

INTRODUCTION; SCOPE

Avon Justine (Pty) Ltd ("Avon," "us," or "we") has created this Privacy Statement to inform you about how we collect, use and disclose information.

This Privacy Statement applies to information collected through this website and any mobile sites, applications, widgets, and other interactive features that link to this Privacy Statement (the "Site"). Except as specifically provided below, this Privacy Statement does not apply to information collected by Avon by or through any other means, such as information collected offline.

Avon grants independent contractors selling rights to its products (hereinafter referred to as Independent Sales Representatives or Avon Representatives). Independent Sales Representatives are not employed by Avon. Therefore, Avon does not control, and is not responsible or liable for the collection, use or disclosure of Personal Information by Independent Sales Representatives, including for their marketing purposes. If you provide information to an Independent Sales Representative through the Site, Avon will have access to it and shall treat it in accordance with this Privacy Statement. Independent Sales Representatives may provide Avon with information regarding their customers, in which case Avon will treat such information, once in its possession, in accordance with this Statement.

If you are the customer of an Independent Sales Representative, you should check with your Representative directly to learn about her data privacy practices.

If you apply to become or are an Independent Sales Representative, in addition to the generally applicable provisions of this Privacy Statement, please review the [Independent Sales Representative](#) section at the bottom of this Privacy Statement to see important information about additional privacy practices that apply to you.

PERSONAL INFORMATION

Collection of Personal Information. "Personal Information" is information that can identify you such as your name, postal address (including billing and shipping addresses), telephone number, e-mail address, credit card number, and user name. We collect Personal Information from you when you choose to participate in our offers and programmes or otherwise provide information directly to us, including when you register with us, purchase products, participate in our interactive features or otherwise interact with us on the Site.

Use of Personal Information. We may use Personal Information:

- for the purposes for which you specifically provided it including, without limitation, to enable us to respond to your inquiries and process and fulfill your requests;
- to send you information about your relationship or transactions with us;
- to tell you about products, services, programmes, and offers that we believe may be of interest to you via e-mail, SMS, telephone or postal mail
- to personalize your experience with us through various means which could include presenting products or offers tailored to you;
- to help you find an Independent Sales Representative including suggesting a new Avon Representative if your Avon Representative has discontinued selling Avon products, and to facilitate the business activities of an Independent Sales Representative;

- for our internal business purposes, such as data analysis, audits, developing new products, enhancing our website, improving our services, identifying usage trends, and determining the effectiveness of our promotional campaigns;
- to allow you to participate in sweepstakes, contests and similar promotions and to administer these activities (some of these activities have additional rules, which could contain additional information about how we use and disclose your Personal Information, so we suggest that you read these rules carefully);
- to complete and fulfill your order, or otherwise provide you with products or services, for example, to process your payments, have your order delivered to you, communicate with you regarding your purchase and provide you with related customer service; and

Sharing Personal Information. We may disclose your Personal Information:

- to companies that are affiliated with us, that is, are part of the Avon family of companies but not for their direct marketing purposes (i.e. Avon affiliates cannot use your Personal Information to market products or services to you). Avon Justine (Pty) Ltd is the data controller and party responsible for jointly used Personal Information;
- to third-party service providers who provide services to Avon, such as website hosting, data analysis, payment processing, order fulfillment, infrastructure provision, information technology services, customer service, e-mail delivery services, credit card processing, auditing, training, and other similar services. (These third parties will be supplied with, or have access to, your Personal Information for the purpose of providing these services to us or on our behalf);
- to Independent Sales Representatives, to the extent necessary for them to contact you, fulfill your orders or provide a service to you;
- to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings); and
- as we believe necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

NON-PERSONAL INFORMATION

Collection of Non-Personal Information. “Non-Personal Information” is any information that does not reveal your specific identity, such as:

- Browser information
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you or our Independent Sales Representatives
- Aggregated information

We and our third-party service providers may collect Non-Personal Information in a variety of ways. For example, we

- collect information such as your computer type (Windows or Macintosh), screen resolution, operating system version and Internet browser type and version.
- collect demographic information, such as your location, education, profession, age, gender, as well as other information, such as your hobbies and special interests when you voluntarily provide this information to us. Unless combined with Personal Information, this information does not personally identify you or anyone else.

Aggregating information. We may aggregate Personal Information so that the aggregated information does not personally identify you or anyone else, such as by using Personal Information to calculate the percentage of our customers who live in a particular area. In some instances, we may combine Non-Personal Information with Personal Information (such as combining your name with your geographical location). If we combine any Non-Personal Information with Personal Information, the combined information will be treated by us as Personal Information as long as it is combined.

Use and Sharing of Non-Personal Information. Because Non-Personal Information does not personally identify you, we may collect, use and disclose Non-Personal Information for any purpose.

COOKIES AND OTHER TECHNOLOGIES

Cookies: We and our third-party service providers may use “cookies” on the Site. Cookies allow a web server to transfer data to a computer for recordkeeping and other purposes. We use cookies and other technologies to, among other things, better serve you with more tailored information and facilitate your ongoing access to and use of the Site. We also allow vendors to use cookies on our website. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to decline the use of cookies. To learn more about cookies, please visit the following site, which is not affiliated with Avon: <http://www.allaboutcookies.org/>.

Local Storage Objects: We and our third-party service providers may use Flash Local Storage Objects (“Flash LSOs”) in certain situations including to recognize you and remember what is in your shopping cart. Flash LSOs are different from browser cookies because of the amount and type of data stored. In addition, you generally cannot control, delete or disable the acceptance of Flash LSOs from your browser. For more information on Flash LSOs, and to learn how to control them, click on the support page for the Flash Player and choose [Global Storage Settings Panel](#) and follow the instructions. To see the Flash LSOs on your computer now, go to the [Website Storage Settings Panel](#) and follow the instructions to review and, if you choose, to delete any specific Flash LSO.

Pixel tags and other technologies: Clear GIFs are tiny graphics with a unique identifier, similar in function to cookies. However, in contrast to cookies, which

are stored on your computer's hard drive, clear GIFs are embedded invisibly on website pages. We may use clear GIFs (also known as web beacons, web bugs or pixel tags) in connection with the Site to, among other things, track the activities of our Site visitors and compile statistics about Site usage and response rates. We and our third-party service providers also may use clear GIFs in HTML-formatted e-mail messages to help us track e-mail response rates, measure the success of our marketing campaigns, and identify when our e-mails are viewed or forwarded.

Site Analytics: Avon may work with third-party service providers who use the technologies described in this section to conduct website analytics to help us track and understand how visitors use our Site. For example, we use Omniture, a third-party web analytics service provider, to help us improve our website performance and user experience. For more information and to review Omniture's privacy policy for Omniture Technology and its opt-out tool, please see their privacy center. [hyperlink needed here to the following URL <http://www.omniture.com/en/privacy/2o7#optout>]

Widgets, Applications and similar technologies. If you choose to utilize technology provided by us (such as a widget), any Personal Information or other information you make available through such technology may become available publicly, for example, through social media and other websites and platforms on which you may make the applicable technology available. In addition, some technology may have the capability to be distributed "virally" in other locations (for example, a friend or a customer of yours may post the widget that contains your information to his or her blog). Avon is not responsible or liable for the collection, use or disclosure of Personal Information and/or other information that is made publicly available.

IP ADDRESSES

How We Collect IP Addresses

Your "IP Address" is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP).

An IP Address may be identified and logged automatically in our server log files whenever a user visits the Site, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice on the Internet and is done automatically by many websites.

How We Use and Disclose IP Addresses

We may use IP Addresses for purposes such as calculating Site usage levels, helping diagnose server problems, detecting fraud, and administering the Site. We may also use and disclose IP Addresses for all the purposes for which we use and disclose Personal Information. Please note that we treat IP Addresses, server log files and related information as Non-Personal Information, except where we are required to do otherwise under applicable law.

SOCIAL NETWORK AND INTERACTIVE TOOLS

Certain features on our Site may give you an opportunity to interact with us and others. These may include blogs, message boards, messaging functionality, chat functionality, and creating community profiles. When you use these features you should be aware that any information you submit, including your name, location and e-mail address, may be publicly available to others. We are not responsible for any information you choose to submit through these interactive features and we strongly discourage you from disclosing any sensitive Personal Information (such as health or credit card information) through these features. If you use these features, your Personal Information may remain on the Site even after you cease use of the Site.

THIRD-PARTY WEBSITES

Our Site may link to websites operated by other third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to or integrated with our Site, or for the privacy practices of third party Internet advertising companies. The inclusion of a link on the Site does not imply endorsement of the linked site by us. Avon's Independent Sales Representatives are solely responsible for their own websites and for any information collected on those websites. [If an Independent Sales Representative uses an Avon Site to collect information from you, Avon may have access to that information and shall treat it in accordance with this Privacy Statement](#)

THIRD-PARTY ADVERTISERS

We may use third-party advertising companies to serve ads when you visit our Site. These companies may use information about your visit to the Site in order to provide advertisements about goods and services that may be of interest to you. In the course of serving advertisements to this Site, these companies may place or recognize a unique cookie on your browser. If you would like more information about this practice and to know your choices about not having this information used by these companies, please visit http://networkadvertising.org/optout_nonppii.asp.

SECURITY

We use reasonable organizational, technical and administrative measures to protect Personal Information under our control. Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the Contacting Us section below.

CHOICE

To opt out of receiving marketing and/or promotional offers from Avon you may respond to the email you received and click on the unsubscribe link provided. Should you have further queries – contact digitalqueries@avon.com to have your details deleted completely. We will endeavor to comply with all requests as soon as reasonably practicable.

ACCESS

If you would like to review, correct, or delete Personal Information that has been previously provided to us, you may contact us via email to digitalqueries@avon.com. In your request, please make clear what information you would like to have changed or deleted. We will endeavor to respond as soon as reasonably practicable.

RETENTION

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or allowed by law.

USE OF SITE BY CHILDREN

The Site is not directed to individuals under the age of fourteen (14), and we request that these individuals not provide Personal Information through the Site. If you are under the age of eighteen (18) you may only provide Personal Information through the Site with the consent of your parent or guardian. By providing your Personal Information through the Site, you represent to us that you are over 18 or, if you are under 18, that you have the necessary consent from your parent or guardian.

CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in any country where we have operations, and by interacting with us and providing us with any Personal Information, you consent to the transfer of information to countries outside of your country of residence, including the United States, which may provide for different data protection rules than in your country.

UPDATES TO THIS PRIVACY STATEMENT

From time to time we may change this Privacy Statement. Please take a look at the "“LAST UPDATED”" legend at the top of this page to see when this Privacy Statement was last revised. Any changes to this Privacy Statement will become effective when we post the revised Privacy Statement on the Site. Your interaction with us following these changes means that you accept the revised Privacy Statement.

CONTACTING US

If you have any questions about this Privacy Statement, please contact us by e-mail at digitalqueries@avon.com or by regular mail at [Digital Queries, Avon Justine PO Box 391120, Bramley, 2018]

Because e-mail communications are not always secure, please do not include sensitive information in your e-mails to us.

INDEPENDENT SALES REPRESENTATIVES

The following provisions are applicable only to Avon's Independent Sales Representatives:

This Privacy Statement applies to the Personal Information of Independent Sales Representatives collected by Avon, whether collected online or offline. This information would be collected in addition to any Personal Information we may collect from you as an Avon customer, as described above.

If you seek to become an Avon Representative we may collect and use your Personal Information including credit-related information to determine your eligibility.

In order to be appointed an Avon Representative, you may be required to enter into a separate agreement with Avon ("Representative Agreement"). If you have entered into a Representative Agreement, we may collect, use and disclose your Personal Information in accordance with this Privacy Statement and the terms of your "Representative Agreement." We also may collect, use and disclose your Personal Information as necessary to fulfill our obligations under the Representative Agreement. In the event of a conflict between this Privacy Statement and the Representative Agreement, the terms of the Representative Agreement shall apply.

Once you are an Avon Representative (including a sales leader), we may disclose your Personal Information:

- to district managers, area sales managers or their equivalent, who may be independent contractors to Avon;
- as part of our sales leadership program, to Avon Representatives who are sales leaders;
- to current and potential customers who are seeking the assistance of an Avon Representative; and
- as necessary to comply with legal requirements such as tax and record keeping obligations.

We may also combine the Non-Personal Information that we and our third-party service providers collect about your use of our Site (as described above) with your unique Representative account number. We may use the combined information for purposes such as to analyze Avon Representatives' use of our Sites, in order to evaluate and make improvements to our business model, and for other internal analytics purposes.