

## PRIVACY AND COOKIES POLICY

The www.zara.com website is an online shopping portal (hereinafter, the Portal or the Website) implemented by ITX MERKEN, B.V. (hereinafter, ITX MERKEN), a company belonging to the Inditex Group, and OU APRANGA ESTONIA, with registration code 11026132 and registered address in Pärnu mnt 10/Väike-Karja 12, Tallinn, Estonia

(hereinafter, the Seller), uses the Portal as a sales channel of ZARA Products through e-commerce in Estonia.

This Privacy Policy establishes the bases upon which the Seller and ITX MERKEN (hereinafter, We, Us or the Joint Data Controllers) process information through this Inditex Group Portal.

By using the Website or providing us your Personal Data through the Portal or by other available channels, you will be bound by the current Privacy Policy and you should review this text every time you use the Website to be sure you agree with it.

### 1. DATA COLLECTION AND PRINCIPAL PURPOSES OF PROCESSING:

We collect and process personal information about your person (hereinafter, Personal Data) when you use the Portal. Without limitation, this Personal Data include personal information that you submit when you sign-up to the Inditex Group Portal, navigate and/or make purchases through it. Such information includes your first name, last name, email address, phone number, delivery and billing address, , signature (when collecting online purchases), voice (when calling us to the customer service), date of birth, age, gender, payment method of purchase, historic purchase information, user ID, and, your payment information.

If you do not provide us with the information requested, We may not be able to fulfil the applicable purpose of collection, such as to supply products to you.

We will process your Personal Data for the following purposes:

- a) Registration as a user of the Inditex Group Portal: The Personal Data provided to us to register as a user of the Portal will be processed in order to identify you as a user of the Inditex Group Website and provide access to the different services and functions that are available to you as a registered user.
- b) Purchases: The development, facilitation and performance of the purchase and sale contract of the products you have purchased to the Seller or of any other contract between both parties and related administrative and legal purposes.

Furthermore, We may use your data to contact you via e-mail, telephone calls or SMS to inform you about status of your order and another communications related to the services, including security updates of the Portal.

In the event that you provide us with third party information, you will be responsible for having informed and obtained their consent for this information to be provided for the purposes explained below. In the event of having purchased a product or gift card (hereafter, goods), third party information provided will be used only for (i) managing the delivery or verification of the receipt of the goods and (ii) attending to any query or request which you or the third party may have;

- c) Gift Receipt: In the event that you have a gift voucher and you wish to return the goods associated with it via the Website, we will use the personal details provided by you on the return form only for (a) managing the request and processing the door to door collection of goods, (b) meeting any requests related to the gift voucher or the return that you request, and (c) confirming acceptance of the return and then sending the Voucher Receipt or Voucher Card with the refund amount via email or other equivalent electronic means.
- d) Requests: In the case that you wish to ask any question, through the contact form available in the Inditex Group Portal, your Personal Data and contact details may be used by us in order to respond to your queries, including those related to the technical service of the Portal, operation of the same, doubts related to the orders, etc. For adequate management of your queries, it may be necessary for us to contact you through e-mail, telephone calls or SMS.

The user (You) hereby guarantees that the Personal Data provided are true and accurate and undertakes to notify us of any change or alteration of them. Any loss or damage caused to the Website or to the Inditex Group, the Seller or to any third person through the provision of erroneous, inexact or incomplete information on the registration form, will be the exclusive responsibility of the user.

## **2. SUBSCRIPTION TO THE NEWSLETTER**

Subscription to our Newsletter may be voluntarily activated through the Inditex Group Portal by acceptance of the user.

If you give us your prior consent, ITX MERKEN will process your Personal Data for providing you with information about ZARA products, as well as from any other brands and/or companies that use the sales channels of the Inditex Group (with activities related to the sectors of decoration, textiles, finished clothing products and home decoration, as well as other complimentary sectors such as cosmetics or leather goods, and the development and support of electronic commercial activities), including, in relation to

these products or services, the sending of commercial communications via email or any other equivalent electronic communication means (such as SMS) or through phone calls.

If you are a registered user, you can change your preferences relating to the sending of commercial communications through accessing My Account. You will only receive commercial electronic messages where you have consented, or as otherwise permitted by law. You can unsubscribe through the Newsletter section.

### **3. DISCLOSURE OF PERSONAL DATA AND INTERNATIONAL TRANSFERS**

To achieve the purposes indicated in the above sections, We may need to disclose or transfer the information that you have provided us with to the holding company of the Inditex Group [Industria de Diseño Textil, S.A., (Inditex, S.A.)] and to certain other entities that are part of the Inditex Group (with activities related to the above-mentioned sectors). You are hereby informed that by registering and providing us with information via this website, you are expressly giving us your authorization to disclose and/or transfer such data to the aforementioned companies of the Inditex Group. Also, in order to achieve the purposes indicated in sections 1. b and 1.e, the Seller may need to disclose or transfer the information that you provided us to certain other entities that are part of the Apranga group. You are hereby informed that by registering and providing us with information via this website, you are expressly giving us your authorization to disclose and/or transfer such data to the aforementioned companies of the Apranga Group.

Where strictly necessary, we may also disclose this information to subsidiaries and affiliates of Inditex, S.A., third-party processors, fulfilment 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 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 the United States of America

### **4. USER RIGHTS**

You are entitled to exercise of your access, rectification, erasure and objection rights by sending an email to [dataprotection@zara.com](mailto:dataprotection@zara.com) indicating the subject "ZARA – Estonia ". If necessary, We may require that the request in question would be in a credible manner demonstrated by the applicant's identity. Our aim is to ensure the maximum level of security and confidentiality. In the event you decide to exercise such

rights please provide us with the email address to which the right of access, rectification, erasure and objection are being exercised.

## **5. INFORMATION ABOUT COOKIES**

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

## **Information about Cookies**

### What is a Cookie?

*A Cookie is a small text file that a website stores on your PC, telephone or any other device, with information about your navigation on that website. Cookies are necessary to facilitate browsing and to make it more user-friendly, and they do not damage your computer.*

*While this Policy uses the general term "Cookies", as they are the main method for storing information used by this website, the browser's "Local Storage" space is also used for the same purposes as the Cookies. All the information included in this section is also applicable to this "Local Storage".*

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

*Cookies are an essential part of how our website works. The main purpose of our Cookies is to improve your browsing experience. For example, they are used to remember your preferences (language, country, etc.) while browsing and on future visits.*

*The information collected by the Cookies also enables us to improve the site by estimating numbers and patterns of use, the suitability of the website to the individual interests of the users, quicker searches, etc.*

*On occasions, if we have obtained your informed consent in advance, we may use Cookies, tags or other similar devices to obtain information that enables us to show you, either from our own website or from third-party websites or any other means, advertising based on the analysis of your browsing habits.*

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

*We do not store sensitive personal information, such as your address, your password, your credit or debit card data, etc., in the Cookies we use.*

### Who uses the information stored in Cookies?

*The information stored in the Cookies from our website is used exclusively by us, except for those identified below as "third-party cookies", which are used and managed by external entities to provide services requested by us to improve our services and the experience of the user when browsing our website. The main services for which these "third-party cookies" are used are to obtain access statistics and to guarantee the payment transactions that are carried out.*

### How can I avoid using Cookies on this website?

*If you prefer to avoid the use of Cookies on this page, taking into account the above-described limitations, first you must disable the use of Cookies in your browser and then delete the Cookies saved in your browser associated with this website.*

*You may use this option for preventing the use of Cookies at any time.*

### How do I disable and prevent the use of Cookies?

*You may restrict, block or delete the Cookies from this website at any time by changing the configuration of your browser following the steps indicated below. While settings are different in each browser, Cookies are normally configured in the "Preferences" or "Tools" menu. For further details on configuring Cookies in your browser, see the "Help" menu in the browser itself.*

Which particular Cookies does this website use and for what purpose?

The chart below shows the Cookies, tags and other similar devices used by this website, together with information on the purpose, duration and management (proprietary and by third parties) of each one of them.

<b>Technical and personalisation cookies: for identification and authentication, browsing, interface customisation, favourites...</b>			
These Cookies are used to identify the user during the session, prevent the user from repeating login processes on the website, speed up certain procedures on the website, remember the selections made during the session or on subsequent visits, remember the pages that they already visited, etc.			
<b>COOKIES</b>	<b>PURPOSE</b>	<b>DURATION</b>	<b>MANAGEMENT</b>
User identification	They are used to identify and authenticate the user. They also contain the technical data from the user's session such as, for example, waiting time for connection, session identifier, etc.	Session	Own cookies
Session identifier	They are used to identify the http session of the user. They are common in all web applications to identify user requests during a session.	Session	Own cookies
Navigational status	They allow the user's navigation status to be identified (start of the session, first page, first access, scroll status, state of voting, etc.).	Session	Own cookies
User selections	They store the session values chosen by the user such as the store, language, currency, products, size etc.	Session	Own cookies
Favourites and last selections	They allow the user's favourite selections to be remembered (stores, for example) as well as their last selections (stores, products, cookies installation consent, etc.) in later web sessions.	Persistent	Own cookies
SHOPPING BASKET	They store information about the mini shopping basket, such as the identification details of the user associated with the aforementioned basket.	Session	Own cookies
Protocol	They allow changes to be processed between secure (https) and non-secure (http) domains (protocol).	Session	Own cookies
<b>Cookies for navigation analysis</b>			
These Cookies obtain generic information about the user's access to the website (not to the content itself) in order to subsequently provide us with aggregated information about these accesses for statistical purposes.			
<b>COOKIES</b>	<b>PURPOSE</b>	<b>DURATION</b>	<b>MANAGEMENT</b>

Origin (WC_GASource)	They are used to determine the origin of a user when arriving on a page on this website, for example, if they have arrived onto the product details page from a product grid, from the search browser or from an external website.	Persistent	Own cookies
Google Analytics (__utma, __utmb, __utmc, __utmd, __utmv, __utmz, _ga...)	They allow monitoring the website by means of the Google Analytics tool, which is a service provided by Google to obtain user access information on the website. Some of the data saved are: number of times a user visits the website, dates of the first and last visit, duration of the visits, the page from where the user accessed the website, the search engine the user used to access the website or the link they clicked on, the place in the world from where the user accesses, etc. The configuration of these cookies is predetermined by the service offered by Google and the information generated by the cookie about the use of your website will be transmitted and stored by Google, Inc (a United States-based company). Therefore we suggest to consult the privacy page of Google Analytics, <a href="https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage">https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage</a> , to obtain further information on the cookies it uses and how to disable them. Please, take into account that we are not responsible for the content or the accuracy of third-party websites.	Persistent	Third party
Optimizely (optimizelySegments; optimizelyEndUserIdentifier; optimizelyPendingLogEvents; optimizelyBuckets...)	The cookies identified with the domain optimizely.com or www.optimizely.com, allow us to optimise appearance, sensations, messages and, in general, the purpose is to ensure that the user has a consistent navigating experience on our website, basing ourselves on how our users use it. Some of the data saved for later analysis are: the number of updates the user has seen, information for visitor segments such as the browser, campaign, type of mobile sources, and all the defined personalised segments, etc. The configuration of these cookies is predetermined by the service offered by our provider Optimizely, Inc. (a United States-based company), therefore we suggest consulting their website <a href="https://help.optimizely.com/hc/en-us/articles/200040335">https://help.optimizely.com/hc/en-us/articles/200040335</a> , to obtain more information regarding the cookies they use, as well as how to disable them through the following link <a href="https://www.optimizely.com/opt_out">https://www.optimizely.com/opt_out</a> . Please, remember that we are not responsible for the content or the accuracy of these third-party websites.	Persistent	Third party
<b>Cookies for purchasing analysis</b>			
These Cookies make possible to collect information on the device from which the purchase was made on this website, to verify that the transactions provide sufficient guarantees to the customers. These cookies never include sensitive information, such as card details.			
COOKIES	PURPOSE	DURATION	MANAGEMENT
Purchase device (thx_guid)	They allow the device's identification (PC, telephone, etc.) from which the purchases are made on this website for its subsequent analysis, with the purpose of being able to offer our clients sufficient guarantees in purchase operations. The information collected in these cookies is collected by an external company (Cybersource) in order to conduct this analysis.	Persistent	Third party

*This information chart will be updated as quickly as possible as the services offered on this website change. However, the information chart may temporarily fail to include a cookie, tag or other similar device as a result of the update, though they will always be devices with identical purposes to those included in this chart.*