



Avon Global Privacy Notice for Customers and Website Users

What does this Privacy Notice apply to?

Avon, (“we”, “us”, “our”), is fully committed to the responsible collection, use and care of the personal data of its customers and website users. This Global Privacy Notice for Customers and Website Users (“Privacy Notice”) provides you with information on how Avon collects, uses, and shares personal data through our websites, products, mobile applications, or other sites that display this Privacy Notice.

If you are in a jurisdiction that recognizes the concept of a Data Controller or similar, the Data Controller is the Avon entity with which you have a customer relationship. If you have a query about how your Personal Data is being used, you can contact the data controller through the Data Protection Officer (DPO) team [here](#)].

Key Definitions

Capitalised terms not otherwise defined in this Notice have the following meanings:

Personal Data means any information relating to an identified or identifiable living individual.

Sensitive Personal Data means any information relating to an individual’s racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, criminal records/history or processing of genetic data or biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation. Depending on the country you are based sensitive personal data may also refer to personal information that, once leaked or illegally used, may cause harm to natural persons, including but not limited to information on specially designated status, financial accounts, individual location tracking, as well as the personal information of minors or information on social security, driver’s license, state identification, and passport numbers, precise geolocation, combination of email address, debit card, or credit card with security or access code, password, or other credentials allowing access to financial account.

Processing means the use of personal data including collection, recording, organization, structuring, adaptation or alteration, analysis, retrieval, consultation, providing or blocking access to (including remote access), disclosure, dissemination, aligning, copying, transfer, storage, deletion, hosting, combination, destruction, disposal, or other use or handling of personal data.

Data Controller means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

Third Party means any natural person or legal entity, public authority, agency or any other body other than Data Subject, Data Controller, any vendor, supplier or service provider who solely or jointly process personal data on behalf of the Data Controller and acts on the Data Controller’s instructions.

Data Subject means the identified or identifiable living individual to whom the Personal Data relates.

Personal Data we collect and process

We collect, store, and process your Personal Data in a number of ways including when you:

- Visit our websites, and branded pages and applications through third-party platforms;
- Register an account with us and/or purchase products through our website and/or undertake a live consultation;
- Visit one of our retail stores or counters, including if you register an account with us in store;
- Provide data to our Customer Engagement, our Franchisees, direct marketing campaigns, sweepstakes and competitions;
- Correspond with us across any of our channels (e.g. messaging platforms such as text message, live chat, social media and email)
- Submit a review regarding our products at our websites, and branded pages and applications.

The following categories of Personal Data are followed by information about their source(s), purpose(s), legal bases and disclosure(s).

Categories of Personal Data	Examples of Personal Data	Purposes and legal bases for Personal Data Processing
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Basic Personal Data	We may collect basic identifiers such as your name, email address, phone number, postal address, account/login details, date of birth and country/region of residence.	<p>When you provide this information to us directly (for example when you create an account, place an order, or contact customer support), we use it to set up and administer your account, deliver your order, provide customer support, and send service-related messages such as order updates or changes to our policies.</p> <p>We process this data because it is necessary to perform our contract with you (or to take steps at your request before entering into a contract) and/or because we have a legitimate interest in operating and improving our customer services.</p> <p>Where required by law, we rely on your consent for specific types of communications.</p>
Order and Transaction Data	We collect order and transaction information such as items purchased, delivery and billing address, order status, returns and refunds, changes in your account information, fraud checks or flags raised about your transactions, payment card refusals, suspected crimes, complaints and/or claims relating to a purchase.	<p>When you submit an order to us (online or in-store) we use this information to fulfil and deliver your purchase, process payments and refunds, handle returns, and respond to any order-related queries or complaints you raise. We also create and maintain records of your orders and returns as part of operating our business.</p> <p>We process this data because it is necessary to perform our contract with you, to comply with legal obligations where applicable (for example, financial/tax record-keeping), and/or because we have a legitimate interest in preventing fraud and defending legal claims.</p>
Payment Data	We process limited payment-related information needed to complete your purchase, such as payment confirmation and the payment method used. Where a payment service provider is used, card details are typically processed securely by that provider rather than stored by us.	<p>When you pay for an order at checkout, we (and/or our payment service providers) use the payment information to complete the transaction, issue refunds where needed, and help detect and prevent fraudulent transactions.</p> <p>We process this data because it is necessary to perform our contract with you and because we have legitimate interests in securing transactions and reducing fraud; in some cases we also process it to comply with legal obligations.</p>
Internet / Device and Website Usage Data	When you use our website or app, we may collect data such as your IP address, device and browser type, cookie identifiers, pages viewed, and basic usage information. This is collected from your device and, where used, from analytics and cookie technology providers.	<p>When you visit and browse our website/app, according to our Cookie Policy, we may collect certain technical and usage information from your device (and, where applicable, from our analytics/cookie providers). We use this information to operate the website/app, maintain security, diagnose technical issues, understand usage patterns, and improve performance and user experience.</p> <p>We process this data on the basis of our legitimate interests in maintaining and improving our digital services and ensuring their security. Where required by law, we rely on your consent for non-essential cookies and similar tracking technologies.</p>
Preference information and Inferences drawn from other Personal Data	We may collect your product and shopping preferences and behaviour. It also includes information ascertained about you from social media such as your profile picture, likes, location, and product preferences.	<p>When you browse our website or make purchases, we may use this information to personalise your experience (such as recommending products), understand how customers use our services, improve our products and website, and measure the effectiveness of our marketing. Where we send you marketing based on your preferences, we will do so in line with your marketing preferences..</p> <p>We process this data on the basis of our legitimate interests in improving our services and marketing, and where required by</p>

		law, on the basis of your consent (for example, for certain cookies and direct marketing).
Communications Data	If you contact us, we may collect records of your communications, such as emails, chat messages, customer service tickets, and notes and recordings of phone conversations.	When you email, chat with, call, or otherwise contact us, we use your communications and any related notes to respond to your enquiry, provide customer support, resolve issues, and maintain service quality (including training/quality assurance where used). This may include communications with Sales Managers, Regional Managers, and/or Beauty Entrepreneurs if they share such communications with us. We process this data because it is necessary to take steps at your request and/or perform our contract with you, and/or because we have a legitimate interest in running an effective customer support function and improving service quality.
Sensitive Personal Data (only where provided by you)	We do not usually require sensitive personal data. However, if you voluntarily provide it—such as information about skin concerns or adverse reactions to a product (and any photos you choose to share with customer support)—we may process that information.	If you choose to provide us with sensitive information (for example when you report a skin concern or an adverse reaction and contact our customer support), we use this solely to respond appropriately and, where relevant, to support product safety and the handling of adverse event We process this data based on your explicit consent and/or where otherwise permitted or required by applicable law (for example, product safety obligations), depending on the circumstances and jurisdiction.
Other Data Collected with Consent (only if applicable)	Optional information you choose to provide (for example, optional profile details). If social media features are offered (e.g. social login), we may receive limited information from the platform depending on your settings.	Where you choose to provide optional information or use optional features, we use that information only for the purpose explained at the point of collection (for example, to complete profile settings or enable the feature). We process this data on the basis of your consent where required, and/or because it is necessary to provide the feature you requested, depending on the context and local law.

Use of Artificial Intelligence (AI)

Avon utilises artificial intelligence (AI) technologies to enhance our services and user experience. We are committed to the safe, ethical and responsible use of AI, in accordance with applicable law, prioritising your privacy and data security. AI systems may process your data to provide personalised experiences, but we do not use AI for automated decision-making for personal data processing without human oversight. We review our AI systems for bias and accuracy, and we provide transparency about when and how AI is used in our services. Where applicable you have the right to request human review of any AI-assisted decisions and to opt out of certain AI-powered features.

About Third-party sites and Cookies

You may be able to access our website from a third-party site or vice versa. Your use of third-party websites is governed by the privacy policy of that site. Different terms and conditions and privacy policies may apply. They may send their own cookies or tracking files to your Device, and they may collect your Personal Data for their own purposes. That information is not subject to this Privacy Notice.

We may use cookies on our websites to personalise content and advertisements, to provide social media features, and to analyse traffic on our platforms. Where permitted by your consent preferences, we may also share information regarding your use of our websites with our social media, advertising, and analytics partners. For further information, please consult our [Cookie Notice].

How long we store your Personal Data

We store your Personal Data processed for the purposes stated in this Notice and for the duration of our business relationship with you. Once our business relationship with you has ended and your data is no longer required for these purposes, we will delete your data, unless your data is required also for other purposes set out in this Privacy Notice, and/or is necessary to fulfil applicable legal or regulatory obligations. We also may store your data for dealing with any complaints regarding our products and services. Our retention periods are being determined as per the legal requirements of the country you are based.

How we share and disclose your Personal Data

As a global Company, we may disclose your Personal Data to:

- Avon companies;
- Representatives and/or Franchisees of Avon, if you have indicated a desire to purchase products this way;
- Third-parties who provide goods or services to help us conduct our business and improve our services;
- External auditors and or legal advisors;
- Other parties to whom we are authorised or required by law to disclose information;
- Law enforcement and other government authorities. To do so, the authority requires an appropriate judicial order or warrant, for which they need to demonstrate that the disclosure of the requested or intercepted information is required. We reserve the right to challenge these requests.

We may share or transfer your Personal Data in the course of any direct or indirect reorganization process including, but not limited to, mergers, acquisitions, divestitures, bankruptcies, and sales of all or part of our assets. Your Personal Data may be shared following the completion of such transaction and/or during the assessment pending transfer (subject to confidentiality requirements). If transferred, your Personal Data will remain subject to this Privacy Notice or a policy that, at a minimum, protects your privacy to an equal degree as this Privacy Notice unless you otherwise consent.

International Data Transfers: We may transfer your Personal Data to our affiliates and subsidiaries or to other third parties, in accordance with applicable local law, depending on the country you are based. We may also transfer your Personal Data from your country or jurisdiction to other countries or jurisdictions in accordance with legal requirements.

- For international data transfers subject to EEA, UK and Swiss law: we primarily use European Union Commission Standard Contractual Clauses.
- For transfers between other jurisdictions, we may rely on other legal mechanisms for international transfers, as appropriate under the relevant law.
- We have also concluded and executed an Intra-Group Agreement to ensure safe and lawful transfers of personal data take place among entities within Avon, and also among different countries around the world, where such transfers are necessary in the course of business.

We carry out Transfers Impact Assessments to implement supplementary measures to ensure your personal data is processed under the standards that apply to your territory.

Your Sensitive Personal Data will not be used for any additional purposes that are incompatible with the purposes listed above unless we provide you with notice of those additional purposes.

We do not sell your Personal Data or your Sensitive Personal Data, nor do we share it with third parties for cross-context behavioural advertising.

How we protect your Personal Data

We implement comprehensive technical, physical and organizational measures to ensure a level of security appropriate to the risk to the personal data we process and to ensure compliance with applicable legal requirements. These measures are aimed at safeguarding the ongoing integrity and confidentiality of personal data. We evaluate and improve these measures on an ongoing basis.

How we approach to children's privacy

Our websites are designed and intended for adults. We understand the importance of taking extra precautions to protect the privacy and safety of children using Avon products and services.

Where one of our websites may be intended for a younger audience, depending on the country our audiences are based we get consent from a parent or guardian in accordance with the applicable local law. If you learn that a child has, in violation of this Privacy Notice, registered for email newsletters, or otherwise provided their Personal Data, please report it to us using the contact information provided at the bottom of this Privacy Notice. If we become aware that an underage user has provided Personal Data without parental permission, we will terminate that account and delete all Personal Data provided by that user to the extent feasible and as soon as practicable.

Depending on the country you are based, we may use your personal data to carry out age verification checks and enforce any such age restrictions.

Your rights in relation to the processing of your Personal Data

Depending on the country you are based, you may have some or all of the following rights:

- To obtain information on the personal data processed concerning you and to obtain a copy of such data (right of access);
- To obtain the rectification of any inaccurate personal data and, having regard to the purposes of the processing, the completion of incomplete personal data (right to rectification) (please let us know if and to what extent your data stored by us has changed, so that we can rectify or update the respective data);
- If there are legitimate reasons, to request the deletion of the personal data (right to erasure);
- To request the restriction of the processing of the personal data, if the legal requirements are met (right to restriction of processing);
- To withdraw your consent at any time, if the data processing is based on consent, provided that such withdrawal does not affect the lawfulness of the previous processing of your data (consent withdrawal);
- To receive the personal data provided by you in a structured, commonly used and machine-readable format and to transfer this personal data to another controller or, if technically feasible, to have it transferred by us (right to data portability); and
- Not to be subject to a decision based solely on automated processing which produces legal effects concerning you or significantly affects you in a similar way, if the legal requirements are not met (not to be subject to automated processing).
- To object, where applicable law provides, to the processing of your data (right to object):
 - which is being processed for the purposes of our legitimate interests (where applicable and depending on the country you are based) unless such interests outweigh your individual rights; and/or
 - for direct marketing purposes, without any special reason

Depending on the country you are based, our digital marketing communications may provide unsubscribe or opt-out mechanisms that allow you to modify your communications preferences. Please note that if you opt-out of marketing communications, we may still contact you with non-promotional communications, such as those about ongoing business relations or administrative messages (e.g. order confirmations or delivery updates)).

In order to exercise your rights, including the withdrawal of your consent, please contact us [here](#). You may also designate an authorized agent to make a request on your behalf. In order to protect your data from unauthorized access or alteration by third parties, all requests regarding your personal information will be subject to verification of the identity of the requesting individual. We endeavour to respond to a verifiable request within required time frames.

A Data Subject who feels that we are not adhering to this Notice or applicable data protection laws with respect to his or her Personal Data may contact us to register a complaint; submit requests for exercising rights; or address any other issue arising under this Notice. Complaints by any person may also be referred to the DPO team by email [here](#).

Without prejudice to any other remedies, you also have the right to lodge a complaint with a supervisory authority at any time.

Geolocation Data

If you have previously consented to sharing precise geolocation information with our Digital Services, you can choose to stop the collection of this information at any time by changing the preferences on your browser or mobile device settings.

Push Notifications/Alerts

If you have permitted one of our mobile applications to send you push notifications or alerts, you can deactivate these messages at any time in the notification settings on your mobile device.

Changes we make

We may update this Notice periodically and will revise the date at the bottom of this Notice to reflect the date when such update occurred. If we make any material changes in the way we collect, use, and/or share the personal information that you have provided,

we will endeavour to provide you with notice before such changes take effect, such as by posting prominent notice on our Company website.

Continued use of the website constitutes acceptance of the new Privacy Notice. We encourage you to periodically review this page for the latest information on our privacy practices. Where required to do so by the applicable law depending on the country you are based, we may seek your prior consent to any material changes we make to this Privacy Notice.

In the event of any difference in interpretation or meaning between the English version and any other translation of this Privacy Notice, the English version shall prevail.

Effective Date: January 2026