



## Privacy Notice – Corporate Website ([www.aswatson.com](http://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:

- i) We will ALWAYS ensure that your personal data is used in line with applicable data protection laws.
- ii) 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.
- iii) We will ALWAYS provide you simple options to say 'STOP' when you are no longer happy with our marketing communications.
- iv) We will ALWAYS take all reasonable steps to protect your personal data and make sure no unauthorized person accesses it.
- v) 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](http://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.

## 1. WHO IS RESPONSIBLE FOR WHAT HAPPENS WITH YOUR DATA?

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

## 2. 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](mailto: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.

## 3. 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.



## **4. 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.



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 6 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.

## **5. 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.

## **6. FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?**

### **6.1 We process the following categories of Personal Data for the following purposes:**



	<b>What Personal Data may we collect?</b>	<b>What is the purpose of the processing?</b>	<b>How long do we store your Personal Data?</b>	<b>What is our legal basis for the processing?</b>
Browsing on our Sites	Information about the type of browser you use when visiting our Sites, your IP and device address, hyperlinks that you have clicked, websites you visited before arriving at our Sites and information collected by Cookies or similar tracking devices. Your user name, profile picture, gender, networks and any other information you choose to share	We (and third party service providers acting on our behalf) use Cookies and similar technologies to process data about you when you visit our Sites. We would like to know whether you have visited us before and your preferences to provide you with a tailored experience of our Sites.  See Section 6.2 below for more information about Cookies.	Please check the Cookie Consent Tool to learn about the storage periods for each Cookie.	Your consent when you click “agree and proceed” in our Cookie Consent Tool in our Sites. In some cases, and always when permitted by law, we will infer from your actions that you agree to Cookies. Please note that we need to process certain basic surfing data in order to provide core Sites functionalities such as secure log-in or remember how far you are through an order  You can always



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	when using Third Party Sites (such as when you use the "Like" functionality on Facebook).			revisit your cookie preferences via our Cookie Consent Tool or by changing your browser settings.
Purchasing products / Agreeing to a Service	Name, title, postal address, email address, home telephone, mobile number, loyalty card number, passwords, order history, payment history, payment information (i.e. bank or credit card details), order history/wishlist,	We process Personal Data to provide you with our products or services that you request from us, including sending you products or samples that you have requested.	As long as you keep 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.	We need this information to process your order or any other service you request from us (performance of a contract). If we need information about you that is considered sensitive (e.g. information on your health for medication) we will inform you in a transparent manner about our



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	age/date of birth, gender, information on the handling of 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.			legal obligations to process such personal data.
Customer Service	Name, title, postal address, email address, home telephone, mobile number, loyalty card number,	We process your Personal Data whenever you contact us and when we respond to your enquires, comments and	For general enquiries and comments relating to service issues, store standards, stock availability etc., we will	To process your enquiries, comments or complaints at your request (performance of a contract or



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



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	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 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, brands you	To suggest tailored products or services (including those of relevant third 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 sending you - via post, email,	As long as you keep shopping with us and/or using our loyalty card. If you are a registered 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 a longer period. If you	You may authorise us to do so if you become a loyalty card member by accepting our Terms & 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 guest check-out



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	<p>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.</p>	<p>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 promotions (such as special coupons) from</p>	<p>purchase online and check-out as a guest, we will retain your data for one year from the date of transaction.</p> <p>If you have signed up to any of our newsletters, we will retain your data until you unsubscribe.</p>	<p>we will contact you with related offers based on legitimate interest and always within the limits of the law, including spamming laws.</p> <p>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.</p>



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



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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, payment history, age.	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.
In-app features (such as in-app beauty filters,	Actions you take when you access or use the	If you choose to use our in-app beauty filter	As long as you are a member of any of our	By providing your consent to use such features you



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comments and postings, etc.)	relevant in-app features in our Sites (including comments, personal images, and other content or information submitted by you).	<p>features, we will process your image to fulfil your request. For some in-app features the images collected will only be stored in your personal device and will not be collected by us.</p> <p>We will ask for your separate permissions for our app to access your camera. If you change your mind, you will be able to revoke them any time by changing the settings on your</p>	<p>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.</p>	<p>authorise us to process your personal data to provide you with all services regarding the relevant features (performance of a contract).</p>



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		<p>device. Please note that rejecting or switching off these permissions will limit the features you can use in our app.</p> <p>We use face recognition technology already included in your phone (such as TrueDepth API) or other software for depth of facial mapping information to create augmented reality effects within the app.</p>		



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		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 about products you order using the Loyalty Program, transactions relevant for the Loyalty Program, account status	To provide you with all services under the Loyalty Program including exclusive offers and points schemes.	As long as you are a member of any of our loyalty programs. 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	By signing up to any of our loyalty programs you authorise us to process your personal data to provide you with all services under the Loyalty Program (performance of a contract).



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	and details regarding points collected and redeemed, payment information (i.e. bank details), payment history, age.		longer period.	
Fraud prevention and other administrative services, such as registration	Name, title, postal address, email address, home telephone or mobile number, information about health or diagnostic data, NHS number (UK only), payment information (i.e. bank details), payment history, age.	To carry out administrative services, including processing any application you submit to us for providing the services, preventing or detecting fraud or other crimes, verifying your identity and credit/payment status, or	As long as you keep shopping with us. If you have no activity after three years, we will delete or anonymise your Personal Data, unless we are required by the law to store them for a longer period.	For the prevention and detection of fraud to ensure that your identity and transactions are secured (balancing of interest with our interest being to prevent fraud and protect our customers).  We perform other



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		<p>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.</p>		<p>administrative services to provide you with the respective underlying services (performance of a contract).</p>



## 6.2 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 analyse 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>.

You can view more information on the Cookies we use and adjust your preferences via the Cookie Consent Tool at the bottom of 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.

A.S. Watson Group

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## 6.3 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.

## 7. WHO WE SHARE YOUR PERSONAL DATA WITH?

### 7.1 Our Service Providers

We share your Personal Data 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).
- 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.

A.S. Watson Group

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- 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.

## 7.2 Other Recipients

We share your Personal Data with the following third parties that process your data for their own purposes (i.e. these third parties are not 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.

## 7.3 Sharing your Site Usage Information

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 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 6.2 for more information about Cookies and how to opt out.

You can also visit the website [www.youronlinechoices.com](http://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.

## **8. TO WHICH JURISDICTIONS DO WE TRANSFER YOUR PERSONAL DATA?**

Many of our trusted third parties and Group companies are based in jurisdictions 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 jurisdiction 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).

## **9. 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.

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## 10. 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 designated jurisdictions only);
- Objection to the processing of Personal Data (applicable to designated jurisdictions only);
- Restriction of processing of Personal Data (applicable to designated 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 designated 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 exercise 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.***

## 11. 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](mailto: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.

## **12. 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.

## **13. 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.

## **14. 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