#### PRIVACY POLICY AND COOKIES ZARA

- 1. Every time You use this website, You will be bound by the then current Privacy Policy and You should review this text every time you use the website to be sure you agree with it.
- 2. Personal data You provide us with will be processed and stored in a file under the responsibility of FASHION RETAIL, S.A. for the purposes of:
  - i. The development, performance and enforcement of the purchase and sale contract over the products you have purchased, or of any other contract between you and us;
  - ii. attending to your requests, and;
  - iii. with your consent, providing You with information about ZARA products or of any other brands/companies that belong to the Inditex Group (whose activities are related to the decoration, textile, finished fashion and homeware products sectors, as well as other complimentary sectors such as cosmetics and leather goods, and the development and support of e-commerce related businesses), including, as regards the above-mentioned products, the sending of commercial communications by e-mail or by any other equivalent electronic communication means (such as SMS) or through phone calls.
    - If you are a registered user, You can change your preferences in respect of receiving such communications by logging into the MY ACCOUNT section of this website and editing your preferences. You are always entitled to revoke the consent to receive marketing information by unsubscribing at the Newsletter section.
  - iv. In the event You provide us with personal data of a third party, You will be responsible of having informed them about the use of their personal data, as well as having obtained the relevant express consent for this information to be provided for the purposes explained above. In the event that You have purchased a product or a gift card, the personal data of the third party provided by You, will be used for the following purposes: (i) managing the delivery and/or verification of correct receipt of the corresponding product and; (ii) attending any query or suggestion you or the third party may have.
  - v. In the event You have a Gift Voucher and you wish to return the goods associated with it through 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 you request, and (c) confirming acceptance of the return and then, sending the Voucher Receipt with the refund amount via email or any other equivalent electronic means.
  - vi. Should you choose to save your card, you expressly give your consent for the data indicated to be used as necessary for its activation and development. The card's CVV is only used for purchases which are being processed, and will not be stored or used at a later date as part of the card's details.
    - Consenting to the activation of this feature will allow your autocompleted details to appear in later purchases, therefore it will not be necessary to introduce your details in each new process, and they shall be considered valid and operative for later purchases.
    - You will be able to change your cards, as well as withdraw your consent for their processing, at any moment via the section My Account Cards. FASHION RETAIL stores and transmits data in accordance with the principal international confidentiality and security standards for credit and debit cards.

- The use of this feature may require the modification of your password for security reasons. Please remember that security when using the website also depends on the correct use and conservation of certain sensitive codes.
- vii. When ZARA announces "Klarna Pay after Delivery" or "Klarna Account", you are able to choose "Klarna Pay after Delivery" or "Klarna Account". Therefore, in case it is available and you choose as payment method "Klarna Pay after Delivery" or "Klarna Account" you recognise that you must provide the additional data requested by Klarna AB and that these personal data must be processed by Fashion Retail together with the data provided by you in connection with the order, in order to transfer them to Klarna AB for independent processing of your invoice and for an identity and credit check.
- 3. Personal data you provide us with through the form available on the website in the contact section of the physical store, as well as through the customer service's telephone number available in the aforementioned section, will be processed by ZARA Finland Oy (hereinafter, Zara) for the purpose of attending to any issue set out by you. Furthermore, ZARA will process the data you provide is with for the management, assistance and tracking of any request that the customer or any other applicant delivers in the physical store.
- 4. FASHION RETAIL, S.A with registered address at Avda. De la Diputación, Edificio Inditex, 15142 Arteixo (A Coruña), Spain, and Zara, being data controllers of the file, undertakes to keep your personal information confidential. You are always entitled to exercise your access, rectification, erasure and objection rights by sending a letter to the above-mentioned address or by e-mail to <a href="mailto:dataprotection@zara.com">dataprotection@zara.com</a>, to the attention of "Data Protection Department". If necessary, we will ask you to provide us with a copy of your ID card, passport or other valid identity document. In the event you decide to exercise such rights and that your e-mail appears as part of the personal details you have provided us with, we would be grateful if you could mention this specific circumstance, indicating the email address to which the right of access, rectification, erasure and objection are being exercised.
- 5. To achieve the purposes indicated in sections 2 and 3, 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 companies 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.

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 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 or other countries or territories outside the European Economic Area.

6. 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. In case you provide us with third-party personal data, you undertake to have informed them and obtained their consent for the purposes

indicated in sections 2 and 3 above. Any loss or damage caused to the website or to the person responsible for the website 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.

7. 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.

### Technical and personalisation cookies: for identification and authentication, browsing, interface customisation, favourites...

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.

COOKIES	PURPOSE	DURATION	MANAGEMENT
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

# **Cookies for navigation analysis**

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.

COOKIES	PURPOSE	DURATION	MANAGEMENT
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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 (optimizelySegment s; optimizelyEndUserl d optimizelyPendingL ogEvents; 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

# **Cookies for purchasing analysis**

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.		Third party

Exelution (DTU)	The Dynamic Tracking System is used for evaluating the performance of different advertising channels of this website. During a visit to our webpage, the visitor's browser data are collected for statistical evaluation. These data are collected by means of a pixel which is usually included on each page of this website. The following data will be collected: • Page- and Referrer-URL; • Browser type and browser version (User-Agent); • Browser specific settings (e.g. language setting of the browser); • Operating system; • Screen resolution; • Use of JavaScript; • Use of Cookies • Colour depth; • Anonymised IP address; • Timestamp of the request; • Product specific data provided by the shop; • Order values (if necessary). The data are transferred to Dynamic 1001 GmbH as our technical and statistical service provider. This only includes the transfer of non-personal data, through which no identification of a person itself is possible. When ordering, only anonymous data like order-ID, customer-ID, shopping cart and order amount, are sent to Dynamic 1001 GmbH, so that a correct calculation of the commission for the advertising partners is possible.	Persistent	Third Party
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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.