browser to get content from another server. These may provide confirmation to us when you open an email from us.



### **YOUR PRIVACY RIGHTS, CHOICE AND ACCESS**

You may direct us not to share your Personal Information with third parties, not to use your Personal Information to provide you with information or offers, or not to send you newsletters, e-mails or other communications by: (i) modifying your registered user information on the Sites; (ii) calling 1-800-BODYSHOP; or (iii) following the removal instructions in the communication that you receive. If you wish to modify, verify, correct, delete, or update any of your Personal Information collected through the Sites, you may edit your profile preferences or contact us at the above number, subject to applicable law. In accordance with our routine recordkeeping, we may delete certain records that contain Personal Information you have submitted through the Sites. We are under no obligation to store such Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Personal Information. In addition, you should be aware that it is not always possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons. We will retain your information (including geo-location data) for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, contact us by calling 1-800-BODYSHOP. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We do not control certain privacy settings and preferences maintained by social media companies like Facebook and Twitter. If you wish to make changes to those settings and preferences, you may do so by visiting the settings page of the appropriate social media site.

### **SOCIAL MEDIA**

We maintain a social media presence, such as a Facebook page, an Instagram page and a Twitter feed. You can interact with us through social media, such as by entering our contests, posting content, sharing material from our Sites, and using our social media plug-ins. When you interact with us using social media, we may receive information such as your user ID, your profile picture, photos you post, and similar information, which is often determined by your privacy settings at the relevant social media sites. We may use the information for the same types of purposes we describe throughout this Privacy Policy. Your use of social media sites is primarily governed by the site operators' privacy policies and terms of service, and the information you share with us and with others is largely controlled by the privacy settings you have established at those sites.

### **NETWORK ADVERTISING**

The Sites license technology to serve advertisements on its own Sites and across the Internet. In addition, the Sites may use third party network advertisers to serve advertisements and third party analytics vendors to evaluate and provide us with information about the use of the Sites and viewing of our content. We do not share Personal Information with these third parties, but ad network providers, the advertisers, the sponsors, and/or analytics service providers may set and access their own cookies, pixel tags and similar technologies on your Device and they may otherwise collect or have access to information about you, including Usage Information. We and our network advertisers may target advertisements for products and services in which you might be interested based on your visits to both the Sites and other web sites. We may use a variety of companies to serve advertisements. If you prefer to not receive targeted advertising, you can opt out of certain network advertising programs through the Network Advertising Initiative (NAI) Opt-Out Page: [http://www.networkadvertising.org/managing/opt\\_out.asp](http://www.networkadvertising.org/managing/opt_out.asp).



Please note that even if you choose to remove your information (opt out), you will still see advertisements while you are browsing online. However, the advertisements you see may be less relevant to you and your interests. Additionally, many network advertising programs allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. The NAI Opt-Out Page provides a tool that identifies its member companies that have cookies on your browser and provides links to those companies. Additional information regarding online advertising is available at: <https://www.networkadvertising.org/understanding-online-advertising/what-are-my-options> or [www.aboutads.info/choices](http://www.aboutads.info/choices)

## **CHILDREN**

### **Under Age 13**

The Sites are not directed to children under 13. We do not knowingly collect, use or disclose personally identifiable information from anyone under 13 years of age without verifiable parental consent. If we learn that a child under the age of 13 has submitted Personal Information online without parental consent, we will take all reasonable measures to delete such information from our databases and to not use such information for any purpose (except where necessary to protect the safety of the child or others as required or allowed by law). If you become aware that we have unknowingly collected personally identifiable information from a child under the age of 13, please contact us by calling 1-800-BODYSHOP.

### **Under Age 18**

Minors under 18 years of age may have the Personal Information that they provide to The Body Shop through the Site deleted by calling 1-800-BODYSHOP and requesting deletion. Please note that, while we make reasonable efforts to comply with such requests, deletion of your Personal Information does not ensure complete and comprehensive removal of that data from all systems.

## **SECURITY OF YOUR INFORMATION**

The Sites use industry-standard security techniques to help protect against loss, unauthorized use, disclosure or destruction. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information that you transmit to us. In this regard, we urge you to take every precaution to protect your personal data while you are on the Internet. At a minimum, we encourage you to make sure that you are using a secure browser as you surf the Internet.

The Body Shop restricts authorized access to your Personal Information to those persons who have a legitimate purpose to know that information to provide products or services to you and those persons you have authorized to have access to such information. We also require that third parties providing services on our behalf protect Personal Information and not use it for purposes other than providing assistance to [thebodyshop.com/en-us](http://thebodyshop.com/en-us).

## **DO NOT TRACK**

Do Not Track (DNT) is a privacy preference that users can set in some web browsers, allowing users to opt out of tracking by websites and online services. At the present time, the World Wide Web Consortium (W3C) has not yet established universal standards for recognizable DNT signals, and therefore, The Body Shop and the Sites do not recognize DNT.





### **OTHER SITES**

The Sites may contain links to third party sites that are not owned or operated by The Body Shop or affiliated companies. This includes links from advertisers, sponsors and/or partners that may use our logo(s) as part of a co-branding or co-marketing agreement. We do not control, recommend or endorse and are not responsible for these sites or their content, products, services or privacy policies or practices. Different terms and conditions and privacy policies may apply to your use of any linked sites. These other sites may send their own cookies or other tracking devices to your Device, they may independently collect data or solicit Personal Information and may or may not have their own published privacy policies. You should also independently assess the authenticity of any site which appears or claims that it is one of our Sites (including those linked to through an email or social networking page). The Sites may make available chat rooms, forums, message boards, and news groups. Remember that any information that you disclose in these areas becomes public information and is not subject to the provisions of this Privacy Policy.

### **CROSS-BORDER TRANSFER OF PERSONAL INFORMATION**

The Sites are governed by and operated in, and in accordance with, the laws of, the United States, and are intended for the enjoyment of residents of the United States. Country or region specific web sites are available for our brands and products around the world. The Body Shop makes no representation that the Sites are governed by or operated in accordance with the laws of any other nation. In some cases, Personal Information that we manage, including information from our customers and website users located in various countries, including in Canada, the EEA and Switzerland, may be transferred to the United States. You understand that your Personal Information may therefore be transferred, processed and stored outside of your country of residence, and therefore may be available to government authorities under lawful orders and laws applicable in such foreign jurisdictions. If you are located in the EEA, Canada or elsewhere outside of the United States, please be aware that information we collect may be transferred to and processed in the United States. By using the Sites, or providing us with any information, you (a) acknowledge that the Sites are subject to the laws of the United States, (b) consent to the collection, processing, maintenance and transfer of such information in and to the United States and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where you reside and/or are a citizen, and (c) waive any claims that may arise under those laws.

### **CHANGES AND POLICY UPDATES**

Please note that we may change information on the Sites and/or this Privacy Policy, at any time without prior notice to you, and any changes will be effective immediately upon the posting of the revised Privacy Policy on the Sites. We will use your Personal Information in a manner consistent with the Privacy Policy in effect at the time you submitted the information, unless you consent to the new or revised policy. We encourage you to periodically review this page for the latest information on our privacy practices.

### **YOUR CALIFORNIA PRIVACY RIGHTS**

This Privacy Policy describes how we may share your information for marketing purposes, as described above. California residents are entitled to request and obtain from us once per calendar year information about any of your Personal Information shared with third parties for their own direct marketing purposes, including the categories of information and the names and addresses of those businesses with which we have shared such information. To request this information and for any other questions about our privacy practices and compliance with California law, please contact us as instructed below.



**CONTACT US**

If you have any questions or concerns regarding this Privacy Policy, please contact us at:

The Body Shop  
Legal Department  
148 Lafayette Street, 5th Floor  
New York, NY 10013  
(UPDATED AS OF MAY 2019)

