

# **Privacy Notice**

## Introduction:

When you interact with WeAreEves, you trust us with your personal data, and we are committed to maintaining that trust. Being transparent is a priority for We Are Eves and this privacy notice outlines how we process personal data which can help you make informed privacy decisions.

# Overview:

# Types of data we collect from you:

- Contact details i.e. First name, last name, postal address, date of birth, email address, telephone number
- Financial information i.e. payment information (credit/debit card details)
- Data that identifies you i.e. Online identifiers such as IP address, login information, location data, browser type and version, cookies and similar technologies
- Demographic information and interests i.e. age, gender or education
- Community data i.e. Comments, photos, videos and other content or information you choose to publish publicly
- Sensitive data Eye colour, skin type, hair type We will always ask for your explicit consent before collecting such data

## Information we obtain from other sources:

We may receive information about you from other sources, for example:

- Information from Social Media Platforms such as your username, user ID, and demographic information, subject to the settings and privacy practices of the relevant Social Media Platform
- URL referral from another website/social media channel
- App information Browser behaviour for A/B testing and optimisation purposes

## How and why we use your data:

- To fulfil our contractual obligation:
  - If you place an order with us, we will use your data for the purposes of processing your transaction in order to provide you with the requested products or services (i.e. using personal data to send shipments)
- Marketing:
  - Sending you emails and messages about new features, products and services, and content (i.e. inviting users to attend events when required)
  - Interest-based advertising Advertising based on your interests as inferred from your activities over time
- Improving WeAreEves:
  - Provide customer assistance or technical support
  - $\circ$   $\ \ \,$  To improve our services and performance that we use to protect our network
  - $\circ$  ~ To update our services based on your interests, participations and communities
  - $\circ$   $\,$  To address any questions or concerns you raise to us about We Are Eves



- Interacting with feedback platforms and questionnaires, conducting data analysis and research
- Keeping WeAreEves running:
  - Managing your requests (e.g. inviting users, connecting your account to other services)
  - o Login and authentication, remembering your settings and preferences, processing payments
- To protect our rights and rights of others:
  - o Carry out fraud detection and prevention

Please note, by creating an account on WeAreEves, you agree to the sharing of your account username, photos, reviews, tips and videos with beauty brands and online content publishes for which WeAreEves are not liable for. Should a user not wish to have content shared with any other party then they should not be place content on this website. WeAreEves is not liable for any content placed on its website by the community about any brand.

If a user creates content on the WeAreEves website, it grants WeAreEves the right to share this content with brands/3<sup>rd</sup> parties that it works with at any time who may use this for internal or external purposes. Should a user not wish to have content shared with any other party, they should refrain from placing content on this website.

# Our legal basis for using your personal data:

- Contractual obligation:
  - For example, when you purchase a product from us, we process your data as necessary to provide you with the products/services you request
- Legitimate interests:
  - For example, we will process your personal data to perform our services and to make improvements on how you interact with us
- Legal obligation:
  - We will process your personal information to comply with legal requirements under applicable law
- Your consent:
  - For example, we may collect personal data through voluntary surveys. Responses to such surveys are collected on the basis of consent. You can withdraw your consent at any time by contacting us **at** the details provided in the 'Contact Us' section below

# Data sharing with third parties and international data transfer:

## In certain circumstances we may share information with third parties, such as:

- Brands
  - We share data of our users with brands we work with for product testing and review purposes
- Service providers:
  - We engage various third parties to provide services on our behalf. Our service providers use the information we provide to them as necessary or appropriate for the performance of their services
- Advertisers & marketing related partners:



- We may provide your information to entities for the purposes of delivering advertising aligned to products and services that may be of interest to you
- Business partners:
  - In certain circumstances, we provide your information to business partners for various reasons. For example, partnering with a third party for events or programs such as WeAreEves BV Eves Beauty Editor Program
- Other parties when required by law:
  - We may share your information as we believe is necessary or appropriate to protect, enforce, or defend our legal rights
- Corporate transactions:
  - If Eves BV is sold or integrated with another business, your personal information is disclosed to consultants of Eves BV and any advisers to the potential buyer
- With your consent:
  - We share your information with third parties when you consent to or request such sharing

Where personal data is transferred to an international jurisdiction, Eves BV ensures that adequate safeguards are in place to ensure the security of your personal data. For more information on these safeguards, please contact us at the details provided in the 'Contact Us' section below.

#### How long do we keep your data?

We will retain your personal information for as long as we have a relationship with you. Once our relationship with you comes to an end, we will retain your data:

- For the purposes of legal proceedings
- To comply with record retention requirements under applicable laws or other legal/statutory requirements
- To conduct fraud prevention/detection

We will delete your personal information when it is no longer required for these purposes.

## Your privacy rights:

- Right to access
  - You have the right to ask us for a copy of your personal information.
  - The categories of data we're processing
  - The purposes of data processing
  - The categories of third parties to whom the data may be disclosed
  - How long the data will be stored (or the criteria used to determine that period)
  - Your other rights regarding our use of your data
- Right to erasure
  - You have the right to ask us to erase your personal information
- Right to objection
  - You have the right to object to certain types of processing such as direct marketing
- Right to rectification
  - You have the right to ask us to rectify information that is inaccurate or incomplete
- Right to portability –



- You have the right to have the data we hold about you transferred to another organisation. If you ask us and it is technically possible, we will directly transfer the data to another service for you
- Right to automated profiling and decision making
  - You also have the right not to be subject to the legal effects of automated processing or profiling
- Right to complain to a supervisory authority
  - You have the right to lodge a complaint to a supervisory authority, please tell us first, so we have a chance to address your concerns. If we fail in this, you can address your complaint to a supervisory authority

Please note, these rights are subject to applicable law. You can exercise your rights by contacting us at the details provided below

Contact us:

Info@weareeves.com

**Physical Address:** 

Moermanskkade 500 1013 BC in Amsterdam

## Updates to this notice:

From time to time this privacy notice will be updated. If we make any significant changes to our privacy notice, we will of course, notify you of these changes by email.

Last updated : 13/03/2020