

## PRIVACY AND COOKIES POLICY

This Privacy and Cookies Policy establishes the terms and conditions under which KG ZARA Deutschland B.V. & Co. (hereinafter "ZARA Deutschland"), with registered address at Mönckebergstraße 11, 20095 Hamburg, a company that currently operates the sales of the ZARA commercial brand in Germany, as well as Industria de Diseño Textil, S.A. (INDITEX, S.A), with registered address at Avda. de la Diputación, Edificio Inditex, 15143, Arteixo (A Coruña), Spain, both as joint data controllers for the purposes of this Privacy and Cookies Policy (hereinafter, jointly "Us" or "the Data Controllers"), process the personal data that you provide Us with when using the website [www.zara.com](http://www.zara.com) (hereinafter, "the Website"), the mobile application or app, understood as the software application designed to be used on smartphones, tablets or other mobile devices (hereinafter, the "App") or other applications, software, digital media, storage medium or functionalities related to the commercial brand ZARA in Germany (jointly, "the Platform").

When using the Platform, each time you provide Us with or it is necessary for Us to access any kind of information which, due to its characteristics, allows us to identify you, such as your name, surname, email address, billing or shipping address, telephone number, type of device or credit or debit card number, etc. (hereinafter, "Personal Data"), whether for purposes of browsing, purchasing our products or using our services or functionalities, you will be subject to this Privacy and Cookies Policy, Use and Purchase Conditions and other documents cited therein (jointly "the Terms and Conditions"), which are applicable at all times and should be reviewed to ensure you agree with them.

### 1. COLLECTION OF PERSONAL DATA AND PROCESSING PURPOSES

Please bear in mind that before using any of our services or functionalities, you must read this Privacy and Cookies Policy as well as the Terms and Conditions in the specific section regarding the service or functionality. In each section, you can see if there are any specific conditions for use, or if they require specific processing of your Personal Data.

Not providing certain compulsory information may mean that it will not be possible to manage your registration as a user or to use certain functionalities or services available through the Platform.

The user (you) hereby guarantees that the Personal Data provided is true and exact, and agrees to report any change or modification thereto. If you provide us with the Personal Data of third parties, you shall be responsible for having informed them and obtained their consent for these details to be provided for the purposes indicated in the corresponding sections of this Privacy and Cookies Policy. Any loss or damage caused to the Platform, to Data Controllers or to any third party through the communication of erroneous, inaccurate or incomplete information on the registration forms shall be the sole responsibility of the user.

The Data Controllers, as appropriate, shall use Personal Data for the following purposes:

- 1.1 To manage your registration as a user of the Platform. The Personal Data you provide us with shall be used to identify you as a Platform user, and to give you access to its different functionalities, products and services that are available to you as a registered user.
- 1.2 The development, compliance and undertaking of the purchase contract for the products you have acquired or any other contract with Us through the Platform. In particular, you must bear the following in mind:

- i. If you choose the option to save your card, you shall expressly authorise us to process the indicated details to be used as necessary for its activation and development. The card's security code (CVV or CVC) shall only be used for making the purchase and shall not be subsequently stored or processed as part of the payment details. Consenting to the activation of this functionality means that your data will automatically appear in these fields when making future purchases, so you will not have to enter your details again for each new purchase as they will be considered as valid and in place. You can change or delete your cards at any time through the My Account section. We store and transmit your card details in accordance with the leading international standards of confidentiality and security for credit and debit cards. The use of this function may require you to change your access password for security reasons. Remember that security when using the Platform also depends on the correct use and storage of certain confidential codes.
- ii. In the event that you have purchased a Gift Card, if you provide us with the personal data of third parties, you shall be responsible for having informed them and obtained their consent so that, in compliance with the Platform's Use and Purchase Conditions, we will be able to process their data for purposes of (a) managing the shipping or verifying receipt of the Gift Card and (b) attending to any requests that you or said third party may make.
- iii. If you have a Gift Receipt and you wish to return goods associated with it through the Platform, we will use the Personal Data provided in the return form for (a) managing the request and processing the collection of the goods from your home address, (b) attending to requests related to the Gift Receipt or the return that you wish to make, and (c) confirming the approval of the return and sending the voucher with the refund amount by email or other equivalent electronic means.
- iv. If the "Change of Size" option is available in the Platform and you choose to use this option where it is displayed in your User Account and do not return the original item you purchased in accordance with the established in the Terms and Conditions, we shall use the data of the credit/debit card you used to pay the first item purchased with the purpose of charging you the cost corresponding to the new order placed.

1.3 Contact you by email, telephone, SMS or other equivalent forms of electronic communication, such as the App's push notifications, etc. regarding updates or informative communications related to the functionalities, products or contracted services, including Platform security updates, when necessary or reasonable for their implementation.

1.4 Attend and manage your requests made using the available customer service channels in relation to the Platform or the Physical Stores, as well as monitoring the quality of our service.

The duration of data processing shall either be for (i) the period set forth in laws; or (ii) an indefinite period of time (i.e. either until you request that a certain data or all your data be erased); (iii) or until the relevant purpose applicable to a particular data ceases to exist. For instance, data relating to your orders will be processed as long as the data controller might be required to hold such data under applicable laws, and will be deleted once this lawful purpose ceases to exist.

## 2. NEWSLETTER SUBSCRIPTION

If you authorise your subscription to the ZARA Newsletter, we will provide you with information regarding our products and services through different means, such as by email, any other equivalent

electronic means of communication (such as SMS, etc.) as well as through push notifications via the App — if you have activated such notifications in your mobile device.

Subscription to the ZARA Newsletter may entail using Personal Data to make personalised advertising related to our products and services available to you via email, SMS or any of our other electronic media or those of third parties. We can also provide you with this information through push notifications from the App if you have activated them in your mobile device. With the aim of improving the service we provide you with, we hereby inform you that Personal Data related to your purchases at online or physical stores, tastes and preferences may be used for the purpose of analysis, generating user profiles, marketing studies, quality surveys and improving our client interaction.

If you are a registered user, you can change your preferences related to the sending of these commercial communications through the My Account section.

You can also unsubscribe through the Platform's Newsletter section at any time, or by following the information we provide in each communication.

### **3. DATA PROTECTION RIGHTS**

The Data Controllers undertake to respect the confidentiality of your Personal Data and to guarantee you can exercise your rights. You may exercise your rights of access, rectification, cancellation and opposition by sending an email to: [dataprotection@zara.com](mailto:dataprotection@zara.com), indicating the reason for your request.

If you decide to exercise these rights, and if part of the personal data you provided was your email address, we would ask you to please specify this circumstance in your written request, indicating the email address from which you wish to exercise your rights of access, rectification, cancellation and opposition.

### **4. OTHER NECESSARY USES OF YOUR PERSONAL DATA**

To fulfil the purposes indicated in this Privacy Policy, it may be necessary that Inditex Group holding company [Industria de Diseño Textil, S.A. (Inditex, S.A)] as well as other companies belonging to the Inditex Group, processes your Personal Data insofar as they are directly involved with each purpose (whose activities relate to the decoration, textile, clothing and home goods sectors, as well as any other complementary sectors, including cosmetics and leather goods, in addition to the development and support for electronic commerce activities).

It may also be necessary to transfer your Personal Data to the mentioned companies belonging to the Inditex Group or to third parties who provide us with support services, such as financial bodies, entities that fight against fraud, providers of technological, logistical, transport and delivery services, customer services and/or services that analyse the transactions made on the Platform with the aim of offering users sufficient guarantees in commercial operations, etc. For purposes of service efficiency, said collaborators and providers may be located in the United States of America or other countries or territories situated outside of the European Economic Area, which do not provide the same level of data protection as that of your country, or, as the case may be, as that of the European Union.

By accepting this Privacy and Cookies Policy, you are expressly authorising us to process and share your Personal Data with the abovementioned companies belonging to the Inditex Group and/or to transfer your Personal Data to the referred service providers located outside of the European Economic Area

for the purposes described herein. Equally, we inform you that we will need to access to your historical data in respect of which other companies belonging to Inditex Group may have acted as data controllers, and which we need to process as Data Controllers in order to fulfil the abovementioned purposes as Data Controllers and provide you with a complete service.

#### **5. INFORMATION ON COOKIES**

We use cookies in this Platform, which are small text files with information on your navigation in this Platform, whose principal objective is to improve your experience in the Platform. Please, continue reading to find further information on the cookies that we use, their purpose and other information of interest.

## Information about cookies

### What are cookies?

A cookie is a small text file that is stored by a website on your computer, phone or other devices with information about your browsing behaviour on this website. Cookies are necessary to make navigation easier and more user-friendly. They do not cause any damage to your computer.

Although the general term "cookie" is used in this data protection policy, as this is the main storage method used for information on this website, "local storage" of temporary internet files in the browser will be used for the same purposes as cookies. Accordingly, all information contained in this section also applies to "local storage".

### What are cookies used for on this website?

Cookies are an essential component of the functionality of this website. The main objective of our cookies is to improve your experience when navigating. For example, they help you to note your preferred settings whilst navigating and for future visits (language, country, etc.).

The information collected in cookies also enables us to optimise the website using assessments about user numbers and user profiles, and to adapt the website to the individual interests of the user, speed up the search function, etc.

From time to time, with your prior consent, we may use cookies, tags or similar applications to collect information that may appear on our website, third party websites or in another medium, based on the analysis of your navigation behaviour.

### What are cookies NOT used for on this website?

We do not store any personal information like address, password, credit card details, etc. in the cookies that we use.

### Who uses the information stored in the cookies?

The information stored in the cookies on our website is used exclusively by us, except for the information identified as "third party cookies" below. These are used and managed by external organisations to provide us with services that are requested by us in order to improve our services and the customer experience of our website. The most important services for which these "third party cookies" are used are the preparation of access statistics and the guarantee of payment transactions.

### How can I prevent the use of cookies on this website?

If, in view of the above, you wish to avoid the use of cookies on this website you must first deactivate the use of cookies in your browser and then delete the cookies stored in your browser that are associated with the website.

This option to avoid using cookies can be used at any time.

### How can I deactivate and delete cookies?

You can restrict, block or delete cookies on this website at any time by changing your browser configuration using the following instructions. Although every browser is different, cookies are usually configured in the "Settings" or "Tools" menu. You can find more information about configuration of cookies in your browser in the browser "Help" menu.

### Which cookies does the website use exactly and for what purpose?

The following list details the cookies, tags or similar applications used on this website, together with information about their purpose, duration and management (by us or by third parties).

<b>Technology and personalisation cookies: identification and authentication, navigation, user interface personalisation, favourites...</b>		
These cookies are used to identify the user during the session, to save the user from having to repeat the online authentication process, to speed up some processes on the website, to record options selected during the session or in previous sessions, to store pages visited previously, etc.		
<b>COOKIES</b>	<b>PURPOSE</b>	<b>DURATION</b>
User identification	Used to identify and authenticate the user. Also contain technical data about the user's session such as wait times whilst establishing a connection, session ID, etc.	Session
Session identification	Identifies the user's HTTP session. Standard for all web applications, to identify a user's inputs during a session.	Session
Navigation status	Enables the user's navigation status (start of session, first page, first access, scroll status, status of a setting, etc.) to be identified.	Session
User's selection	The values selected by the user for the session, such as shop, language, currency, products, size, etc. are stored.	Session
Favourites and last selection	Enables the user's preferred options (e.g. for shops) or last selection (shops, products, acceptance of cookies, etc.) from previous visits to the website to be displayed.	Permanent
Shopping basket	Information about the shopping basket and data for identifying the user in connection with the shopping basket are stored.	Session
Protocols	Enables the management of the switch between secure domain (protocol) and non-secure domain (http)	Session
<b>Navigation analysis cookies</b>		

These cookies contain general information about users' visits to the website (not about the content itself), in order to provide us with supplementary information about these visits for statistical purposes later on.		
Session ID (ASP.NET_SessionId)	Used to detect whether the user continues to use cookies from our service provider, Dynamic 1001 GmbH, in a session	Session
Google Analytics (__utma, __utmb, __utmc, __utmd, __utmv, __utmz, <a href="#">_ga</a> ...)	<p>Enables the use of the website to be tracked using the "Google Analytics" tool. This is a service provided by Google to obtain information about the user's visits to the website. Some of the data stored for later analysis are: number of user's visits to the website, data from his first and last visit, duration of visit, website from which he accessed this website, search machine used by the user to find this website or the link clicked on, the location from where the visit took place, etc.</p> <p>The configuration of these cookies has been determined in advance by the service offered by Google. We therefore advise you to consult the Google Analytics data protection policy, <a href="http://www.google.com/intl/es/analytics/privacyoverview.html">http://www.google.com/intl/es/analytics/privacyoverview.html</a>, to obtain more information about the cookies used or to block cookies (please note that we are not responsible for the content or accuracy of third party websites).</p>	Permanent
Optimizely (optimizelySegments; optimizelyEndUserId optimizelyPendingLogEvents; optimizelyBuckets...)	<p>The cookies identified at the domain <a href="http://optimizely.com">optimizely.com</a> or <a href="http://www.optimizely.com">www.optimizely.com</a> enable us to optimise the appearance, perception and communication and generally to ensure that the user can navigate our website seamlessly on the basis of how it is utilised by our users. Some of the data stored for later analysis are: the number of times the user has refreshed the page, information from visitor groups, e.g. browsers, campaigns, type of mobile sources and all defined personalised sectors, etc.</p> <p>The configuration of these cookies has been preset by our service provider, Optimizely, Inc. for the service provided. Further information about the cookies used and deactivation of these cookies can be found at: <a href="https://www.optimizely.com/opt_out">https://www.optimizely.com/opt_out</a>. Please be aware that we are not responsible for the content or accuracy of third party websites).</p>	Permanent
Implementation (DTU)	The Dynamic Tracking System is used to evaluate the performance of different advertising channels on this website. During a visit to our website the user's browser data are collected for statistical evaluation purposes. These data are collected using a pixel, which is generally incorporated into each page of this website.	Permanent

	<p>The following data are collected: • URL of pages and referrer; • Browser type and browser version (user agent); • Browser-specific settings (e.g. browser language settings); • Operating system; • Screen resolution; • Use of JavaScript; • Use of cookies • Colour depth; • Anonymous IP address; • Request time stamp; • Product specific data, which are provided by the shop; • Order values (if necessary).</p> <p>The data are passed on to our technical and statistical service provider, Dynamic 1001 GmbH. This only involves the transfer of non-personal data, which does not enable personal identification. When ordering, only anonymous data such as order ID, customer ID, purchase ticket or order amount will be sent to Dynamic 1001 GmbH, so that it is possible to calculate the advertising partner's commission correctly.</p>		
(good)	The traffic on our website is analysed anonymously, in particular the way in which our registered users have accessed our online store over a longer period (website, mobile website, application, etc.). The information associated with a specific identity marker is anonymised for later analysis so that we can offer our customers a seamless browsing experience.	Permanent	Us
<b>Purchase analysis cookies</b>			
These cookies enable us to collect information about the device used to carry out the purchase. This is for the purpose of verifying these purchase transactions so that our customers are offered sufficient security during the process. These cookies never contain sensitive information, such as credit card details.			
<b>COOKIES</b>	<b>PURPOSE</b>		<b>DURATION</b>
Device used to purchase (thx_guid)	Enables one-off identification of the device (PC, phone, etc.) from which purchases are made in order to carry out analysis later on and offer our customers sufficient security during purchase transactions. The information contained in this cookie will be collected by an external company in order to carry out these analyses.		Permanent

*If the services offered on this website are modified, this list will be updated as soon as possible. However it is possible that certain cookies will no longer appear on the list during the update process. These will always be cookies with the same purposes as those in the list.*