

Privacy Notice - Corporate Website (www.aswatson.com)

Last Updated: March 2021

Our Privacy Principles

At A.S. Watson Retail (HK) Limited ("AS Watson" or "we" or "us" or "our"), the headquarters of the A.S. Watson group of companies ("ASW Group") which is part of the multinational conglomerate CK Hutchison Holdings Limited and its affiliated or related companies ("CK Hutchison Group"), we take your privacy seriously.

Here are our 5 privacy promises to you:

- 1. We will ALWAYS ensure that your personal data is used in line with applicable data protection laws.
- 2. We will ALWAYS be transparent with you about how we use your personal data. This includes informing you about what information we collect, what we do with it, with whom we share it and who you should contact if you have any concerns.
- 3. We will ALWAYS provide you simple options to say 'STOP' when you are no longer happy with our marketing communications.
- 4. We will ALWAYS take all reasonable steps to protect your personal data and make sure no unauthorized person accesses it.
- 5. We will ALWAYS respond to any questions on processing of your personal data without undue delay.

Our Privacy Policy

We are committed to safeguarding your privacy rights and ensuring that your personal data is protected.

A.S. Watson Group

Watson House, 1-5 Wo Liu Hang Road, Fo Tan, Hong Kong Tel +852 2606 8833 Fax +852 2695 3664 www.aswatson.com

This Privacy Policy explains the types of personal data we collect and how we process and protect that data in connection with the services we offer. This includes information collected **offline** in our stores or through our customer services, and **online** through our websites, applications (including mobile apps) and third party platforms (together referred to as "Sites").

This Privacy Policy also applies to our targeted content, including online offers and advertisements for products and services, which you may see on third party websites, platforms and applications ("Third Party Sites") based on your online activity. These Third Party Sites may have their own privacy policies and terms and conditions. We encourage you to read them before using those Third Party Sites.

WHO IS RESPONSIBLE FOR WHAT HAPPENS WITH YOUR DATA?

We are responsible for processing your personal data on our Sites.

HOW DO I CONTACT THE DATA PROTECTION OFFICER FOR ENQUIRIES ABOUT MY PERSONAL DATA?

If you have a question in relation to how we process your personal data you can contact our Global Data Protection Officer via email asia.privacy@aswatson.com or via post at Group Privacy Office, Watson House, 1-5 Wo Liu Hang Road, Fotan, Shatin, New Territories, Hong Kong SAR.

WHAT IS PERSONAL DATA?

Personal Data generally refers to information that can directly or indirectly identify you ("**Personal Data**"). This typically includes information such as your name, address, email address, and telephone number, but can also include other information such as IP address, shopping habits, information about health and beauty, information about your lifestyle or preferences such as your hobbies and interests. Information about health are called "special categories of Personal Data" that require special protection because of their sensitivity.

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WHAT HAPPENS WHEN YOU PROVIDE US WITH YOUR PERSONAL DATA OR WHEN WE

OTHERWISE RECEIVE YOUR PERSONAL DATA?

We collect your Personal Data directly in a number of ways, for example when you provide us with your information to register as a customer for our Sites or as a member of any of our loyalty programs, register for prize draws, games or competitions, subscribe to our newsletter, receive information or mailings, use our applications, buy a product or service from us, complete a survey, complete a beauty or health diagnostic test, make a comment or enquiry or contact

our customer services.

When you provide us with your Personal Data, we will process it in accordance with this Privacy Policy. If you do

not wish us to process your Personal Data in this way, please do not provide us with your personal information.

We may also receive your Personal Data from other sources, including information from commercially available

sources, such as public databases and data aggregators, and information from third parties. If you do not want us to

receive your Personal Data from other sources, please communicate your preferences directly with the relevant

sources.

We process your Personal Data to provide you with our services as further explained below. In certain instances, we

only process your Personal Data if you have given us permission to do so, for example in most cases where we

process your Personal Data for marketing purposes, use Cookies (as defined in Clause 6.2 below) or location data or

where we process your sensitive personal information. In other instances we may rely on other legal grounds for

processing your personal data, such as performance of the contract with you or legitimate interests, like fraud

prevention.

If you become a member of any of our loyalty programmes, we may infer in a transparent manner - and only where

permitted by applicable law - that you would like us to process your Personal Data for marketing purposes. You can

always opt out of marketing communications without detriment to your loyalty benefits.

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Where we process your Personal Data on the basis of your consent, we will ask for your consent explicitly and only for a particular purpose. We will also ask you to provide additional consent if we need to use your Personal Data for purposes not covered by this Privacy Policy.

Please refer to Section 0 of this Privacy Policy for details of the various types of Personal Data we may collect, the relevant purposes and the legal basis for such processing.

• WHAT HAPPENS IF OUR CUSTOMER IS A CHILD?

Our Sites are intended for adults, but there could be instances where some customers under the age of 18 view or purchase products on our Sites. If we know a customer is under the age of 18, we will not use such customer's Personal Data for marketing purposes unless parental consent is provided to us.

To provide parental consent to marketing, please ask your parent or guardian to call or write to A.S. Watson contact details as listed in Section 2 (applicable to loyalty card or online account members only).

In some cases, we will infer from your actions that you obtained parental consent. We then reserve the right to decide whether you will receive our marketing until you reach the eligible age.

Note however that access to certain parts of our Sites and/or eligibility to receive prizes, samples or other rewards may be limited to users over a certain age. We may use your Personal Data to carry out age verification checks and enforce any such age restrictions.

FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

• We process the following categories of Personal Data for the following purposes:

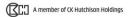
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	What Personal	What is the	How long do we	What is our legal
	Data may we	purpose of the	store your	basis for the
	collect?	processing?	Personal Data?	processing?
Browsing on our	Information	We (and third	Please check the	Your consent
Sites	about the type	party service	Cookie Consent	when you click
	of browser you	providers acting	Tool to learn	"agree and
	use when visiting	on our behalf)	about the	proceed" in our
	our Sites, your IP	use Cookies and	storage periods	Cookie Consent
	and device	similar	for each Cookie.	Tool in our Sites. In
	address,	technologies to		some cases, and
	hyperlinks that	process data		always when
	you have clicked,	about you when		permitted by law,
	websites you	you visit our		we will infer from
	visited before	Sites. We would		your actions that
	arriving at our	like to know		you agree to
	Sites and	whether you		Cookies. Please
	information	have visited us		note that we need
	collected by	before and your		to process certain
	Cookies or	preferences to		basic surfing data
	similar tracking	provide you with		in order to provide
	devices. Your	a tailored		core Sites
	user name,	experience of		functionalities
	profile picture,	our Sites.		such as secure log-
	gender,			in or remember
	networks and	See Section 🛚 o		how far you are
	any other	below for more		through an order
	information you			

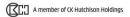
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	What Personal Data may we collect?	What is the purpose of the processing?	How long do we store your Personal Data?	What is our legal basis for the processing?
	choose to share	information		You can always
	when using Third	about Cookies.		revisit your cookie
	Party Sites (such			preferences via
	as when you use			our Cookie
	the "Like"			Consent Tool or by
	functionality on			changing your
	Facebook).			browser settings.
Purchasing	Name, title,	We process	As long as you	We need this
products /	postal address,	Personal Data to	keep shopping	information to
Agreeing to a	email address,	provide you with	with us. If you	process your order
Service	home	our products or	have no activity	or any other
	telephone,	services that you	after three	service you
	mobile number,	request from us,	years, we will	request from us
	loyalty card	including	delete or	(performance of a
	number,	sending you	anonymise your	contract). If we
	passwords,	products or	Personal Data,	need information
	order history,	samples that you	unless we are	about you that is
	payment history,	have requested.	required by	considered
	payment		law to store it for	sensitive (e.g.
	information (i.e.		a longer period.	information on
	bank or credit			your health for
	card details),			medication) we
	order			will inform you in a
	history/wishlist,			transparent

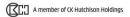
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	What Personal	What is the	How long do we	What is our legal
	Data may we	purpose of the	store your	basis for the
	collect?	processing?	Personal Data?	processing?
	age/date of			manner about our
	birth, gender,			legal obligations to
	information on			process such
	the handling of			personal data.
	your request			
	(including			
	information			
	relating to			
	controlled drugs			
	and other			
	medicine or			
	beauty products			
	that you order),			
	and other			
	Personal Data			
	you voluntarily			
	provide to us.			
Customer	Name, title,	We process your	For general	To process your
Service	postal address,	Personal Data	enquiries and	enquiries,
	email address,	whenever you	comments	comments or
	home	contact us and	relating to	complaints at your
	telephone,	when we	service issues,	request
	mobile number,	respond to your	store standards,	(performance of a
	loyalty card	enquries,	stock availability	

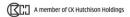
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What Personal	What is the	How long do we	What is our legal
Data may we	purpose of the	store your	basis for the
collect?	processing?	Personal Data?	processing?
number,	comments and	etc., we will	contract or quasi-
passwords,	complaints.	store such data	contract).
order history,		for three years	
payment history,		from the last	
payment		communication	
information (i.e.		with you.	
bank or credit		Communications	
card details),		relating to	
order		personal	
history/wishlist,		injuries,	
age/date of		accidents and	
birth, gender,		other health and	
information on		safety issues	
the handling of		may need to be	
your query,		kept for a longer	
posts and other		period in case of	
content you		legal claims or	
submit to our		settlements.	
Sites, and			
further			
information			
submitted by			
you in relation to			
a purchase or			

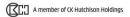
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	What Personal Data may we collect? service request	What is the purpose of the processing?	How long do we store your Personal Data?	What is our legal basis for the processing?
	or other query (including sensitive personal information).			
Suggesting products & services which may interest you	Name, title, postal address, email address, mobile number, loyalty card number, order	tailored products or services (including those of relevant third	As long as you keep shopping with us and/or using our loyalty card. If you are a registered	You may authorise us to do so if you become a loyalty card member by accepting our Terms &
	history/wishlist (including purchases you make on our Site, mobile app, in-store or pharmacy), payment history, age, date of birth, gender, products you view on our Site,	parties) that we think may be of interest to you based on your shopping history and behaviour, your preferences, and our market segmentation strategies. We may do this by	shopper and/or are a loyalty card member and you have no activity after three years, we will delete or anonymise your Personal Data, unless we are required by the law to store it for	Conditions (performance of a contract). If you are not a loyalty club member, you will authorise us by signing up to our newsletters. If you purchase online through

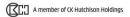
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What Personal Data may we collect?	What is the purpose of the processing?	How long do we store your Personal Data?	What is our legal basis for the processing?
brands you prefer, favourite store, actions you take on our website (including comments made by you in using our Sites) or when viewing our emails, answers you provide in surveys or competitions, your shopping habits and preferences and information about your lifestyle, such as your hobbies and interests.	sending you - via post, email, newsletter, SMS, push notifications or phone - details of products, services, special offers, promotions and other information. We may also contact you to offer the opportunity to take part in customer research surveys, promotions, prize draws or competitions. You may also receive in-store	a longer period. If you purchase online and check-out as a guest, we will retain your data for one year from the date of transaction. If you have signed up to any of our newsletters, we will retain your data until you unsubscribe.	guest check-out we will contact you with related offers based on legitimate interest and always within the limits of the law, including spamming laws. You can always opt-out of our marketing via your "Marketing Preferences Dashboard" in your profile (if you have one) or via the unsubscribe button in any of our marketing communications.

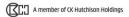
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	What Personal Data may we collect?	What is the purpose of the processing?	How long do we store your Personal Data?	What is our legal basis for the processing?
		promotions (such as special coupons) from us when you have an account with us or are a member of any of our loyalty programs.		
Competitions,	Name, title,	To carry out	Three months	We may need this
events and	postal address,	prize draws,	after the	information for
games	email address,	games or	competition or	identification
	home telephone	competitions	game is	purposes and to
	or mobile	which you chose	completed,	provide you with
	number, age,	to participate in	unless we are	the prize if
	date of birth,	and to	required by law	applicable
	gender, images	determine the	to store them for	(performance of a
	collected during	winner or to	a longer period.	contract). Where
	any events, user	provide the prize		we intend to use
	generated	if you win.		your personal data
	content or any			for marketing
	other relevant			purposes, we will
	Personal Data			clearly inform you
	that you submit			before we collect

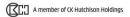
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	What Personal Data may we collect?	What is the purpose of the processing?	How long do we store your Personal Data?	What is our legal basis for the processing?
Oalias Shannias	- as required for the competition or game.			your personal data and ask you for your consent.
Online Shopping	Name, title, postal address, email address, home telephone or mobile number, information about products you order, (including health products or drugs if you order from our online pharmacy), order history, details about your purchase, payment information,	To process your online purchase and deliver the product to you as ordered. Your payment and delivery related Personal Data may be transferred to payment and courier service providers to process your payments and deliver your orders, respectively.	As long as you keep shopping with us. If you have no activity after 3 years, we will delete or anonymise your Personal Data, unless we are required by law to store it for a longer period. If you check out as a guest, we will retain your data for one year from the date of transaction.	We need this information to provide you with your online order performance of a contract; for Processing of information about health and beauty or diagnostic data: your consent.

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			processing?
payment history, age.			
(such as in-app beauty filters, or use the beauty filters, comments and postings, etc.) features in our prosites (including imacomments, you personal images, and other feat content or imacinformation will submitted by storyou). We you per our	or some in-app atures the lages collected III only be lored in your ersonal device and will not be allected by us. The will ask for our separate ermissions for	As long as you are a member of any of our loyalty programs or shopping with us. If you have no activity after three years, we will delete or anonymise your Personal Data, unless we are required by law to store it for a longer period in the event that such data is collected and stored by us.	By providing your consent to use such features you authorise us to process your personal data to provide you with all services regarding the relevant features (performance of a contract).

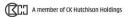
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What Personal Data may we collect?	What is the purpose of the processing?	How long do we store your Personal Data?	What is our legal basis for the processing?
	change your mind, you will be able to revoke		
	them any time by changing the		
	settings on your device. Please note that		
	rejecting or switching off		
	these permissions will limit the		
	features you can use in our app.		
	We use face recognition		
	technology already included in your phone		
	(such as TrueDepth API)		
	or other software for		

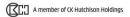
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	What Personal Data may we collect?	What is the purpose of the processing?	How long do we store your Personal Data?	What is our legal basis for the processing?
		depth of facial mapping information to create augmented reality effects within the app. We do not share information with third parties, do not store or process in any other way the data which our app accesses and uses via this technology.		
Loyalty Program	Name, title, postal address, email address, home telephone or mobile number, information	To provide you with all services under the Loyalty Program including exclusive offers	As long as you are a member of any of our loyalty programs. If you have no activity after three	By signing up to any of our loyalty programs you authorise us to process your personal data to provide you with

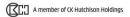
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	What Personal Data may we collect? about products you order using the Loyalty	What is the purpose of the processing? and points schemes.	How long do we store your Personal Data? years, we will delete or anonymise your	What is our legal basis for the processing? all services under the Loyalty Program
	Program, transactions relevant for the Loyalty Program, account status and details regarding points collected and		Personal Data, unless we are required by law to store it for a longer period.	(performance of a contract).
	redeemed, payment information (i.e. bank details), payment history, age.			
Fraud prevention and other administrative	Name, title, postal address, email address, home telephone	To carry out administrative services, including	As long as you keep shopping with us. If you have no activity	For the prevention and detection of fraud to ensure that your identity
services, such as registration	or mobile number, information	processing any application you submit to us for	after three years, we will delete or	and transactions are secured (balancing of

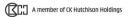
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What Personal	What is the	How long do we	What is our legal
Data may we	purpose of the	store your	basis for the
collect?	processing?	Personal Data?	processing?
about health or diagnostic data, NHS number (UK only), payment information (i.e. bank details), payment history, age.	providing the services, preventing or detecting fraud or other crimes, verifying your identity and credit/payment status, or processing payment instructions. Your payment related Personal Data may be transferred to payment service providers to process your payments or the police for fraud prevention purposes.	anonymise your Personal Data, unless we are required by the law to store them for a longer period.	interest with our interest being to prevent fraud and protect our customers). We perform other administrative services to provide you with the respective underlying services (performance of a contract).

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o Cookies and Similar Technologies

We use cookies, pixels tags, web beacons and similar technologies (together referred to as "Cookies") to improve our products and your experience on our Sites by collecting information on how you use our Sites. Some of the Cookies we use are required to enable core site functionality, for example to provide secure log-in or to remember how far you are through an order, but we also use Cookies that allow us to analyze site usage (so we can measure and improve performance), and advertisement Cookies which are used by advertising companies to serve ads that are relevant to your interests.

We may also tailor our Sites and our products to your interests and needs, by collecting information about your device and linking this to your Personal Data so as to ensure that our Sites present the best web experience on our Sites for you. The types of data we may collect from you when you visit the Sites include:

- information about the mobile device used and the characteristics of such mobile device;
- information about the type of browser you use;
- details of the web pages you have viewed;
- your IP address;
- the hyperlinks you have clicked; and
- the websites you visited before arriving at our Site.

Where we use Google Analytics, we have set up the service to anonymise your IP address as soon as data is received by the Analytics Collection Network (https://support.google.com/analytics/answer/2763052?hl=en), before any storage or processing takes place. To opt out of being tracked by Google Analytics across all websites please visit http://tools.google.com/dlpage/gaoptout.

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You can view more information on the Cookies we use and adjust your preferences via the Cookie Consent Tool hyperlink to Tool on our Sites Please note, however, that without cookies you may not be able to use all of the features of our Sites or online services.

About using our Sites

When you choose to use or download our Sites or allow connectivity via Wi-Fi connections to your device, we receive information about your location and mobile device, including a unique identifier for your personalised device, your GPS data or wireless networks data (WLAN). Location data is neither stored nor transmitted to third parties. If you agree with the localisation function, we can provide you with location-based services including advertising, search results and personalised content. When you are near one of our Stores, then we can use push email communications or notifications (such as recommended promotion and recommended products) to you if you have provided your consent to receive such communications and advertising.

Most mobile devices allow you to turn off location services and push notifications. Should you wish to do so, please follow the relevant instructions under your mobile.

WHO WE SHARE YOUR PERSONAL DATA WITH?

o Our Service Providers

We share your Personal Data with with the following data processors (i.e. service providers that help us to perform the above tasks):

• relevant companies of the ASW Group and subsidiaries of CK Hutchison for the purposes of Customer Relationship Management and analytics, in particular A.S. Watson (Health and Beauty UK) Ltd..

• relevant companies of ASW Group and trusted third parties which directly support our promotional activities, Sites administration and Loyalty Program, in particular A.S. Watson (Health and Beauty Continental Europe) B.V. for IT management (hosting, maintenance and test).

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trusted third parties to help us process and analyse your Personal Data for us, to support us when suggesting

products & services which may interest you in line with Section 6.1 above.

if you order a product or service from us, trusted third parties to allow payment and delivery of the products and

services you have ordered. Unless you provided consent, any such trusted third parties are not authorised by us

to use your Personal Data in any other way and will be required by us to implement adequate technical and

organizational measures to protect your Personal Data.

These processors are bound by us to strict requirements as required under applicable data protection laws to only

handle your Personal Data for us and to comply with high IT security standards.

Other Recipients 0

We share your Personal Data with the following third parties that process your data for their own purposes (i.e. these

third parties are no processors; they rather use your Personal Data because they have an own interest or because you

had consented):

interested third parties (that are not relevant companies of the ASW Group and subsidiaries of CK Hutchison)

that will send you marketing, but only if you consented to receive such communications from them.

law enforcement or other agencies if we are required to do so by law, or by a warrant, subpoena or court order to

disclose your Personal Data.

Please note that we never share your Personal Data with social media platforms. When we engage in audience

building or customer matching activities with social media platforms like Facebook or Google, your Personal Data

is always anonymised before the transfer. If there any changes in the future and we have to share your Personal Data

with a social media platform, we will ask for your consent.

Sharing your Site Usage Information 0

With your consent, we will share Site usage information with trusted third parties (e.g. advertisers, advertising

agencies, advertising networks, data exchanges, etc.) in order to offer you tailored content which may be of interest

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to you based on your prior activity on our Site. These trusted third parties may set and access their own Cookies, web beacons and similar tracking technologies on your device in order to help us deliver customised content and advertising to you when you visit our relevant Sites. Please see section □o for more information about Cookies and

how to opt out.

You can also visit the website www.youronlinechoices.com to choose which companies can deliver customized advertisements.

Please note that even if you opt out, you may still receive advertisements from us that are not customised based on your Site Usage Information.

• TO WHICH COUNTRIES DO WE TRANSFER YOUR PERSONAL DATA?

Many of our trusted third parties and Group companies are based in countries that provide an adequate level of data protection, such as the European Economic Area ("EEA"), Singapore and Hong Kong to ensure your Personal Data are safeguarded with sufficient protection at a level as required by our own standards.

We also transfer your data to Ukraine (where our web development team sits), USA and India (where some of our suppliers have back office services), and Canada (where some of our suppliers that provide us with data analytics and personalization services are located).

When we need to transfer your Personal Data to a trusted third party or Group company based in a country where data protection laws are considered not to offer the same level of protection, we ensure adequate data protection safeguards by relying on other legitimate means, such as the Privacy Shield certification and/or Standard Contractual Clauses.

More details on the transfer mechanism can be obtained from our Data Protection Officer (see contact details in Section 2).

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HOW LONG DO WE PROCESS YOUR PERSONAL DATA?

We will store your Personal Data only until the aforementioned purposes for which we have collected or received your Personal Data are fulfilled and once our statutory obligations to preserve records have expired as further described in Section 5.

WHAT ARE YOUR RIGHTS?

If certain requirements are fulfilled, you have the right to:

- Obtain from us confirmation as to whether or not we process Personal Data from you and, where that is the case, access to your Personal Data;
- Rectification of inaccurate Personal Data;
- Erasure of Personal Data (applicable to desginated jurisdictions only);
- Objection to the processing of Personal Data (applicable to desginated jurisdictions only);
- Restriction of processing of Personal Data (applicable to desginated jurisdictions only); and
- Portability of Personal Data receive the Personal Data you have provided to us in a structured, commonly
 used and machine-readable form and transmit it to another data controller (applicable to desginated
 jurisdictions only).

You can learn more about these rights here from the applicable competent supervisory authority in your jurisdiction. To exercise your rights, please contact the Global Data Protection Officer (see Section 2 for contact details).

Note that you do not need to contact our Global Data Protection Officer to excerise your rights to stop receiving marketing communications from us. You can opt out of receiving such communications by changing your Marketing Preferences under 'My Account' if you have an account with us, or unsubscribe directly from the communications we send you.

A.S. Watson Group

Watson House, 1-5 Wo Liu Hang Road, Fo Tan, Hong Kong Tel +852 2606 8833 Fax +852 2695 3664



CAN YOU WITHDRAW YOUR CONSENT TO THE PROCESSING OF PERSONAL DATA?

Where your consent is the legal basis for the processing of your Personal Data, you can withdraw your consent for:

- Marketing communications: by changing your Marketing Preferences after logging into your account or using the unsubscription link in any of our marketing communications.
- Use of Cookies: via our Cookie Consent Tool at the bottom of our Sites.
- Other purposes: by sending us an email to asia.privacy@aswatson.com or by posting to the address as listed in Section 2.

Please note that withdrawing your consent will not affect the lawfulness of the processing before the withdrawal.

CAN YOU COMPLAIN WITH THE DATA PROTECTION AUTHORITIES?

If you think that the processing of Personal Data by us violates data protection laws, you can lodge a complaint with the competent supervisory authority, in particular in the Member State your habitual residence, place of work or of an alleged infringement of the GDPR.

• HOW DO WE PROTECT YOUR PERSONAL DATA?

We maintain appropriate technical and organizational measures to protect the Personal Data you provide to us against accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to your Personal Data.

• CAN WE CHANGE OUR PRIVACY POLICY?

We may change this Privacy Policy from time to time by posting the updated version of the Privacy Policy here. We encourage you to visit this area frequently to stay informed.

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