

## Zara's Privacy and Cookies Statement HONG KONG SAR

1. This privacy and cookies statement applies to all customers of ZARA ASIA Ltd trading as ZARA a Hong Kong SAR company registered at the Chamber of Commerce of Hong Kong SAR under registration number 593159, with corporate seat at Suites 3401-5, 34/F, Tower 2, The Gateway, Harbour City, 25 Canton Road, Tsim Sha Tsui, Kowloon, Hong Kong SAR, with Fiscal Identification Number 20622103-000 (hereinafter, "ZARA" / "us" / "our" / "we").
2. Whenever you use this website, you will be subject to the terms of the privacy and cookies statement in force from time to time, and you should review that statement in order to check that you are in agreement with its terms.
3. When you use this website we may ask you to provide data that enables you to be personally identified. That data ("Personal Data") may include your name, email address, residential address, telephone number and credit card details when you make a purchase. The provision of your Personal Data is voluntary, however, please note that if you do not provide us with the required Personal Data, we may not be able to provide the information, products or services you need or process your request.
4. Personal Data you provide will be kept securely by ZARA for the purposes of:
  1. the performance and enforcement of the purchase contract for the products you have purchased, or of any other contract between you and us;
  2. attending to your requests;
  3. providing you with marketing materials as set out in (9) below.
  4. In the event of having purchased a product or gift card (hereafter, "Goods"), third party information provided will be used only for (a) managing the delivery or verification of the receipt of the Goods and (b) attending any query or suggestion which you or the third part may have. In the event that you provide us with third party information, you will be responsible for having informed and obtained that third party consent for this information to be provided for these purposes.
  5. in the event that you have a [ZARA] gift voucher and you wish to return the goods associated with it via this 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 store credit card with the refund amount via email or other equivalent electronic means;
  6. should you choose to save your [credit/debit] card [details via this website], 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 card details to appear in later purchases, therefore it will not be necessary to provide your card details in each new process, and they shall be considered valid and operative for later purchases.

You will be able to change your chosen purchase cards, as well as withdraw your consent for their processing, at any time via the "My Account Cards" section of this website.

ZARA stores and transmits data in accordance with the principal international confidentiality and security standards for credit and debit cards.

The use of this [card storage] feature may require the modification of your password for security reasons. Please remember that data security when using the website also depends on the correct use and conservation of certain sensitive codes.

7. Activate the mechanisms necessary to prevent and detect unauthorised uses of the website, 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.
8. For invoicing purposes and to make available to you the tickets and invoices of the purchases you have made through the website or in any of our brick-and-mortar stores of ZARA.

9. Personalise the services we offer you and enable us to give you recommendations based on your interactions with ZARA on the website and an analysis of your user profile (for example, based on your purchase and browsing history). Likewise, 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).
  
10. Data enrichment: 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 website 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. You have the right to access and correct your Personal Data and request information about our data protection policies and procedures at any time. You can do this by writing to ZARA ASIA Ltd., at Suites 3401-5, 34/F, Tower 2, The Gateway, Harbour City, 25 Canton Road, Tsim Sha Tsui, Kowloon, Hong Kong SAR, or by e-mail to [dataprotection@zara.com](mailto:dataprotection@zara.com).
6. To fulfil the purposes in section (4) above, it may be necessary for us to transfer your Personal Data to the holding company of the Inditex Group - Industria de Diseño Textil, S.A. (Inditex, S.A.), - located in Spain, whose registered office is at Avenida de la Diputación, Edificio Inditex, 15142 Arteixo (A Coruña) and to other companies within the Inditex Group (of which ZARA forms part) both within and outside Hong Kong SAR. By providing your Personal Data to us, you expressly authorize us to disclose and process your information as described in this privacy statement.
7. It may also be necessary to disclose your Personal Data to government departments or other appropriate governmental or regulatory authorities both in Hong Kong SAR or elsewhere.
8. We may also transfer your data to any agent, contractor or third party who provides administrative or other services to us or any other company within the Inditex Group, in Hong Kong SAR or elsewhere. Examples of such persons include: external auditors, legal advisors, delivery couriers and payment services providers.
9. We also intend to use your name, email address, address or phone number ("Marketing Data") to send you commercial communications ("Marketing Materials") by phone, email, SMS and post about products and services offered by ZARA including but not limited to decoration, textiles, finished fashions, homeware and furniture, cosmetics, leather goods, lingerie, underwear, accessories, fragrances, and other brands/companies belonging to the Inditex Group together with [exclusive offers and promotions] and [news] which we consider may be of interest to you. We may also share your Marketing Data with other companies within the Inditex Group to provide you with Marketing Materials relating to decoration, textile, finished fashion, homeware and furniture, cosmetics, leather goods, lingerie, underwear, accessories, fragrances and the development and support of e-commerce business. Your consent is required before we use your Marketing

Data in this way. You can withdraw your consent at any time by writing to the address/e-mail for ZARA at (6) above. You can also change your account preferences for receiving Marketing Materials at any time by logging into the 'MY ACCOUNT' section of this website and editing your preferences. You can also unsubscribe at any time within the 'Newsletter' section of the website.

10. You hereby confirm that the Personal Data you have provided is true and accurate. Please notify us of any changes or alterations to your Personal Data so that we may continue to provide the information, products or services you need and to process your requests. Any loss or damage caused to the website or to the person responsible for the web-site or to any third person through the provision of erroneous, inexact or incomplete information on the registration forms will be the exclusive responsibility of the website user. ZARA takes reasonable administrative, technical and physical measures to safeguard your Personal Data against loss, theft, and unauthorised access, use, disclosure, alteration, or destruction.
11. ZARA will only retain your Personal Data for the period necessary to fulfil the purposes outlined in this privacy Statement unless a longer retention period is required subject to applicable laws.

## Cookies Policy

We use cookies on this website. By accepting this privacy and cookies statement you consent to the use of the cookies used in this website and which are described below. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies as described in more detail below. However, if you select this setting you may be unable to access certain parts of the website or use all of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

### What is a cookie?

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

While this policy uses the general term "cookie", as it is 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 in 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 occasion, 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, on our own website, those of third parties, 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 information which could identify you as your address, password, credit or debit card number, etc. in the cookies from our website.

### Who has access/use this website's 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 primary services for which these "third-party cookies" are used are to obtain access statistics and to guarantee any payment operation made.

### 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 limitations described above, you must first 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 can I disable and eliminate the use of cookies?

You may restrict, block or delete the cookies from this website at any time by modifying your browser configuration in accordance to the instructions given below. While settings are different in each browser, it is usual that the cookies configuration is made in the menu "Preferences" or "Tools". For further details of the configuration of cookies in your browser, see the "Help" menu of the same.

### What specific cookies uses this web site and for what purposes?

The information 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 them.

<b>Technical and personalization cookies: identification and authentication, browsing, interface personalization, favourites, etc.</b>			
These cookies are used to identify users during the session, prevent users from having to repeat website authentication processes, and offer reminders of selections made during the session or later visits, as well of previously visited pages, etc.			
<b>COOKIES</b>	<b>PURPOSE</b>	<b>DURATION</b>	<b>ADMINISTRATION</b>
User identification	They are used to identify and authenticate the user. They also contain technical data of the user's session, such as, for example, connection timeout, session identifier, etc.	Session	Own
Session identification	It identifies the http session of the user. It is common in all the web applications to identify a user's petitions in a session.	Session	Own
Browsing status	This allows the user's browsing status to be tracked (start of session, home page, first visit, scroll status, voting status, etc.).	Session	Own
User selections	These store the session values selected by the user such as the store, language, currency, products, sizes, etc.	Session	Own
Favourites and recent activity	This remembers the user's favourite selections (such as stores) or their recent activity (stores or products) during later website visits.	Persistent	Own
Shopping cart	They store details of the mini shopping basket, as well as the user logon details associated with this basket.	Session	Own
Protocols	This allows for changes to be processed between a secure domain (protocol) (https) and an unsecure one (http).	Session	Own
<b>Cookies for navigation analysis</b>			
These cookies obtain generic information on the user's accesses to the website (not to its content) in order to provide us subsequently with aggregated information of these accesses for statistical purposes.			
<b>COOKIES</b>	<b>PURPOSE</b>	<b>DURATION</b>	<b>ADMINISTRATION</b>
Origin (WC_GASource)	It is used to know the origin of a user upon reaching a page of this website, for example, if it comes from a page of product detail from a product grid, from the search engine or from an external website.	Persistent	Own
Google Analytics (__utma, __utmb, __utmc, __utmz)	They allow monitoring the website by means of the Google Analytics tool, which is a service provided by Google for obtaining information of the accesses of the users to the websites. Some of the data saved for subsequent analyses are: number of times a user visits the website, dates of the first and last visit of the user, duration of the visits, from what page the user accessed the website, what search engine the user used to reach the website or what link he clicked on, from what place of the world the user accesses, etc.  The configuration of these cookies is predetermined by the service offered by Google, for which reason we suggest that you consult the privacy page of Google Analytics, <a href="https://support.google.com/analytics/answer/6004245?hl=en">https://support.google.com/analytics/answer/6004245?hl=en</a> , to obtain further information on the cookies that it uses and how to disable them (in the understanding that we are not responsible for the content or the veracity of the third-party websites).	Persistent	Third parties

Conversion pixels and SDKs	<p>These tools allow us to follow a user's browsing with the goal of implementing measuring services through the technology offered by third parties (Facebook, for example) and to offer personalised ads on these social media sites and other web pages such as Google. For more information on this technology and how to deactivate it (keeping in mind that we are not responsible for the content or accuracy of third-party websites), continue reading: Information on these technologies:</p> <ul style="list-style-type: none"> <li>- Facebook: <a href="https://www.facebook.com/ads/about/?entry_product=ad_preferences">https://www.facebook.com/ads/about/?entry_product=ad_preferences</a></li> <li>- Google: <a href="https://policies.google.com/technologies/ads?hl=es">https://policies.google.com/technologies/ads?hl=es</a></li> </ul> <p>If you have our App installed and do not want us 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 as follows: If you have the Zara App installed on an iOS device you can adjust your preferences in Settings/Privacy/Ads. If your device is Android, access Settings/Google/Ads</p>	Persistent	Third Party
Optimizely (optimizelySegments; optimizelyEndUserId; optimizelyPendingLogEvents; optimizelyBuckets...)	<p>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 is: 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., therefore we suggest you look at their website: <a href="https://help.optimizely.com/hc/fr/articles/200040335-What-information-does-Optimizely-store-in-its-cookies-">https://help.optimizely.com/hc/fr/articles/200040335-What-information-does-Optimizely-store-in-its-cookies-</a>, to obtain more information regarding the cookies they use and how to disable them in: <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.</p>	Persistent	Third party
<b>Cookies for purchase analysis</b>			
These cookies allow compiling information on the device from which the purchase is made in this website for the purpose of verifying that these operations offer sufficient guarantees for the clients. At no time do these cookies include sensitive information such as credit card data.			
<b>COOKIES</b>	<b>PURPOSE</b>	<b>DURATION</b>	<b>ADMINISTRATION</b>
Purchase device (thx_guid)	It allows identifying solely the device (PC, telephone, etc.) from which the purchases are made in this website for its subsequent analysis with the purpose of being able to offer our clients sufficient guarantees in the purchase operations. The information contained in this cookie is collected by an external company in order to conduct these analyses.	Persistent	Third parties

*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.*