

Superdrug mobile

Privacy Policy

SHORT VERSION

At Superdrug Mobile, we take privacy seriously.

The categories of personal data that we process depends on how you use our services. We use your personal data to provide our online services in alignment with your preferences, to process your requests, to contact you regarding products and services which may be of interest to you, to provide prize draws or competitions, or to carry out relevant administrative services. All personal data is processed in accordance with applicable data protection laws.

We only disclose your personal data to third parties that assist us with providing you with our services and, if you authorise us explicitly, to our affiliated companies for the purpose of customer relationship management, analytics and marketing.

With your consent we also use cookies for marketing, performance and statistical purposes.

As our valued customer, we also offer you various choices to control how your personal data is used. For example, if you would like to update your 'cookie preferences', click on the Cookie Consent Tool located at the bottom right of our website.

In addition, if you have an electronic account with us (on the website or mobile app), you can update your contact information and your Privacy Preferences under the 'My Account' section. Alternatively, you can contact our Customer Team by phone – 03456 710 709 or by sending an email to help@superdrugmobile.com.

If you would like more information about the processing of your personal data by us and on the cookies that we use, see below the full version of our Privacy Policy.



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EXTENDED VERSION

Our Privacy Principles

At Superdrug Mobile we have 5 Privacy Promises which explain how we use and look after your information. We will:

1. ALWAYS use your personal data in line with data protection law.
2. ALWAYS tell you what information we collect, what we do with it, who we share it with and who to contact if you have any concerns.
3. ALWAYS provide options to say 'STOP' if you don't want marketing communications.
4. ALWAYS take steps to protect your information and make sure no unauthorised person accesses it.
5. ALWAYS respond to questions about your personal data without delay.



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Our Privacy Policy

Last updated: May 2018

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

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 ("**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?

Superdrug Stores plc trading as Superdrug Mobile ("Superdrug" or "we") are responsible for processing your personal data on our Sites. Superdrug is a member of the A.S. Watson group of companies ("**ASW Group**"), which is part of the multinational conglomerate CK Hutchison Holdings Limited ("**CK Hutchison**").

2. HOW DO I CONTACT THE DATA PROTECTION OFFICER?

If you have a "question in relation to how we process your personal data you can contact our Data Protection Officer via email dataprotectionofficer@superdrug.com or via post at Group Information Security, 17 Nijborg, 3927 DA Renswoude, The Netherlands.

3. WHAT IS PERSONAL DATA?

Personal Data means 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 your health and information about your lifestyle or preferences such as



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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 Health & Beautycard member, register for prize draws or competitions, subscribe to our newsletter, receive information or mailings, use our applications, buy a product or service from us, complete a survey, make a comment or enquiry or contact our Customer Team.

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.

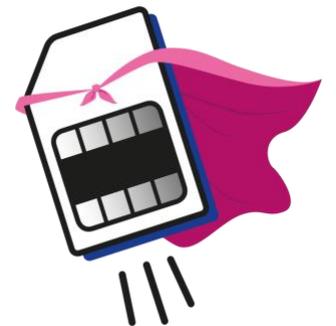
We may also receive your Personal Data from other sources, including information from commercially available sources, such as public databases and data aggregators, and information from third parties. If you do not want us to receive your Personal Data from other sources, please communicate your preferences 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 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.

As a Health & Beautycard member, we may infer in a transparent manner 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 the table in Section 0.1 below for details of the various types of Personal Data we may collect, the relevant purposes and the legal basis for such processing.



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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 13 view or purchase products on our Sites. If we know a customer is under the age of 13, 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 the Customer Team. (Phone: 03456 710 709 (UK) or email: help@superdrug.com) (applicable to Health & Beautycard 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.

6.1

FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL DATA?

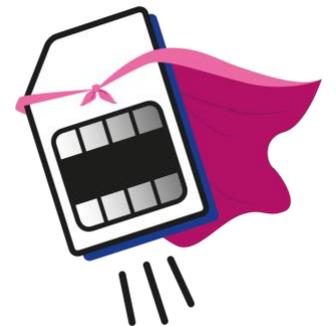
We process the following categories of Personal Data for the following purposes:

	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?
Browsing on our Sites	Information about the type of browser you use when visiting our Sites,	We (and third party service providers acting on our behalf) use cookies and similar technologies to process data	Please check the Cookie Consent Tool to learn	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



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	<p>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 when using Third Party Sites (such as when you use the "Like" functionality on Facebook).</p>	<p>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.</p> <p>See Section 5.2. below for more information about cookies.</p>	<p>about the storage periods for each cookie.</p>	<p>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</p> <p>You can always revisit your cookie preferences via our Cookie Consent Tool or by changing your browser settings.</p>
<p>Account and Service Management</p>	<p>Name, title, postal address, email address, home telephone, mobile number, Health & Beautycard number, 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</p>	<p>We process Personal Data to process applications, registrations or orders made by you and to supply products or services requested by you, to create and administer accounts, to calculate and charge for our Services, to produce any necessary invoices or billing statements.</p> <p>We process Personal Data to update your device remotely "over the air" with software updates and to investigate and resolve any Services</p>	<p>Generally, we'll keep your Communications Data for up to one year. Your account information will be kept after your relationship with us ends to comply with legal and</p>	<p>We need this information to process your order or any other service you request from us (performance of a contract).</p>



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	<p>handling of your request , and other Personal Data you voluntarily provide to us. We also collect information about the routing of service, calls and messages you make and receive, the date, time, duration and cost of these, and information about the identity of your device and SIM (“Communications Data”)</p>	<p>related queries made by you;</p> <p>We use Personal Data to process data revealing the geographic location of your device when using our services or when your device is switched on (“Location Data”) in order to provide location based services requested by you and which may be provided by us or by third parties on behalf of us, or where you request location based services directly from third parties. Your Location Data will be transmitted when calling the emergency services from your phone within our coverage area in the UK. However, if you call the emergency services when you’re outside our coverage area in the UK, your telephone number and your Location Data will not be transmitted.</p>	<p>regulatory obligations.</p>	
Customer Service	<p>Name, title, postal address, email address, home telephone, mobile number, Health & Beautycard number, passwords, order history, payment history, payment information (i.e. bank or</p>	<p>We process your Personal Data whenever you contact us and when we respond to your enquiries and comments.</p>	<p>General enquiries and comments relating to service issues, store standards, stock availability etc. three years</p>	<p>To process your enquiries, comments or complaints at your request (performance of a contract or quasi-contract).</p>



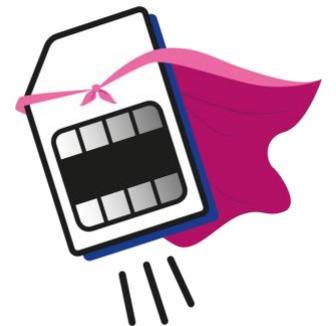
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	credit card details), order history/ wishlist, age/date of birth, gender, information on the handling of your query, posts and other content you submit to our Sites, and further information submitted by you in relation to a purchase or service request or other query (including sensitive personal information).		from 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.	
Suggesting products & services which may interest you	Name, title, postal address, email address, mobile number, Health & Beautycard number, order history/wishlist (including purchases you make on our Site or instore), payment history, age, date of birth, gender, products you view on our Site, brands you prefer, favourite store, actions you take on our website or	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, 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	As long as you keep shopping with us. If you are a Health & Beautycard member and after three years, you have no transactions, we delete or anonymise your Personal Data, unless we are	You may authorise us to do when you become a Health & Beautycard member by accepting our Terms & Conditions (performance of a contract). You can always opt-out of our marketing via your "Privacy Preferences" in your profile (if you have one), by calling our Customer Team or via the unsubscribe button in any our marketing communications.



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	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.	to take part in customer research surveys, promotions, prize draws or competitions. You may also receive in-store promotions (such as special coupons) from us when you have an account with us or as a Health & Beautycard member.	required by the law to store it for a longer period. If you have signed up to any of our newsletters, we will retain your Personal Data until you unsubscribe.	
Competitions and prize draws	Name, title, postal address, email address, home telephone or mobile number, age, date of birth, gender, user generated content or any other Personal Data that you submit – as required for the competition or prize draw.	To carry out prize draws 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 was 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.
Health & Beautycard	Name, title, postal address, email address, home telephone or mobile number, information	To provide you with all services under the Health & Beautycard	As long as you are a Health & Beautycard member. If after	By signing up to Health & Beautycard you authorise us to process your personal data to provide you with all



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<p>Loyalty Programme</p>	<p>about products you order using your Health & Beautycard (including health products or medicines if you order from our online pharmacy), transactions relevant for the Health & Beautycard programme account status and details regarding points collected and redeemed, payment information (i.e. bank details), payment history, age.</p>	<p>programme including exclusive offers and points schemes.</p>	<p>three years, you have no transactions, we delete or anonymise your Personal Data, unless we are required by law to store it for a longer period.</p>	<p>services under the Health & Beautycard programme (performance of a contract).</p>
<p>Fraud prevention and other administrative services, such as registration</p>	<p>Name, title, postal address, email address, home telephone or mobile number, , payment information (i.e. bank details), payment history, age.</p>	<p>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 processing payment instructions. Your payment related Personal Data may be transferred to payment providers to process your payments or the police for fraud prevention purposes.</p>	<p>As long as you keep shopping with us. If after three years, you have no transactions, we delete or anonymise your Personal Data, unless we are required by the law to store</p>	<p>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).</p> <p>We perform other administrative services to provide you with the respective underlying services (performance of a contract).</p>



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			them for a longer period.	
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Cookies and Similar Technologies

We use cookies and similar technologies (“**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 for you.

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 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.

WHO WE SHARE YOUR PERSONAL DATA WITH?

Our Service Providers



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

- Hutchison 3G UK Limited for the purposes of providing the Superdrug Mobile network services to you.
- relevant companies of the ASW Group and subsidiaries of CK Hutchison for the purposes of Customer Relationship Management and analytics, in particular with A.S. Watson (Health & Beauty UK) Limited.
- relevant companies of the ASW Group and trusted third parties which directly support our promotional activities, Sites administration and the Health & Beautycard programme, in particular A.S. Watson (Health & 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.
- 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 organisational 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

We share your Personal Data with the following third parties that process your Personal Data for their own purposes (i.e. these third parties are not processors; they rather use your Personal Data because they have their 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



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before the transfer. If there are 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

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 5.2 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 customised 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 ASW Group companies and CK Hutchison companies are based in countries that provide an adequate level of data protection, such as the European Economic Area.

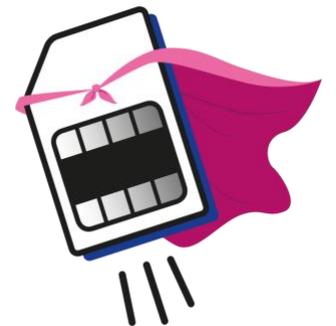
We also transfer your data to Ukraine (where our web development team sits), USA and India (where some of our suppliers have back office services), and Canada (where some of our suppliers that provide us with data analytics and personalisation services are located).

When we need to transfer your Personal Data to a trusted third party or ASW Group or CK Hutchison 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).

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 6.1.



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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;
- Objection to the processing of Personal Data;
- Restriction of processing of Personal Data; 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.

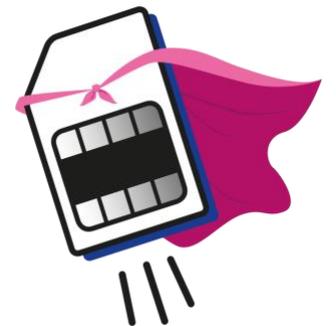
You can learn more about these rights here: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>. To exercise your rights, please contact the Data Protection Officer (see Section 2 for contact details) or get in touch with our Customer Team on the details set out below.

Note that you do not need to contact our Data Protection Officer to exercise your rights to stop receiving marketing communications from us. You can opt out of receiving such communications by going to the Privacy Preferences section of your 'My Account' if you have an account with us, directly from the communications we send you or by contacting our Customer Team by phone (03456 710 709) or by sending an email to help@superdrug.com.

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 logging into your account under Privacy Preferences or using the unsubscribe link in any of our marketing communications.



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- Use of Cookies: via our Cookie Consent Tool at the bottom of our Sites.
- Other purposes: by sending us an email to dataprotectionofficer@superdrug.com or by contacting our Customer Team as detailed in Section 10.

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 Information Commissioner (www.ico.org.uk).

HOW DO WE PROTECT YOUR PERSONAL DATA?

We maintain appropriate technical and organisational 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.

May 2018

