



## **TRANSPARENCY REPORT**

### **INTRODUCTION**

The Beauty Health Company and its affiliates (together, “Hydrafacial”, “we” or “us”) are committed to being fully transparent about our privacy practices. Here, we describe our policy for managing government and law enforcement requests to access personal information that is stored in our systems, and we provide our Transparency Report that documents the requests we have received to date.

### **GOVERNMENT & LAW ENFORCEMENT REQUEST POLICY**

Hydrafacial does not voluntarily disclose any personal data of customers to government authorities or otherwise grant them access to such data. In addition, Hydrafacial has not built, and will not purposefully build, backdoors to enable government actors to access its data or information systems, and has not changed, and will not purposefully change, its processes in a manner that facilitates government access to data.

However, Hydrafacial may receive a legally binding subpoena, writ, warrant, or other court order from a government authority requesting that it disclose personal data. Hydrafacial will only provide the requested personal data in response to formal and valid legal process. Where Hydrafacial receives such a request, Hydrafacial’s legal team reviews the request to ensure that it satisfies applicable legal requirements. If the legal assessment reveals legitimate and lawful grounds for challenging the request, Hydrafacial will do so where appropriate. Hydrafacial’s policy is to construe such requests narrowly to limit the scope of the personal data provided.

For Hydrafacial to disclose any customer data, the request must also satisfy the following policies:

- be made in writing and on official letterhead,
- identify and be signed by an authorized official of the requesting party and provide official contact information, including a valid email address,
- indicate the reason for, and nature of, the request,
- identify the individual or subject account that is the target of the request,
- describe with specificity the data/information sought and its relationship to the investigation, and
- be issued and served in compliance with applicable law.

Where Hydrafacial receives a legally binding request for a customer’s personal data, Hydrafacial’s policy is to notify the customer via email before disclosing any information. To the extent permissible under the request and/or applicable law, the



notice will describe the personal data requested, the authority making the request, the legal basis of the request, and any response already provided. This notice gives the customer an opportunity to pursue a legal remedy, such as filing an objection with a court or the requesting authority.

Exceptions to Hydrafacial's policy for personal data requests by government authorities:

- A statute, court order, or other law may prohibit Hydrafacial from notifying the data subject about the request, but Hydrafacial will make reasonable efforts to obtain a waiver of the prohibition or provide notice once the prohibition requirement ends.
- Hydrafacial might not give notice to the customer in exceptional circumstances involving imminent danger of death or serious physical injury to any person or to prevent harm to Hydrafacial's services.
- Hydrafacial might not give notice to the customer when it has reason to believe that the notice would not go to the actual customer account holder, for instance, if an account has been hijacked.
- Where Hydrafacial identifies unlawful or harmful activity, or suspects any such activity, related to a customer's account, it might notify appropriate authorities, such as in the cases of hacking.

## **TRANSPARENCY REPORT**

Hydrafacial's Transparency Report shows:

- The countries where we operate
- The number of requests received per country
- The identities of the requesting authorities
- The number of accounts related to each request
- The types of personal data requested
- The number of requests we have challenged
- The number of times we disclosed personal data in response to the requests



Business entity	Number of requests received	Name of the country and government/law enforcement authority	Number of customer accounts affected by the request(s)	Type(s) of personal information requested	Number of requests we challenged	Number of disclosures we made
Hydrafacial LCC	0					

## ADDITIONAL INFORMATION

For more information on HydraFacial's privacy and security practices, please refer to our Privacy Notice.

### Details

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HydraFacial France SAS  
5 rue Tilsit, 75008 Paris

The HydraFacial Company Iberia SL  
Claudio Coello 75, 1º A, 28001 Madrid

### Data Protection Officer

Ignacio de la Corte  
Email Address: [dpo@hydrafacial.com](mailto:dpo@hydrafacial.com)

If you have questions, requests or concerns regarding your privacy and rights, please let us know how we can help.