

ZARA'S PRIVACY POLICY

UPDATED ON NOVEMBER 2ND 2015

We at ZARA respect your privacy. This privacy policy (the "Policy") describes the manner in which we ("we", "ZARA" or "us") collect your personal information and how we process it, consistent with our commitment to providing you with a satisfactory and helpful shopping experience.

ZARA knows that you care about how your personal information is used and shared, and we take your privacy seriously.

This Policy applies to our interactions with you in which we collect Personal Information (as described below), whether in person in our stores, by phone or other means through our customer service, as well as through your use of the ZARA.COM website/app and co-branded versions of the website located at URLs that point to the domain name ZARA.COM (the "Website" or "Site"). Because we gather certain types of information about our users, we want you to understand what information we collect, how we collect it, how that information is used, how you can consult that information and how you can control our disclosure of that information.

By visiting our Site, using our services, purchasing products on our Website, posting on our message boards in social networks or online chats and making other submissions to our Site, or providing us with Personal Information (as described below), you acknowledge that you accept the practices and policies outlined in the then current Privacy Policy and our Terms and Conditions.

You should review this Policy every time you provide us with Personal Information to make sure that you agree with it. If you do not agree with this Policy, please do not provide us with Personal Information or use our Site.

1. WHO IS ZARA?

For purposes of this Policy, ZARA means ITX Canada Inc. (doing business as ZARA, ZARA HOME and MASSIMO DUTTI) and Zara Canada Inc. ZARA also includes any affiliates or subsidiaries of the above-listed companies, as well as all of their respective successors and assigns.

2. WHAT IS PERSONAL INFORMATION?

Personal Information is information that refers to an individual specifically and is recorded in any form. Personal information includes such things as your name, last name, billing address, e-mail and postal addresses, telephone numbers and credit or debit card data, etc.

3. HOW IS PERSONAL INFORMATION COLLECTED?

Personal Information may be collected in our stores. It may also be collected online when you voluntarily register with us or update your existing profile with us, receive catalogues, newsletters or emails, use our customer services, answer surveys, enter contests or other

promotional opportunities, and when you post on our social networks message boards, online chats or make other submissions to our Site.

If you choose to send an e-mail from our Site to another person or if you purchase a gift card for another person on our Site, we will also collect that person's Personal Information.

Our Site is intended for use by adults. We do not knowingly collect any Personal Information from children under the age of 13. Those under the age of 13 should not use the Site or provide ZARA with any Personal Information.

4. PURPOSE OF COLLECTION

We use Personal Information in an effort to improve your shopping experience, to communicate with you about our products, promotions or contests, if any, to protect you and us from error and fraud, to process your requests or orders and to keep track of and analyze your purchases, transactions, shopping patterns, account activity, payment history, to assess your credit-worthiness and to comply with legal requirements. We may also use this information to make offers to you, to help us target specific products to you, and to help us develop and improve our Site and tailor it to your interests. Finally, we may use the information to conduct surveys and analyses for research, statistical and product development purposes and achieve other purposes as may, from time to time, be permitted by law.

5. CONSENT

We will collect, use or disclose your Personal Information only with your knowledge and consent, including as set out in the Policy, except where otherwise required or permitted by law.

Consent may be oral or written, express or implied. Implied consent is obtained in a number of ways, including where a customer relationship already exists, express consent has previously been given, or the purpose of using the Personal Information is reasonably apparent to you.

ZARA is part of a network of retailers offering a unique mix of products. We share your Personal Information within the ZARA family of companies so that we can notify you about products, services, rewards and special offers you might enjoy. These notifications may be given to you by postal mail, e-mail, telephone, text message, automatic dialing-announcing device or other form of electronic means using the contact information that you provide to us. Occasionally, we may transfer your Personal Information outside the ZARA family of companies to trusted entities which may assist us in servicing you. When we do so, we require such entity to protect the information in a manner that is consistent with this Policy.

You may change or withdraw your consent at any time, on reasonable notice, subject to legal or contractual restrictions. We will inform you of the implications of doing so. To amend your consent, refer to the Contacting Us section below.

If you provide us with Personal Information about another person, you represent and warrant to us that you have obtained all necessary consents from that other person to permit us to use that Personal Information as set forth in this Policy.

Should you choose to check the option to store your PAYMENT DATA (i.e. credit / debit card data), you expressly authorize us to process and store the data indicated as necessary for activation and development. The Card-Verification-Value-Code (CVV) will only be used to make able the purchase in progress, and will not be stored or processed subsequently as part of your PAYMENT DATA.

Giving us your consent to activate this functionality, allows your data to appear auto filled in subsequent purchases on this website, so you will not need to enter the data in each new process, and such consent shall be valid and effective for subsequent purchases.

You can change your PAYMENT DATA and revoke your consent for processing and storing at any time through My Account section – Payment Data.

ZARA stores and transmits your card's data according to the main standards of confidentiality and security of credit and debit cards, in compliance with Payment Card Industry Data Security Standard (PCI DSS).

When using this functionality, changing your password may be requested for security reasons. Remember that the safety in use of the website also depends on proper use and conservation of certain key/passwords confidential.

6. LIMITING USE, DISCLOSURE AND RETENTION

Personal Information will not be used or disclosed for purposes other than those for which it was collected, except with your consent or as required or permitted by law. It will be retained only as long as necessary for those purposes or as required by law.

If you send an e-mail from our Site to another person or if you purchase a gift card for another person on our Site, that person's Personal Information will only be used for the purpose of sending that person the e-mail or delivering the gift card to that person, and for related technical problems, queries and customer service matters.

To fulfill the purposes above, we disclose the information that you have provided to us to Industria de Diseño Textil, S.A. (Inditex, S.A.), holding company of the Inditex Group to which ZARA belongs, with registered address at Avda. de la Diputación, Edificio Inditex, 15142 Arteixo, A Coruña (Spain). We may also disclose this information to subsidiaries and affiliates of Inditex, S.A., third party processors, fulfillment centers, financial institutions or other third party service providers who help with our business operations (such as fraud investigations, bill collection, affiliate and rewards programs, suppliers of technological services, financial transaction management, logistics services, transportation, order management and customer service, and / or analysis of the transactions made through the Website in order to provide our users with sufficient guarantees in purchasing transactions, etc.) or as necessary to process your purchases. By providing Personal Information in this Website or otherwise to us, you expressly authorize us to disclose and process your information as described. Your consent to this access/disclosure, includes those cases where for efficiency of the provision of the services, providers may be located in and/or have access to the data from countries or territories outside Canada, as the United States of America, Ireland or Spain, will be deemed as granted by clicking the button of acceptance. Please do not proceed if you do not agree on the abovementioned personal information usage and cross border transfer.

7. ACCURACY

We will keep your Personal Information as accurate, complete and up-to-date as necessary and reasonably possible for the purposes for which it is to be used. You may request access to any Personal Information we have on record in order to review and amend the information, as appropriate.

8. SAFEGUARDS AND ACCOUNTABILITY

We will protect Personal Information by security safeguards appropriate to the sensitivity of the information, including through the use of the following measures: (i) physical security measures, such as restricted access facilities and appropriate disposal of Personal Information; and (ii) electronic security measures, such as password protection, for accessing computerized Personal Information.

We are responsible for Personal Information under our control, including any Personal Information that is transferred to third parties for processing, storage or other purposes.

When we use trusted third parties to act on our behalf by performing such functions as fulfilling orders, delivering packages, processing card payments or providing customer service, contractual or other appropriate means are used to ensure compliance by such third parties with this Policy and all applicable privacy laws.

We cannot be responsible for any Personal Information you share or post on our message boards, chat rooms or by way of other submissions to the public spaces of our Site. These are public areas and may be consulted or viewed by anyone visiting these sections of our Site and, as such, fall outside this Policy.

9. OPENNESS AND INDIVIDUAL ACCESS

This Policy and any related information are available at all times on our Site, www.zara.com under [Privacy Policy](#), or on request.

Upon request, we will inform you of the existence, use and disclosure of Personal Information relating to you, and give you access to that information. You have the right to challenge the accuracy and completeness of your information and have it amended as appropriate.

10. CONTACTING US

For anything to do with this Policy, including questions, comments or withdrawing of consent, please contact us as follows:

E-mail: dataprotection@zara.com

We will inform individuals who make enquiries or lodge complaints about our enquiry or complaint procedures, as applicable. If a complaint is found to be justified, we will take appropriate measures, including, if necessary, amending our policies and practices.

11. ASSIGNMENT

You consent to the transfer of your Personal Information to a third party acquirer of ZARA's business.

12. COOKIES AND WEB BEACONS

Cookies are small text files which embed themselves on your hard drive from some of the Site's pages. Cookies are harmless in the sense that they cannot extract any information from your hard drive, over which you have complete control. We use cookies to determine site traffic, convey useful information about your interests, and to personalize any future visits you make to the Site. Cookies do not systematically provide us with any personal information about you, and you can opt to stop receiving cookies at any time by simply modifying your browser's configuration.

We also use Web beacons which are small strings of code that are placed in a website page or in an e-mail message. They are sometimes called "clear GIFs" (Graphics Interchange Format) or "pixel tags." When you visit a particular page, web beacons notify us of your visit. Since web beacons are used in combination with cookies, if you disable cookies the web beacons will only detect an anonymous Site visit. When used in an e-mail, web beacons enable us to know whether you have received the e-mail.

13. LINKS TO OTHER SITES

Our Site may contain links to sites other than our own or outside the ZARA family of companies. Those sites may have their own privacy policy, or no privacy policy at all. We are not responsible for those sites, and we provide these links solely for the convenience of visitors to our Site. These sites may send their own cookies to you and may collect information and use it in a way inconsistent with this Policy. We encourage you to review the privacy policies and terms of use of any third-party sites or services before providing any of them with any of your Personal Information. We do not control the content that appears on these sites or take any responsibility for their content, nor should it be implied that we endorse or otherwise recommend such sites or their products or services offered.