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# ZARA PRIVACY POLICY

Effective Date: September 21, 2021

Last Updated: December 4, 2024

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## Applicability

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

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## Notice at Collection

### We collect information from and about you.

We collect various types of information from you, as described below. California law requires us to tell you if we share information for cross-contextual behavioral advertising. Described below by category is the information we may collect and if we share it for cross-contextual behavioral advertising. To learn how to modify your cross-contextual advertising preferences view our [Notice of Right to Opt-out of Sharing for Cross-Contextual Behavioral Advertising](#).

**We collect contact information.** For example, we collect personal identification data, online or in person, among other purposes, to manage your registration as a user, to manage a transaction including your purchases of products or services, to respond to your queries, for example, customer service, and, if you wish, to send you our customized including name, mailing address, email addresses and phone numbers. If you register as a user, we will also have you create a password. In some cases, we may share this information for the purpose noted above.

**We collect payment information.** If you buy products or services we will collect the relevant data, online or in person, as your debit or credit card number to manage payment of the products or services that you purchase, regardless of the method of payment used.

**We collect information you submit online.** This includes information you post when you interact with us on social media platforms and customer services. In some cases, we may share this information for the purpose noted above.

**We collect demographic information and information about product preferences.** This includes collecting your age and gender. In some cases, we may share this information for the purpose noted above.

**We collect biometric information.** We may collect biometric information as permitted by law. This includes information collected as part of virtual try-on experiences such as a body or face scan to provide you with product suggestions. This may also include if you decide to pay with your palm print in locations that offer it. This information is kept for the duration of your use of the service.

**We collect information about your device and location.** We collect the type of device you use and location to access our Platforms, including the access and use of the Wi-Fi that we make available to our customers at our stores. 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 or the advertising ID. If you use our app, we may look at how often you use the app and where you downloaded it. If you use any of the specific services that we

may offer you (such as item finder, reserve a fitting room, etc.) available in some of our stores, we also may process your location and contact information. In some cases, we may share this information for the purpose noted above.

**We collect information about your use of the Platforms.** This includes browsing activity, how you interact with our websites and mobile apps, the products that you buy, and search terms entered. In some cases, we may share this information for the purpose noted above.

### [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 or any product or service related matter including e-receipts. It also includes sending you push notifications or SMS, if authorized for any of the above or for receiving newsletters from us.

**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 of any nature.

**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, personalized or not, 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 your personal data including those you provide into the AI Assistant** (such as text, images, or voice) in order to respond to your requests in a personalized way, and to enhance your browsing and shopping experience.

**We use your personal data** to respond to your request.

If you choose to use Try On functionality, **We use your personal data** (images) you submit to us to create an avatar and show you a simulation of how certain products may appear on you. **We use information for security and fraud prevention purposes.** We may use your information to protect our company and our customers both on line and in our stores. We also use information to protect our websites and apps.

**We may use Radio Frequency Identification (RFID) technology for inventory purposes at our stores.** If RFID is used, all RFID tags are disabled upon completion of purchase and personal identifiable information is not collected or stored.

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

### **Sensitive Information Collection and Use**

We do not use or disclose sensitive personal information for inferring characteristics or for purposes other than those permitted or required by law. This includes if you voluntarily provide us with sensitive information when reporting an adverse event. For example, if you experience an allergic reaction or infection after using a particular product.

### **More Information**

We keep personal information as long as it is necessary or relevant for the practices described in this Policy. We also keep information as required by law.

In case of use the artificial intelligence (AI) features available to you:

We will process the personal data you provide in the AI Assistant only for the time necessary to provide you with the requested service, as indicated below. In the case of the product search engine, personal data will be kept exclusively for the duration of your active session, after which it will be automatically deleted. For Customer Service inquiries, we will retain your data for the time required to process your request or application.

In the case of the Try On functionality, the images you upload will be processed solely for the creation of your avatar during the creation process and will be automatically deleted once the avatar has been created.

The avatar generated for viewing products will be stored as follows:

- i. For registered users: If you have a Zara user account, your avatar will be stored in your account for a maximum period of one (1) year. After this period, your avatar will be automatically deleted, unless you have consented to its storage for an additional year; or in any case when you decide to delete it from your account
- ii. For unregistered users: If you do not have a Zara account, your avatar will only be stored up to 24 hours. After this period, the avatar will be automatically deleted, and you will need to create a new avatar to continue using our service

## More Information

For more information about our privacy practices, read below for the rest of our privacy policy.

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## We collect information from you in different ways.

**We collect information directly from you, online or offline.** This includes when you create an account or to manage your purchases of products or services. We also collect information if you contact customer service to respond to your queries or sign up for our newsletter to send you our customized communications. We also collect information when you take a survey or participate in a promotion.

We use video cameras surveillance at some of our retail stores.

**We collect information passively.** We use tracking tools like browser cookies, pixels, web beacons and similar technology to collect information about you when you interact with us including information about your browsing and purchasing behavior. To learn more about cookies visit the [FTC's Online Tracking page](#). We may use these tools on our websites, chat feature messages and in emails/messages 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 do not collect or process sensitive personal information as defined by Colorado, Connecticut, or Virginia laws.

**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.

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## 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.

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## We disclose information as described here.

**We provide information with our affiliated organizations and parent company.** This includes our affiliates and Industria de Diseño Textil, S.A. (Inditex, S.A.), the parent company of the Inditex Group, which is the holding group associated with ZARA. It also includes ITX USA LLC. We may share information with ITX USA

LLC if you make purchases from ZARA HOME or MASSIMO DUTTI so that we can complete your purchases or inquiries.

**We may disclose information with third parties who perform services for us.** We share information with payment processors, insurers and brokers, external auditors, credit reporting agencies, our banks, marketing providers, online platforms or third parties approved by you, including social media sites you choose to link your account to or third party payment providers or some of which offer support for features such as the AI Assistant and Try On. We also share information with advertising and marketing service providers that, for example send emails or SMS on our behalf.

By opting in to receive SMS messages, you agree to receive recurring automated promotional and marketing messages from us. These messages will be sent to the mobile telephone number you provided when opting in.

**We may share information for cross-contextual behavioral advertising.** We may share information with third parties in order to provide cross-contextual behavioral advertising. In the Notice at Collection (above) we outlined which categories of information are shared for cross-contextual behavioral advertising.

**We may transfer 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 disclose information if we think we have to in order to comply with the law or to protect ourselves.** This could include, for example, responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests it or are bound to report information to a governmental agency whether local, state or federal. We might share information when we are investigating a potential fraud or other violation of applicable laws. 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 disclose information for other reasons we may describe to you.**

**Additional information for residents of certain jurisdictions.** Certain states, like California, Colorado, Connecticut, Nevada, and Virginia require that we tell you if we sell personal information with a third party for monetary or (in California) other valuable consideration. We do not do this. We also do not sell personal information of minors under the age of 16 for monetary or other valuable consideration.

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## You have certain choices about how we use your information.

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**You can opt out of receiving our marketing emails or SMS.** To stop receiving our promotional emails or SMS 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.

**Shine the Light.** Under California law, our Customers who are residents of California may request certain information about our disclosure of personal information during the prior calendar year to third parties for their direct marketing purposes. To make such a request, please contact us in the “you can contact us” section below. Mark your message “Shine the Light.”

### OUR COOKIE AND AD POLICY

**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.

**Cross-contextual behavioral advertising.** To opt out of cross-contextual behavioral advertising, read our [Notice of Right to Opt-out of Sharing](#) below. Additionally, the Self-Regulatory Program for Online Behavioral Advertising provides consumers with the ability to manage certain choices online [here](#) and provides a tool for managing mobile choices [here](#).

**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, push notifications or your advertising ID in your phone settings.

***Options you select are browser and device specific.***

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## Your Privacy Rights

If you live in California, Colorado, Connecticut, Oregon, Virginia or Washington or a state with similar rights, you have legal rights in addition to the choices listed above. You can exercise those rights by submitting a request through our [form](#). In the alternative, you can call us at 1-855 635 9272 or email us at [privacy.us@zara.com](mailto:privacy.us@zara.com). Those rights are listed below:

1. **Access:** to learn the categories of information we collect and use, and for those in California, the categories of sources of collection and disclosure and the business purpose for collection;
2. **Portability:** a copy of (Virginia) or specific pieces of (California) personal information collected;
3. **Deletion:** to have us delete information we collected from you;
4. **Correction:** asking us to fix your information; and
5. **Non-retaliation:** not to be discriminated against for exercising a privacy right.

**How it works:** When you submit your request, we use information you provide to verify your request. We do this by matching the information you provide with information we already have about you. In some situations we may not be able to process your request. This may include if a legal exception applies. If you disagree with our decision you can contact us as described at the end of this policy.

**Nevada residents:** you may also opt out of the future sale of their information to a third party so that they may license or sell that information by emailing us at noted at the end of this notice.

**Third party agents:** If you are submitting a request on behalf of an eligible resident, we may ask for additional information to verify your identity. This may include providing proof that you are registered with the Secretary of State to act on someone's behalf or proof of a power of attorney. You may also submit a copy of the consumer's signed permission to submit the specific request.

**Notice of Right to Opt-out of Sharing for Cross-Contextual Behavioral Advertising:** You can opt out of the sharing of your personal information for cross-contextual behavioral advertising by clicking on Do not Sell or Share My Personal Information and toggle the button to “inactive” for cross-contextual behavioral advertising cookies. You can also configure your browser as we describe in this section. Some browsers or browser extensions also allow you to tell websites not to share your information for cross-contextual behavioral advertising through the “global privacy control” signal. We will respond to this signal in a frictionless manner. If you configure this setting on your browser, certain features on our site may not work and you will receive less targeted advertising. To learn how to configure this setting, view [here](#).

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## 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://consumer.ftc.gov/articles/protecting-your-childs-privacy-online>

We use reasonable security measures.

The Internet is not 100% secure. We cannot promise that your use of our Platform or other electronic transactions whether online or our brick and mortar stores will be completely safe. We encourage you to use caution when using the Internet or any electronic transactions. A username and a password are needed to access certain areas of the ZARA Platforms. It is your responsibility to protect your username and password.

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

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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.

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## In case that you use Zara Pre-Owned services.

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**We use your data to provide you with products and services.** For example, we use your data to manage the listing of items you choose to sell through Zara Resell, the collection and delivery of items, transactions, and the processing of payments through various options available on the platform, as well as to enable and manage the reviews you give or receive from other users on the platform.

**We use your data to improve our products and platforms.** We may use your data to personalize your experience on Zara Pre-Owned and to provide a reliable service for all users. This includes managing ratings and reviews, both those you give and those you receive from other members.

**We use your data to respond to your requests.** This includes managing inquiries or requests related to Zara Pre-Owned features, such as the buying or selling of second-hand items, the repair or donation of products, as well as any other interactions related to the platform.

**We may share your data with individuals** (in the case of using the Zara Resell feature) and/or **with governmental and/or tax authorities** (if necessary to comply with information obligations associated with the Zara Resell feature).

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## You can contact us if you have questions.

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

ZARAUSA INC  
500 5<sup>th</sup> Avenue, Suite 400  
New York, NY 10110  
Attn: Privacy

For Zara Home or Massimo Dutti, you can contact us at the address above or at [privacy.us@zarahome.com](mailto:privacy.us@zarahome.com) or [privacy.us@massimodutti.com](mailto:privacy.us@massimodutti.com).



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## We may change this Policy.

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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.

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## Zara - Consumer Health Data Privacy Policy for Washington Residents

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### Applicability

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Washington law requires that we have a Consumer Health Data Privacy Policy under the My Health My Data Act. This is that policy, and describes ZARA USA, INC.'s collection and use practices for "consumer health data" collected from Washington residents. This policy applies only in the narrow circumstances where we are collecting and processing consumer health data as that term is defined under Washington law. For example, this includes personal information linked to you that identifies your physical or mental health status. In this policy we refer to this information as "CHD."

This policy does not apply to our general privacy practices. To learn about how we treat personally identifiable information we collect that is not governed by the Washington My Health My Data Law, please review our general consumer privacy policy. This policy also does not apply to information we collect from employees or contractors. This policy is subject to our [Terms of Use](#).

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### Categories of Consumer Health Data We Collect

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The type of CHD we collect depends on your relationship with us. It also depends on how you interact with us. If you experience a reaction to one of our products, you may voluntarily provide us with certain CHD. For example, we may collect information about your health conditions, treatments, diseases or diagnosis. This could also include your health-related surgeries or procedures. If you used or purchased a prescribed medication, we may collect that information from you. We may collect information about bodily functions and vital signs or symptoms. We may also collect diagnoses or diagnostic testing results.

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### Purpose of Collection and Use of Consumer Health Data

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We use CHD to investigate reports or complaints submitted about our products when reporting an adverse event by you. We also use CHD as permitted by your consent. We use CHD to fulfill our legal obligations and as otherwise permitted by law.

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### Sources of Consumer Health Data

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We collect CHD directly from you. For example, we collect CHD when you tell us about a medical reaction you may have had to one of our products. We also collect CHD if you otherwise submit it to us.

We may get CHD from third parties. For example, if you experience an adverse reaction, we may need to contact third parties involved in treating or responding to your condition. As permitted by law, these third parties may share certain CHD about you with us.

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## When We Share Consumer Health Data

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We may share CHD for purposes permitted by law. This includes sharing with vendors that provide services to us for the purpose for which the CHD was collected. It also includes sharing CHD with regulators or government agencies as required by reporting obligations under law. This also includes sharing CHD to any successor to our business, such as part of a merger, acquisition or bankruptcy, etc. Under Washington law we are not required to obtain your consent for sharing in these circumstances.

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## Your Rights Under the Washington My Health My Data Law

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Under Washington law you have certain rights. Those rights depend on our relationship. They are subject to certain limitations and are not absolute. This might include if a legal exception applies. If that is the case, we will not be able to process your request. You can exercise your rights by emailing us at [privacy.us@zara.com](mailto:privacy.us@zara.com). The rights include the following:

- You have the right to confirm that we are collecting, selling or sharing CHD about you. As part of that request, you can ask for a list of third parties to whom CHD has been sold or shared (if any) and for their email addresses.
- You can withdraw consent to collecting and sharing CHD (for sharing that is based upon consent), this does not apply in the event the CHD is required by a legal requirement.
- You have the right to ask us to delete your CHD this does not apply in the event the CHD is required by a legal requirement.