

# PRIVACY POLICY

Lyoneess Europe AG ("We" or "Lyoneess") is committed to protect and respect your privacy.

For the purpose of the Austrian Data Protection Law (the Acts), the data controller is Lyoneess Europe AG Gürtelturmplatz 1, A-8020 Graz, Austria, commercial register number FN 389134g ("Lyoneess")

We strongly believe in the protection of personal data. We are committed to create processes that enable you to use our services securely. We are also committed to observing all laws related to the protection of personal data. This Privacy Policy describes which of your data we collect and how we protect it.

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## Area of Applicability

This Policy applies to Lyoneess Membership and the Lyoneess Website available at <http://www.lyoneess.com> (Site) and sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

As we enhance our websites to improve our services, we may need to amend and revise this Privacy Policy. Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

## Recorded Data

Personal data is all information about your personal or material circumstances that we have collected during your Lyoneess Membership and your application for Membership and that can be assigned to you either directly or indirectly (e.g. via your Membership Number) . This includes: Your full name, date of birth, postal address, telephone number, e-mail address, bank details and purchase data related to your Lyoneess Membership, details of your visits to our Site including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access. When you email us, we may keep a record of that correspondence. We may also ask you for information when you enter a competition or promotion sponsored by Lyoneess, and when you report a problem with our Site or as provided below.

## Cookies

Our websites use cookies. Cookies are small text files saved onto your computer that can be accessed again at a later date. Cookies enable you to log in to access our services and also help us to customise our website for you.

Some areas of our websites can also be accessed without you needing to log in or register. In these areas we will also record automatically certain information that will enable us to collect static data regarding the use and efficiency of our websites and thus adapt them to suit our users' needs. We therefore record information about your IP address, the time and length of your visit, the number of visits, your use of online forms and other similar information. Cookies are stored for a range of different periods. The majority of the cookies we use are deleted automatically as soon as you leave the website. We make a record of every time our website is accessed and every time a user opens one of the files stored on our websites. The cookies provide information for our own exclusive use and are not made available to third parties.

We also use Google Analytics to record your activities on our website and to determine how many users visit our pages and which pages are accessed the most. All analysed data is kept anonymous. Google Analytics cookies are saved onto your computer where they can be analysed by Google. We use the following Google Analytics tools: IP anonymisation, demographic data and interests. To find out more, please see <https://support.google.com/analytics/answer/6004245?hl=en-GB>. At <https://tools.google.com/dlpage/gaoptout?hl=en-GB>, Google Analytics provides users with the option to deactivate data collection.

Cookie	Parameter	Purpose	How it works
lyo_it_accept_cookie	True	This cookie tracks when the user has approved something.	To revoke approval, the user must delete the cookie from his/her browser
_utma _utmb _utmc _utmz	Google Analytics	These cookies help us to collect information such as how users use our websites (time, day, etc.) and how frequently they access them. This information helps us to improve our web services.	To find out more, please consult Google's Privacy Policy.
ASP.NET_SessionId	ID	This cookie helps to identify a particular user.	The session ID is saved in a cookie.
Lyo-Search-Settings	TreeType	Cookie for storing search results.	This cookie stores data every time a user clicks on a search result to access our website.
lyo_box_account_info_settings	true/false	Cookie for showing and hiding data in the account overview.	This cookie is used to activate or deactivate the overview of account data.
popup_lyoness3steps_closed	true/false	A pop-up with information about Lyoness appears the first time the user visits the website.	Cookies for managing pop-ups. Once the user has closed the pop-up, it will not appear the next time he/she visits the site.

Please note that most Internet browsers accept cookies as standard. You can change your browser settings to reject all or some cookies or to ask you every time you are required to accept new cookies. Most browsers will contain instructions on how to do this under the "Help" option in their main menu. These instructions will also inform you how to delete cookies already stored on your computer.

Please note that you may not be able to use all of the functions on our website if you do not accept cookies.

By using our website, you agree to the use of the cookies listed above.

### **Use of Data**

Lyoness only uses your personal data in accordance with the relevant legal regulations. We record and process the personal data that you provide when registering as a Lyoness Member and during your Membership with Lyoness for the purposes set out in this Privacy Statement, including without limitation for fulfilling our contractual obligations towards you. In order to record and process this data, we must first obtain your consent.

We use your data to communicate with you, to verify your identity, to give you access to your personal Member area on the Lyoness website, to process your enquiries and orders, and to give you access to our services. Furthermore, we also use your data to determine the Member Benefits allocated to you as part of the Lyoness Loyalty Programme.

Provided that you have granted separate approval, we also use your data to provide additional information, e.g. on offers and deals available from our Loyalty Merchants.

We also use your data

- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to the services enabled by the Site or the Lyoness Loyalty Programme.

If you are an existing Member, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.

If you are a new Member, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.

### **Data Security and Transferring Data**

In order to protect your data, we employ state-of-the-art technology, such as encrypted forms of data transfer (SSL encryption), firewalls, hacker protection software and additional security functions.

Your personal data is collected and processed by Lyoness Europe AG (Lyoness), which contracts with you under its General Terms and Conditions. **Lyoness serves you in Ireland, with customer support provided by the local Lyoness subsidiary, Lyoness Loyalty Ireland and by Lyoness Group AG.** However, your personal data may also be passed on to certain service providers and other companies within the Lyoness Group, as follows:

1. We reserve the right to employ certain **service providers** to help us perform our services, communicate with Members and manage our online presence. We select these service providers carefully to make sure that your personal data is processed in a secure and proper manner. We also ensure that our service providers are obliged to use your personal data in accordance with our own specifications and in accordance with Austrian and Ireland Laws and Data Protection Laws. Our service providers are not permitted to use your data once they have completed the process for which it was provided.
2. Furthermore, provided that we observe the relevant data security measures, we are also able to pass on your personal data to other companies within the **Lyoness Group** provided that it is required for the electronic processing or management of data or to supply you with a specific service. Lyoness Group companies are also obliged to use your personal data in accordance with our defined specifications and in accordance with Austrian and Ireland Laws and Data Protection Laws. The following website contains a list of all companies within the Lyoness Group: <http://www.lyoness-corporate.com/en-US/Company/Organisation/>
3. The following services in particular may require your data to be passed on: contacting Members using electronic messaging services (e.g. e-mail or text message), contacting members via social media (e.g. Facebook), contacting Members by e-mail, fax or telephone to inform them about products and offers available from our Loyalty Merchants, identifying offers that may appeal to your interests, conducting customer satisfaction surveys, operating hotlines, and processing transactions. When required to perform a particular service for you, we will also transfer the necessary personal data to our Loyalty Merchants. Our Loyalty Merchants are also obliged to use your personal data in accordance with our defined specifications and in accordance with Austrian and Ireland Laws and Data Protection Laws.
4. If Lyoness are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our General Terms and Conditions and other agreements; or to protect the rights, property, or safety of Lyoness, Lyoness subsidiaries our customers, or others, to detect, prevent or otherwise address fraud, security or technical issues. You additionally agree that your IP address may be supplied to regulatory authorities in connection with fraud or other formal investigations and we undertake to keep such information confidential except for disclosure to such authorities in connection with such investigations.
5. You agree that if you send offensive or objectionable content or otherwise engage in any disruptive behaviour on the Site, that that we can use whatever information that is available to us about you to stop such behaviour. This may involve informing relevant third parties such as law enforcement agencies about the content and your behaviour.
6. In order to prevent fraud, to check your identity or prevent money laundering, we or a supplier to us may search the files of credit reference agencies that will record any credit searches on your file. We may also disclose details of how you conduct your account with us to such suppliers or agencies. The information will be used by lenders for making credit decisions about you, for fraud and money laundering prevention and for tracing debtors.

Lyoness is an international company whose business activities, management and technical infrastructures cross national borders. We are therefore able to transfer your personal data **to other countries**. Under article 12 paragraph 2 of the Austrian Data Protection Act (DSG 2000)/ 8<sup>th</sup> Principle of the Data Protection Act 1998, we do not require any additional approval to transfer your personal data to other Members of the European Economic Area, to Switzerland or to other countries that observe data protection laws. If we are required to transfer your personal data to a country that does not fall into the categories named above, we shall obtain your separate approval in advance.

Save as set out above, we shall not pass your personal data on to any other parties. However, we shall always obtain your separate approval should we be required to pass your data on to any other party in order to execute an Agreement.

#### **Right of Withdrawal, Information, Changing Data and Contact Details and Other Matters**

You have the right, at any time, to withdraw your consent regarding the future use of data without stating a reason. By withdrawing your consent, we no longer shall have the right to use your data. If you wish to withdraw your consent, please send a written declaration (post, fax, or email) to the following address:

#### **Lyoness Loyalty Ireland Limited**

Unit 8, 4075 Kingswood Road, Citywest Business Campus, Dublin 24

Phone: +353 17917700

Fax: +353 1 7917798

E-Mail: [office@lyoness.ie](mailto:office@lyoness.ie)

You have the right to be given a copy of your personal data which you may have supplied to us via the Site. To exercise this right, you must make your request in writing and send it to our address as specified above and include with the request, a copy of your passport, a copy utility bill which will verify your address. A request will be dealt with as soon as possible and will take not more than 40 days to process.

You also have the right to have inaccurate personal data corrected. If you discover that we hold inaccurate personal data about you, you have a right to instruct us to correct that information. Such an instruction must be in writing and will not take more than 40 days to process.

In certain circumstances you may also request that personal data which you have supplied via the Site be deleted, if we do not have a legitimate reason for retaining the personal data. We are not entitled to charge for dealing with such a request and we must comply within 40 days of the

receipt of such a request. To exercise this right you would generally be expected to identify some contravention of data protection law in the manner in which the Site processes the personal data concerned.

In each case, you must make your request in writing and send it to our address as specified above and include with the request, a copy of your passport, and a copy utility bill which will verify your address.

Please contact us if you have any questions regarding the use of your personal data or if you wish to update or correct your data.

## JOB PORTAL PRIVACY POLICY

Lyoneess is committed to provide all of its employees with equal employment opportunities. Without any consideration of their ethnic origin, skin colour, religion, gender, sexual orientation, nationality, disabilities, or age.

### **Recorded Data**

Our website [www.lyoneess-corporate.com](http://www.lyoneess-corporate.com) is an international careers portal and lists all of the positions available at all Lyoneess Group branches and subsidiaries. Therefore, before entering any personal data you may have to select the country in which you would like to work. Once selected, you will then be directed to the job listings for that country. The following website contains a list of all companies within the Lyoneess Group, including those located in other countries: <http://www.lyoneess-corporate.com/en-US/Company/Organisation/>

In order to apply for a job listed on our website, you will be asked to fill out an application form and/or upload files.

We record and store the following personal data: your title, first name, surname, home address including street name and number, town and post code, your date of birth, native language, nationality, e-mail address, telephone number, highest qualification, salary expectations, gross annual salary and earliest possible start date. You also have the option to add special skills and qualifications, such as IT skills, foreign languages, etc. You can also enter information about your education and career to date.

Furthermore, you will have the chance to upload files onto our server, such as your CV, letter of application, photograph, certificates, and other documents relevant to the job.

You are also welcome to add your own message in the comments field.

Lyoneess is aware that not all of the personal data listed above is required by law. We have therefore only declared as mandatory certain fields, such as surname and contact address. Your personal data is used only to process your application.

**By using the Lyoneess Job Portal, you agree to your personal data being saved electronically and processed within the Lyoneess Group.**

### **Right of Withdrawal, Information, Changing Data and Contact Details**

**You have the right, at any time, to withdraw your consent regarding the future use of data without stating a reason. By withdrawing your consent, we no longer shall have the right to use your data. If you wish to withdraw your consent, please send a written declaration (post, fax, or email) to the following address:**

#### **Lyoneess Loyalty Ireland Limited**

Unit 8, 4075 Kingswood Road, Citywest Business Campus, Dublin 24

Phone: +353 1 7917700

Fax: +353 1 7917798

E-Mail: [office@lyoneess.ie](mailto:office@lyoneess.ie)

We shall be happy to let you know which of your personal data is stored in our systems. You are also able to request that your data be amended or deleted at any time. Please send an email to the address above if you do not wish your application data to be retained for a year following the end of the selection process.