



Avon Global Privacy Notice for Representatives and Consultants

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 representatives and consultants. This Global Privacy Notice for Representatives and Consultants (“Privacy Notice”) provides you with information on how we collect, use, and share 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 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 (including remote access) to, 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 are appointed as a representative or consultant of any of our brands.
- Depending on your role, your personal information may also be processed by Sales Leaders as independent controllers of your personal information. This means that Sales Leaders may, independently from us running their business operations, process your personal information.
- Sales Leaders will generally use your personal information in a way which is compatible with this Privacy Notice. If they use your personal information in a different way, they are required to provide you with further privacy information to comply with their own legal obligations under data protection laws.
- When you visit one of our retail stores or counters, including if you register an account with us in store;
- When you correspond with us across any of our channels (e.g. messaging platforms such as text message, live chat, social media and email).

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

<p>Identification and Contact Data</p>	<p>Name, contact details (email, phone, postal address and delivery address), Rep/Consultant ID, date of birth, profile photo (if uploaded), and bank details, We may also collect government issued identification numbers, such as national ID, passport or driving-licence details.</p>	<p>When you register as a Representative and manage your account, you provide identification and contact details to enable us to set up and administer your Representative account and communicate with you about operational and administrative matters (for example ID verifications, order confirmations, payment information, and changes to our programmes). We also use these details to pay commissions, rebates, discounts and incentives and to manage our contractual relationship with you.</p> <p>We process this data because it is necessary to perform our contract with you and, where relevant, because we have legitimate interests in operating our representative network and running our business effectively.</p>
<p>Orders, Account Limits, and Credit/Verification Checks</p>	<p>Information needed to fulfil your orders and manage payment terms (e.g. order/payment status), and information used for identity and credit checks where we offer an account limit or payment terms (such as a type of an ID Document). This may include information obtained from you and from third-party providers that support identity/credit checking.</p>	<p>When you place orders or request purchasing on payment terms, we use your information to process and fulfil orders and to apply commissions and incentives linked to those orders. Where we offer an account limit or payment terms, we may carry out identity checks and (where applicable) credit checks using third-party providers to assess eligibility, manage risk, and protect our legal rights (including debt recovery and defending legal claims).</p> <p>We process this data because it is necessary to perform our contract with you and/or because we have legitimate interests in preventing fraud, managing credit risk, and pursuing or defending legal claims.</p>
<p>Representative Commercial and Performance Data</p>	<p>Your purchases from us, commission/discount records, incentive eligibility, and reporting line information (e.g. Sales Leader/regional structure), and preferences for certain product types (based on your ordering activity).</p>	<p>When you order products and participate in the Representative programme, we use this information to calculate and administer commissions, discounts, rebates and incentives, to manage your reporting/operational structure, and to support you in selling Avon products (for example by sharing product updates and offers relevant to your activity). We may also use purchasing and programme activity to tailor Representative communications and tools so the programme operates effectively.</p> <p>We process this data because it is necessary to perform our contract with you and/or because we have legitimate interests in administering the programme, improving Representative support, and running our business efficiently. We may also process some information to comply with legal obligations (e.g. accounting and record-keeping).</p>
<p>Preferences and Engagement Data</p>	<p>Information about your engagement with our tools and communications (e.g. whether you open emails, participate in surveys/training, or use Representative platforms), and high-level preferences inferred from your programme activity (e.g. product categories you frequently order).</p>	<p>When you interact with our Representative platforms and communications, we use this information to provide programme support, improve Representative experience, measure the effectiveness of programme communications, and offer content or product information that is relevant to you. We keep this limited to what is necessary and do not use unnecessary profiling concepts (such as “psychological traits”).</p> <p>We process this data on the basis of our legitimate interests in improving the programme and communications, and where required by law, on the basis of your consent (for example, for certain marketing/cookie technologies).</p>
<p>Website/Device and Platform Usage Data</p>	<p>IP address, device/browser type, cookie identifiers, pages viewed and basic usage information when you use our websites/apps/Representative portals. This is collected automatically</p>	<p>When you use our websites/apps/Representative tools, we may receive certain technical and usage information to keep the platforms secure, ensure they function properly, troubleshoot issues, and understand how they are used so we can improve performance and usability.</p>

	from your device and, where used, via analytics/cookie providers.	We process this data on the basis of our legitimate interests in operating, securing, and improving our digital services. Where required by law, we rely on your consent for non-essential cookies and similar tracking technologies.
Communications Data	Emails, chats, messages, call notes, and communications between you and Avon (and, where relevant, communications shared with us by Sales Managers/Regional Managers as part of programme administration).	<p>When you contact us (or when programme managers share communications necessary to support programme operations), we use these communications to respond to enquiries, provide support, and send transactional, operational, and educational communications relevant to your role as a Representative. Where permitted by law, we may also send programme-related marketing communications, where required in your jurisdiction, we will do so with your consent.</p> <p>We process this data because it is necessary to perform our contract with you and/or because we have legitimate interests in operating an effective support function and managing our Representative network. Marketing communications are processed on the basis of consent where required by applicable law.</p>
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.	<p>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).</p> <p>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.</p>

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 retain your Personal Data

We retain your Personal Data for the purposes stated on this Notice. To the extent retention of your Personal Data is no longer necessary for these purposes, your data will be deleted, unless your data is required for other purposes set out in this Privacy Notice, or further retention is mandatory by applicable laws and/or necessary to fulfil legal or regulatory obligations or to protect our legitimate interests (where applicable depending on the country you are based), including the establishment, exercise, or defence of any existing or potential legal claims. 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;
- Customers, other Representatives, Sales Leaders; and/or Franchisees of Avon;
- 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.

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);

- If the legal requirements are met, 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 (right 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 shall 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.

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.

How we approach to children’s privacy

Our services and Representative programme are intended for adults and are not directed at children. We do not knowingly collect or process personal data relating to individuals under the age of 18. If we become aware that a minor has provided personal data in connection with our Representative programme, we will delete it as soon as reasonably practicable.

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 the Company website.

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