

ZARA PRIVACY POLICY

Effective Date: January 2020

This privacy policy applies to the sites and apps where it appears.

This Privacy Policy describes how ZARA USA, INC treats customer personal information on the websites and mobile apps where it is located (in this policy we call these our Platforms). Your use of this platform indicates you agree to our collection, use and disclosure of your information as described in this Privacy Policy.

We collect information from and about you.

We collect contact information. For example, we collect your name and mailing address if you register with us. We also collect email addresses and phone numbers. If you register we will also have you create a password.

We collect payment information. If you buy product we will collect the relevant data as your debit or credit card number.

We collect information you submit online. This includes information you post when you interact with us on social media platforms.

We collect demographic information and information about product preferences. This includes collecting your age and gender.

We collect information about your device and location. We collect the type of device you use to access our Platform. We also collect information about the type of browser you are using. And, we may look at what site you came from or what site you go to when you leave us. If you are using our apps, we may also collect your device identification number. If you use our app, we may look at how often you use the app and where you downloaded it.

We collect information from you in different ways.

We collect information directly from you. This includes when you create an account our purchase product. We also collect information if you contact customer service or sign up for our newsletter. We also collect information when you take a survey or participate in a promotion.

We collect information passively. We use tracking tools like browser cookies and web beacons. We use these tools on our websites and in emails we send to you. We may also use these tools in our mobile apps. We collect information about users over time when you use our Platforms. We have third parties who collect information this way as well.

We get information about you from third parties. This includes social media platforms and friends who use our "email a friend" feature. We may receive information about you from other sources.

We combine information we collect from different sources.

We combine offline and online information. We also combine information across multiple devices. We also combine information we get from a third party with information we already have about you.

We use information as disclosed and described here.

We use your information to provide you with products and services. This includes sending you product you purchase or processing a return. It also includes sending you newsletters you signed up to receive.

We use information to improve our products and Platforms. We may use your information to make our Platforms or products better. We may also use your information to customize your experience with us. This includes understanding your interests and preferences.

We use your information to respond to your requests. This includes responding to customer inquiries.

We use your information to communicate with you about our relationship. We may communicate with you about your account or our relationship. This includes electronic messages (as SMS or push notifications) and calls about order status. We may also contact you about this Policy or our Platform Terms & Conditions.

We use your information for marketing purposes. We may provide you with information about new products and special offers. We may also serve you ads about products and offers. We might tell you about new features or updates. These might be third party offers or products we think you might find interesting. For more information about your choices see the Choices section below.

We use information for security purposes. We may use your information to protect our company and our customers. We also use information to protect our websites and apps.

We use information as otherwise permitted by law or as we may notify you.

We share information with third parties.

We share information with our affiliated organizations and parent company. This includes our affiliates and Industria de Diseño Textil, S.A. (Inditex, S.A.), the matrix company of the Inditex Group, which is the holding group associated with ZARA.

We may share information with third parties who perform services for us. We share information with payment processors. We also share information with advertising and marketing service providers that, for example send emails on our behalf.

We may share information with any successor to all our part of our business. For example, if ZARA is sold we may give a customer list as part of that transaction.

We will share information if we think we have to in order to comply with the law or to protect ourselves. This could include responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests. We might share information when we are investigating a potential fraud. This could include fraud we think has occurred during a sweepstakes or promotion. We may also share information if you are the winner of a sweepstakes or other contest with anyone who requests a winner's list.

We may share information for other reasons we may describe to you.

You have certain choices about how we use your information.

You can opt out of receiving our marketing emails. To stop receiving our promotional emails follow the instructions in any promotional message you get from us. Even if you opt out of getting marketing messages, we will still send you transactional messages. These include responses to your questions.

You can control cookies and tracking tools. Your browser may give you the ability to control cookies or other tracking tools. How you do so depends on the type of tool. Certain browsers can be set to reject browser cookies. To control flash cookies, which we may use on certain websites from time to time, you can go to <http://www.aboutads.info/choices/>. Why? Because flash cookies cannot be controlled through your browser settings.

Our Do Not Track Policy: Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals. If you block cookies, certain features on our sites may not work. If you block or reject cookies, not all of the tracking described here will stop.

You can control tools on your mobile devices. For example, you can turn off the Bluetooth, GPS locator or push notifications in your phone settings.

Options you select are browser and device specific.

These sites are not intended for children.

Our Platforms are meant for adults. We do not knowingly collect personally identifiable data from children under 13. If you are a parent or legal guardian and think your child has given us information, you can write to us at the address listed at the end of this website Policy. Please mark your inquiries "COPPA Information Request." Parents, you can learn more about how to protect children's privacy on-line visiting: <https://www.consumer.ftc.gov/articles/0031-protecting-your-childs-privacy-online>.

We use standard security measures.

The Internet is not 100% secure. We cannot promise that your use of our Platform will be completely safe. We encourage you to use caution when using the Internet. A username and a password are needed to access certain areas of the ZARA Platform. It is your responsibility to protect your username and password.

We may link to platforms or have third party tools on our platforms we don't control.

If you click on a link to a third party site, you will be taken to a site we do not control. We are not responsible for the privacy practices of third parties. This includes third parties who may have ads or content on our site. We suggest that you read their privacy policies carefully.

You can contact us if you have questions.

If you have additional questions about our privacy practices you can email us at privacy.us@zara.com write to us at:

Attn: Privacy
ZARA USA INC
500 5th Avenue, Suite 400
New York, NY 10110

Your California Privacy Rights

We collect various types of personal information about you both online and offline, as described in this Privacy Policy. If you reside in California, we are required by California law to provide you with additional information about how we use and disclose your personal information, and you may have additional rights with regard to how we use your personal information. We have included this California-specific information below.

CA personal information collection. Consistent with the "We collect information from and about you" section, we collect and use personal information regarding California residents as follows:

- In the preceding 12 months, we have collected the following categories of personal information from California residents users, regardless of the means (online or in person) they use to interact with us: Identifiers, commercial information, Internet or other electronic network activity information, Geolocation data, Audio and Electronic information.
- We have collected that personal information directly from you via our Platforms or devices, and consistent with the "We collect information from you in different ways" and "We combine information we collect from different sources" sections of this Policy.
- We collected that personal information consistent with the "We use your information as disclosed and described here" section above, for the following purposes: to complete a transaction, provide a good or service required by you or reasonably anticipated by you, to send commercial communications and to manage customer inquiries.
- We shared personal information with the categories of third parties listed in section "We share information with third parties" above.

- We collected the following specific pieces of personal information: Name and last name; Email; Address; Telephone number; Signature; Image/Voice; Electronic signature; Payment card data; Transactions of goods and services; Purchase amount and frequency.
- In the preceding 12 months, we disclosed the following categories of personal information about consumers for a business purpose, consistent with the “We share information with third parties” section, to comply with federal/state law, comply with civil or criminal investigation/inquiry, or exercise or defend legal claims.
- We did not “sell” any consumers’ personal information in the preceding 12 months.

California Residents’ Privacy Rights. Subject to certain exceptions, California residents have the right to: (i) request access to their personal information; (ii) request deletion of their personal information; and (iii) request information about the personal information that we have disclosed to third parties within the past 12 months. You can exercise these rights by sending us an email to privacy.us@zara.com and/or by contacting our Customer Service at the “Contact Us” sections of the Platform

To make a request, you can also write to us at the following address:

ZARA USA, INC (Zara.com). 500 5th Avenue, Suite 400, New York, NY 10110. USA

We may change this Policy.

From time to time, we may change our privacy policy. We will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our Platforms. Please check our Platforms periodically for updates.