

USA

Henkel Privacy Notice

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[Purpose and Reach](#) | [Information Collected](#) | [Marketing, Cookies, and Similar Technologies](#) | [Third Parties](#) | [Your Rights Regarding Your Personal Data](#) | [Safeguarding Information](#) | [How Long Your Personal Data Will Be Retained](#) | [Changes to This Privacy Notice](#) | [Contact Us](#)

Who We Are

Henkel Colombiana S.A.S (“Henkel,” “we,” “our,” or “us”) values your privacy and the protection of your Personal Data. This Privacy Notice (“**Notice**”) explains how we collect, store, use, share, transfer, delete, and process information collected from or about you known as **Personal Data** (defined further below in this Notice).

Purpose and Reach of this Privacy Notice

This Notice describes the types of Personal Data that Henkel may collect or process, how we may use and disclose that Personal Data, and how you may exercise any rights you may have regarding our processing of your Personal Data.

This Notice applies to Personal Data collected or processed by us. This includes data collected or processed:

- Through online activities and services we offer (through websites, web surveys, newsletters, online messaging services/channels, and otherwise) (“**Online Services**”);
- When we provide products or services to you and in other situations in which you interact with us, including but not limited to interacting with us through our customer services or product assistance lines, SMS/text messages, or email; or (such services, together with the Online Services are collectively, the “**Products and Services**”);
- When you interact with us in a professional capacity, or if you are an employee of a company with which we do business or provide Products and Services;
- When we undertake employment recruiting activities; or

- Anywhere this Notice is posted or referenced.

Henkel may provide you with a different privacy notice in certain specific situations, in which case that privacy notice or policy will apply to the Personal Data collected or processed in that specific situation, rather than this one. If you provide us with Personal Data of anyone other than yourself (such as a family member), please note that you are responsible for complying with all applicable privacy and data protection laws prior to providing that information to Henkel (including obtaining consent, if required).

Please review this Notice carefully. To the extent permitted by applicable law, by providing us your Personal Data or otherwise interacting with us, you are agreeing to this Notice.

Information Collected

What is Personal Data?

“**Personal Data**” is any information—as electronically or otherwise recorded—that can be used to identify a person or that we can link to or associate with a specific individual.

Personal Data may include information considered sensitive in some jurisdictions, such as financial account information, specific geolocation, social security number, driver’s license, state identification card, passport number, and other similar information. Data that could be considered Sensitive Personal Data is highlighted with an asterisk (*) in the chart below.

We will process any Personal Data we collect in accordance with applicable law and as described in this Notice (unless, as explained above, a separate policy or notice governs). In some circumstances, if you do not provide us with your Personal Data, certain Products and Services may be unavailable to you.

The below table is a high-level summary of the types of Personal Data we may collect from you. Following that high-level summary is additional detail and information on how we collect, process, and use Personal Data and the potential recipients of your Personal Data, now and in the preceding 12 months. Some jurisdictions require us to state the legal bases for processing your Personal Data, which are included below, but please note that not all jurisdictions may recognize all legal bases. The types of Personal Data we collect and disclose depends on your relationship with Henkel. Not all of the categories listed in the following charts may apply to you. If the nature of your relationship with Henkel changes, additional categories of Personal Data may also apply.

	Identity and contact information	Other personal information	Visual and audio information	Technical Information	Commercial and financial information	Inferences	De-identified data
	<i>This may include name, email, phone number, etc.</i>	<i>This may include age range, date of birth, etc.</i>	<i>This may include call recordings, etc.</i>	<i>This may include Internet Protocol (IP) address, browser, device type, etc.</i>	<i>This may include order and transaction history, etc.</i>	<i>Drawn from your Personal Data used to create a profile about you</i>	<i>Data for which your individual personal characteristics have been removed</i>
Website Visitors, Users of Online Services, and Senders of Inquiries	X	X	X	X*	X*	X	X
Users of our Products	X	X	X	X*	X*	X	X
Business Partners and Their Employees, Agents, and Contractors	X	X		X*		X	X
Employment and Apprenticeship Candidates	X	X*		X*		X	X

Personal Data that may be considered sensitive is noted with a “**”.

Website Visitors, Users of Online Services and Senders of Inquiries

We may process your Personal Data when you: (1) visit our website; (2) engage or interact with us via the Online Services; (3) submit inquiries to us both online (e.g., via email) or offline (e.g., by written letters); or (4) sign up for our newsletters or other informational or marketing materials.

*Examples of the types of data we process (Personal Data that may be considered sensitive is noted with a “**”)*

Identity and contact information, such as:	<ul style="list-style-type: none">• first and last name or unique pseudonym• honorifics and titles, preferred form of address• email address• postal address• phone number• social media handle• customer number
Other personal information, such as:	<ul style="list-style-type: none">• age range• gender• date of birth• household composition
Visual and audio information, such as:	<ul style="list-style-type: none">• recordings of your calls with our customer service representatives
Technical Information, such as:	<ul style="list-style-type: none">• Internet Protocol (IP) addresses (which may identify your general geographic location or company)• browser type and browser language• device type• advertising IDs associated with your device (such as Apple’s Identifier for Advertising (IDFA) or Android’s Advertising ID (AAID))• date and time you use our Online Services• Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services• activity on our Online Services and referring websites or applications• data collected from cookies or other similar technologies***
Commercial and financial information, such as:	<ul style="list-style-type: none">• order and transaction history, including product preferences• bank account number and details*• request documentation• customer service records• financial transaction history• financial account number*

Deidentified Data:	<ul style="list-style-type: none"> Deidentified data is data for which your individual personal characteristics have been removed such that you are not identified and the information is no longer considered Personal Data under data protection laws
<i>Where do we get the data?</i>	
<ul style="list-style-type: none"> you directly those authorized to provide personal data on your behalf such as your authorized representative your devices third parties that provide access to information you make publicly available, such as social media 	
<i>Why do we process the data? (Purposes for the processing of Personal Data that may be considered sensitive are noted with a “**”)</i>	
<ul style="list-style-type: none"> to provide you with our Products and Services to communicate with you and respond to your requests, questions, comments and/or suggestions to ensure the proper and secure functioning of our Online Services* to identify and authenticate you* for marketing, internal research, and development* to conduct raffles, sweepstakes, contests, promotions, and to provide the results* to ensure we have up-to-date contact information to open, maintain, manage, and track user accounts or enrollments* to provide service and assistance to users* to detect security incidents* to provide you with information related to product or service updates, promotional notices, offers and other information from Henkel and its affiliates* to send you marketing or promotional materials* to protect against malicious or illegal activity* to improve our Online Services* for short-term, transient use* to customize content for you* for administrative purposes* to monitor and analyze trends, usage and activities in connection with our Products and Services* for quality assurance and to assist in training and development of our representatives* to operate our business, including for auditing to comply with legal and regulatory obligations* 	
<i>Who receives the data? (Parties that may receive Personal Data that may be considered sensitive are noted with a “**”)</i>	
<ul style="list-style-type: none"> Henkel, our affiliates, and related companies third parties who assist with fraud prevention, detection and mitigation 	

- third parties who assist with our information technology and security programs and our loss prevention programs
- service providers, including distributors or other product distributors
- partners that assist us in providing the Products and Services or help us improve our marketing or administration**
- Henkel’s lawyers, auditors and consultants

Users of Our Products

We may process your Personal Data when you are the existing or prospective Henkel customer and/or when you receive or use Henkel products.

*Examples of the types of data we process (Personal Data that may be considered sensitive is noted with a “**”)*

<p>Identity and contact information, such as:</p>	<ul style="list-style-type: none"> • first and last name or unique pseudonym • honorifics and titles, preferred form of address • email address • postal address • phone number • social media handle • customer number
<p>Other personal information, such as:</p>	<ul style="list-style-type: none"> • age range • gender • date of birth • household composition
<p>Visual and audio information, such as:</p>	<ul style="list-style-type: none"> • recordings of your calls with our customer service representatives
<p>Technical Information, such as:</p>	<ul style="list-style-type: none"> • Internet Protocol (IP) addresses (which may identify your general geographic location or company) • browser type and browser language • device type • advertising IDs associated with your device (such as Apple’s Identifier for Advertising (IDFA) or Android’s Advertising ID (AAID)) • date and time you use our Products and Services • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services • activity on our Online Services and referring websites or applications • data collected from cookies or other similar technologies***

Commercial and financial information, such as:	<ul style="list-style-type: none"> • order and transaction history, including product preferences • bank account number and details* • request documentation • customer service records • financial transaction history • financial account number*
De-identified Data:	<ul style="list-style-type: none"> • De-identified data is data for which your individual personal characteristics have been removed such that you are not identified and the information is no longer considered Personal Data under data protection laws****

Where do we get the data?

- you directly
- those authorized to provide personal data on your behalf such as your authorized representative
- your devices
- third parties that provide access to information you make publicly available, such as social media

*Why do we process the data? (Purposes for the processing of Personal Data that may be considered sensitive are noted with a “**”)*

- to provide you with our Products and Services
- to communicate with you and respond to your requests, questions, comments and/or suggestions
- to ensure the proper and secure functioning of our Online Services*
- to identify and authenticate you*
- for marketing, internal research, and development*
- to conduct raffles, sweepstakes, contests, promotions, and to provide the results*
- to ensure we have up-to-date contact information
- to open, maintain, manage, and track user accounts or enrollments*
- to provide service and assistance to users*
- to detect security incidents*
- to provide you with information related to product or service updates, promotional notices, offers and other information from Henkel and its affiliates*
- to send you marketing or promotional materials*
- to protect against malicious or illegal activity*
- to improve our Online Services*
- for short-term, transient use*
- to customize content for you*
- for administrative purposes*
- to monitor and analyze trends, usage and activities in connection with our Products and Services*
- for quality assurance and to assist in training and development of our representatives*

- to operate our business, including for auditing
- to comply with legal and regulatory obligations*

Who receives the data? (Parties that may receive Personal Data that may be considered sensitive are noted with a “”)*

- Henkel, our affiliates, and related companies
- third parties who assist with fraud prevention, detection and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- service providers, including distributors or other product distributors
- partners that assist us in providing the Products and Services or help us improve our marketing or administration**
- Henkel’s lawyers, auditors and consultants

Business Partners and Their Employees, Agents, and Contractors

We may process your Personal Data if you are a current Henkel business partner, employee of a Henkel business partner, agent or contractor

*Examples of the types of data we process (Personal Data that may be considered sensitive is noted with a “**”)*

Identity and contact information, such as:	<ul style="list-style-type: none">• first and last name or unique pseudonym• honorifics and titles, preferred form of address• company/employer• email address• postal address• phone number
Other personal information, such as:	<ul style="list-style-type: none">• age• gender• date of birth
Technical Information, such as:	<ul style="list-style-type: none">• Internet Protocol (IP) addresses (which may identify your general geographic location or company)• browser type and browser language• device type• advertising IDs associated with your device (such as Apple’s Identifier for Advertising (IDFA) or Android’s Advertising ID (AAID))• date and time you use our Online Services• Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services• activity on our Online Services and referring websites or applications• data collected from cookies or other similar technologies***
De-identified Data:	<ul style="list-style-type: none">• De-identified data is data for which your individual personal characteristics have been removed such that you are not identified and the information is no longer considered Personal Data under data protection laws****

Where do we get the data?

- you directly
- our business partners and other third parties
- your employer or principal
- your devices

*Why do we process the data? (Purposes for the processing of Personal Data that may be considered sensitive are noted with a “**”)*

- to communicate with you and respond to your requests, questions, comments and/or suggestions
- to identify and authenticate you*

- to ensure we have up-to-date contact information
- to detect security incidents*
- to provide you with information related to product or service updates, promotional notices, offers and other information from Henkel and its affiliates*
- to protect against malicious or illegal activity*
- for short-term, transient use*
- for administrative purposes*
- for marketing, internal research and development*
- to operate our business, including for auditing
- to comply with legal and regulatory obligations*

*Who receives the data? (Parties that may receive Personal Data that may be considered sensitive are noted with a “**”)*

- Henkel, our affiliates, and related companies
- third parties who assist with fraud prevention, detection and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- service providers, including distributors or other product distributors
- partners that assist us in providing the Products and Services or help us improve our marketing or administration**
- Henkel’s lawyers, auditors and consultants

Employment and Apprenticeship Candidates

We may process your Personal Data when you apply or are a candidate for employment or apprenticeship at Henkel.

*Examples of the types of data we process (Personal Data that may be considered sensitive is noted with a “**”)*

<p>Identity and contact information, such as:</p>	<ul style="list-style-type: none"> • first and last name or unique pseudonym • honorifics and titles, preferred form of address • email address • postal address • phone number • social media handle • username or code and password
<p>Other personal information, such as:</p>	<ul style="list-style-type: none"> • age • gender • disability*

	<ul style="list-style-type: none"> • date of birth
Technical Information, such as:	<ul style="list-style-type: none"> • Internet Protocol (IP) addresses (which may identify your general geographic location or company) • browser type and browser language • device type • advertising IDs associated with your device (such as Apple’s Identifier for Advertising (IDFA) or Android’s Advertising ID (AAID)) • date and time you use our Online Services • Uniform Resource Locators, or URLs (i.e., website addresses) visited prior to arriving and after leaving our Online Services • activity on our Products and Services and referring websites or applications • data collected from cookies or other similar technologies***
Professional and educational information, such as:	<ul style="list-style-type: none"> • job title or position • employer • work skills • employment history • graduate degrees • certifications • specialized training • responses to surveys and questionnaires
De-identified Data:	<ul style="list-style-type: none"> • De-identified data is data for which your individual personal characteristics have been removed such that you are not identified and the information is no longer considered Personal Data under data protection laws****
<i>Where do we get the data?</i>	
<ul style="list-style-type: none"> • you directly • your employer or principal • your devices • our business partners and other third parties 	
<i>Why do we process the data? (Purposes for the processing of Personal Data that may be considered sensitive are noted with a “**”)</i>	
<ul style="list-style-type: none"> • to communicate with you and provide you with information about employment opportunities • to administer the selection process and to consider you for employment* • to identify and authenticate you* • to detect security incidents* • to protect against malicious or illegal activity* • for short-term, transient use* 	

- for administrative purposes*
- for marketing, internal research, and development*
- to comply with legal and regulatory obligations*

*Who receives the data? (Parties that may receive Personal Data that may be considered sensitive are noted with a “**”)*

- Henkel, our affiliates, and related companies
- third parties who assist with fraud prevention, detection and mitigation
- third parties who assist with our information technology and security programs and our loss prevention programs
- service providers, including distributors or other product distributors
- Henkel’s lawyers, auditors and consultants

Children

Henkel does not knowingly collect, maintain, disclose, or otherwise process Personal Data from minors below the age of 18 without the permission of such minor’s parents or legal guardians.

**In limited circumstances, recipients may include, (1) in the event of a sale, assignment, merger, consolidation, corporate reorganization, or transfer, to the buyer, assignee, or transferee; and (2) government or regulatory officials, law enforcement, courts, public authorities, or others when permitted by this Notice or required by law.

***Please see the [Marketing, Cookies, and Similar Technologies](#) section below for more information on how we use cookies and similar technologies.

Marketing, Cookies, and Similar Technologies

Marketing Uses, Cookies, and Other Activities

To the extent permitted by applicable law, including in accordance with your consent where required by applicable law, we may engage in the following activities:

- We may use your contact details to contact you to determine whether you would like to initiate a business relationship with us or to send you marketing emails. If you do not wish to receive such marketing emails, you may opt-out by declining to receive such emails when registering or in our subsequent communications by following opt-out or unsubscribe instructions included in the email or at other information collection points on the Online Services.
- We may display advertisements to you regarding products or services that we believe are relevant to you based on your activities on the Online Services or on other web or digital properties. Such advertisements may be shown on our Online Services or the online services of others. For more information about these activities and how to manage or opt-out of them, please see the below sections.
- We also perform statistical analyses of the users of our Online Services to improve the functionality, content, design, and navigation of the website.

Do-Not-Track Signals

Certain web browsers and other programs may transmit “opt-out” signals, also called a Global Privacy Control (or GPC) signal (we refer to these as “GPC Signals”), to websites with which the browser communicates. We currently do not recognize GPC Signals.

Behavioral Advertising

Where allowed by law, as described above, we use your Personal Data to provide you with targeted advertisements or marketing communications we believe may be of interest to you. In some jurisdictions, you may have the right to opt-out of these types of targeted advertisements. See the Opt-out of Sale or Sharing section below to do so.

For more information about how targeted advertising works, you can visit the Network Advertising Initiative’s (“NAI”) educational page by going to <http://www.networkadvertising.org/understanding-online-advertising/how-does-it-work>.

Additionally, you can opt-out of some of these services by visiting the Digital Advertising Alliance's opt-out portal at: <http://optout.aboutads.info/>.

Opt-out of Sale, Sharing, or Targeted Advertising

Certain of Henkel's practices may be considered the sale or sharing of Personal Data under certain applicable laws. You may have the right to opt-out. To exercise these rights, please see the [Your Rights Regarding Your Personal Data](#) section below.

Third Parties

Service Providers

Service providers acting on our behalf must execute agreements requiring them to maintain confidentiality and to process Personal Data as necessary to perform their functions in a manner consistent with this Notice, other applicable privacy notices, and as explicitly permitted or required by applicable laws, rules, and regulations.

Combination of Data with Data Received from Third Parties

We may combine information we collect, including Personal Data, with Personal Data that we may obtain from third parties.

Links to Other Websites

Our website may contain links to other websites, applications, products, or services that are not owned or operated by Henkel, such as social media websites and applications like Facebook and Twitter. You should carefully review the privacy policies and practices of other websites, products, and services as we cannot control and are not responsible for privacy policies, notices, or practices of third-party websites, applications, products, and services.

Your Rights Regarding Your Personal Data

Please note that in many circumstances, we cannot effectively do business with you without processing some Personal Data about you (e.g., your contact information). For example, when you contact us, we may require you to provide information to authenticate your identity to assist you with your request. If you are unable to provide this information, we may be unable to process your request.

To the extent that the state in which you live has a data protection law that requires us to offer some or all of the following rights to you, we will provide the following rights to you based on your state's law:

- To opt-out of the sale of your Personal Data or sharing your Personal Data for cross-context behavioral advertising or, in other states, to opt-out of targeted advertising;
- To request access to and a copy or representative summary of your Personal Data, including to provide your Personal Data directly to another organization, i.e., a right to data portability;
- To request to know about the Personal Data we process about you or, in other states, to request to acknowledge our processing of your Personal Data;
- To request that we correct your Personal Data;
- To request that we delete your Personal Data;
- To request a list of the categories of third parties to which your Personal Data is disclosed or, in other states, to request a list of specific third parties (other than natural persons) to which we have disclosed your Personal Data;
- To request that we limit the processing of your Sensitive Personal Data;
- To appeal the denial of a request; and
- To lodge a complaint with the data protection authority in your jurisdiction.

To learn if you have the other above rights in the state in which you live and to exercise any of these rights with respect to your Personal Data, please contact us at notificacion.privacidad@henkel.com. We will not discriminate against you for exercising any of the rights described above, although we may not be able to continue to provide you Products and Services or it may otherwise affect the way we are able to interact with you.

We will make reasonable efforts to respond promptly to your requests in accordance with applicable laws. We may, after receiving your request, require additional information from you to honor your request and verify your identity. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.

In the event you wish to make a complaint about how we process your Personal Data, please contact us at notificacion.privacidad@henkel.com, and we will handle your request as soon as possible. Even if you make a complaint to us, you may always lodge a complaint with the relevant authority in your location.

Safeguarding Information

Consistent with applicable laws and requirements, Henkel has put in place physical, technical, and administrative safeguards designed to protect Personal Data from loss, misuse, alteration, theft, unauthorized access, and unauthorized disclosure consistent with legal obligations and industry practices. However, as is the case with all websites, applications, products, and services, we unfortunately are not able to guarantee security for data collected through our Products and Services. In addition, it is your responsibility to safeguard any passwords, ID numbers, or similar individual information associated with your use of the Products and Services.

How Long Your Personal Data Will Be Retained

We generally retain Personal Data for as long as needed for the specific business purpose or purposes for which it was collected or obtained, and as outlined in this Notice. In some cases, we may be required to retain Personal Data for a longer period of time by law or for other necessary business purposes. Whenever possible, we aim to de-identify the information or otherwise remove some or all information that may identify you from records that we may need to keep for periods beyond the specified retention period. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject that affects the Personal Data; and (iii) whether retention is determined to be necessary or advisable for Henkel due to applicable statutes of limitations, litigation, or other legal or regulatory obligations. Henkel takes reasonable steps to dispose of Personal Data upon the expiration of retention periods taking into consideration these litigation, legal, or regulatory obligations.

Changes to This Privacy Notice

We reserve the right to change this Notice from time to time. We will alert you when changes have been made by indicating the date this Notice was last updated as the date the Notice became effective or as otherwise may be required by law. It is recommended that you periodically revisit this Notice to learn of any changes.

Contact Us

If you have questions or comments about this Notice or about how your Personal Data is processed, please contact us by one of the methods below:

Email: notificacion.privacidad@henkel.com

Mail: Calle 17 No. 68b-97, Zona Industrial de Montevideo, Bogotá D.C., Colombia

We will make reasonable efforts to respond promptly to your requests in accordance with applicable laws. We may, after receiving your request, require additional information from you to honor your request and verify your identity. Please be aware that we may be unable to afford these rights to you under certain circumstances, such as if we are legally prevented from doing so.