

















PRIVACY POLICY

- Effective Date: May 2, 2022
- Revisions
 - Labelling of Major Categories of Personal Information Processing
 - Adapted recommendations from the latest Guideline & increased readability
 - New Outsourcee: Mesh Korea Co., Ltd.

ITX Korea Limited (hereinafter referred to as the “Company” or “We”) duly processes and safely manages personal data in compliance with the Personal Information Protection Act (“PIPA”) and other applicable laws and regulations to protect the freedom and rights of data subjects (hereinafter referred to as “You” or the “data subject”). Accordingly, we establish and disclose this Privacy Policy in order to inform you of the procedures and standards for processing personal data and resolve related grievances in accordance with Article 30 of the PIPA. This Privacy Policy shall be applicable to our use of your personal data, regardless of the channels or means (hereinafter referred to as the “Platform”) that you use to interact with us.

[Labeling of Major Categories of Personal Information Processing]

| | | | |
|---------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| Collected Items  | Processed Items  | Purpose  | Behavioral Information  |
| <ul style="list-style-type: none"> ▪ Email address, name, address/zip code, phone number, etc. | | <ul style="list-style-type: none"> ▪ To manage your registration, etc. | <ul style="list-style-type: none"> ▪ Right to accept or refuse collection |
| Overseas Transfer  | Outsourcing  | Retention Period  | Destruction  |
| <ul style="list-style-type: none"> ▪ 2 entities ▪ Platform operation | <ul style="list-style-type: none"> ▪ 9 entities ▪ Payment/delivery, etc. | <ul style="list-style-type: none"> ▪ Retained and destroyed by the time specified in this Privacy Policy, such as when membership is withdrawn or by the time specified in applicable laws | |
| Your Rights and Obligations  | Measures to Ensure Safety  | Amendment of Privacy Policy  | Legal Representative  |
| <ul style="list-style-type: none"> ▪ Right to access, correct, delete | <ul style="list-style-type: none"> ▪ Encryption measures, etc. | <ul style="list-style-type: none"> ▪ Previous polices disclosed | <ul style="list-style-type: none"> ▪ Represent minors |

| | | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| Data Protection Officer  | Grievance Handling Department  | Request for Access  | Authority  |
| <ul style="list-style-type: none"> ▪ Data Protection Team / dataprotection@zara.com / “My Account” | | | <ul style="list-style-type: none"> ▪ www.kopico.go.kr |

※For more information, please see the Privacy Policy below.

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1. PURPOSE OF COLLECTION, COLLECTED ITEMS AND RETENTION PERIOD

(a) We process your personal data as follows:

| Service | Purpose of Collection | Collected Items | Retention period |
|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| To manage your registration as user of the Platform | To identify users, grant users access to our various functionalities, products and services available to registered users, prevent illegal use of the Platform and send various notifications. | [Mandatory] Email address, password, name | Until your account is terminated* |
| For the provision of goods and services | Sales and delivery of goods, provision of service, payment and settlement, handling of inquiries/requests. | [Mandatory] Address/zip code, phone number, name, payment method | (Registered Users) Until your account is terminated* (Guest users) For the time necessary to manage the purchase of goods or services* |
| For marketing purposes | To introduce new products and services or perform promotional actions. | [Optional] Email address, field of interest | Until you unsubscribe the Newsletter |

* However, if there is an ongoing investigation due to a violation of applicable laws and regulations, until the completion of the investigation; if there is any remaining creditor-debtor relationship arising from the use of the Platform, until such creditor-debtor relationship is settled.

(b) In the process of using the service, the following information can be automatically generated and collected: your location data, device identification number, type of browser, IP address from which payment is made, preference related to the historic purchase and browsing history, and advertising ID.

(c) Certain data will be kept longer than the period mentioned above, as stipulated by relevant laws as follows:

- (i) Under the Protection of Communication Secrets Act:
 - Service usage record, access log, IP information: 3 months
- (ii) Under the Act on the Consumer Protection in E-commerce:
 - Records related to marks and advertisements: 6 months
 - Records related to cancellation of contracts or subscription, etc.: 5 years
 - Records related to payment for and supply of goods, etc.: 5 years
 - Records related to resolution of consumer complaints or disputes: 3 years

2. OUTSOURCING OF PERSONAL DATA PROCESSING

(a) For effective handling of duties relating to personal data, we outsource the processing of personal data to the following entities:

| Name of the outsourcee | Details of the outsourced work |
|----------------------------------|-----------------------------------------------------------|
| Zara Retail Korea Co., Ltd. | Customer Service related to order, shipment, return, etc. |
| NHNKCP | Payment Gateway |
| NICEPAY | Payment Gateway |
| LF Logistics | Managing delivery and return |
| CJ Logistics Corporation | Delivery |
| Lotte Global Logistics Co., Ltd. | Delivery |
| Hanjin Transportation Co., Ltd. | Delivery |
| Logen Co., Ltd. | Delivery |
| Mesh Korea Co., Ltd. | Delivery |

(b) We specify the matter stipulated in the PIPA when executing contract with any outsourcee and supervise whether they process your personal data securely.

(c) We will inform you any changes of this section without delay via amending this Privacy Policy.

3. OVERSEAS TRANSFER OF PERSONAL DATA

For effective handling of duties relating to personal data, we outsource the processing of personal data to the following overseas entities:

| | |
|----------------------------|----------------------------------------------------------------------------|
| Name of the outsourcee | Industria de Diseño Textil, S.A. (Inditex, S.A) |
| Location of the outsourcee | Avenida de la Diputación, Edificio Inditex, Arteixo 15143, A Coruña, Spain |

| | |
|----------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Date and Method of Outsourcing | Personal data is collected at the time of use of the service via website/app and then transferred via telecommunications network or other electronic or paper-based means |
| Contact Information of Data Officer | dataprotection@zara.com |
| Personal data subject to outsourcing | Email address, password, name, address/ZIP code, phone number, payment method, the location data, the device identification number, type of browser, IP address from which payment is made, preference related to the historic purchase and browsing history, advertising ID. |
| Details of the outsourced work | Corporate policies fulfillment and compliance. |
| Period of Retention and Use of Personal Data | Same as the retention period set forth in this Privacy Policy. |

| | |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of the outsourcee | ITX Merken B.V |
| Location of the outsourcee | Nieuwezijds Voorburgwal 307, 1012 RM Amsterdam, Netherlands |
| Date and Method of Outsourcing | Personal data is collected at the time of use of the service via website/app and then transferred via telecommunications network or other electronic or paper-based means. |
| Contact Information of Data Officer | dataprotection@zara.com |
| Personal data subject to outsourcing | Email address, password, name, address/ZIP code, phone number, payment method, the location data, the device identification number, type of browser, IP address from which payment is made, preference related to the historic purchase and browsing history, and advertising ID. |
| Details of the outsourced work | Technology development and e-commerce platform support. |
| Period of Retention and Use of Personal Data | Same as the retention period set forth in this Privacy Policy. |

4. DESTRUCTION OF PERSONAL DATA

- (a) Once each of the potential actions is time-barred we will proceed to delete the personal data.
- (b) Notwithstanding the above, the personal data which needs to be kept in accordance with relevant laws shall be preserved separately.
- (c) Personal data in electronic files shall be permanently erased not to restore data and paper documents containing personal data shall be shredded or incinerated.

5. DESTRUCTION OF INACTIVE USER'S PERSONAL DATA

- (a) We destroy the personal data of users who have not used the service for the period of one (1) year. However, the personal data which needs to be kept in accordance with relevant laws shall be preserved separately.
- (b) We notify users of the fact that their personal data will be destroyed, the date of destruction, and the

items of personal data to be destroyed, at least 30 days prior to the destruction by means of email or text message, etc.

(c) If you do not wish us to destroy your personal data, you may log in to the service before the date of destruction.

6. RIGHTS AND OBLIGATIONS OF DATA SUBJECT AND LEGAL REPRESENTATIVE

(a) You may exercise the right to access, rectify, erase or limit processing your personal data at any time. If you are a minor aged 14 or above, you may exercise your rights either directly or through your legal representative.

(b) You have the opportunity to exercise the rights directly through your device or the Platform (for example, you can change your personal information in “My Account” section). You may also exercise your rights by writing us an email to our email address (dataprotection@zara.com). We will take necessary actions upon your request without delay.

(c) You may exercise your rights under this section through a legal representative or an attorney. In such cases, you shall submit a power of attorney by using the Attached Form No.11 under ‘Notice on Personal Information Processing Method’.

(d) The rights to access or limit processing personal data may be restricted in accordance with Article 35 (4) and Article 37 (2) of the PIPA.

(e) The rights to rectify or erase personal data cannot be exercised if we are obligated to collect such data under relevant laws.

(f) We verify whether the person requested to exercise the rights is the subject of such rights or a legitimate representative.

7. MEASURES TO ENSURE THE SECURITY OF DATA

We apply the following security measures to protect your data:

1. Conduct regular audits

To ensure the stability of personal data, we conduct regular self-audits.

2. Minimizing and training of employees who process personal data

We take measures to manage personal data by designating a limited number of employees with access to personal data.

3. Establishment of Internal Management Plan

We have established and implemented an Internal Management Plan to process personal data securely.

4. Technical measures against cyberattack

We install, periodically update and inspect security programs to prevent leakage or damage of personal data caused by hacking, computer viruses, etc. We also keep our systems in facilities where access from outside is restricted.

5. Encryption of personal data

Your password is encrypted for storage and management. In addition, we apply security measures to protect other important data.

6. Storage of access records and prevention of forgery.

We keep records of access to personal information processing system according to relevant laws and regulations. Also, we implement security measures to prevent forgery, theft or loss of such records.

7. Restricting access to personal data

We implement necessary measures to control access to personal data by granting, changing and cancelling access rights to the personal data processing database system. We use an intrusion prevention system to control unauthorized access from outside.

8. Use of lock for document security

We keep documents or auxiliary storage media that contains personal data in a safe and locked place.

8. AUTOMATIC PERSONAL DATA COLLECTION DEVICES

(a) We use cookies and similar devices to provide you with personalized and customized service.

(b) A cookie is a small text file that a website, app or other platform store on your computer, tablet, smartphone or any other similar device, with information on your browsing and use.

(i) Purpose of use of cookies: The main goal of our Cookies is to make your browsing experience as easy and efficient as possible, by identifying your visits, service usage, popular search word or whether secure access is available.

(ii) Installation, operation and refusal of cookies: You can disable the use of Cookies on your browser, device and on the cookies settings available at the website or app.

(iii) If you block the use of cookies, you may have difficulties in using customized services.

9. COLLECTION AND USE OF BEHAVIORAL INFORMATION

(a) To provide optimized, customized services and benefits as well as personalized online ads to you, we collect and use behavioral information through cookies and similar devices.

(b) Details of behavioral information collected by us can be found in the "Cookie Settings" menu.

(c) You may allow or refuse the collection and use of your behavioral information via pop-up you see at the time of your first visit to the Platform, or anytime through the "Cookie Settings" menu. You cannot block "Strictly necessary cookies" to use our Platform, while "Analysis cookies," "Functionality or customisation cookies," and "Behavioral advertising cookies" will be enabled only if you choose to activate them. You may change the settings at any time by navigating to the "Cookies settings" menu.

(d) We collect only the minimum behavioral information necessary for each purpose. We do not collect any sensitive behavioral information that may seriously infringe upon any individual's rights, interests, or privacy, such as ideology, belief, familial relationship, educational background, medical history or history of other social activities.

(e) We do not collect behavioral information for advertising purposes from children that we know to be under the age of 14 or online services mainly targeting children under the age of 14. We do not provide personalized ads to children that we know to be under 14.

(f) We collect and use advertising ID to run personalized online ads on the mobile app (Android only). You may allow or block personalized ads on the app by changing the settings on your mobile device.

(g) You may allow or block all personalized online ads by changing the cookies settings on your web browser. Here is how to do this on the most popular browsers:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari](#)

10. DATA PROTECTION OFFICER AND DEPARTMENT IN CHARGE

(a) The Company has appointed Data Protection Officer (“DPO”) and designated a department in charge of personal information protection.

- Data Protection Department
TEL: 080-479-0880
Email: dataprotection@zara.com

(b) You may make the following inquiries using the contact information in Paragraph (1):

- Request access to personal information pursuant to Article 35 of the PIPA;
- Make customer inquiries or complaints regarding the protection of personal data;
- Exercise your rights under Article 6 directly or through your legal representative; or
- Inquire about behavioral information under Article 9, exercise the right of refusal, or inquire about filing a damage report

11. REGULATORY AUTHORITY

We inform you that you have the right to file a claim before the responsible data protection regulatory authority.

- Personal Information Dispute Mediation Committee (www.kopico.go.kr / 1833-6972)
- KISA Personal Information Infringement Reporting Center (privacy.kisa.or.kr / 118)
- Supreme Prosecutors’ Office (www.spo.go.kr / 1301)
- National Police Agency (ecrm.cyber.go.kr / 182)

12. AMENDMENT OF PRIVACY POLICY

(a) This Privacy Policy is entering into force on May 2, 2022.

(b) The previous version of this Privacy Policy is available at the link below:

- Effective before [May 2, 2022](#)
- Effective before [August 2, 2021](#)
- Effective before [May 14, 2021](#)