

Privacy Statement and Cookies Policy ZARA

1. General Provisions

This Privacy Policy establishes the terms and conditions under which ITX Korea, Limited. (hereinafter "ITX Korea"), with registered address at 33Fl., 511, Yeongdong-daero, Gangnam-gu, Seoul, Korea, a company that currently operates the online sales of the ZARA commercial brand in South Korea, as well as the companies belonging to the Inditex Group as applicable in each given case (hereinafter, jointly "Us" or "the Data Controllers") processes the personal information that you provide Us with when using the website www.zara.com/kr (hereinafter, "the Website"), the mobile application or app, understood as the software application designed to be used on smart phones, 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 South Korea (jointly, "the Platform").

Every time the user ("You") use the Platform, You will be bound by the current Privacy Statement and Cookies Policy and You should review this text every time You use the Platform to be sure that You agree with it.

This Privacy Statement and Cookies Policy may be amended according to relevant laws, regulations and guidelines. Any amendment made to this Privacy Statement and reasons thereto shall be disclosed on this Platform.

You hereby guarantee that the personal data provided is true and accurate and undertakes to notify any change or alteration to the same. Any loss or damage caused to the Platform 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 You.

In case You facilitate us personal data of a third party You shall be responsible of informing about the use of such data and obtaining the relevant express consent. In the event that You have purchased a product or a gift card, then the personal data of the third party provided by You shall be used for the following purposes: (a) managing of the delivery and/or verification of correct receipt of the corresponding product and;(b) attend any query or suggestion you may formulate in respect of said product.

In specific cases, a third party may have provided us with information about You by using a feature or service on the Platform, for example by sending you a gift card or shipping an order to your address. In these cases, we only process your data where relevant to this feature or service, as stated in this Privacy and Cookies Policy.

2. Items of Personal Information Collected/Method of Collection

ITX KOREA shall use the methods such as user account creation form, online contact form, Newsletter subscription form, etc. to collect the following personal information:

Name (Korean, English); e-mail address; telephone (mobile) number; postal address (invoice/delivery); payment method of the purchase, payment date (including credit/debit card number), user name (login) and password, type of web browsers and OS, access log, IP address, advertising ID, cookies, date of visit, service use log, etc.

3. Purpose of Collecting Personal Information

The Personal data You provide will be processed and stored under the responsibility of ITX KOREA for the purposes of:

- To manage Your registration as a user of the Platform. The personal information 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.
- The performance and enforcement of the purchase and sale contract over the products You have purchase, or of any other contract between You and Us;
- Activate the mechanisms necessary to prevent and detect unauthorised uses of the Platform (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.
- For invoicing purposes and to make available to you the tickets and invoices of the purchases you have made through the Platform or in any of our brick-and-mortar stores of ZARA.
- Contact You by email, telephone calls, 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.
- 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.

- If You authorize Your subscription to the ZARA Newsletter, We will provide You with information regarding Our products and services, through different means as, among others, by email, any other equivalent electronic means of communication (such as SMS, etc.) as well as through push notifications via the App – in case You have activated such notifications in Your mobile device.

Subscription to the ZARA Newsletter may entail using personal information to make personalized advertising related to Our products and services available to You via email, SMS or any other of Our own electronic media or those of third parties. We can also provide You with this information through push notifications from the App in case 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 information 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.

- Personalise the services we offer you and enable us to give you recommendations based on your interactions with ZARA on the Platform and an analysis of your user profile (for example, based on your purchase and browsing history). Likewise, we 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.
 - o 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.
 - o 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).

- 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 Platform or in any of our stores (for example, information related to your purchases, whether in brick and mortar stores or online, your preferences).

4. Processing of Personal Information/Retention Period and Destruction of Personal Information

a. Processing of Personal Information/Retention Period

As a matter of principle, personal information is destroyed without delay upon meeting the purpose of collection and use of personal information. Withdrawal of membership, withdrawal of consent to use personal information and the requesting of deletion of personal information are causes for destroying the relevant personal information without delay. However, should there be reason to preserve the personal information as a requirement of law, the relevant personal information may be retained for the period provided for by law and be used only for the purposes as provide for by such law.

b. Destruction of Personal Information

Upon meeting the purpose of use of personal information, personal information will be retained for certain period of time per internal policy and relevant law (please take into account that this would be studied in a case by case basis, with a maximum mandatory retention period of 10 years). Personal information printed on paper shall be shredded or burned whereas electronic files shall be irrecoverably destroyed.

5. Delegation of Processing of Personal Information and Overseas Transfer

When necessary for the fulfillment of the purposes abovementioned in previous sections, as well as the development or support of certain technical and operational services or functionalities of the e-commerce platform, third party suppliers may have access to your personal data, as per example suppliers of technological services, financial transaction management, logistics services, transportation, order management and customer service, and / or analysis of the transactions made through the Platform in order to provide our users with sufficient guarantees in purchasing transactions, etc. Your express consent to this access/disclosure of data, includes those cases where for efficiency of the provision of the services, providers may be located in and/or have access to the data from countries or territories outside South Korea, as territories/countries within the European Economic Area or United States of America.

Delegatee - Location	Delegated Work
ITX Merken – The Netherlands	Corporate services, such as technology development and electronic commerce platform support
Zara Retail Korea Co. Ltd. – South Korea	Assistance with the customer services and management services related to customers
Industria de Diseño Textil (Inditex, S.A.) - Spain	Corporate policies fulfillment and compliance support
Cybersource Limited – UK and USA	Operation of electronic platform commerce and prevention of fraudulent transaction
UBase, Inc – South Korea	Supplementary service of telephone and customer support
KCP- South Korea	Online payment service

6. Rights of Users and their Legal Representatives

ITX KOREA ensures the exercise of Your access, rectification, erasure and objection rights by sending a letter to the above mentioned address to ITX KOREA as provided in the paragraph below, or by e-mail to dataprotection@zara.com, to the attention of the ITX KOREA Department in Charge of Personal Information Protection.

At any time, You and your legal representative may review/edit your personal information or request that your membership be withdrawn or user account deactivated/deleted. In order to review/edit your personal information, please visit MY ACCOUNT to review, edit your personal information or withdraw your membership completely. In the alternative, you may call or email the Department in Charge of Personal Information Protection and request that we process your request for reviewing, editing personal information or for withdrawing membership. In the event you request that your personal information be revised due to an error, we will not use or process your personal information. If your personal information was already transferred to a third party despite their being an error, we will provide a notice to such third party without delay in order to correct

your personal information. Any personal information that has been requested to be deleted by You or your legal representative shall be processed in accordance with the applicable “Processing of Personal Information/Retention Period” provision and will not be reviewed or used for other purposes.

Should you not wish us to send information to third parties 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. 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. If you are visiting the website, you can change the cookie settings in your browser.

7. Installation of User’s Information Collection Mechanisms and Refusal thereto

We use cookies in this Platform, small text files with information on Your navigation in this site whose principal objective is to improve Your experience in the Platform. You can find further information on the cookies that We use, their purpose and other information of interest in the following Cookies Policy.

By accepting this Privacy Statement and Cookies Policy You consent to the use of the cookies used in this Platform and which are described in the following Cookies Policy.

8. Departments in charge of personal information and related complaints

ITX Korea maintains a department dedicated to protection of Your personal information and resolution of any complaints that may rise in relation thereof. You may report any personal information related matters arising from Your use of ITX Korea’s services to the below department.

Department in Charge of Personal Information Protection

Telephone No : +82 2 34139800

E-mail : dataprotection@zara.com

Cookies Policy

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.

Technical and personalization cookies: identification and authentication, browsing, interface personalization, favourites, etc.

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.

COOKIES	PURPOSE	DURATION	ADMINISTRATION
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

Cookies for navigation analysis

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.

COOKIES	PURPOSE	DURATION	ADMINISTRATION
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, https://support.google.com/analytics/answer/6004245?hl=en , to obtain further	Persistent	Third parties

	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).		
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.</p> <p>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:</p> <p>Information on these technologies:</p> <ul style="list-style-type: none"> - Facebook: https://www.facebook.com/ads/about/?entry_product=ad_preferences - Google: https://policies.google.com/technologies/ads?hl=es <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 parties
Cookies for purchase analysis			
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.			
COOKIES	PURPOSE	DURATION	ADMINISTRATION
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.