## **Privacy & Cookie Policy**

#### **Statement For Aucora Customers**

1. Who is responsible for your personal information

This Privacy Statement applies to the personal information of Aucora customers where your personal information is passed to Aucora by you or by your Aucora Brand Partner. References to "us", "we" or "our" in this Privacy Statement mean Aucora. Where your personal information is passed to Aucora, we will be a controller of your personal information in any scenario where we determine the means and purposes of processing of such information. Where you purchase Aucora goods via a Aucora Brand Partner, your personal information will also be processed by the partner, as a separate controller of your personal information. Aucora Brand Partners are independent and not employed by Aucora. Aucora is not responsible for the use of personal information by partners. This means that the partner will, independently from Aucora's business operations, process your personal information for purposes they decide and in ways that they decide, including for their own marketing purposes. In general, Aucora's independent partners will use your personal information in a way which is compatible with this Privacy Statement. 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 law.

- 2. Personal information we collect about you
- When using the term "personal information" in this Privacy Statement, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. We obtain this information either directly from you or from partners who may provide it to us. We may collect the following personal information about you:
- Your name and contact details (title, surname, first name, any other name(s), postal address, e-mail address, telephone numbers)
- Your date of birth
- Information on your purchases from Aucora, and information about your preferences for particular types of products
- The communications you exchange with us (for example, your emails, letters, calls, or posts and messages on social media), or with your brand partner on systems that we provide.
- Information about how you use our website or our mobile app
- Information on how you use our website, using cookies or similar identifiers. Cookies are small pieces of information stored by your browser on your computer's hard drive. They enable you to navigate on our website and allow us to provide features, such as keeping you logged in to our website; they also allow us to assess the website so we can improve it, and provide us with information for marketing purposes. For more information on how we use cookies and how you can remove them, read our Cookie Policy.
- Identifiers such as your computer's IP address or your mobile's MAC address.

If you have a customer account with us, you also have the option to save your preferred payment method (whereby we have access to the last four digits of your card number and your billing address). We use a third party payment gateway to take payment for any orders placed, but Aucora does not process or store payment details. If you choose to click through to third

party websites via our website, third parties may collect information about your use of our website, using certain technologies available to them, for example cookies. Similarly, where you choose to interact with Aucora content on social media, third parties may collect information about these interactions. Information collected by these third party services is governed by the privacy policies of those third parties. Where you are directed to a third party's website by Aucora, Aucora is only responsible for the processing of your personal information by that third party, where the third party is processing your personal data on instructions from Aucora.

- 3. How and why we use the personal information that we collect We use your personal information for the following purposes:
- To fulfil your order When you place your Aucora order, we use your personal information to fulfil that order. We may contact you by email and/or SMS to send you confirmation of your order, payment and order status. This is to meet our contractual obligations to you.
- To inform you about our products and offers that you may like. If you have signed up to our Newsletter or purchased from us previously, we may send you email and/or SMS communications about our products and offers. We may also, from time to time, inform you of opportunities to become a Aucora Brand Partner as part of our marketing communications. Such marketing communications are sent on the basis of your consent, which you can withdraw at any time. We may use the information we have about you (including your purchasing history) to build a profile about your preferences, and to send you products and offers tailored to you. You may also see advertising related to Aucora products across the web on the basis of the information we hold about you. This is to meet our legitimate business interests in marketing our products effectively. If you do not want to receive marketing communications (e.g. emails) from us, please contact us. Where you interact with Aucora by posting or messaging on social media, we may use personal information included in social media posts for this purpose.
- To improve our services, fulfil our administrative purposes and protect our business interests. The business purposes for which we will use your personal information include accounting, billing, security, and legal purposes (including to investigate complaints or claims, and to administer the Aucora product guarantee and any other rights to return products), statistical and marketing analysis, systems testing, maintenance and development. This will include the use of your personal information to comply with our legal obligations, for example, our obligation to maintain records for tax and audit purposes. Where there is no specific legal obligation, we are required to meet, we process this personal information to meet our legitimate interests in managing our business and keeping our records accurate and up to date.
- To request your participation in product reviews.

  We may contact you to ask you to participate in product reviews. This may be for a product you have purchased, a sample provided by Aucora or a product we think you may be interested in. We process this information on the basis of our legitimate interest to improve our product offering. If you choose to participate, the processing of the information relating to your participation and review is carried out on the basis of your consent, which you can withdraw at any time by contacting us.
- To administer competitions you enter and incentive schemes you have signed up for. We run certain competitions, and will need to process your name and contact details if you enter, as well as to let you know if you have won. We do this on the basis of your consent, which

you can withdraw at any time by contacting us as set out below. Specific uses of personal data in this context will be detailed in the competition rules. If you object to the use of your personal information to fulfil any of the purposes set out above, please contact us. Whilst your decision to provide your personal information to Aucora is generally voluntary, if you do not provide certain information Aucora may not be able to accomplish some of the purposes outlined in this Privacy Statement. For example, we may not be able to post products to you without knowing your postal address.

- 4. How we may share or transfer the data we collect. We may share your personal information with:
- Aucora Brand Partners;
- Suppliers providing services to us in order to help us run our business and improve our services and your customer experience;
- Government authorities.

This sharing will be for the purposes set out above (including the engagement of third-party service providers, who may act as controllers of your personal information) or to comply with specific legal obligations to which we are subject.

5. How long we keep your personal information.

We will retain your personal information for as long as is necessary to fulfil the purposes for which it was collected. Order processing information will be kept by Aucora for 10 years or until tax audit close, whichever is later. Aucora may use your personal information while you are active with Aucora. In deciding how long to keep personal information after you cease to be active with Aucora, we consider any ongoing obligations we may have (e.g. to store the information for accounting purposes) or the length of time given to commence or defend any legal claims. If you would like more specific timescales please contact us, and we will provide them where we can. We will stop processing your data for direct marketing, including profiling activities, if you object to such processing of your data or if you withdraw your consent to processing, where your consent has previously been obtained.

#### 6. Your rights.

You have a right to request access to the personal information that we hold about you and to have any inaccurate personal information we hold about you rectified. You may also have the right to restrict the processing of your personal information, to port your personal information to another controller or to have your personal information erased.

If you have an issue or complaint about how we handle your personal information, please contact us. In the event we are unable to resolve the issue to your satisfaction, then you have the right to contact your local data privacy supervisory authority. In the UK, this is the ICO, whose details can be found at: <a href="https://ico.org.uk/">https://ico.org.uk/</a>

#### 7. How to contact us.

If you have any questions, comments or requests regarding this Privacy Statement please email our customer service team.

8. Changes to this Privacy Statement We may make changes to this Privacy Statement from time to time. We will publish any new version of this Privacy Statement on our website. Last updated: 20/12/2023

### **Aucora Privacy statement for Brand Partners**

1. Who is responsible for your personal information.

This Privacy Statement applies to the personal information of Aucora Brand Partners. References to "us", "we" or "our" in this Privacy Statement means Aucora, who is a controller of your personal information. This means Aucora will decide the purposes for which and the ways in which your personal information is processed.

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 Aucora's business operations, process your personal information for purposes they decide and in ways that they decide. For example, your personal information may be processed by Sales Leaders to enable them to support your Aucora business. Sales Leaders will generally use your personal information in a way which is compatible with this Privacy Statement. 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.

2. Personal information we collect about you.

When using the term "personal information" in this Privacy Statement, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold. We obtain this information either directly from you or from Sales Leaders who may provide it to us.

We may collect the following personal information about you:

- Your name and contact details (title, surname, first name, any other name(s), postal address, an alternative delivery address, e-mail address, telephone numbers), as well as any unique identifiers allocated to you by Aucora (e.g. Partner ID), and any profile photo you upload to our systems.
- Your date of birth
- Your banking details
- Information on your purchases from Aucora, commission and discount records and your reporting line information, as well as information about your preferences for particular types of products
- The communications you exchange with us (for example, your emails, letters, calls, or posts and messages on social media. This may include communications with Sales Leaders which are shared with us)
- Information about how you use our websites or our mobile apps. We use cookies and other similar technologies (such as Flash LSOs and pixel tags) on our websites and mobile apps. Cookies are small pieces of information stored by your browser on your computer's hard drive. They enable you to navigate on our websites or apps and allow us to provide features, such as keeping you logged in to our websites. For more information on how we use cookies and how you can remove them, read our Cookie Policy.
- Identity verification and credit checks (via use of a Credit Reference Agency)

- 3. How and why we use the personal information that we collect. For Brand Partners, we use your personal information for the following purposes:
- To fulfil your orders, provide appropriate commissions, discounts and incentives and manage your Partner account When you or your customers place an order with us, we use your personal information to fulfil that order and provide appropriate commissions, rebates, discounts and incentives. This is to meet our contractual obligations to you.
- To communicate with you and manage our relationship with you We may contact you by email, SMS or telephone for administrative or operational reasons, for example in order to send you confirmation of your order and your payments. This is to meet our legitimate business interests in sharing relevant information with you, and ensuring you are up to date with your orders.
- To personalise and improve your partner experience We may use your personal information in order to tailor our service to your needs and preferences and to provide you with a personalised partner experience. For example, you may provide us with specific delivery preferences about where your order should be left. This is to meet our legitimate business interests in showing you products that will be most useful to you, and to answer any questions you have most effectively.
- To inform you about our products and offers that you may like To help you sell Aucora products to your customers, we may contact you by email, SMS or telephone about our products and offers this is on the basis of your consent, which you can withdraw at any time by unsubscribing using the option on the marketing communication itself, or by contacting us. We may use the information we have about you (including your purchasing history) to build a profile about your preferences and to send you products and offers tailored to you to ensure that we run our business most effectively. This is to meet our legitimate business interests in marketing our products effectively, helping to promote Aucora product awareness and to help you build your business with Aucora.
- To improve our services, fulfil our administrative purposes and protect our business interests. The business purposes for which we will use your personal information include accounting, billing, audit, ID verification and credit checks (via use of a Credit Reference Agency), fraud screening, safety, security and legal purposes, statistical and marketing analysis, systems testing, maintenance, development, and to administer the Aucora product guarantee and any other rights, statutory or otherwise, to return products. We may also use website navigation data to monitor our websites and improve them. This will include the use of your personal information to comply with our legal obligations, for example, our obligation to maintain tax records. Where there is no specific legal obligation we are required to meet, we process this personal information to meet our legitimate interests in managing our business and keeping our records accurate and up to date.
- To run competitions We run certain competitions, and will need to process your name, contact details and certain other information we hold about you as a Partner if you enter, as well as to let you know if you have won. Specific uses of personal data in this context will be detailed in the competition rules. This processing will be on the basis of your consent, if you choose to enter the competition, which can be withdrawn at any time by contacting us.

  If you are an upline, in addition to the purposes set out above, your personal information may be used by Aucora to support the businesses of other Partners, and in particular the reporting of sales performance data.

If you object to the use of your personal information to fulfil any of the purposes set out above,

please contact us. Whilst your decision to provide your personal information to Aucora is generally voluntary, if you do not provide certain information Aucora may not be able to accomplish some of the purposes outlined in this Privacy Statement. For example, we need to know your name and postal address before we can post products to you, and we need to know your payment details so that we can take payments from you when you buy products.

- 4. How we may share or transfer the data we collect. We may share your personal information with:
- Aucora customers;
- Aucora Brand Partners;
- suppliers providing services to us in order to help us run our business and improve our services, and your partner experience; and
- Government authorities.

This sharing will be for the purposes set out above (including the engagement of third party service providers, who may act as controllers of your personal information) or to comply with specific legal obligations to which we are subject.

If you choose to click through to third party websites via our website, third parties may collect information about your use of our website, using certain technologies available to them, for example cookies. Similarly, where you choose to interact with Aucora content on social media, third parties may collect information about these interactions. Information collected by these third party services is governed by the privacy policies of those third parties. Where you are directed to a third party's website by Aucora, Aucora is only responsible for the processing of your personal information by that third party, where the third party is processing your personal data on instructions from Aucora.

#### 5. How long we keep your personal information.

Your personal information will be used and stored by Aucora for the length of your association with Aucora and for a length of time needed after, to take into account any ongoing obligations we may have (e.g. to store the information for accounting purposes), or the length of time given to commence or defend any legal claims. If you would like more specific timescales please contact us. We will stop processing your data for direct marketing, including profiling activities, if you object to such processing of your data or if you withdraw your consent to processing, where your consent has previously been obtained.

- 6. Your responsibilities
- To ensure that we can keep your personal information up to date, please inform us promptly of any changes to your personal information.
- As an independent brand partner, you are legally responsible for the personal information that you hold through the course of your business belonging to customers, other partners and any other individuals. This is a unique component of the direct seller relationship. You agree to comply with all applicable data protection laws in respect of the personal information collected, received, processed and stored by you. You will not use any personal information for any purpose which is incompatible with this Privacy Statement.

#### 7. Your rights.

You have a right to request access to the personal information that we hold about you and to have any inaccurate personal information we hold about you rectified. You may also have the right to restrict the processing of your personal information, to port your personal information to another controller or to have your personal information erased. If you have an issue or complaint about how we handle your personal information, please contact us. In the event we are unable to resolve the issue then contact your local data privacy supervisory authority.

- 8. Additional information for prospective brand partners Where you provide your personal information to Aucora or a Aucora brand partner for the purposes of enquiring about becoming a brand partner, your personal information may be shared with Aucora or a brand partner for the purpose of contacting you to discuss becoming a partner. This may be via electronic means, including email, telephone, SMS, MMS and social media.
- 9. How to contact us If you have any questions, comments or requests regarding this Privacy Statement please email our customer service team.
- 10. Changes to this Privacy Statement We may make changes to this Privacy Statement from time to time. We will publish any new version of this Privacy Statement on our website. Last updated: 20/12/2023

# **Cookie Policy**

This Cookie Policy describes the different types of cookies or similar technologies that may be used in connection with the Aucora website from which you are accessing this Cookie Policy (the "Site"), and how you can manage them. We may change this Cookie Policy at any time, and will notify you if we make material changes. Any changes to this Cookie Policy will become effective when we make the revised Cookie Policy available on or through the Site.

#### What is a Cookie?

Cookies are small text files that are downloaded to your computer or mobile device when you visit a website. Other types of similar technologies either work in the same way, or by retrieving information which is already stored on your computer or mobile device when you visit that site (such as clear gifs, pixels and digital fingerprints. Together we refer to these technologies as "cookies"). They may be set by the website owner or a third party. They are widely used in order to make websites work, or work in a better, more efficient way. They can do this because websites can read and write these files, enabling them to recognise you and remember important information that will make your use and navigation of a website more convenient. Some cookies, known as 'session cookies', expire at the end of your browser session. Other cookies, known as 'persistent cookies', are stored on your computer or mobile device between browser sessions.

#### What Cookies Do We Use?

Below we list the different types of cookies that may be used on the Site, together with generic examples. Cookies can be categorised into 4 main types.

#### Strictly Necessary Cookies.

These cookies are essential for the Site to work and enable you to move around it and to use its services and features. Without these cookies, the Site will not perform as smoothly for you as we would like it to, and we may not be able to provide the Site or certain services or features that you have specifically requested. Some examples would be; Shopping basket - such cookies ensure the items you place into the basket are still there when you wish to check out; User ID - User ID cookies are used to ensure that you only see your own information and keep you logged into the site so you don't have to repeatedly log in on every page; and Security - Security cookies are used for security controls and checks.

#### Performance Cookies

Google Analytics - Google Analytics cookies collect aggregate statistical data to improve site presentation and navigation.

#### **Functionality Cookies**

These cookies allow the Site to remember choices you make when using the Site. Such cookies enable us to provide enhanced, more personal features, for example, they can remember your marketing preferences, such as opting in or out of marketing emails. These cookies can also be used to remember changes you have made to text size, fonts and other parts of the Site that you can customise. They may also be used to provide services you have asked for such as watching a video or commenting on a blog. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

#### Targeting or Advertising Cookies

We may use third party advertising companies to serve ads when you visit our Site. These companies may place or recognise a unique cookie on your computer or mobile device. These cookies are used to deliver advertisements more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They remember that you have visited a website and are linked to other pieces of information relevant to your interests to help ensure that advertisements and website content are more relevant to you. This information is shared with other organisations such as advertisers.

Note that to the extent information collected through cookies constitutes personal information, we process that personal information in accordance with our Privacy Statement.

#### How Do I Manage Cookies?

You may refuse or accept cookies from the Site at any time by using the cookie settings on your browser. Information about the procedure to follow in order to enable or disable cookies from your browser can be found on your Internet browser provider's website via your help screen. Please be aware that if cookies are disabled, not all features of the Site may operate as intended. When you withhold your consent, this does not automatically delete any cookies that are already on your device pursuant to your previous consent. You will need to delete these cookies manually by following the instructions on your web browser.

#### Contact Us

If you have any questions, comments or requests regarding this Cookie Policy please email our customer service team.