ZARA PRIVACY POLICY

ITX Korea Co., Ltd. (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 www.zara.com.

[Labeling of Major Categories of Personal Information Processing]

Collected Items	Processed Items	Purpose	Behavioral Information
			
▪ Email address, name, address/zip code, phone number, etc.		▪ To manage your registration, etc.	▪ Right to accept or refuse collection

Overseas Transfer	Outsourcing	Retention Period	Destruction
			
▪ 3 entities including Inditex S.A. ▪ Platform operation	▪ 11 entities including Hanjin ▪ Payment/ delivery, etc.	▪ Retained and destroyed by the time specified in this Privacy Policy, such as when membership is withdrawn or by the time specified in applicable laws	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
			
▪ Right to access, correct, delete	▪ Encryption measures, etc.	▪ Previous polices disclosed	▪ Represent minors

Personal Location Information	Grievance Handling Department	Request for Access	Authority
			
▪ Provision of location information services such as store mode	▪ Data Protection Team / dataprotection@zara.com / “My Account”		▪ www.kopico.go.kr

1. PURPOSE OF COLLECTION, COLLECTED ITEMS AND RETENTION PERIOD

(a) Items of personal data processed without the consent of the data subject

We process your personal data without your consent as follows:

Legal Basis	Purpose of Collection	Collected Items	Period of Retention and Use
Article 15(1)(iv) of the PIPA (performing and concluding a contract)	Member account management, prevention of fraudulent use	Email address, password, name, mobile phone number	Until withdrawal of membership
Article 15(1)(iv) of the PIPA (performing and concluding a contract)	Social media account login	o Kakao: Kakao account (email address) o Naver: (mandatory) Unique identifier of user, mobile phone number (optional) Name, email address o Google: Name, profile image, email address	Until withdrawal of membership
Article 15(1)(iv) of the PIPA (performing and concluding a contract)	Conclusion and fulfillment of product purchase contracts	(Required) Name, mobile phone number, delivery address and invoice address, email address (Optional) common entrance password	For members: Until withdrawal of membership For non-members: 5 years
Article 15(1)(iv) of the PIPA (performing and concluding a contract)	Conclusion and fulfillment of product purchase contracts	Purchase history, payment method,	5 years
Article 15(1)(iv) of the PIPA (performing and concluding a contract)	Handling customer complaints through customer service	Email address, mobile phone number, order number, order history, payment method	3 years
Article 15(1)(iv) of the PIPA (performing and concluding a contract)	Restock notification	Email address, mobile phone number	Until notification
Article 15(1)(iv) of the PIPA (performing and concluding a contract)	Providing AI Assistant service at the customer's request	Image, voice and text input by the customer	Until 30 minutes after the session
	Providing AI Try-On service at the	Image input by the customer	For member accounts: 1 year maximum or

	customer's request		until the customer deletes the data For non-member accounts: Up to 24 hours since the user creates the avatar
Article 15(1)(iv) of the PIPA (performing and concluding a contract)	Recommendation of an appropriate size based on the information provided	(Required) Name, preferred section, height, weight, preferred fit (Optional) Year of birth, hip circumference, waist circumference, bra size, abdomen information, chest circumference	For members: 2 years from providing the information or until a deletion request is made For non-members: 3 months from providing the information or until a deletion request is made

(b) Items of personal data processed upon the consent of the data subject

We process your personal data upon your consent as follows:

Legal Basis	**Purpose of Collection**	**Collected Items**	**Period of Retention and Use**
Article 15(1)(i) and Article 22(1)(vii) of the PIPA	To introduce new products and services or perform promotional actions.	email address, product 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.

(c) 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.

(d) The company receives personal information from the relevant social media service provider to offer social media account login services.

(e) Certain data will be kept longer than the period of retention and use set forth for such data, as stipulated by relevant laws as follows:

(i) Under the Protection of Communication Secrets Act (Article 15-2):

- Service usage record, access log, IP information: 3 months

(ii) Under the Act on the Consumer Protection in E-commerce (Article 6):

- 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

(f) We process personal location information based on consent to the Terms of Use for Location-Based Services. For more details, please refer to the "12. Processing of Personal Location Information" section.

2. PROCEDURE AND METHOD OF PERSONAL DATA DESTRUCTION

(a) We destroy the personal data when it becomes unnecessary, such as when the retention period has expired or the purpose of processing has been fulfilled.

(b) However, if the personal data needs to be retained in accordance with relevant laws despite the expiration of retention period or achievement of processing purposes, the personal data will be preserved separately.

* The item and legal basis of the personal data preserved under other laws can be found in the "1. Purpose of Collection, Collected Items and Retention Period" section.

(c) Personal data in the form of electronic files is destroyed in a non-reversible manner, and personal data written and stored in paper documents is shredded or incinerated.

3. THIRD PARTY PROVISIONS OF PERSONAL DATA

(a) We process personal data of the data subjects only within the scope specified in the purpose of processing such personal data, and provide personal data to a third party only in cases falling under Article 17 and Article 18 of the PIPA, for example, with the data subject's consent or pursuant to special provisions of laws. Otherwise, we do not provide the personal data of the data subjects to any third party.

4. 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:

(i) Status of Outsourcing

Name of the outsourcee	**Details of the outsourced work**
Zara Retail Korea Co., Ltd.	Customer Service related to order, shipment, return, etc.
NHNKCP Corp.	Payment Gateway
NICE Information & Telecommunication INC.	Payment Gateway
Maersk Logistics Korea Inc.	Managing delivery and return
CJ Logistics Corporation	Delivery
Lotte Global Logistics Co., Ltd.	Delivery
Hanjin Transportation Co., Ltd.	Delivery
Logen Co., Ltd.	Delivery
GSNetworks Co., Ltd	Delivery

(ii) Status of Sub-contracting

Name of the outsourcee	**Status of sub-contracting**
NHNKCP Corp.	See Privacy Policy

NICE Information & Telecommunication INC.	See Privacy Policy
CJ Logistics Corporation	See Privacy Policy
Lotte Global Logistics Co., Ltd.	See Privacy Policy
Hanjin Transportation Co., Ltd.	See Privacy Policy
Logen Co., Ltd.	See Privacy Policy
Link Mobility Co., Ltd.	Texting service
Concentrix Service Korea Limited	Customer care service

(b) When entering into contracts with an outsourcee, we specify the following in documents as contracts in accordance with Article 26 of the PIPA: prohibition of personal data processing for any purpose other than the performance of outsourced work, technical and managerial measures for protecting personal data, restrictions on sub-contracting, management and supervision of the outsourcee, and matters regarding liabilities for damages. We supervise whether the outsourcee processes your personal data securely.

(c) In accordance with Article 26(6) of the PIPA, the outsourcee obtains our consent when they sub-contract the processing of personal data to a third party, and discloses the details of the sub-contracted services through this Privacy Policy.

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

(e) The overseas transfer of personal data is described in the “5. Overseas Transfer of Personal Data” section.

5. OVERSEAS TRANSFER OF PERSONAL DATA

We outsource the processing of personal data we collected to the following overseas entities, in accordance with Article 28-8(1)(iii)(a)(Overseas Transfer of Personal Data for Contract Performance) of the PIPA, and we inform you as follows, pursuant to Article 28-8(2) of the PIPA. If you refuse the overseas transfer, you will not be able to use our service. Should you wish to refuse the transfer, you can withdraw your membership from the platform or request withdrawal of membership through the customer center.

Transferred Items	Transferred Country	Transfer Date and Method	Recipient	Purpose of use	Period of Retention and Use
Personal data collected under Section 1 above	Spain, Ireland	Personal data is collected at the time of use of the service via website/app and then transferred via information and communications network or other electronic or paper-	Industria de Diseño Textil, S.A. (Inditex, S.A) (dataprotection@zara.com)	Corporate policies fulfillment and compliance, Technology development, e-commerce platform support and	Period of retention and use of the relevant data set forth in Section 1 above

		based means		Customer Service, Provide product information	
Personal data collected under Section 1 above	Netherlands	Personal data is collected at the time of use of the service via website/app and then transferred via information and communications network or other electronic or paper-based means	ITX Merken B.V (dataprotection@zara.com)		Period of retention and use of the relevant data set forth in Section 1 above

6. MEASURES TO ENSURE THE SECURITY OF DATA

We apply the following security measures to protect your data:

(a) Conduct regular audits

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

(b) 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.

(c) Establishment of Internal Management Plan

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

(d) 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.

(e) Encryption of personal data

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

(f) 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.

(g) 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.

(h) Use of lock for document security

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

7. INSTALLATION, OPERATION AND REFUSAL OF AUTOMATIC PERSONAL DATA COLLECTION DEVICES

(a) We use “cookies” which store and retrieve data periodically, to provide you with personalized service

and convenience.
(b) A cookie is a small piece of data that a server (http), used to operate the website, sends to your browser, and is stored on your PC or mobile device. When you access the website, cookies are automatically transmitted from your browser to the server.
(c) You can choose to allow or deny cookies by adjusting the web browser option. However, if you refuse storing cookies, you may have difficulties in using customized services.
- You can allow or block cookies, except for essential cookies, at any time through 'Account > Settings > Cookie Settings'.

8. COLLECTION, USE AND REFUSAL OF BEHAVIORAL INFORMATION

(a) To provide optimized, personalized services and benefits as well as personalized online ads during your service usage, we process behavioral information through automatic collection devices such as cookies, in a manner that does not identify individuals.
(b) To provide services such as personalized online ads, we collect and use behavioral information via an automatic personal data collection device installed on website and app operated by a third party.
(c) We collect only the minimum behavioral information necessary for the personalized services and benefits, and online personalized advertisements. We do not collect any sensitive behavioral information that may infringe upon any individual's rights, interests, or privacy, such as ideology, belief, educational background, medical history.
(d) You may allow or block all personalized online ads by changing the cookies settings on your web browser. However, modifying the cookies settings may limit you from using certain services as automatic website log-in.
(e) We collect and use advertising IDs for personalized ads in our Android App. You can allow or block personalized ads in App by changing the settings on your mobile device.
(f) You may contact the department in charge of personal data protection to inquire about any questions regarding behavioral information, exercising your right of refusal, and filing damage.

9. RIGHTS AND OBLIGATIONS OF DATA SUBJECT AND LEGAL REPRESENTATIVE

(a) You may exercise the right to access, rectify, erase, limit or request withdrawal of your personal data processing at any time. If you are a minor aged 14 or above, you may exercise your rights to your personal data either directly or through your legal representative.
(b) You may exercise the rights in writing, via e-mail, etc., as outlined in Article 41(1) of the Enforcement Decree of the PIPA. We will take actions upon your request at any time without delay.
- You can access, modify, or erase personal data directly in the "Account > My Details" section of the website at any time.
- You can withdraw consent for the collection and use of personal data in the "Account > My Details" section at any time.
- You can withdraw consent for the collection and use of personal information at any time through 'Account > Settings > Newsletter > Unsubscribe'.

(c) You may also 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) Your right to request access or limitation of processing personal data may be restricted in accordance with Article 35(4) and Article 37(2) of the PIPA.

(e) You cannot request rectification or erasure of personal data 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.

(g) You may exercise your rights by contacting the department in charge of personal data protection. We will make every effort to promptly process your exercise of rights.

10. DEPARTMENT IN CHARGE OF PERSONAL DATA PROTECTION

(a) We appointed a Data Protection Officer ("DPO") and are operating a department in charge of personal data protection as follows. They are tasked with overall responsibility for processing personal data, and handle complaints and damage relief of data subjects related to personal data processing.

- Data Protection Department
  TEL: 080-822-0311
  Email: dataprotection@zara.com

(b) You may contact the department in charge of personal data protection for all inquiries related to personal data protection, complaints, and damage relief, arising while using our service. We will respond and handle your inquiries without delay.

11. METHODS FOR REMEDYING INFRINGEMENT OF RIGHTS OF DATA SUBJECTS

(a) 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)

(b) We strive to secure the right to self-determination of personal data for data subjects, and to consult and remedy damage caused by infringement of personal data. If you need to report or seek consultation, please contact to the department in charge of personal data protection.

12. PROCESSING OF PERSONAL LOCATION INFORMATION

(a) Purpose and Retention Period for Processing Personal Location Information

We process your personal location information for the purpose of providing location-based services pursuant to Article 3 of the Terms of Use for Location-Based Services. We retain the personal location information until the purpose of the service are achieved, and upon achieving such purpose, the personal

location information is promptly destroyed.

- Store mode: Enable you to use the following services when in stores
  - Click and find (search and locate store items)
  - Click and try (book a fitting room)
- Click and go: Recommend the nearest store where the item in your shopping cart is in stock. You may pick up the item within 2 hours when purchasing it at the recommended store.
- Store locator: Show the nearest stores to you or, the nearest stores given a location entered by you
- Droppoint: Enable you to select a store to pick up items purchased online
- Autocomplete Address: Automatically complete all address data when you add a new address
- Live tracking: Enable you to locate the item being delivered from a warehouse

(b) Grounds for and Period of Retaining Verification Data Concerning Collection, Use, and Provision of Personal Location Information

We collect and use your location information for the purpose of providing the above services, but do not store it on servers or provide it to third parties. Within this scope, based on Article 16(2) of the Location Information Act, we automatically record verification data concerning collection/use/provision of location information of the personal location information subjects in a location information system and store it for at least 6 months.

(c) Procedure and Method for Destruction of Personal Location Information

Upon expiration of the retention period or achievement of the processing purpose, when the personal information becomes unnecessary, we safely and promptly destroy the corresponding personal location information. The procedure and method for destruction shall follow "2. Procedure and Method of Personal Data Destruction."

(d) Matters Concerning the Provision and Notification of Personal Location Information to Third Parties

We do not provide your personal location information to third parties. If we provide personal location information to a third party designated by you, we immediately notify you of the recipient, the date/time of provision, and the purpose of provision, or with your consent, we may collect and provide notification of the provision details at set frequencies or for a specified period, to the extent permitted by the Location Information Act, in accordance with Article 19, Paragraph 3 and 4 of the Location Information Act.

(e) Rights and Duties of the Legal Guardian of Children Aged 8 or Under and Others, and the Method of Exercise

Pursuant to Article 26, Paragraph 1 of the Location Information Act, if the legal guardian consents to the use or provision of the personal location information of the following data subjects for the purpose of protecting their life or physical safety, it shall be regarded as your consent. A legal guardian who wishes to exercise these rights must submit a written consent form, along with documentation proving their guardianship or a family relationship certificate, to us. In this case, the legal guardian shall possess all the rights of the user as stipulated in the Terms of Use for Location-Based Services.

- A child eight years or younger
- A person under adult guardianship

- Persons with a mental disorder defined in Article 2 (2) 2 of the Act on Welfare of Persons with Disabilities, classified as a person with a severe disability defined in subparagraph 2 of Article 2 of the Act on the Employment Promotion and Vocational Rehabilitation of Persons with Disabilities (limited to those registered as disabled persons under Article 32 of the Act on Welfare of Persons with Disabilities).

(f) Department Name and Contact Information for Personal Location Information Protection and Related Complaints

Location Information Management Department:

- dataprotection@zara.com (Zara)

13. AMENDMENT OF PRIVACY POLICY

(a) This Privacy Policy is entering into force on November 20, 2026.

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

- Effective before November 20, 2026
- Effective before August 1, 2026
- Effective before January 20, 2026
- Effective before December 1, 2025
- Effective before August 22, 2025
- Effective before May 9, 2025
- Effective before August 20, 2024
- Effective before May 24, 2024
- Effective before August 1, 2023
- Effective before May 1, 2023
- Effective before May 2, 2022
- Effective before August 2, 2021
- Effective before May 14, 2021