

Privacy Policy

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This policy explains what personal data Lavonelle collects when you visit lavonelle.com, buy from us, contact us or work with us as a trade partner. It also explains why we collect it, who we share it with and the rights you have. We handle your data in line with UAE law, in particular Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (the "PDPL").

1. Who we are

Lavonelle Beauty is the brand of LAVONELLE Trading ("Lavonelle", "we", "us"), a sole establishment licensed in Dubai, United Arab Emirates. We distribute professional beauty brands. We decide how and why your personal data is used, which makes us the controller of that data under the PDPL.

LAVONELLE Trading (لغونيل للتجارة), Sole Establishment

Trade licence no. 1649501, issued by the Dubai Department of Economy and Tourism

Dubai, United Arab Emirates

Email: hello@lavonelle.com · WhatsApp: +971 54 488 8528 · lavonelle.com

2. The laws we follow

We collect and use personal data in line with:

- Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data (PDPL);
- Federal Law No. 15 of 2020 on Consumer Protection and its Executive Regulations, which prohibit suppliers from circulating or disclosing consumer data for trading or marketing purposes;
- Federal Decree-Law No. 14 of 2023 on Trading by Modern Technological Means, which requires online sellers to protect consumer data and not use it for marketing without consent;
- Federal Decree-Law No. 34 of 2021 on Combating Rumours and Cybercrimes, which protects the privacy of information held electronically.

3. The information we collect

- **Contact and identity details:** your name, email address and phone or WhatsApp number.
- **Delivery and billing details:** the addresses you give us.
- **Order details:** what you bought, prices, delivery, claims and refunds.
- **Payment information:** card payments are processed by our payment providers. We receive confirmation of payment and limited details, such as card type and the last four digits. We never see or store your full card number.

- **Account details:** if you create an account, your login email, saved preferences and any store credit. Your password is stored in encrypted form by our website platform.
- **Messages:** what you send us by email, WhatsApp, our contact form or social media, including photos or videos sent with a claim.
- **Trade and professional details:** if you apply as a salon, hairdresser or retail partner, your business name, trade licence and proof of professional qualification or activity.
- **Technical information:** your IP address, device and browser type and the pages you visit, collected through cookies (see section 9).
- **Marketing preferences:** whether you have agreed to hear from us.

If you mention a scalp, hair or skin concern when asking us for product advice, we use it only to answer your question and do not keep it longer than needed. We do not ask for any other sensitive personal data.

4. Why we use it, and on what basis

Under the PDPL, we may process personal data with your consent, or without it where processing is necessary for one of the purposes the law allows. We use your data:

- **to process, deliver and support your orders,** including claims, replacements, refunds and store credit. This is necessary to perform our contract with you;
- **to verify professional customers** before selling professional-use products. This is necessary to perform our contract;
- **to keep invoices, accounting and tax records,** which UAE law requires;
- **to prevent fraud and keep our website secure,** which is necessary to perform our contract and meet our legal obligations;
- **to answer your enquiries** and claims;
- **to send you news, offers and new arrivals, only with your consent.** You can withdraw consent at any time using the link in every email or by messaging us.

We never sell your personal data, and we never share it with other companies for their own marketing. We do not make decisions about you based only on automated processing.

5. Who we share it with

We share only what is needed, with:

- our website and online store platform, Wix.com, which hosts our site and processes orders on our behalf;
- our payment providers, to process your payment;
- the delivery and courier companies we work with, to deliver your order;

- communication services we use to reply to you, such as WhatsApp (Meta) and our email provider;
- our professional advisers, such as accountants and lawyers, who are bound by confidentiality;
- courts, regulators and government authorities, where UAE law requires it.

These service providers may use your data only to provide their services to us, and we require them to protect it.

6. Transfers outside the UAE

Some of our service providers store or process data outside the UAE. Wix, for example, uses servers in several countries. Under Articles 22 and 23 of the PDPL, we transfer personal data outside the UAE only:

- to countries whose data protection laws offer an adequate level of protection;
- under contracts that require the recipient to protect your data to the standard of the PDPL;
- where the transfer is necessary to perform our contract with you, for example to process your payment; or
- with your express consent.

7. How long we keep it

- **Orders, invoices and tax records:** for as long as UAE tax and commercial laws require, currently up to seven years.
- **Account details and store credit:** while your account is active, and deleted on request or after 24 months without use.
- **Marketing preferences:** until you unsubscribe.
- **Messages, claims and enquiries:** up to two years, unless needed for an ongoing claim.
- **Trade partner records:** for the length of our relationship and up to five years afterwards.

8. Your rights under the PDPL

You have the right to:

- be told what personal data we hold about you, why, and who we share it with (Article 13);
- receive your data in a structured, machine-readable format and have it transferred (Article 14);
- have inaccurate data corrected and data that is no longer needed erased (Article 15);
- ask us to restrict how we use your data (Article 16);
- ask us to stop processing your data, including for direct marketing at any time (Article 17);
- object to decisions made solely by automated processing (Article 18);
- withdraw your consent at any time, where we rely on it.

To use any of these rights, contact us by email at hello@lavonelle.com or by WhatsApp. We may ask you to confirm your identity first. We reply within 30 days, and there is no charge.

If you are not satisfied with our response, you can complain to the UAE Data Office.

9. Cookies

Our website runs on Wix. It uses essential cookies to make the site work, for your bag, checkout and security. With your consent, we also use analytics cookies to understand how the site is used. You can manage cookies through the cookie banner and your browser settings. Blocking essential cookies may stop the store from working properly.

10. Keeping your data safe

Our website uses encryption (HTTPS). Card payments are handled by payment providers that meet the card industry's security standard (PCI DSS). Only people who need your data to do their job can access it. If a data breach occurs that could affect your privacy, we will notify the UAE Data Office and you, as Article 9 of the PDPL requires.

11. Children

Our website and products are intended for adults. We do not knowingly collect personal data from anyone under 18. If you believe we have, please contact us and we will delete it.

12. Other websites

Our site links to brand websites, social media and WhatsApp. Those services have their own privacy policies, and we are not responsible for how they use your data.

13. Changes to this policy

We may update this policy from time to time. The date at the top always shows the latest version. If we make significant changes, we will tell you by email or with a notice on our website.

14. Contact us

For any question about your privacy, contact us:

- **Email:** hello@lavonelle.com
- **WhatsApp:** +971 54 488 8528
- **Contact form:** on lavonelle.com

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