

ZARA'S PRIVACY POLICY

Updated on September 7TH, 2020

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 satisfying 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, through your use of the ZARA App or ZARA.COM website and co-branded versions of the website located at URLs that point to the domain name ZARA.COM (the "Website" or "Site") (jointly, the Platform). 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 Platform, using our services, purchasing products on our Website, posting on our message boards or chat rooms and making other submissions to our Platform, 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 satisfy yourself that you are happy with it. If you do not agree with this Policy, please do not provide us with Personal Information or use our Platform.

1. WHO IS ZARA?

For purposes of this Policy, ZARA means ZARA Canada Inc, Zara Home Canada Inc. and Massimo Dutti Canada Inc. and includes our parent companies, Zara Holding B.V. and Industria Textil de Diseño, S.A (Inditex S.A). 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 age, income, date of birth, e-mail and postal addresses, telephone numbers and financial information.

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 communication services, answer surveys, enter contests or other promotional opportunities, and when you post on our message boards, chat rooms or make other submissions to our Platform. We may also collect Personal Information from third parties

to whom you have provided same. In specific cases, a third party may have provided us with information about you by using a feature or service on the Platform, for example by sending you a gift card or shipping an order to your address. In these cases, we only process your data where relevant to this feature or service, as stated in this Privacy Policy.

Likewise, if you choose to send an e-mail from our Platform to a friend, we will also collect your friend's name and e-mail address. Your friend's information is only used to send the forwarding e-mail and is not saved in our customer or marketing databases.

Our Platform 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 Platform 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 to activate the mechanisms necessary to prevent and detect unauthorised uses of the Platform (for example, during the purchase and returns process as well as potential fraud being committed against you and/or against us. If we consider that the transaction may be fraudulent or we detect abnormal behaviour which indicates attempted fraudulent use of our features, products or services, this processing may result in consequences such as the blocking of the transaction or the deletion of your user account; to process your requests (if you contact us via telephone, the call may be recorded for quality purposes and so that we can respond to your request) 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 Platform 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.

For marketing purposes, we personalise the services we offer you and enable us to give you recommendations based on your interactions with ZARA on the Platform and an analysis of your user profile (for example, based on your purchase and browsing history); and we show you ads on the Internet which you may see when visiting websites and apps, for example, on social media. The ads you see may be random, but on other occasions they may be ads related to your preferences or purchase and browsing history.

If you use social media, we may provide the companies with which we collaborate certain information so that they can show you ZARA ads and, in general, offer you and users like you advertisements which take into account your profile on said social media sites. If you want information about the use of your data and how advertising works on social media, we recommend you review the privacy policies of the social media sites on which you have profiles.

We also use your data to carry out measurement and segment analyses on the ads which we show users on some of our collaborators' platforms. To do this we collaborate with these third parties who offer us the necessary technology (for example, cookies, pixels, SDK) to use these services. Keep in mind that, although we do not provide identifying personal data to these collaborators, we do give them some form of identifier each time (for example, the advertising ID associated with the device, an identifier associated with a cookie, etc.) If you would like more information in this respect, please review our Cookies Policy. Likewise, you can reset your

advertising ID or disable personalised ads on your device (if you have our App installed on an iOS device you can adjust your preferences in Settings/Privacy/Ads. If your device is Android, access Settings/Google/Ads).

When we gather your personal data from a variety of sources, we may consolidate them under certain circumstances for the purpose of improving our understanding of your needs and preferences related to our products and services (including for the purposes of analyses, generating user profiles, marketing studies, quality surveys and improving our interactions with our customers). This refers, for example, to the way we may combine your information if you have a registered account and, using the same email linked to your account, you make a purchase as a guest, or to information which is automatically compiled (such as IP and MAC addresses or metadata) which we may link with the information you have provided us directly through your activity on the Platform or in any of our stores (for example, information related to your purchases, whether in brick and mortar stores or online, your preferences, etc.).

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 telecommunication 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.

When we use trusted third parties to act on our behalf by performing such functions as fulfilling orders, delivering packages, processing credit 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. Our disclosure of your personal information in accordance with this Policy may involve the transfer of your personal information outside Canada, including Ireland and/or Spain. Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfilment of those purposes.

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. Should you not wish us to send information to third parties to show you ads, you can change your preferences on your mobile device by resetting your advertising ID or disabling personalised ads on your device. If you have our App installed on an iOS device you can adjust your preferences in Settings/Privacy/Ads. If your device is Android, access Settings/Google/Ads. If you are visiting the website, you can change the cookie settings in your browser.

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.

Where we transfer your Personal Information outside Canada, we will ensure that it is held in a similar manner and under policies similar to this Policy. You agree that persons outside of Canada to whom Personal Information is transferred may be required to disclose your Personal Information under the laws of their jurisdiction.

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. In circumstances where your Personal Information has been provided by a third party, we will refer you to that party (e.g. credit bureaus).

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 credit 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 Platform. These are public areas and may be consulted or viewed by anyone visiting these sections of our Platform 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 Platform, 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
- Address : Avda. de la Diputación, Edificio Inditex, 15143, Arteixo (A Coruña), Spain.

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 Platform'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 Platform. 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 Platform 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 Platform 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 Platform. 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.