**Privacy Policy**

## **1. Who operates this website?**

This website (the **website**) is operated by BEAUTY MATCHING ENGINE LTD., a company registered in England and Wales under registration number 12451874 whose registered office is at Flat 708 Schrier Arboretum Place Ropeworks Barking England IG11 7FL, UK, trading as “Beauty Matching Engine™” (**we**, **us** or **Beauty Matching Engine™**)

## **2. What is this policy about?**

Beauty Matching Engine™ is committed to protecting your personal information when you use our website and we want our users to have a safe and enjoyable experience. It is completely optional to become a registered user (a member) and when you choose to do so, you will need to create your Beauty Matching Engine™ profile and enter personal data about yourself. To become a Member you will be required to set up an account with password, email address and your gender. You may also wish to add your skin concerns, hair concerns, job profession, age and other beauty preferences. This policy explains what information we collect about you, what we use it for, and also your rights in relation to that information.

## **3. What information will Beauty Matching Engine™ collect about me?**

### **Unregistered Users**

3.1 We encourage you to register with us in order to be part of the Beauty Matching Engine™ community and to take full advantage of Beauty Matching Engine’s™ features detailed below. However, you may choose not to register and take advantage of any feature of our site where registration is not required. If you do not register the information we collect from you is limited. We log your IP address in order to help diagnose problems with our applications or hosting environments, administer our website and track usage statistics. It would be extremely difficult for us to identify you through your IP address, and we make no attempt to do so. If you reached our site by clicking on a link or advertisement on another site, then we also log that information. This helps us to maximise our internet exposure and understand the interests of our users. All of this information is collected and used only in the aggregate that it is entered into our database, where we can use it to generate overall reports on our visitors, but not reports about individual visitors.

3.2 We also place small files known as ‘cookies’ (and/or similar technology) on your computer’s hard drive to maintain the integrity of our content and to provide our users with a better site experience. Please see section 11 below for more information about the cookies we place.

3.3 You do not always need to be a registered member to participate in Beauty Matching Engine™ competitions. When you sign up to participate in competitions which Beauty Matching Engine™ may run from time to time on the service, we will probably ask for personal information about you. This can consist of information such as your name, email address, postal address, telephone or mobile number or date of birth.

### **Members**

3.5 If you choose to register with us, we will collect personal information from you including your name, email address, gender and password. We may also give you the opportunity to add optional information about yourself.

3.6 You may also be able to include optional information under the following categories: about you, your age, your interests and brand preferences, your beauty concerns, as well as contact information for other people that you provide to us. The information we collect may vary, but we only collect the information that you provide to us as part of using the website (such as your likes and dislikes) or otherwise authorise us to collect.

3.7 We may store all or some of your personal information in a cookie file on your hard drive, so that our system will recognise you each time you visit our site. In that way, we can save your preferences from visit to visit and present you with a customised website, without requiring you to log into our site every time you visit. Please see section 11 below for more information about the cookies we place.

### **Retailer partners and hyperlinks**

3.8 If you visit our site by ‘clicking–through’ from a site operated by one of our partners, and you have registered with that partner, then certain information you have provided to that partner may be transmitted to us. You should review the privacy policy of the website from which you reached our site in order to determine what information was collected and how you agreed that our partner could use that information. Regardless of what information was transmitted to us, however, we don’t keep it unless you register with us.

3.9 If you choose to purchase any beauty/skincare (or any other service Beauty Matching Engine™ will or may provide) by clicking on a link provided on the website to a retailer’s website, that retailer will collect your personal details (such as your credit card number, address, etc.) for the purpose of completing your chosen transaction. We may be provided with confirmation of your transactions with such retailers and, in some instances, such confirmation may include your personal information. Aside from such confirmations, the only information that we will collect with respect to such retailer links is: (a) the number of generic Beauty Matching Engine™ users who use such links; (b) the number of purchases made by these generic users; and (c) your name, email address, destination and selected product so that we may contact you to enquire about your experience or to propose compatible products (if you agree, see section 4 below).

3.10 The website contains hyperlinks to websites owned and operated by third parties including the retailers described above. These third party websites have their own privacy policies, including cookies, and we urge you to review them. They will govern the use of personal information you submit or are collected by cookies whilst visiting these websites. We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

## **4. How will Beauty Matching Engine™ use my information?**

### **To personalise the way content is presented to you**

4.1 As part of the Beauty Matching Engine™ registration process you will be given the option to create your Beauty Matching Engine’s™ profile. Having selected various options (and any options that we may add to in the future), you will be presented with garments that you then decide which you prefer. This will create your automated style preferences which enables Beauty Matching Engine™ to tailor and match the content presented to you so that the recommendations you receive are personalised according to our machine learning algorithms.

### **To contact you**

4.2 We will use the email address and any other means provided by you when you register to contact you from time to time. This may be for security reasons (so that we can check that you are who you say you are, by sending you an initial validation email), to inform you about planned maintenance to the website or other disruptions, to ask your opinion about the website, to invite you to participate in surveys about Beauty Matching Engine™ services, or to keep you updated on the services currently available on the website as well as any changes to those services and those that we intend to launch in the future. Other than for security reasons, we will only contact you where you have agreed that we may do so.

4.3 Where you have agreed, we may also use such personal information to send you our newsletters and marketing communications (including by email or SMS where you agree), on behalf of others and ourselves, regarding products and services that we think may be of interest to you, or to deliver targeted advertisements, promotions and other similar initiatives to you. While this may include material about third party products or services, those third parties will not contact you directly (unless you subsequently ask them to or agree that we may share your details for that purpose).

4.4 We won’t pass your email address on to anyone to contact you directly about their own products or services, unless you have provided your prior consent for us to do so.

4.5 Where you have provided consent, you may opt out at any time.

### **Statistical analysis**

4.6 We may use your information in order to generate anonymous statistics regarding use of the website. We may share this anonymous information with our partners and advertisers. This is not linked to any personal information that can identify any individual person.

## **5. Will Beauty Matching Engine™ share my information with anyone else?**

5.1 We will keep your information confidential except as set out in this policy or where disclosure is required or permitted by law.

5.2 If you engage in any disruptive behaviour the website, Beauty Matching Engine™ may use your personal information to stop such behaviour. Where Beauty Matching Engine™ reasonably believes that you are or may be in breach of any of applicable law (e.g. because content you have posted may be defamatory), Beauty Matching Engine™ may use your personal information to inform relevant third parties or law enforcement agencies about the content and your behaviour.

5.3 If Beauty Matching Engine™ is acquired by another company or sells all or a portion of its assets to another company, or in the event of a merger or reorganisation, it is likely that user information will be a part of the assets transferred and may be disclosed to the new company.

5.4 We may need to share your information with third party suppliers that support the website and our services such as our web hosting provider and email marketing provider (only where you have opted in to receive such marketing as described above).

5.5 We may use third–party advertising companies to target and serve ads when you visit the website. These companies may use information (this will not include your name, address – though possibly the location of your home town or email address) about your visits to this and other websites in order to provide advertisements about goods and services of interest to you. These companies may employ cookies and other tracking technologies to measure advertising effectiveness. Any information that these third parties collect via cookies is generally not personally identifiable (unless, for example, you provide personal information to them through an ad or email message). Please see section 11 below for more information about the cookies these adservers place.

## **6. What rules apply to “Invite a Friend”?**

If you click on ‘Invitations’ or ‘Tell a Friend’ and submit email addresses your contacts to invite to Beauty Matching Engine™ you accept that by doing so, an email invitation will be sent on your behalf, to the relevant email address, and that a reminder email could be sent to that contact on your behalf. By inviting your contacts to join Beauty Matching Engine™, you agree that you have obtained their prior consent to send them such an invitation and a reminder. Beauty Matching Engine™ will store the name and email address of your contacts for the purpose of automatically adding the respondent to your contacts list and to send a reminder to that invitation on the member’s behalf. Beauty Matching Engine™ does not sell these email addresses or use them to send any other communication besides invitations and the reminder to an invitation on behalf of the Member. You or your ‘friend’ can request the removal of their details from our database at any time by sending an email to: info@beautymatchingengine.com

## **7. What is Beauty Matching Engine™’s policy regarding children?**

Children under the age of 13 are not eligible to use the website and must not attempt to register with Beauty Matching Engine™ and/or submit any personal information to us. We don’t knowingly collect personal information from any person who is under the age of 13 or allow them to register. If it comes to our attention that we have collected personal data from a person under the age of 13, we will delete the relevant information as quickly as possible. If you have reason to believe that this has occurred, please contact us at info@beautymatchingengine.com. If you are aged between 13 and 17, please get your parent/guardian’s permission beforehand whenever you provide personal information to the Beauty Matching Engine™ website. Users of that age without this consent are not allowed to provide us with personal information or use the website.

## **8. How do I opt out or update my personal information?**

8.1 You may have your registration details, including your profile, removed at anytime. To remove yourself, please email us at info@beautymatchingengine.com and we will endeavour to remove your details within 7 days of receipt of the email.

8.2 You can review and update the personal information you have provided through the registration process by clicking on ‘My Profile’ on your account page.

8.3 To simply opt out of receiving marketing materials from us please email us at info@beautymatchingengine.com. To opt out of receiving marketing communications from the retailers please contact them or follow their unsubscribe mechanisms.

## **9. How long will Beauty Matching Engine™ hold my information and is it secure?**

9.1 We employ firewalls and store all of our files and information on computer hardware which require password access. You should never disclose your account password to unauthorised people. We use certain security measures to help keep your personal information safe, but we cannot guarantee that these measures will stop any users trying to get around the privacy or security settings on the website. Consequently, you acknowledge that there are circumstances in which your personal information may be accessed by unauthorised persons.

9.2 In the event that we believe the security of your personal information in our possession or control may have been compromised, we may seek to notify you. If a notification is appropriate, we would endeavour to do so as promptly as possible under the circumstances, and to the extent we have your email address, we may notify you by email.

9.3 We will hold your personal information on our systems for as long as is necessary to provide the relevant services. If you wish to cancel your registration as a member your account will be deleted, however your anonymised data is retained for internal analysis to continue to improve the service.

## **10. Will this Privacy Policy change?**

We may change this privacy policy from time to time and so you should check it regularly. Your continued use of the website will be deemed acceptance of the updated or amended policy. We last updated this policy on 1st January 2017.

## **11. Cookies**

11.1 A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer or mobile device (referred to here as a ‘device’) browser from a website and is stored on your device’s hard drive. Each website can send its own cookie to your browser if your browser’s preferences allow it, but to protect your privacy your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. Many sites do this whenever a user visits their website in order to track online traffic flows.

11.2 We use cookies for the following purposes:(a) **Performance —** To collect data that we can use to improve the efficiency and quality of our service and the website, identifying you as a valid user and to help personalise your Beauty Matching Engine™ experience in conjunction with your profile, and remembering that you have used the website before, meaning we can identify the number of unique visitors we receive to different parts of the website. (b) **Necessary session management —** Managing your login session so you can move easily from one page to another within the website and your page requests are loaded in smooth and secure manner. (c) **Functionality —** Storing your preferences and selections, and customising elements of the layout and/or content of the pages of the website for you. (d) **Internet based advertising —** Gathering information about the pages on the website, and also other information about other websites that you visit, so as to place you in a “market segment”. This information is collected by reference to the IP address that you are using and so does not identify you personally, but does include information about the country and city you are in, together with the name of your internet service provider. This information is then used to place interest-based adverts on the website and other websites believed to be relevant to your market segment. For more information about this type of interest based advertising, and about how to turn this feature off please visit www.youronlinechoices.com/uk/ without these cookies, advertisements you encounter will be less relevant to you and to your interests.

11.3 We currently employ session cookies as well as persistent cookies which stay on your computer after you have gone offline. Persistent cookies remain in the “cookies” folder after you have closed your web browser.

11.4 The cookies we use and what we use then for is explained further below:

|  |  |  |
| --- | --- | --- |
| **Cookie name** | **Purpose** | **More Information** |
| Beauty Matching Engine™ credentials cookieuser\_credentials | Allows us to verify that you are logged in. It is removed upon logout or when the browser is closed | Session |
| Beauty Matching Engine™ session cookie\_Beauty Matching Engine™.com\_session | Stores transient information such as error messages and the last page visited. It is removed upon logout or when the browser is closed | Session |
| Last logged in cookielast\_login | The email of the last person to have logged in is stored and pre filled when you return to the website. This cookie last 48 hours and is only set when using the tifying the last Beauty Matching Engine™ service | Persistent |
| Last login id cookielast\_user\_id | An opaque value identifying the last Beauty Matching Engine™ user to have used the site. This is used to provide limited personalisation of content when a visitor is no longer logged in | Persistent, 3 weeks |
| Authentication cookieRemember\_me\_token | Allows users of the Beauty Matching Engine™ to stay logged in for up to 2 years | Persistent, 2 years |
|   | Third party cookies |   |
| Google (Analytics) \_utma \_utmc \_utmz | As explained above we use Google Analytics to help us collect anonymous statistics on visitors to the site, where visitors have come to the site from, how long a user spends on the site and the pages they visited. This helps us to understand how people use the site and to make improvements to our site. | Persistent & session 2 years 30 minutes Session 6 months <http://tools.google.com/dlpage/gaoptout> |

11.5 You can opt out of Google’s use of cookies by visiting Google’s Ads Settings (<http://www.google.com/settings/ads>). Alternatively, you can point your visitors to opt out of a third party vendor’s use of cookies by visiting the Network Advertising Initiative (<http://www.networkadvertising.org/choices/>) opt out page.

11.6 Most browsers have cookies turned on as a default, but you can always disable cookies or only allow non persistent cookies via your browser preferences. You can also learn more about cookies by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org/) which includes additional useful information on cookies and how to block cookies using different types of browser. If you choose to disable cookies, however, you won’t be able enjoy a significant proportion of Beauty Matching Engine’s™ functionality. Please remember that cookies cannot read your hard drive or give any information collected to any third party. A cookie can only be read by the organisation that sets it.

## **12. How can I find out which personal information Beauty Matching Engine™ holds about me?**

Under the Data Protection Act you have the right to request a copy of the personal information Beauty Matching Engine™ holds about you and to have any inaccuracies corrected. (We charge £10 for information requests and will require you to prove your identity.) We will use reasonable efforts to supply, correct or delete personal information about you on our files. Please address requests and questions about this or any other question about this privacy policy to info@beautymatchingengine.com.