

## PRIVACY AND COOKIES POLICY

This Privacy and Cookies Policy establishes the terms and conditions under which ZA CLOTHING IRELAND, LTD. with registered address at Fifth Floor, Block 5 Harcourt Centre, Harcourt Road, Dublin 2, a company that currently operates the sales of the ZARA commercial brand in Ireland (hereinafter "ZARA Ireland"), 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 Ireland (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 (please see Contact Us – Customer Service section information) in relation to the Platform or the Physical Stores, as well as monitoring the quality of our service.

If you decide to use the WhatsApp channel, where available on our Platform by clicking the access button, it also entails that if you have the WhatsApp app installed in your device, the Data Controllers will transfer your mobile/cellular phone number to WhatsApp Inc. to verify if your number relates to a current user of the WhatsApp platform. Such verification service described above includes transmitting data back to Us so you can use this channel. We recommend that you

review your privacy settings and read the WhatsApp's privacy policy for more detailed information about how WhatsApp manages your personal data in relation to their services.

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 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
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

<p>Google Analytics (__utma, __utmb, __utmc, __utmd, __utmv, __utmz, _ga...)</p>	<p>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.</p>	<p>Persistent</p>	<p>Third party</p>
<p>Optimizely (optimizelySegment s; optimizelyEndUserI d optimizelyPendingL ogEvents; optimizelyBuckets... )</p>	<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 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.</p>	<p>Persistent</p>	<p>Third party</p>
<p><b>Cookies for purchasing analysis</b></p>			
<p>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.</p>			
<p><b>COOKIES</b></p>	<p><b>PURPOSE</b></p>	<p><b>DURATION</b></p>	<p><b>MANAGEMENT</b></p>
<p>Purchase device (thx_guid)</p>	<p>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.</p>	<p>Persistent</p>	<p>Third party</p>



Exelution (DTU)	<p>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.</p> <p>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).</p> <p>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.</p>	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.*