



PRIVACY POLICY

SABON Privacy Policy

Last updated: 15.06.2021

1. Introduction

“At SABON, we are 100% committed to protecting the privacy and security of our customers and site visitors. The SABON team members are customers themselves, of both SABON of course and other brands – so we deeply appreciate and respect how important privacy is.”

- 1.1. This Privacy Policy describes how we implement these core values and how we respect and protect your right to privacy. **We strongly urge you to read this statement carefully**, as it sets out the basis on which we use your personal data when you buy our products online or in one of our stores or via other SABON’s points of sale (“Products”), access our websites, interact with us or otherwise use our services and applications (jointly referred to as: "Services").
- 1.2. <https://www.sabon.com.sg/> (hereinafter: the “Site”) is an internet website operated by **Sabon Shel Paam Industries Ltd.** , whose registered address is 16 Hamezuda St. Azur Israel (hereinafter: the “Company”) a member of the multinational Rocher group companies (the Company together with all entities holding the Company, being held by the Company or under joint holding with the Company and the Company’s officially appointed distributors in Singapore or in other territories, shall be hereinafter referred to as “SABON” and/or “We” and/or “Us”).
- 1.3. This Privacy Policy (hereinafter: the “Privacy Policy”) is meant to provide you with details about:
 - **Information on the way we collect your personal data**
 - **The Security measures** we take to ensure the respect and protection of your personal data
 - **Your individual rights** in terms of right to access, correct, or delete your personal data in accordance with your local data regulation

- **General information about the Company** and its products, as well as an online store for the sale of the Company's products (collectively the "Services").

By partaking of the Service, you accept the terms set forth in this Privacy Policy you consent to the collection, use, disclosure, transfer, and processing of your personal data in accordance with this Privacy Policy agree to be bound by the obligations it imposes on you. You are deemed to have accepted and consented to this Privacy Policy when you continue to browse and interact with the Site.

Unless otherwise specifically set forth: (1) any reference to the Services in this Privacy Policy shall include any part thereof; (2) terms defined in the Terms of Use shall have the same meanings here; and (3) all of the terms of this Privacy Policy shall apply for the benefit of: 1) SABON's subsidiaries or business partners, including the heirs and assigns thereof; 2) any of SABON's controlling shareholders; 3) any entity controlled by SABON; 4) any entity under joint control with SABON; and 5) Company's officially appointed distributors in Singapore and in other territories.

The terms set forth below apply to both genders and any reference in the male form is for convenience only. Moreover, terms in singular form shall also apply to the plural and vice versa.

By using the Services offered on the Site, you are deemed to agree to our use of your information in accordance with this policy. We encourage you take a few minutes to read through and contact us if you have any queries.

2. Updating the Privacy Policy

This Privacy Policy may be revised from time to time by SABON in accordance to local legal requirements. If a critical change to the nature of the use of your personal data is involved or if the change is in any other manner relevant to you, we will make sure to provide you with the adapted update in a way that will remain visible and acknowledgeable by you in advance of the change actually taking effect.

3. Collecting Information

We collect personal information in the following ways:

- We may collect technical information, linked to identifiers to perform statistical analysis (in order to prevent errors and to improve our Services), such as:
 - Anonymous User Ids
 - Type of device you are using and device IDs
 - Browser type
 - Access times

- The features or functionality you selected whilst using the Services
- Your general geographic location. As a rule, we will.
- Required information – in order to make an order, you must provide us with certain information, such as:
 - Your name
 - Your email address
 - Your contact information
 - Your membership information
 - Your order and delivery information
 - Information related to your account on the website
 - Your credit card information
 - Etc.

We may ask you for additional and/or other information during the order process in order for us to enhance your user experience, improve the value and quality of the Services and to analyze use of the Services. In the event that you choose to purchase certain services and products offered on the Site, you may be required to provide additional information in order to complete such purchase.

If you choose to register to the Site and/or create an account in the Site, we will also collect personal information from you that enable you to be identified, such as your name, your phone number and your email address. Whether or not you provide us with this kind of information is always entirely under your control. In order to minimize the impact on your privacy, we will never knowingly collect more Personal Data than is strictly necessary to perform the activities described in this policy.

We may combine personal information with non-personal information in order to enhance your user experience, improve the value and quality of the Service and analyze use of the Service.

In addition to the information that is collected in the manner described above, you may choose to share with us additional information about yourself in the context of the Service, and if you choose to do so, you do so at your sole discretion and responsibility.

Your personal information will not be disclosed to third parties in the context of your purchase of services on the Site, unless you grant your prior written consent for such disclosure, or unless we are required to disclose such information in accordance with a court order or a legal proceeding, including proceedings concerning prevention of fraud.

4. Storing and Protecting Your Personal Information

Your personal information will be stored and processed on our computers or servers located in various jurisdictions in accordance with applicable law in such jurisdictions, including privacy laws. As a result, your personal information may be subject to access requests from governments, courts, or law enforcement in those countries according to laws in those countries. Subject to the applicable laws in such other countries, we will do our best to transfer your information via

protected, secret and secure channels. By providing us personal information, you agree that your information may be transferred to and stored in these countries. We will keep and use your information in order to comply with our own legal obligations, for resolving disputes concerning your use of the Service and to enforce the terms of this Agreement.

We make the confidentiality and security of your personal information our highest priority and we limit access to it to our employees who need to come into contact with it in order to fulfill their role and enable the Services to be provided to you .

Although we do our best to protect your Personal Information, the transmission of information via the internet can never be completely secure and we are therefore unable to guarantee the security of the information which you share with us at your own risk.

5. Use of the Information and Personal Data

We may use personal information in a variety of ways, including by contacting you, on the Site, by email or other correspondence and through third parties (including our officially appointed distributors in Singapore or other territories). We use personal information for the purposes set forth in this Policy and in accordance with applicable law. Generally, we use personal information for the following purposes:

- Provide you with the services and products that you selected or purchased
- Provide you with marketing information concerning the Company and the Site
- Send you satisfaction, market research and quality assurance surveys
- Send you sales offers from us and our business partners that we believe you will find of interest
- Enhance our understanding of our market and improve the products and services that we offer.

6. Sharing information with third parties.

We take our customers' privacy very seriously and do not sell, lease or otherwise provide personal identification information to third parties, save for in the manner described in this Privacy Policy (which includes provision and processing of personal information by Company's officially appointed distributors in Singapore or in other territories). We will not share personal information generated as a result of a transaction with other services without your express consent or receiving your instruction to do so, save for when such disclosure is necessary in our opinion in order to perform any of the following purposes:

- Abide by any instruction given as a part of a legal proceeding, including, but not limited to, summonses to civil and criminal proceedings, court order and/or obligatory disclosure in response to the demand of governmental entities, authorities and/or agencies

- The enforcement of the terms of this Privacy Policy, the Terms of Use or any other agreement between us and you
- Provide customer service-related solutions;
- To report to your legal advisor (if any)
- Protect the rights, property or personal security of SABON, its customers or the general public. Without derogating from the generality of the aforesaid and at our sole discretion, we may provide third parties, including potential advertisers on the Site, certain non-personal information concerning use of the Service, for various purposes.

7. Links to third-party sites and services

Third-parties are external partners or services that can be used by companies, including SABON, to fulfill a certain number of needs such as:

- Website operational functions: customer reviews, customer service, etc.
- Logistics: order preparation, shipping/delivery, returns
- Data processing & Communication management (email, SMS, push notifications...) with platforms such as Salesforce, Mailchimp... for services from operational communication (order confirmation, delivery confirmation...) to information or promotional newsletters sent by email or SMS
- Online third-parties used for Advertisement purposes: campaign display banners, banners of social media.
 - The fact that the Service links to other sites or services, or presents a banner or other form of advertisement, should not be interpreted as an endorsement or approval by us of such third-party and does not constitute a declaration of any form of affiliation with such third party. If you click on a link to a third-party site or service, including an advertisement, you will leave the Site or the Services you are using and will be transferred to such third-party site or service.
 - Online third-party sites and services may set “cookies” or other devices on your computer or mobile device and may collect personal information from you. Other sites and services are governed by terms that differ from ours with respect to collection and/or disclosure of personal information that you provide.
 - Since we cannot control such third-party activities, we shall not be responsible for any use of your personal information by such third parties and we do not guarantee that they adhere to privacy policies and maintain security measures similar to ours. Therefore, we recommend that you read the privacy policies, terms of use and declarations of such third-party sites and services that you visit before providing them with any personal information.
 - However, in the prospective of giving our customers the level of compliance that is dictated by local regulation, and a fortiori GDPR, the customers can modify their choices directly in the cookie banner and therefore prevent the third-parties to track their visits and interactions with the website.