PRIVACY AND COOKIES POLICY

The www.zara.com website is an online shopping portal (hereinafter, the Portal or the Website) implemented by ITX MERKEN, B.V. (hereinafter, ITX MERKEN), a Dutch company belonging to the Inditex Group, and ARYAN (SEA) PRIVATE LIMITED, with registration code 200201554C] and registered address in 171 Chin Swee Road, #09-01, CES Centre, Singapore 169877 (hereinafter, the Seller), uses the Portal as a sales channel of ZARA Products through e-commerce in Singapore.

This Privacy Policy establishes the bases upon which the Seller and ITX MERKEN (hereinafter, We or we, Us or us, or the Joint Data Controllers) process information through this Portal.

By using the Website or providing us your Personal Data (defined below) through the Portal or by other available channels, you consent to the collection of your Personal Data for the purposes described below, and will be bound by the current Privacy Policy and you should review this text every time you use the Website to be sure you agree with it.

1.   DATA COLLECTION AND PRINCIPAL PURPOSES OF PROCESSING:

We collect and process personal information about your person (hereinafter, Personal Data) when you use the Portal. Without limitation, this Personal Data includes personal information that you submit when you sign-up to the Portal, navigate and/or make purchases through it. Such information includes your first name, last name, email address, phone number, delivery and billing address, signature (when collecting online purchases), voice (when calling us to the customer service), date of birth, age, gender, payment method of purchase, historic purchase information, user ID, and, your payment information.

In specific cases, a third party may have provided us with information about you by using a feature or service on the Portal, 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.

If you do not provide us with the information requested, We may not be able to fulfil the applicable purpose of collection, such as to supply products to you.

We will process your Personal Data for the following purposes:

a)   Registration as a user of the Portal: The Personal Data provided to us to register as a user of the Portal will be processed in order to identify you as a user of the Website and provide access to the different services and functions that are available to you as a registered user.

b) <u>Purchases</u>: The development, facilitation and performance of the purchase and sale contract of the products you have purchased to the Seller or of any other contract between both parties and related administrative and legal purposes.

Furthermore, We may use your data to contact you via e-mail, telephone calls or SMS to inform you about status of your order and another communications related to the services, including security updates of the Portal.

In the event that you provide us with third party information, you will be responsible for having informed and obtained their consent for this information to be provided for the purposes explained below. In the event of having purchased a product or gift card (hereafter, goods), third party information provided will be used only for (i) managing the delivery or verification of the receipt of the goods and (ii) attending to any query or request which you or the third party may have;

c) <u>Gift Receipt</u>: In the event that you have a gift voucher and you wish to return the goods associated with it via the Website, we will use the personal details including your Personal Data 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 Voucher Receipt or Voucher Card with the refund amount via email or other equivalent electronic means.

d) Activate the mechanisms necessary to prevent and detect unauthorised uses of the Portal (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.

e) 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.

f) <u>Requests</u>: In the event that you wish to ask any question, through the contact form available in the Portal, your Personal Data and contact details may be used by us in order to respond to your queries, including those related to the technical service of the Portal, operation of the same, doubts related to the orders, etc. For adequate management of your queries, it may be necessary for us to contact you through e-mail, telephone calls or SMS.

g) <u>Marketing</u>: ITX MERKEN shall process your Personal Data to personalise the services we offer you and enable us to give you recommendations based on your interactions with ZARA on the Portal and an analysis of your user profile (for example, based on your purchase and browsing history). Likewise, to 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, ITX MERKEN may provide the companies with which it collaborates 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, please, review the privacy policies of the social media sites on which you have profiles.

- ITX MERKEN also uses 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 ITX MERKEN collaborates with these third parties who offer us the necessary technology (for example, cookies, pixels, SDK) to use these services. Keep in mind that, although ITX MERKEN does not provide identifying personal data to these collaborators, IT may 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).

h) Data enrichment: When ITX MERKEN gathers your personal data from a variety of sources, it may consolidate them under certain circumstances for the purpose of improving the understanding of your needs and preferences related to the 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 ITX MERKEN 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 ITX MERKEN may link with the information you have provided us directly through your activity on the Portal or in any of our stores (for example, information related to your purchases, whether in brick and mortar stores or online, your preferences, etc.).

The user (You) hereby guarantees that the Personal Data provided are true and accurate and undertakes to notify us of any change or alteration of them. Any loss or damage caused to the Website or to the Inditex Group, the Seller or to any third person through the provision of erroneous, inexact or incomplete information on the registration form, will be the exclusive responsibility of the user.

We will retain your Personal Data for as long as required to fulfil the purpose for which the Personal Data was collected.

2. PROTECTING YOUR PERSONAL DATA

To prevent unauthorised access to your Personal Data, we maintain reasonable physical, electronic and organisational procedures to protect your Personal Data against unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

3. SUBSCRIPTION TO THE NEWSLETTER

Subscription to our Newsletter may be voluntarily activated through the Portal by acceptance of the user.

If you give us your prior consent, ITX MERKEN will process your Personal Data for providing you with information about ZARA products, as well as from any other brands and/or companies that use the sales channels of the Inditex Group (with activities related to the sectors of decoration, textiles, finished clothing products and home decoration, as well as other complimentary sectors such as cosmetics or leather goods, and the development and support of electronic commercial activities), including, in relation to these products or services, the sending of commercial communications via email or any other equivalent electronic communication means (such as SMS) or through phone calls.

If you are a registered user, you can change your preferences relating to the sending of commercial communications through accessing My Account. You will only receive commercial electronic messages where you have consented, or as otherwise permitted by law. You can unsubscribe through the Newsletter section.

4. DISCLOSURE OF PERSONAL DATA AND INTERNATIONAL TRANSFERS

To achieve the purposes indicated in the above sections, We may need to disclose or transfer the information that you have provided us with to the holding company of the Inditex Group [Industria de Diseño Textil, S.A., (Inditex, S.A.)] and to certain other entities that are part of the Inditex Group (with activities related to the above-mentioned sectors). You are hereby informed that by registering and providing us with information via this Website, you are expressly giving us your authorization to disclose and/or transfer such data to the aforementioned companies of the Inditex Group located in the European Union. Also, in order to achieve the purposes indicated in sections 1.b and 1.d, the Seller may need to disclose or transfer the information that you provided us to certain other entities that are affiliates of ARYAN (SEA) PRIVATE LIMITED. You are hereby informed that by registering and providing us with information via this website, you are expressly giving us your authorization to disclose and/or transfer such data to the aforementioned companies (i.e. affiliates of ARYAN (SEA) PRIVATE LIMITED).

Where strictly necessary, we may also disclose this information to subsidiaries and affiliates of Inditex, S.A., third-party processors, fulfilment centres, financial institutions or other third-party-service providers who help with our business operations (such as fraud investigations, bill collection, affiliate and rewards programs,

suppliers of technological and analytical services, financial transaction management, logistics services, transportation (and/or their partner establishments), service providers and collaborators related to marketing and publicity, such as social media sites, advertising agencies or advertising partners, order management and customer service, and / or analysis of the transactions made through the Website in order to provide our users with sufficient guarantees in purchasing transactions, etc.) or as necessary to process your purchases. By providing information in this Website or otherwise to Us, you expressly authorize us to disclose and process your information as described. Your consent to this access/disclosure includes those cases where, for efficiency of the provision of the services, providers may be located in the United States of America, the European Union, Singapore and Malaysia.

5.   USER RIGHTS

Where applicable, you are entitled to exercise your access, rectification, erasure and objection rights by sending an email to dataprotection@zara.com indicating the subject "ZARA – Singapore". If necessary, We may require that the request in question would be in a credible manner demonstrated by the applicant's identity. Our aim is to ensure the maximum level of security and confidentiality. In the event you decide to exercise such rights please provide us with the email address to which the right of access, rectification, erasure and objection are being exercised. 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.

6.   INFORMATION ABOUT COOKIES

We use cookies in this website, which are small text files with information on your navigation in this site, whose principal objective is to improve your experience in the website. 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

Google Analytics (__utma, __utmb, __utmc, __utmd, __utmv, __utmz, _ga...)	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, https://support.google.com/analytics/answer/6004245?hl=en, 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.	Persistent	Third party
Optimizely (optimizelySegments; optimizelyEndUserId optimizelyPendingLogEvents; optimizelyBuckets…)	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 https://help.optimizely.com/hc/en-us/articles/200040335, to obtain more information regarding the cookies they use, as well as how to disable them through the following link https://www.optimizely.com/opt_out. Please, remember that we are not responsible for the content or the accuracy of these third-party websites.	Persistent	Third party
Conversion pixels and SDKs	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: - Facebook: https://www.facebook.com/ads/about/?entry_product=ad_preferences - Google: https://policies.google.com/technologies/ads?hl=es 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	Persistent	Third party

	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		

Cookies for purchasing analysis			
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.			
COOKIES	**PURPOSE**	**DURATION**	**MANAGEMENT**
Purchase device (thx_guid)	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.	Persistent	Third party

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.