

# PRIVACY AND COOKIES POLICY

## OUR PRIVACY AND COOKIES POLICY AT A GLANCE

1. **WHO WE ARE.** We are **ZARA S, d.o.o** and **Industria de Diseño Textil, S.A. (Inditex, S.A.), S.A.**, and we process your personal data as *joint controllers*. This means that we are jointly responsible for how we process and protect your data. [See more.](#)
2. **WHAT WE USE YOUR DATA FOR.** We will use your data (collected online or in person), among other purposes, **to manage your registration** as a user, **to manage your purchases** of products or services, to respond to your queries, and, if you wish, to send you our customised communications. [See more.](#)
3. **WHY WE USE YOUR DATA.** We have legal standing to process your data for various reasons. The main reason is that we need to process your data to **perform the contract** that you accept with us when you register and when you make a purchase or enjoy any of our services or functionalities. We also use your data for other reasons, for example, to respond to your queries or to send you newsletters that you have asked to receive from us. [See more.](#)
4. **WHO WE SHARE YOUR DATA WITH.** We share your data with service providers who provide us with assistance or support, these being companies in the Inditex Group or third party providers, both inside and outside the European Union. [See more.](#)
5. **YOUR RIGHTS.** You have the right to access, rectify or delete your personal data. In certain cases, you are also entitled to other rights, such as, for example, to object to us using your data, or to transferring your data, as explained in depth below. [See more.](#)

We encourage you to read our full **Privacy and Cookies Policy** below to understand in depth the manner in which we will use your personal data and your rights over your data.

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## BEFORE YOU START ...

- In this **Privacy and Cookies Policy**, you will find **all relevant information** applicable to our use of our users' and clients' personal data, **regardless of the channel or means (online or in person)** of ZARA in Slovenia that you use to interact with us.
- **We are transparent** about what we do with your personal data, to help you to understand the implications of the way in which we use your data, and the rights you are entitled to in relation to your data:
  - We **permanently** make available for you all the information included in this Privacy and Cookies Policy, that you can check when you consider appropriate, and in addition,
  - you will also find **further information** on how we use your data **as you interact with us**.
- These are some terms we regularly use in this Privacy and Cookies Policy:
  - When we speak about our **Platform**, we refer, in general, to any of the channels or means, digital or in person, you may have used to interact with us. The main ones are:
    - Our **Website**, [www.zara.com](http://www.zara.com)
    - Our **ZARA App**, this is, including both the mobile application you installed on your mobile device and others we may use in our stores.
    - In person, in any of our **ZARA Slovenia Stores**.

## 1. WHO IS THE CONTROLLER OF YOUR DATA?

Your data controllers are:

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| <ul style="list-style-type: none"><li>▪ <b>ZARA S, d.o.o</b>, company currently operating in Slovenia the sale of ZARA brand products ("ZARA SLOVENIA"):<ul style="list-style-type: none"><li>○ Postal address: Ameriška ulica 8, 1000 Ljubljana, Slovenia</li><li>○ E-mail of Data Protection Officer: <a href="mailto:dataprotection@zara.com">dataprotection@zara.com</a></li></ul></li></ul> |
| <ul style="list-style-type: none"><li>▪ <b>INDUSTRIA DE DISEÑO TEXTIL, S.A. (INDITEX, S.A.), S.A.</b> ("INDITEX"):<ul style="list-style-type: none"><li>○ Postal address: Avda. de la Diputación, Edificio Inditex, 15143, Arteixo (A Coruña), Spain.</li><li>○ E-mail of Data Protection Officer: <a href="mailto:dataprotection@zara.com">dataprotection@zara.com</a></li></ul></li></ul>      |

In other words, both ZARA SLOVENIA and INDITEX (jointly "We", "Us" or "the Joint Controllers"), are **Joint Controllers** of the data. This means that we have regulated and are jointly responsible for processing and protecting your personal data.

## 2. WHY WE PROCESS YOUR PERSONAL DATA

Depending on the purpose for which we process your data from time to time, as explained above, we need to process one or other data, which will in general be, **depending on each case**, as follows:

- your **identity data** (for example, your name, surname, language and country from which you interact with us, contact data, etc.);
- **economic and transactions** information (for example, your payment or card data, information on your purchases, orders, returns, etc.);
- **connection, geolocation and/or browsing** data (if you interact with us from your mobile phone, for example);
- **commercial** information (for example, if you have subscribed to our newsletter),
- information about your **tastes and preferences**.

Remember that, when we ask you to fill in your personal data to give you access to any functionality or service of the Platform, we will mark certain fields as *compulsory*, since this is information that we need to be able to provide the service or give you access to the functionality in question. Please take into account that, if you decide not to make such data available to us, you may be unable to complete your user registration or may not be able to enjoy those services or functionalities.

Depending on how you interact with our Platform, i.e., depending on the services, products or functionalities that you wish to enjoy, we will process your personal data for the following purposes:

PURPOSE	+ info
<p><b>1. To manage your registration as user of the Platform</b></p>	<p>If you decide to become a registered user of our Platform, we need to process your data to <b>identify you as a user</b> of the Platform and <b>grant you access</b> to its various functionalities, products and services available to you as a registered user. You may cancel your registered user account by contacting us through Customer Service.</p>
<p><b>2. For the development, performance and execution of the purchase or services contract that you executed with Us on the Platform</b></p>	<p>This purpose includes processing your data, mainly:</p> <ul style="list-style-type: none"> <li>▪ <b>To contact you</b> for updates or informative notices <b>related to the contracted functionalities, products or services</b>, including <b>quality surveys</b> and to be able to establish the degree of customer satisfaction with the provided service;</li> <li>▪ <b>To manage payment</b> of the products that you purchase, regardless of the payment procedure used. For example: <ul style="list-style-type: none"> <li>▪ If on purchasing any of our products through the Website or the App, you opt to activate the functionality of <b>save your card data</b> for future purchases, we need to process the indicated data for activation and development of that functionality. Consent to the activation of this functionality enables your autocompleted</li> </ul> </li> </ul>

	<p>payment data to appear in subsequent purchases so that you do not need to introduce them in each new process, and these data will be deemed valid and effective for subsequent purchases. You may change or cancel your cards at any time through the section on payment information, either of your Website registered user account, or of the Wallet functionality of the ZARA App.</p> <ul style="list-style-type: none"> <li>▪ If you use the Wallet functionality of the App to pay your face-to-face purchases, we need to process your data to activate it, so that you may start your purchases at the brick-and-mortar stores of ZARA in Slovenia (“the Brick-and-Mortar Stores”) enabled for the purpose.</li> <li>▪ Activate the necessary arrangements in order to <b>control and prevent potential fraud against you and against us</b> during the purchase process. If we consider that the transaction can be fraudulent, this processing may cause the blocking of the transaction.</li> <li>▪ To manage potential <b>returns</b> after you have purchased and manage <b>requests of availability information for articles, reservations of products through the Platform</b>, depending on the availability of such options from time to time.</li> <li>▪ For invoicing purposes and to make available to you the tickets and invoices of the purchases you have made through the Platform.</li> <li>▪ To ensure that you are able to use <b>other available functionalities or services</b>, such as the purchase, management and use of the <b>Gift Card</b> or of the <b>Gift Voucher</b>, and to afford you access and use of the <b>Wi-Fi</b> that we make available to our customers at Brick-and-Mortar Stores.</li> </ul>
<p><b>3.</b> To meet requests or applications that you make through the <b>Customer Support</b> channels</p>	<p>We only process the personal data that are <b>strictly necessary</b> to manage or resolve your request or application.</p>
<p><b>4.</b> For <b>marketing purposes</b>.</p>	<p>This purpose includes the processing of your data, mainly, for:</p> <ul style="list-style-type: none"> <li>▪ If and when you subscribe to our Newsletter, we will process your personal data to <b>manage your subscription</b>, including to <b>send customised information</b> on our products or services through various means (such as e-mail or SMS). We may also make available to you this information through push notifications in case you have activated them in your mobile device. <ul style="list-style-type: none"> <li>▪ Accordingly, please take into account that this data processing implies <b>analysis of your user or customer</b></li> </ul> </li> </ul>

	<p><b>profile</b> to establish your preferences and therefore which products and services are most fit to your style when sending you information. For example, based on your purchases and browsing history (i.e., depending on the articles that you clicked), we will make you suggestions on products that we believe may interest you and, if you are a registered user, we will provide you with the "recover cart " functionality.</p> <ul style="list-style-type: none"> <li>▪ Remember that <b>you may unsubscribe from the Newsletter at any time</b> without cost through the "Newsletter" section of the Platform, in addition to through the instructions that we provide you with in each notice. If you do not want to receive push notifications, you can deactivate this option in your mobile device.</li> <li>▪ To perform <b>promotional actions</b> (for example, for the organization of competitions or to send the list of items stored to the e-mail you designate). On participating in any promotional action, you authorise us to process the personal data that you have shared with us depending on the promotional action and disclose them through different media such as social networks or the Platform itself. In each promotional action in which you participate you will have available the terms and conditions where we will be providing more detailed information about the processing of your personal data.</li> <li>▪ To disseminate in the Platform or through our channels in the social networks photographs or pictures that you shared publicly, provided that you expressly give us your consent for the purpose.</li> </ul>
<p><b>5. Analysis of usability and quality</b> to improve our services</p>	<p>If you access our Platform, we inform you that we will treat your browsing data for <b>analytic and statistic purposes</b>, i.e., to understand the manner in which users interact with our Platform and thus be capable of introducing improvements in the Platform.</p> <p>In addition, we occasionally perform <b>quality surveys and actions</b> to know the degree of satisfaction of our customers and users and detect those areas in which we may improve.</p>

### 3. HOW WE ARE LEGALLY PERMITTED TO PROCESS YOUR DATA?

The legal terms on which we are permitted to process your personal data also depends on the purpose for which we process them, as explained in the following table:

Purpose	Legal standing
<p><b>1. To manage your Platform user registration</b></p>	<p>We process your data because this is <b>necessary on the terms regulating the use of the Platform</b>. In other words, for you to be able to register as a user on the Platform, we need to process your personal data, since we would otherwise be unable to manage your registration.</p>
<p><b>2. Development, performance and making of the purchase or services contract</b></p>	<p>We process your data because their processing is necessary for us <b>to make the purchase or services contract</b> with you.</p> <p>Certain processing of data related to the purchase process is activated only because you request or authorise it, as is the case of the storage of payment (card) data for future purchases or the processing of data necessary to scan the till receipts through the Wallet section of the App or to provide you with the Coming Soon / Back Soon functionalities. In these cases, our processing of your data is supported by your own <b>consent</b>.</p> <p>We consider that we have a <b>legitimate interest</b> to carry out the necessary verifications to detect and prevent potential fraud when you make a purchase. We understand that the processing of these data is positive for all the participating parties when a purchase is paid and in particular for you, since this allows us to establish measures to protect you from fraud attempts by third parties.</p>
<p><b>3. Customer Support</b></p>	<p>We consider that we have <b>legitimate interest</b> in answering the requests or queries raised by you through the existing different contact channels. We understand that the processing of these data is also beneficial to you to the extent that it enables us to assist you adequately and answer to the queries raised.</p> <p>When you get in touch with us, in particular, for the management of incidents related to your order or the product/service acquired through the Platform,</p>

	<p>the processing of your data is necessary <b>to perform the purchase contract.</b></p> <p>When your request is related to the exercise of your rights on which we inform you below, or to claims on our products or services, we are legally permitted to process your data <b>for compliance with our legal obligations.</b></p>
<p><b>4. Marketing</b></p>	<p>We are legally permitted to process your data for marketing purposes due to the <b>consent</b> that you give us, for example when you accept receiving customized information through multiple channels, when authorizing the sending of push notifications in your mobile device or when accepting the legal terms and conditions to participate in a promotional action or to publish your pictures on the Platform or on our social networks' channels.</p> <p>In order to show you customised information. we consider that we have a legitimate interest to conduct a profiling with the information that we have about you (such as your browsing, preferences or purchase history) and the personal data that you have provided us, such as the age range or language, since we understand that the data processing of these data is also beneficial to you because it allows you to improve your user experience and access the information in accordance with your preferences.</p>
<p><b>5. Analysis of usability and quality</b></p>	<p>We consider that we have a <b>legitimate interest</b> in analysing the Platform usability and the user's satisfaction degree, since we understand that the processing of these data is also beneficial for your because the purpose is to improve the user experience and provide a higher quality service.</p>

## 4. HOW LONG WILL WE KEEP YOUR DATA?

The **time for which we will keep** your data will depend on the purposes for which we process them, as explained below:

Purpose	Time for which the data are kept
<b>1. To manage your Platform user registration</b>	We will process your data for the time during which you remain a registered user (meaning, until you decide to unsubscribe).
<b>2. Development, performance and execution of the purchase or services contract</b>	We will process your data for the time necessary to manage the purchase of the products or services that you buy, including potential returns, complaints or claims related to the purchase of the product or service in question.  Sometimes, we will only process the data until the time when you decide, as is the case of payment (card) data that you requested us to store for future purchases.
<b>3. Customer Support</b>	We will process your data for the time necessary to meet your request or application.
<b>4. Marketing</b>	We will process your data until you unsubscribe or cancel your subscription to the newsletter.  If you participate in promotional actions, we will keep the data during a six (6) months period from the end of the action.
<b>5. Analysis of usability and quality</b>	We will process your data occasionally for the time during which we proceed to carry out a specific quality action or survey or until we anonymise your browsing data.

Notwithstanding the fact that we will process your data for the time strictly necessary to achieve the purpose in question, we will subsequently keep them duly stored and protected for the time during which liability may arise for their processing, in compliance with legislation in force from time to time. Once each of the potential actions is time-barred we will proceed to delete the personal data.

## 5. DO WE SHARE YOUR DATA WITH THIRD PARTIES?

To achieve the purposes mentioned in this Privacy and Cookies Policy, we must give access to your personal data to **entities of the Inditex Group** and to **third parties** that provide us with support in the services that we offer you, i.e.:

- **financial** institutions,
- **anti-fraud detection and prevention** entities,
- **technological** service providers,
- **logistic, transport and delivery** partners and service providers,
- providers of **customer support** related services,
- **advertising** and **marketing** related partners and service providers.

For service efficiency purposes, some of these providers are located in territories outside the European Economic Area that do not offer a level of data protection comparable to that of the European Union, as the United States of America. In such cases, we inform you that we will transfer your data with **adequate safeguards and always keeping your data safe**:

- Some providers are certified **Privacy Shield**, which certification you may consult through the following link:

<https://www.privacyshield.gov/welcome>

- With other providers, we have agreed **Standard Contractual Clauses** approved by the EU Commission, the content of which you may consult through the following link:

[https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

## 6. WHAT YOUR RIGHTS ARE WHEN MAKING YOUR DATA AVAILABLE TO US

We undertake to keep your personal data confidential and to ensure that you may **exercise your rights**. Bearing that in mind, we Joint Controllers have agreed that you may exercise your rights **free of charge** by writing us an e-mail to a **single e-mail address** ([dataprotection@zara.com](mailto:dataprotection@zara.com)), simply informing us of the reason for your request and the right that you wish to exercise. If we consider this necessary to be able to identify you, we may request you to provide a copy of a document evidencing your identity.

In particular, notwithstanding the purpose or legal basis we use to process your data, you have the following rights:

- To request **access** to your personal data that we hold. We remind you that where you are a Platform registered user you may also consult this information in the relevant section of your online account.
- To request that we **rectify** the personal data that we hold. Please bear in mind that if you are a registered user on the Platform, you may also access the relevant personal data section of your online account to change or update your personal data. In any case, please take into account that, on actively making your personal data available to us through any procedure, you guarantee that they are **true and accurate** and you undertake to notify to us any change or modification of your data. You will be liable for any loss or damage caused to the Platform or to the person responsible for the Platform or to any third party by reporting erroneous, inaccurate or incomplete information in the registration forms. Please remember that, as a

general rule, you must provide us only with your own data, not with those of third parties, other than to the extent otherwise permitted in this Privacy and Cookies Policy.

- To request that we **erase** your personal data to the extent that they are no longer necessary for the purpose for which we need to keep processing them, as we have explained above, or when we are no longer legally permitted to process them.
- To request that we **cancel or limit the processing** of your personal data, which entails that in certain cases you can request us to temporarily suspend the processing of the data or that we keep them longer than necessary.

If you have given us your **consent** to process your data for any purpose, you **also have the right to withdraw such consent at any time**. Some of the circumstances in which you may withdraw your consent are detailed in section 2 where we explain for which purposes we process your data.

When we are legally permitted to process your data due to your **consent** or to for the purposes of a **contract**, as explained in section 3, you will also have the right to request the **portability of your personal data**. This means that you will have the right to receive the personal data that you made available to us in a structured, commonly used and machine-legible format, to be able to transmit them to another entity directly without impediments on our part.

In addition, where the processing of your data is based on our **legitimate interest**, you will also have the right to **object** to the processing of your data.

Finally, we inform you that you have the right to file a claim before the responsible data protection **regulatory authority**, in particular, before:

- the Spanish Data Protection Authority (<https://www.agpd.es/portalwebAGPD/index-ides-idphp.php>),
- the authority of the country in which the country retail company is located: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

## **7. WHAT HAPPENS WHEN YOU PROVIDE US WITH DATA OF THIRD PARTIES?**

We offer functionalities or services that require us to process the personal data of a third party that you must provide, such as in the case of activation and sending of the Gift Voucher or the management of the application for the Gift Voucher. If you provide us with personal data of third parties, you confirm that you informed them of the purposes and of the manner in which we need to process their personal data.

## **8. CHANGES TO THE PRIVACY AND COOKIES POLICY**

We may amend the information contained in this Privacy and Cookies Policy when we consider this appropriate. Should we do so, we will notify you by various procedures through the Platform (for example, through a banner, a pop-up or a push notification), or we may even send you a notice to your e-mail address when the change in question is relevant to your privacy, for you to be able to review the changes, assess them and, as the case may be, object or unsubscribe from any service or functionality. In any case, we suggest you to review this Privacy and Cookies Policy from time to time in case minor changes are made or we make any interactive improvement, taking the opportunity that you will always find it as a permanent point of information on our Website and our App.

## **9. INFORMATION ON COOKIES**

We use cookies and similar devices to facilitate your browsing in the Platform, understand how you interact with us and, in certain cases, to be able to show you advertisements in accordance with your browsing habits. Please read our Information about Cookies to understand with greater detail the cookies and similar devices 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 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, 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, 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 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 the 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.

<b>COOKIES</b>	<b>PURPOSE</b>	<b>DURATION</b>	<b>MANAGEMENT</b>
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, <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.	Persistent	Third party
Optimizely (optimizelySegme nts; optimizelyEndUse rId optimizelyPending LogEvents; 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 <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.	Persistent	Third party

### 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.*

# PRAVILNIK O ZASEBNOSTI IN PIŠKOTKIH

## KRATEK PREGLED NAŠEGA PRAVILNIKA O ZASEBNOSTI

6. **KDO SMO.** Smo družba ZARA S, d.o.o e Industria de Diseño Textil, S.A. (INDITEX, S.A.) in obdelujemo vaše osebne podatke kot *skupni upravljavci*. To pomeni, da smo skupaj odgovorni za to, kako obdelujemo in varujemo vaše podatke. [Več informacij.](#)
7. **V KAKŠNE NAMENE UPORABLJAMO VAŠE PODATKE.** Vaše podatke (zbrane na spletu ali v živo) bomo med drugim uporabili **za obdelavo vaše registracije** uporabnika, **za obdelavo vaših nakupov** izdelkov ali storitev, za odgovarjanje na vaša vprašanja in, če to želite, za pošiljanje naših prilagojenih sporočil. [Več informacij.](#)
8. **ZAKAJ UPORABLJAMO VAŠE PODATKE.** Pravno podlago za obdelavo vaših podatkov imamo iz več razlogov. Glavni od teh je, da jih moramo obdelati, da lahko **izpolnimo pogodbo**, v katero z nami stopite ob vaši registraciji, nakupu ali uporabi katere koli od naših storitev ali funkcije, njihovo uporabo pa nam omogočajo tudi drugi razlogi, kot so naš interes za odgovarjanje na vaše poizvedbe ali **soglasje**, ki nam ga daste, da vam lahko pošiljamo svoje glasilo. [Več informacij.](#)
9. **S KOM DELIMO VAŠE PODATKE.** Vaše podatke delimo s ponudniki storitev, ki nam nudijo pomoč ali podporo; to so družbe, ki so del skupine Inditex Group ali tretji izvajalci, s katerimi smo sklenili sporazum, znotraj in zunaj Evropske unije. [Več informacij.](#)
10. **VAŠE PRAVICE.** Imate pravico dostopati, popravljati ali izbrisati svoje osebne podatke. V določenih primerih imate tudi druge pravice, na primer, do ugovora na našo uporabo vaših podatkov, ali do njihove prenosljivosti, kot je podrobneje razloženo v nadaljevanju. [Več informacij.](#)

Vabimo vas, da preberete naš celotni **Pravilnik o zasebnosti in piškotkih** v nadaljevanju, da boste podrobno razumeli način, na katerega uporabljamo vaše osebne podatke in svoje pravice glede tega.

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## PREDEN ZAČNETE ...

- V tem **Pravilniku o zasebnosti in piškotkih** boste našli **vse pomembne informacije**, ki veljajo za našo uporabo osebnih podatkov naših uporabnikov in strank, **ne glede na pot ali način (na spletu ali v živo)** družbe ZARA v Slovenija, ki jih uporabite za interakcijo z nami.
- Glede tega, kar počnemo z vašimi osebnimi podatki smo **transparentni**, zato da bi razumeli posledice načina, na katerega uporabljamo vaše podatke, in svoje pravice, do katerih ste upravičeni glede svojih podatkov:
  - Vse informacije, ki so vključene v ta Pravilnik o zasebnosti in piškotkih so vam **stalno** na voljo, tako da jih lahko preverite, kadarkoli se vam to zdi ustrezno, poleg tega pa
  - so vam na voljo tudi **dodatne informacije** o vsakem postopku obdelave vaših podatkov **pri vaši interakciji z nami**.
- Tukaj je nekaj izrazov, ki jih uporabljamo v tem Pravilniku o zasebnosti in piškotkih:
  - Ko govorimo o svoji **platformi**, v splošnem govorimo o kateri koli poti ali načinu – digitalnem ali v živo – ki ste ga morda uporabili za interakcijo z nami. Glavni načini so:
    - Naše **spletno mesto**, [www.zara.com](http://www.zara.com)
    - Naša **aplikacija Zara**, ki vključuje mobilno aplikacijo, ki ste jo namestili na svojo mobilno napravo, in druge, ki jih morda uporabljamo v naših trgovinah.
    - V živo v kateri koli naši **trgovini Zara Slovenija**.

## 10. KDO JE UPRAVLJAVEC VAŠIH PODATKOV?

Upravljalci vaših podatkov so:

- ZARA S, d.o.o družba, ki trenutno posluje v Slovenija in prodaja izdelke znamke ZARA (v nadaljevanju: »ZARA SLOVENIJA«):
  - Poštni naslov: Ameriška ulica 8, 1000 Ljubljana, Slovenija
  - E-poštni naslov uradne osebe za varstvo podatkov: [dataprotection@zara.com](mailto:dataprotection@zara.com)
- INDUSTRIA DE DISEÑO TEXTIL, S.A., krovna družba Inditex Group (v nadaljevanju: »INDITEX«):
  - Poštni naslov: Avda. de la Diputación, Edificio Inditex, 15143, Arteixo (A Coruña), Španija.
  - E-poštni naslov uradne osebe za varstvo podatkov: [dataprotection@zara.com](mailto:dataprotection@zara.com)

Povedano drugače, ZARA SLOVENIJA in INDITEX (skupaj imenovani »mi«, »nas« ali »skupna upravljavca«) sta **skupna upravljavca** podatkov. To pomeni, da smo skupaj uredili in smo skupaj odgovorni za obdelavo in varstvo vaših osebnih podatkov.

## 11. ZAKAJ OBDELUJEMO VAŠE OSEBNE PODATKE.

Odvisno od namena, za katerega občasno obdelujemo vaše podatke, moramo obdelati določene podatke, ki v glavnem, **odvisno od posameznega primera**, vključujejo naslednje:

- podatke o vaši **identiteti** (na primer vaše ime, priimek, jezik in državo, iz katere poteka vaša interakcija z nami, kontaktni podatki itd.);
- **finančne in transakcije** podatke (na primer podatke o vašem plačilu ali kartici, podatke o vaših nakupih, naročilih, vračilih itd.);
- **povezavo, geografsko lokacijo in/ali** podatke o **brskanju** (na primer, če vaša interakcija z nami poteka na mobilnem telefonu);
- **komercialne** podatke (na primer, če ste se naročili na naše glasilo),
- informacije o vaših **okusih in željah**.

Pomnite, da bomo ob zahtevi za vnos vaših osebnih podatkov za potrebe omogočanja dostopa do katere koli funkcije ali storitve na platformi, pri tem nekatera polja označili kot *obvezna*, saj gre za podatke, ki jih moramo imeti za opravljanje storitve ali zagotovitev dostopa do zadevne funkcije. Upoštevajte, da svoje uporabniške registracije morda ne boste mogli dokončati ali pa ne boste mogli uporabljati zadevnih storitev ali funkcij, če se odločite, da nam ne daste zahtevanih podatkov.

Odvisno od načina, na katerega poteka vaša interakcija z nami na naši platformi, tj. glede na storitve, izdelke ali funkcije, ki jih želite uporabljati, bomo vaše osebne podatke obdelali za naslednje namene:

NAMEN	+ informacije
<b>1. Za upravljanje vaše uporabniške registracije na platformi</b>	Če se odločite, da boste postali registrirani uporabnik naše platforme, moramo vaše podatke obdelati tako, da <b>vas lahko prepoznamo kot uporabnika</b> platforme in <b>vam omogočimo dostop</b> do njenih različnih funkcij, izdelkov in storitev, ki so na voljo registriranim uporabnikom. Registrirani uporabniški račun lahko prekličete, tako da se obrnete na našo službo podpore strankam.
<b>2. Za razvoj, obdelavo in izvajanje pogodbe o nakupu ali storitvi</b> , v katero ste stopili z nami na platformi	Ta namen vključuje obdelavo vaših podatkov, predvsem: <ul style="list-style-type: none"><li>▪ <b>za obvestila</b> o posodobitvah ali informativna obvestila, <b>povezana s funkcijami, izdelki ali storitvami</b> iz pogodbe, vključno z <b>anketami o kakovosti</b> ter o možnostih za ugotavljanje stopnje zadovoljstva strank z opravljeno storitvijo;</li><li>▪ <b>za obdelavo plačila</b> izdelkov, ki jih kupite, ne glede na uporabljeni postopek plačila. Na primer:<ul style="list-style-type: none"><li>▪ Če se pri nakupu katerega koli od naših izdelkov prek spletnega mesta ali aplikacije odločite za aktivacijo funkcije <b>shranjevanja podatkov o vaših kartici</b> za prihodnje nakupe, bomo morali obdelati te podatke z namenom aktivacije in razvoje te funkcije. Soglasje za aktivacijo te funkcije vam omogoča, da se ob</li></ul></li></ul>

	<p>naslednjih nakupih podatki o plačilu samodejno pojavijo, tako da jih vam ni treba vnesti ob vsakem novem postopku, te podatke pa bomo upoštevali kot veljavne tudi za naslednje nakupe. Podatke o svojih karticah lahko kadarkoli spremenite ali jih prekličete v razdelku o plačilnih podatkih v računu registriranega uporabnika spletnega mesta ali v funkciji denarnice aplikacije ZARA.</p> <ul style="list-style-type: none"> <li>▪ Če funkcijo denarnice v aplikaciji uporabite za plačilo svojih nakupov v živo, moramo vaše podatke obdelati, da lahko aktiviramo to funkcijo, tako da boste lahko na ta način nakupovali v fizičnih prodajalnah družbe ZARA v Slovenija (v nadaljevanju: fizične prodajalne«).</li> <li>▪ Za izvedbo ustreznih ukrepov za <b>nadzor in preprečevanje morebitnih goljufij v vašo ali našo škodo</b> med postopkom nakupa. Če menimo, da bi transakcija lahko bila goljufiva, lahko v takšni obdelavi transakcijo blokiramo.</li> <li>▪ Za obdelavo morebitnih <b>vračil</b>, potem ko ste kupili in oddali <b>zahtevek za informacije o razpoložljivosti izdelkov, rezervacijo izdelkov prek platforme</b> ali za nudenje storitev, povezanih s funkcijo <b>osebne prilagajanja</b>, odvisno od občasne razpoložljivosti te možnosti.</li> <li>▪ Za potrebe izdajanja računov in omogočanje dostopa do vstopnic in računov za nakupe, ki ste jih izvedli prek platforme.</li> <li>▪ Za zagotavljanje tega, da lahko uporabljate <b>druge razpoložljive funkcije ali storitve</b>, kot so nakup, upravljanje in uporaba <b>darilne kartice</b> ali <b>darilnega kupona</b> ter za omogočanje dostopa in uporabe omrežja <b>Wi-Fi</b>, ki je našim strankam na voljo v fizičnih prodajalnah.</li> </ul>
<p><b>3. Za izpolnitev zahtevkov ali vlog, ki jih pošljete službi podpore strankam</b></p>	<p>Obdelujemo samo osebne podatke, ki so <b>nujno potrebni</b> za upravljanje ali razreševanje vašega zahtevka ali vloge.</p>
<p><b>4. Za namene trženja.</b></p>	<p>Ta namen vključuje obdelavo vaših podatkov, predvsem:</p> <ul style="list-style-type: none"> <li>▪ če in ko se naročite na naše glasilo, bomo vaše osebne podatke obdelali z namenom <b>upravljanja naročnine</b>, vključno s <b>pošiljanjem prilagojenih informacij</b> o naših izdelkih ali storitvah na različne načine (na primer prek e-pošte ali SMS). Te informacije vam lahko zagotovimo tudi s potisnimi obvestili, če to možnost aktivirate na svoji mobilni napravi. <ul style="list-style-type: none"> <li>▪ V skladu s tem upoštevajte, da ta obdelava podatkov vključuje <b>analizo vašega profila uporabnika ali stranke</b> za ugotavljanje vaših želja in tega, kateri izdelki in storitve</li> </ul> </li> </ul>

	<p>najbolje ustrezajo vašemu slogu, ko vam pošljemo informacije. Na primer, na podlagi vaših nakupov in zgodovine brskanja (tj. odvisno od izdelkov, na katere ste kliknili), bomo za vas pripravili predloge izdelkov, za katere menimo, da bi vas lahko zanimali, in če ste registrirani uporabnik, vam bomo ponudili funkcijo »obnovitev nakupovalnega vozička«.</p> <ul style="list-style-type: none"> <li>▪ Pomnite, da <b>se lahko od glasila kadarkoli</b> brez stroškov <b>odjavite v razdelku »Glasilo«</b> na platformi, poleg navodil, ki vam jih posredujemo v vsakem obvestilu. Če potisnih obvestil ne želite prejemati, lahko to možnost izklopite na mobilni napravi.</li> <li>▪ Za izvedbo <b>promocijskih akcij</b> (na primer za organizacijo tekmovanj ali za pošiljanje seznama postavk, shranjenih za e-poštni naslov, ki ste ga določili). S sodelovanjem v kakršni koli promocijski akciji nam dajete dovoljenje, da obdelamo vaše osebne podatke, ki ste nam jih posredovali glede na posamezno promocijsko akcijo, in da jih razkrijemo na različnih medijih, kot so družabna omrežja ali na sami platformi. V vsaki promocijski akciji, v kateri sodelujete, vam bodo na voljo pogoji, v katerih bomo podrobneje opisali obdelavo vaših osebnih podatkov.</li> <li>▪ Za razširjanje fotografij ali slik, ki ste jih javno objavili, na platformi ali po poteh družbenih omrežij, če v ta namen daste svoje izrecno soglasje.</li> </ul>
<p><b>5. Za analizo uporabnosti in kakovosti</b> za izboljšanje naših storitev.</p>	<p>Če dostopate do naše platforme, vas obveščamo, da bomo vaše podatke o brskanju obdelali za <b>analitične in statistične namene</b>, tj. da bi razumeli, kako uporabniki uporabljajo našo platformo in bi jo lahko tako izboljšali.</p> <p>Poleg tega občasno izvajamo <b>ankete o kakovosti in ukrepih</b>, da se seznanimo s stopnjo zadovoljstva naših strank in uporabnikov ter za odkrivanje področij, ki bi jih lahko izboljšali.</p>

## 12. KAKO SMEMO ZAKONITO OBDELOVATI VAŠE PODATKE?

Zakonski pogoji, na podlagi katerih nam je dovoljeno obdelovati vaše osebne podatke, so odvisni tudi od namena, za katerega jih obdelujemo, kot je obrazloženo v naslednji preglednici:

Namen	Pravna podlaga
<p><b>1. Za upravljanje vaše uporabniške registracije na platformi</b></p>	<p>Vaše podatke obdelujemo, saj je to <b>potrebno glede na pogoje za uporabo platforme</b>. Povedano drugače, vaše osebne podatke moramo obdelati, da se lahko na platformi registrirate kot</p>

	<p>uporabnik, sicer vaše registracije ne bi mogli upravljati.</p>
<p><b>2. Za razvoj, obdelavo in izvajanje pogodbe o nakupu ali storitvi</b></p>	<p>Vaše podatke obdelujemo, saj je to za nas potrebno, <b>da lahko z vami vstopimo v pogodbo o nakupu ali storitvi.</b></p> <p>Nekatere vrste obdelave podatkov, povezanih s postopkom nakupa, se aktivirajo le zaradi vaše zahteve ali dovoljenja, kar velja tudi za hrambo plačilnih podatkov (o kartici) za prihodnje nakupe ali obdelavo podatkov, potrebnih za branje blagajniških prejemkov v razdelku denarnice v aplikaciji ali za zagotavljanje funkcij »Kmalu na voljo« ali »Kmalu spet na voljo«. V teh primerih naša obdelava vaših podatkov temelji na vašem <b>soglasju.</b></p> <p>Menimo, da imamo <b>zakoniti interes</b> za izvajanje potrebnih preverjanj za odkrivanje in preprečevanje morebitnih goljufij ob nakupu. Zavedamo se, da je obdelava teh podatkov pozitivna za vse udeležence v plačilu nakupa in zlasti za vas, saj nam omogoča izvajanje ukrepov, s katerimi vas zaščitimo pred poskusi goljufij s strani tretjih oseb.</p>
<p><b>3. Službo podpore strankam</b></p>	<p>Menimo, da imamo <b>zakoniti interes</b> za odgovarjanje na vaše zahteve ali vprašanja prek obstoječih poti za vzpostavitev stika. Razumemo, da obdelovanje teh podatkov koristi tudi vam v obsegu, v katerem nam omogoča, da vam ustrezno pomagamo in odgovorimo na zastavljena vprašanja.</p> <p>Ko stopite v stik z nami, je obdelava vaših podatkov za <b>izvedbo pogodbe o nakupu</b>, zlasti pri upravljanju incidentov, povezanih z vaših naročilom ali izdelkom/storitvijo, ki ste ju pridobili prek platforme.</p> <p>Če je vaše vprašanje povezano z uveljavljanjem vaših pravic, s katerimi vas seznanjamo v nadaljevanju, ali z zahtevki glede naših izdelkov ali storitev, nam obdelavo vaših podatkov dovoljuje zakon, saj je namenjena zagotavljanju <b>skladnosti z našimi zakonskimi obveznostmi.</b></p>
<p><b>4. Trženje</b></p>	<p>Obdelava vaših podatkov za namene trženja nam je zakonsko dovoljena zaradi <b>soglasja</b>, ki ste nam ga dali, na primer ko ste pristali na prejemanje prilagojenih informacij po različnih poteh, ko ste</p>

	<p>dovolili prejetje potisnih obvestil na vaši mobilni napravi ali ko ste sprejeli pravno zavezujoče pogoje za sodelovanje v promocijski akciji ali objavili svoje slike na platformi ali prek poti naših družabnih omrežij.</p> <p>Menimo, da imamo za namen prikazovanja prilagojenih informacij zakoniti interes za izvajanje profiliranja z informacijami, ki jih imamo o vas (na primer o vašem načinu brskanja, željah ali zgodovini nakupov) in osebnih podatkov, ki ste nam jih posredovali, na primer razpon starosti ali jezik, saj razumemo, da obdelava teh podatkov koristi tudi vam, saj vam omogoča izboljševanje svoje vaše uporabniške izkušnje in dostopa do informacij v skladu z vašimi željami.</p>
<b>5. Analiza uporabnosti in kakovosti</b>	<p>Menimo, da imamo <b>zakoniti interes</b> za analizo uporabnosti platforme in stopnje zadovoljstva uporabnika, saj razumemo, da obdelava teh podatkov koristi tudi vam, saj omogoča izboljševanje uporabniške izkušnje in zagotavljanja storitev visoke kakovosti.</p>

### 13. KAKO DOLGO BOMO HRANILI VAŠE PODATKE

**Čas hrambe** vaših podatkov je odvisen od namenov, za katere jih obdelujemo, kot je pojasnjeno v nadaljevanju:

<b>Namen</b>	<b>Čas hrambe podatkov</b>
<b>1. Za upravljanje vaše uporabniške registracije na platformi</b>	Vaše podatke bomo obdelovali, dokler boste ostali registrirani uporabnik (to pomeni, dokler se ne odločite, da se boste odjavili).
<b>2. Za razvoj, obdelavo in izvajanje pogodbe o nakupu ali storitvi</b>	<p>Vaše podatke bomo obdelovali tako dolgo, kot bo to potrebno za izvedbo nakupa izdelkov ali storitev, ki ste jih pridobili, vključno z morebitnimi vračili, pritožbami ali zahtevki glede nakupa zadevnega izdelka ali storitve.</p> <p>Včasih bomo podatke obdelovali le dokler se vi ne odločite drugače, kot na primer podatke o plačilnem sredstvu (kartici), za katere ste zahtevali shranjevanje za prihodnje nakupe.</p>
<b>3. Služba podpore strankam</b>	Vaše podatke bomo obdelovali tako dolgo, kot je to potrebno za razrešitev vašega zahtevka ali vloge.

<b>4. Trženje</b>	<p>Vaše podatke bomo obdelovali tako dolgo, dokler se ne odjavite ali dokler ne prekličete svoje naročnine na glasilo.</p> <p>Če sodelujete v promocijskih dejavnostih, bomo podatke hranili za obdobje šestih (6) mesecev od zaključka akcije.</p>
<b>5. Analiza uporabnosti in kakovosti</b>	<p>Vaše podatke bomo občasno obdelovali tako dolgo, da bomo lahko izvedli določen ukrep ali anketo, povezano s kakovostjo, ali dokler podatkov o vašem načinu brskanja ne anonimiziramo.</p>

Ne glede na to, da bomo vaše podatke obdelovali v času, ki je nujno potreben za doseganje zadevnega namena, jih bomo nato shranili in zaščitili za čas, v katerem lahko pride do zahtevka zaradi njihove obdelave v skladu z vsakokrat veljavno zakonodajo. Ko vsak od potencialnih zahtevkov zastara, bomo vaše osebne podatke izbrisali.

## 14. ALI VAŠE PODATKE DELIMO S TRETJIMI OSEBAMI?

Za namene, omenjene v tem Pravilniku o zasebnosti in piškotkih, moramo dostop do vaših osebnih podatkov omogočiti **pravnim osebam skupine Inditex Group** in **tretjim osebam**, ki nam nudijo podporo pri storitvah, ki vam jih ponujamo, tj.:

- **finančnim** ustanovam,
- **organom za odkrivanje in preprečevanje goljufij**,
- ponudnikom **tehnoloških** storitev,
- partnerjem za **logistiko, prevoz in dostavo** ter ponudnikom storitev,
- ponudnikom storitev, povezanih s **podporo strankam**,
- partnerjem in ponudnikom storitev **oglaševanja in trženja**.

Zaradi učinkovitosti izvajanja storitev se nekateri od teh ponudnikov nahajajo na ozemljih zunaj Evropskega gospodarskega prostora, ki ne zagotavljajo stopnje varstva podatkov, primerljive s to, ki jo zagotavlja Evropska unija, torej v Združenih državah Amerike. Obveščamo vas, da bomo v teh primerih vaše podatke prenesli z **ustreznimi varovali in jih vedno ohranjali varne**:

- Nekateri ponudniki imajo certifikat **zasebnostnega ščita**, kar lahko preverite na tej povezavi:  
<https://www.privacyshield.gov/welcome>
- Z drugimi ponudniki smo sklenili **Pogodbo o standardnih pogojih**, ki jo je odobrila Komisija, njeno vsebino pa si lahko ogledate na tej povezavi:  
[https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

## 15. KATERE SO VAŠE PRAVICE, KO NAM POSREDUJETE SVOJE PODATKE

Zavezujemo se, da bomo vaše osebne podatke ohranili zaupne in vam zagotavljamo, da lahko **uveljavljate svoje pravice**. Pomnite, da sta se skupna upravljavca dogovorila, da lahko svoje pravice uveljavljate **brezplačno**, tako da nam pišete na **enotni e-poštni naslov** [dataprotection@zara.com](mailto:dataprotection@zara.com), nas preprosto obvestite o razlogu za svoj zahtevek in o pravici, ki jo želite uveljaviti. Če bomo menili, da je to potrebno, da vas prepoznamo, bomo od vas morda zahtevali kopijo dokumenta, ki bo služil kot dokazilo o vaši identiteti.

Ne glede na namen ali zakonsko podlago, ki jo uporabljamo pri obdelavi vaših podatkov, imate naslednje pravice:

- Pravico imate, da zahtevate **dostop** do podatkov, ki so nam na voljo o vas. Če ste registrirani uporabnik platforme pomnite, da si lahko te informacije ogledate v ustreznem razdelku svojih osebnih podatkov.
- Pravico imate, da zahtevate **popravek** podatkov, ki so nam na voljo o vas. Če ste registrirani uporabnik platforme pomnite, da lahko do zadevnega razdelka z osebnimi podatki kadarkoli dostopate in jih spremenite ali posodobite. V vsakem primeru upoštevajte, da s tem, ko nam aktivno omogočite dostop do svojih osebnih podatkov v katerem koli postopku, zagotavljate, da so ti **resnični in točni** ter se zavezujete, da nas boste obvestili o vsakršnih spremembah. Uporabnik je sam odgovoren za vsakršno izgubo ali škodo na platformi ali osebi, odgovorni za platformo, ali kateri koli tretji osebi, če v registracijskih obrazcih navede napačne, netočne ali nepopolne podatke. Pomnite, da nam v splošnem smete posredovati samo svoje lastne podatke in ne podatkov tretjih oseb, razen v obsegu, kot je to sicer dovoljeno v tem Pravilniku o zasebnosti in piškotkih.
- Pravico imate, da zahtevate **izbris** svojih osebnih podatkov v obsegu, v katerim niso nujno potrebni za namen, za katerega jih obdelujemo, kot smo pojasnili zgoraj, ali ko nimamo več zakonite podlage za njihovo obdelavo.
- Pravico imate, da zahtevate **preklic ali omejitev obdelave** svojih osebnih podatkov, kar vključuje to, da lahko v nekaterih primerih zahtevate od nas, da začasno prekinemo z obdelavo podatkov ali da jih hranimo dlje, kot je potrebno, za primer, da bi jih spet potrebovali.

Če ste nam dali svoje **soglasje** za obdelavo vaših podatkov v kakršen koli namen, **imate tudi pravico, da takšno soglasje kadarkoli umaknete**. Nekaj načinov, na katere lahko umaknete svoje soglasje, je pojasnenih v razdelku 2 o namenih obdelave vaših podatkov.

Če imamo zakonito podlago za obdelavo vaših podatkov zaradi vašega **soglasja** ali če **z vami vstopimo v pogodbo**, kot je pojasnjeno v razdelku 3, boste imeli tudi pravico zahtevati **prenosljivost vaših osebnih podatkov**. To pomeni, da imate pravico prejeti osebne podatke, dostop do katerih ste nam omogočili, v strukturirani, običajni in strojno berljivi obliki, da jih boste lahko drugi osebi posredovali neposredno brez ovir z naše strani.

Če obdelovanje vaših podatkov temelji na našem **zakonitem interesu**, velja tudi, da imate pravico do **ugovora** na obdelavo vaših podatkov.

Na koncu vas obveščamo tudi, da imate pravico, da vložite zahtevek pri **regulatornem organu**, zadolženem za varstvo podatkov, zlasti pri:

- Španski agenciji za varstvo podatkov: <https://www.agpd.es/portalwebAGPD/index-ides-idphp.php>
- organ države, v kateri se maloprodajno podjetje nahaja: [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

## **16. KAJ SE ZGODI, ČE NAM POSREDUJETE PODATKE TRETJIH OSEB**

Ponujamo funkcije ali storitve, zaradi katerih moramo obdelovati osebne podatke tretjih oseb, ki nam jih morate posredovati vi sami, na primer v primeru aktivacije in pošiljanja darilnih kuponov ali upravljanja vloge za darilni kupon. Če nam predložite osebne podatke tretjih oseb zagotavljate, da ste jih obvestili o svojih namenih in tudi o načinu, na katerega moramo njihove podatke obdelati.

## **17. SPREMEMBE PRAVILNIKA O ZASEBNOSTI IN PIŠKOTKIH**

Informacije v tem Pravilniku o zasebnosti in piškotkih bomo morda spremenili, ko se nam bo to zdelo ustrezno. V tem primeru vas bomo o tem obvestili na različne načine na platformi (na primer prek pasice, pojavnega okna ali potisnega obvestila), morda pa vam bomo poslali celo obvestilo na vaš e-poštni naslov, če je zadevna sprememba pomembna za vašo zasebnost, da jo boste lahko prebrali, jo ocenili in ji po potrebi ugovarjali ali se odjavili od katere koli storitve ali funkcije. V vsakem primeru vam predlagamo, da občasno preverite ta Pravilnik o zasebnosti in piškotkih za manjšimi spremembami ali morebitnim izboljšanjem interakcije; vedno vam bo dostopen kot stalna informacijska točka na našem spletnem mestu in v aplikaciji.

## **18. INFORMACIJE O PIŠKOTKIH**

Piškotke in podobna sredstva uporabljamo, da vam omogočimo brskanje v platformi, da razumemo vaš način interakcije z nami in, v nekaterih primerih, da vam lahko prikažemo oglase v skladu glede na vaše navade brskanja. Preberite naš Pravilnik o piškotkih za podrobnosti o piškotkih in podobnih sredstvih, ki jih uporabljamo, o njihovem namenu in drugih informacijah, ki vas zadevajo.

## Informacije o piškotkih

### Kaj je piškotek?

Piškotek je majhna besedilna datoteka, ki jo spletna stran shrani na vaš osebni računalnik, telefon ali katero koli drugo napravo, z informacijami o vaši navigaciji na tej spletni strani. Piškotki so nujni za lažje in uporabniku prijaznejše brskanje in ne poškodujejo vašega računalnika.

Ker ta politika uporablja splošni izraz „piškotki“, saj so slednji glavna metoda shranjevanja informacij, ki jo uporablja ta spletna stran, se za iste namene kot piškotki uporablja tudi prostor za „lokalno shranjevanje“ brskalnika. Vse informacije, ki jih vsebuje ta razdelek, veljajo tudi za „lokalno shranjevanje“.

### Čemu se uporabljajo piškotki na tej spletni strani?

Piškotki so sestavni del načina delovanja naše spletne strani. Glavni namen naših piškotkov je izboljšati vašo izkušnjo brskanja. Uporabljajo se denimo za pomnjenje vaših priljubljenih nastavitev (jezik, država itd.) med brskanjem in ob obiskih v prihodnosti.

Informacije, ki jih zberejo piškotki, nam prav tako omogočajo izboljšati stran z ocenjevanjem števila in vzorcev uporabe, ustreznosti spletne strani glede na individualne interese uporabnikov, pospešijo iskanje itd.

V primeru, da smo prejeli vaše soglasje po predhodnem obveščanju vnaprej, lahko uporabljamo piškotke, oznake ali druge podobne naprave za pridobivanje informacij, ki nam omogočajo prikaz bodisi naše lastne spletne strani ali spletne strani tretjih oseb ali katerih koli drugih sredstev na tržni podlagi analize vaših navad brskanja.

### Za kaj se piškotki na tej spletni strani NE uporabljajo?

V piškotkih, ki jih uporabljamo, ne shranjujemo občutljivih osebnih informacij, kot so vaš naslov, vaše geslo, podatki o vaši kreditni ali debetni kartici itd..

### Kdo uporablja informacije, shranjene v piškotkih?

Informacije, shranjene v piškotkih z naše spletne strani, uporabljamo izključno mi, razen tistih, ki so opredeljene spodaj kot „piškotki tretjih oseb“, ki jih uporabljajo in upravljajo zunanji subjekti za zagotavljanje storitev, ki jih naročimo, da bi izboljšali svoje storitve in izkušnje uporabnikov med brskanjem na naši spletni strani. Glavne storitve, za katero se uporabljajo ti „piškotki tretjih oseb“, so izvajanje statistike o dostopu in zagotavljanje plačilnih transakcij, ki se izvršujejo.

### Kako se lahko izognem uporabi piškotkov na tej spletni strani?

Če bi se raje izognili uporabi piškotkov na tej spletni strani ob upoštevanju zgoraj opisanih omejitev, morate najprej onemogočiti uporabo piškotkov v svojem brskalniku, nato pa izbrisati piškotke, shranjene v vašem brskalniku in povezane s to spletno stranjo.

To možnost lahko uporabite kadar koli za preprečevanje uporabe piškotkov.

### Kako onemogočim in preprečim uporabo piškotkov?

Piškotke s te spletne strani lahko kadar koli omejite, blokirate ali izbrišete tako, da spremenite konfiguracijo svojega brskalnika z upoštevanjem spodaj navedenih korakov. Medtem ko so nastavitve različne za vsak brskalnik, je piškotke mogoče normalno konfigurirati v meniju „priljubljene“ ali „orodja“. Za nadaljnje podrobnosti o konfiguriranju piškotkov v vašem brskalniku glej meni „pomoč“ v samem brskalniku.

Katere piškotke točno uporablja ta spletna stran in s kakšnim namenom?

Spodnja preglednica prikazuje piškotke, oznake in druge podobne naprave, ki jih uporablja ta spletna stran, skupaj z informacijami o namenu, trajanju in upravljanju (lastnem ali s strani tretjih oseb) za vsakega od njih.

**Tehnični in personalizacijski piškotki: za prepoznavanje, avtentifikacijo, brskanje, prilagajanje vmesnika, priljubljenih nastavitev...**

Ti piškotki se uporabljajo za prepoznavanje uporabnika med sejo, preprečujejo, da bi moral uporabnik ponovno opraviti postopek prijave na spletni strani, pospešijo določene postopke na spletni strani, pomnijo izbire, opravljene med sejo ali ob nadaljnjih obiskih, pomnijo že obiskane strani itd.

<b>PIŠKOTKI</b>	<b>NAMEN</b>	<b>TRAJANJE</b>	<b>UPRAVLJANJE</b>
Prepoznavanje uporabnika (»User identification«)	Uporabljajo se za prepoznavanje in avtentifikacijo uporabnika. Prav tako vsebujejo tehnične podatke uporabnikove seje, kot so denimo čas čakanja na povezavo, identifikator seje itd.	Seja	Lastni piškotki
Identifikator seje (»Session identifier«)	Uporabljajo se za prepoznavanje seje http uporabnika. So skupni za vse spletne aplikacije za prepoznavanje uporabnikovih zahtev med sejo.	Seja	Lastni piškotki
Navigacijski status (»Navigational status«)	Omogočajo prepoznavanje navigacijskega statusa uporabnika (začetek seje, prva stran, prvi dostop, status brskanja, status glasovanja itd.)	Seja	Lastni piškotki
Izbire uporabnika (»User selections«)	Shranjujejo vrednosti seje, ki jih izbere uporabnik, kot so denimo trgovina, jezik, valuta, izdelki, velikost, itd.	Seja	Lastni piškotki
Zaznamki in zadnje izbire (»Favourites and last selections«)	Omogočajo pomnjenje najljubših uporabnikovih izbir (npr. trgovin), pa tudi njihovih zadnjih izbir (trgovin, izdelkov, soglasje za namestitev piškotkov itd.) v kasnejših spletnih sejah.	Trajno	Lastni piškotki
NAKUPOVALNA KOŠARICA (»SHOPPING BASKET«)	Shranjujejo informacije o mini nakupovalnih košaricah, kot so denimo podrobnosti o prepoznavanju uporabnika, povezane s prej omenjeno košarico.	Seja	Lastni piškotki
Protokol (»Protocol«)	Omogočajo obdelavo sprememb med varnimi (https) in nevarnimi (http) domenami (protokol).	Seja	Lastni piškotki

### Piškotki za analizo navigacije

Ti piškotki pridobivajo splošne informacije o dostopu uporabnika do spletne strani (ne do same vsebine), da bi nam kasneje zagotovili zbrane informacije o teh dostopih v statistične namene.

PIŠKOTKI	NAMEN	TRAJANJE	UPRAVLJANJE
Izvor (WC_GASource)	Uporabljajo se za določanje izvora uporabnika, ko pride na stran na tej spletni strani, če so denimo prispeli na stran s podrobnostmi o izdelku z mreže izdelkov, z brskalnika ali z zunanje spletne strani.	Trajno	Lastni piškotki
Storitev Google Analytics (__utma, __utmb, __utmc, __utmd, __utmv, __utmz, _ga...)	Omogočajo spremljanje spletne strani z orodjem storitve Google Analytics, ki jo zagotavlja Google za pridobivanje informacij o dostopu uporabnikov na spletni strani. Nekateri shranjeni podatki so: število obiskov uporabnika na spletni strani, datumi prvega in zadnjega obiska, trajanje obiskov, stran, s katere je uporabnik dostopal do spletne strani, brskalnik, ki ga je uporabnik uporabljal za dostop do spletne strani ali povezavo, na katero je kliknil, kraj na svetu, od koder uporabnik dostopa itd. Konfiguracijo teh piškotkov določi storitev, ki jo nudi Google, vnaprej, informacije, ki jih zbere piškotek o uporabi vaše spletne strani, pa prenese in shrani Google, Inc (podjetje, s sedežem v Združenih državah Amerike) Zato predlagamo, da se obrnete na stran zasebnosti v storitvi 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> , da bi prejeli nadaljnje informacije o piškotkih, ki jih uporablja o načinu, kako jih onemogočite. Prosimo, pomnite, da ne odgovarjamo za vsebino ali točnost spletnih strani tretjih oseb.	Trajno	Tretje osebe
Domena optimizely (optimizelySegment s; optimizelyEndUserId; optimizelyPendingLogEvents; optimizelyBuckets ...)	Piškotki, prepoznani z domenama optimizely.com ali www.optimizely.com, nam omogočajo optimizacijo prikaza, zaznavanja in sporočil, njihov splošni namen pa je zagotoviti, da ima uporabnik dosledno navigacijsko izkušnjo na naši spletni strani, na podlagi česar lahko sklepamo, kako jo naši uporabniki uporabljajo. Nekateri podatki, shranjeni za kasnejšo analizo, so: število posodobitev, ki jim je uporabnik bil priča, informacije za segmente obiskovalcev, kot so brskalnik, kampanja, tip mobilnih virov in vsi določeni personalizirani segmenti itd. Konfiguracijo teh piškotkov vnaprej določi storitev, ki j nudi naš ponudnik Optimizely, Inc. (podjetje, s sedežem v Združenih državah Amerike), zato predlagamo, da se obrnete na njihovo spletno stran <a href="https://help.optimizely.com/hc/en-us/articles/200040335">https://help.optimizely.com/hc/en-us/articles/200040335</a> , da bi prejeli več informacij o piškotkih, ki jih uporabljajo, pa tudi o načinu, kako jih onemogočiti, z uporabo naslednje povezave <a href="https://www.optimizely.com/opt_out">https://www.optimizely.com/opt_out</a> . Prosimo, pomnite, da ne odgovarjamo za vsebino ali točnost spletnih strani tretjih oseb.	Trajno	Tretje osebe

### Piškotki za analizo nakupa

Ti piškotki omogočajo zbiranje informacij na napravi, s katere se na tej spletni strani opravljajo nakupi za potrjevanje, da te transakcije zagotavljajo zadostna jamstva kupcu. Ti piškotki nikoli ne vključujejo občutljivih informacij, kot so podrobnosti o kartici.

PIŠKOTKI	NAMEN	TRAJANJE	UPRAVLJANJE
Naprava za nakup (tx_guid)	Omogočajo prepoznavanje naprave (osebni računalnik, telefon itd.), s katere se na tej spletni strani opravljajo nakupi, za nadaljnjo analizo z namenom, da bi lahko našim kupcem ponudili zadostna jamstva pri korakih nakupa. Informacije, ki so zbrane s temi piškotki, zbira zunanje podjetje (Cybersource) za izvajanje te analize.	Trajno	Tretje osebe

*Pričujoča preglednica informacij bo posodobljena takoj, ko se bodo spremenile storitve, ki se nudijo na tej spletni strani. Vendar pa je mogoče, da preglednica informacij začasno ne vsebuje piškotka, oznake ali druge podobne naprave zaradi posodobitve, vendar pa bodo vselej vključene naprave z istimi nameni, kot so vključeni v tej preglednici.*