

**THE ESTEE LAUDER COMPANIES
HACKATHON 2020 PRIVACY
POLICY**

Effective Date: 8/19/20

The Estee Lauder Companies Inc. (collectively referred to herein as “ELC”, “we”, “us”, or “our”) respects your concerns about privacy and values the relationship we have with you.

This Privacy Policy describes the types of personal information we collect about you when you register for and participate in the ELC Virtual Hackathon (the “Hackathon”), how we use this information, with whom we share it, and your rights regarding our use of the information. We also describe the measures we take to protect the security of the information, how long we retain it and how you can contact us about our privacy practices and how to exercise your rights.

Information We Collect

We may collect and may have collected the following categories of information about you. In some cases, the information we collect may fall within more than one category.

- **Contact information and personal identifiers**, such as email address, telephone number.
- **Education or professional information**, such as the school you attend, your major or field of study, your date of graduation, or your company affiliation.
- **Visual information**, such as photos and videos of you participating in the Hackathon.

How we Collect Information

We may collect and may have collected personal information about you when you provide it to us during the Hackathon registration process, and when you participate in the Hackathon.

How We Use the Information

We may use and may have used the information we have about you to:

- Facilitate your participation in the Hackathon.
- Communicate with you regarding the Hackathon.
- Respond to your inquiries.
- Comply with applicable legal requirements, relevant industry standards and our policies.

We also may use the information in other ways for which we provide specific notice at the time of collection.

Information We Share

We may share or may have shared your personal information with:

- **Our corporate affiliates.** For a list of our corporate brands see

<https://www.elcompanies.com/en/our-brands> and for a list of our corporate affiliates see <https://www.elcompanies.com/en/news-and-media/contact-us>.

- **Service providers.** We may transfer personal information to service provider who perform services on our behalf based on our instructions. We do not authorize these service providers to use or disclose the information except as necessary to perform the services on our behalf or comply with legal requirements. Examples of these service providers include entities that provide website and application functionality and hosting services.
- **Parties to a corporate transaction.** We also reserve the right to transfer personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution, or liquidation).
- **Other third parties.** In addition, may disclose information about you (i) if we are required or permitted to do so by law or legal process, (ii) to law enforcement authorities or other government officials, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity; or (iv) with your consent.

Your Rights

Subject to applicable law, you may have the right to request access to and receive details about the personal information we maintain about you, update and correct inaccuracies in your personal information, and have the personal information deleted, as appropriate. These rights may be limited in some circumstances by local law. We may take reasonable steps to verify your identity before granting access or making corrections. You may request to access, change, or delete your personal information by sending an email to: privacy@estee.com.

Data Retention

We will keep your personal information for the purposes set out in this Privacy Policy, plus a reasonable period of time thereafter or such other time as may be required or permitted by applicable law.

How We Protect Personal information

We maintain reasonable administrative, technical, and physical safeguards designed to protect your personal information against accidental unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

Updates To Our Privacy Policy

This Privacy Policy may be updated periodically to reflect changes in our privacy practices. We will notify you of any significant changes to our Privacy Policy and indicate at the top of the Policy when it was most recently updated.

How To Contact Us

If you have any questions, comments or complaints about this Privacy Policy or about how we treat personal information, please contact us by email at privacy@estee.com.

ADDITIONAL RIGHTS AND DISCLOSURES FOR CALIFORNIA RESIDENTS

Disclosures of Personal Information

We may disclose or may have disclosed your personal information to certain categories of third parties, as described below.

Category	Disclosed to Third Parties
Contact information and personal identifiers	We may disclose or may have disclosed this information to: <ul style="list-style-type: none"> • service providers
Educational or professional information	We may disclose or may have disclosed this information to: <ul style="list-style-type: none"> • service providers

These disclosures take place for the following business or commercial purposes:

- To administer the Hackathon;
- To detect, prevent, and prosecute against harmful, fraudulent, or illegal activity;
- To identify and repair bugs on our website or mobile applications; and
- To further our business goals.

The disclosure of personal information for which we receive valuable consideration (i.e., the receipt of some benefit other than money) is considered a “sale”. We do not sell the personal information we collect when you register for or participate in the Hackathon.

Your California Privacy Rights

You have the right to request, twice in a 12 month period, that we disclose to you the personal information we have collected, used, disclosed, and sold about you during the past 12 months. In addition, you have the right to request that we delete the personal information we have collected from you (subject to certain exceptions).

You can exercise your rights by sending an email to privacy@estee.com. Before processing your request, we will take reasonable steps to verify your identity, which will include verifying that the email address from which you submit the request matches the email address we maintain on file for you. In order to ensure you are the owner of the email address, you must respond to a confirmation email that we will send to such email address. In some cases, we may ask that you provide additional information in order to verify your identity.

You may also designate an authorized agent to make a request on your behalf. The authorized agent may submit the request by sending an email to privacy@estee.com and will be required to provide proof that they have been authorized to act on your behalf. If the authorized agent does not provide such proof, you will be required to confirm your identity and the authenticity of the request.

We will not discriminate against you on account of your exercise of your California privacy rights.