

Shiseido Americas Corporation Privacy Shield Policy

This Privacy Shield Policy ("Policy") describes how Shiseido Americas Corporation ("SAC") and its subsidiaries and affiliates in the United States ("US") ("SAC," "we," or "us") collect, use, and disclose certain personally identifiable information that we receive in the US from the European Union ("EU Personal Data"). This Policy applies to the following US affiliated entities: Shiseido Americas Corporation (on behalf of the bareMinerals, Buxom, Cle de Peau Beaute, Laura Mercier, NARS, and Shiseido cosmetics brands). This Policy supplements our Website Privacy Policy for each brand, and unless specifically defined in this Policy, the terms in this Policy have the same meaning as the Website Privacy Policy.

SAC recognizes that the EU has established protections regarding the handling of EU Personal Data, including requirements to provide adequate protection for EU Personal Data transferred outside of the EU. To provide adequate protection for certain EU Personal Data about consumers, business contacts and job applicants received in the US, SAC has elected to self-certify to the EU-US Privacy Shield Framework administered by the US Department of Commerce ("Privacy Shield"). SAC adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability.

For purposes of enforcing compliance with the Privacy Shield, SAC is subject to the investigatory and enforcement authority of the US Federal Trade Commission. For more information about the Privacy Shield, see the US Department of Commerce's Privacy Shield website located at: <https://www.privacyshield.gov>. To review SAC's representation on the Privacy Shield list, see the US Department of Commerce's Privacy Shield self-certification list located at: <https://www.privacyshield.gov/list>.

Personal Data Collection and Use

We may receive the following categories of EU Personal Data in the US: Contact information (name, email address, address), resumes containing personal information from job applicants, and billing and shipping information. We process EU Personal Data for the following purposes:

- to register for more information about our products and services;
- email promotions or newsletters;
- business marketing and research;
- applications to fill job openings;
- and to fulfill customer orders.

Data Integrity and Purpose Limitation

SAC will only process EU Personal Data in ways that are compatible with the purpose that SAC collected it for, or for purposes the individual later authorizes. Before we use your EU Personal Data for a purpose that is materially different than the purpose we collected it for or that you later authorized, we will provide you with the opportunity to opt out. SAC maintains reasonable procedures to help ensure that EU Personal Data is reliable for its intended use, accurate, complete, and current.

Accountability for Onward Transfers

Third-Party Agents or Service Providers. We may transfer EU Personal Data to our third-party agents or service providers who perform functions on our behalf as described in our Website Privacy Policy. Where required by the Privacy Shield, we enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection the Privacy Shield requires and limiting their use of the data to the specified services provided on our behalf. We take reasonable and appropriate steps to ensure that third-party agents and service providers process EU Personal Data in accordance with our Privacy Shield obligations and to stop and remediate any unauthorized processing. Under certain circumstances, we may remain liable for the acts of our third-party agents or service providers who perform services on our behalf for their handling of EU Personal Data that we transfer to them.

Disclosures for National Security or Law Enforcement. Under certain circumstances, we may be required to disclose your EU Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Security

SAC maintains reasonable and appropriate security measures to protect EU Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in accordance with the Privacy Shield.

Access Rights

You have the right to access the EU Personal Data that we hold about you and to request that we correct, amend, or delete it if it is inaccurate or processed in violation of the Privacy Shield. These access rights may not apply in some cases, including where providing access is unreasonably burdensome or expensive under the circumstances or where it would violate the rights of someone other than the individual requesting access. If you would like to request access to, correction, amendment, or deletion of your EU Personal Data, you can submit a written request to the contact information provided below. We may request specific information from you to confirm your identity. In some circumstances we may charge a reasonable fee for access to your information.

Enforcement and Dispute Resolution

You can direct any questions or complaints about the use or disclosure of your EU Personal Data to us at privacy@sac.shiseido.com. We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of your EU Personal Data within 45 days of receiving your complaint. If you are unsatisfied with the resolution of your complaint, you may seek resolution via binding arbitration, free of charge as described below.

SAC is registered with JAMS as its alternative dispute resolution provider based in the U.S. Accordingly, JAMS is the independent dispute resolution body designed by SAC to address complaints and provide appropriate recourse without cost to you. Please use the JAMS complaint form found at https://www.jamsadr.com/files/Uploads/Documents/JAMS_Arbitration_Demand.pdf. The services of JAMS are provided at no cost to you.

As a last resort, privacy complaints that remain unresolved after pursuing these and other channels may be subject to binding arbitration before the Privacy Shield Panel as described in the Privacy Shield Agreement, Annex I (Binding Arbitration). For additional information, please visit the Privacy Shield website: www.privacyshield.gov for further information and assistance.

Contact Us

If you have any questions about this Policy or would like to request access to your EU Personal Data, please contact us at privacy@sac.shiseido.com.

Changes To This Policy

We reserve the right to amend this Policy from time to time consistent with the Privacy Shield's requirements. Appropriate notice will be given concerning such amendments.

Effective Date: October 4, 2019