

# PRIVACY POLICY

## OUR PRIVACY POLICY AT A GLANCE

1. **WHO ARE WE?** We are ITX MERKEN, B.V and we handle your personal information like *data controllers*. This means we take charge of how to use and protect your information. [View more.](#)
2. **WHAT DO WE USE YOUR INFORMATION FOR?** We use your information in order to, among other things, **answer questions you may have** and, if you wish, send you **personalized messages**. [View more.](#)
3. **WHY DO WE USE IT?** We may legitimately handle your information for different reasons, for example, the legitimate interest in answering your questions or to manage your **consent** to send you our newsletters and the like. [View more.](#)
4. **WHO DO WE SHARE YOUR INFORMATION WITH?** We may share your information with service providers that help or support us, as long as they are companies within the Grupo Inditex or external collaborators with whom we have reached an agreement, whether or not they are located within the European Union. [View more.](#)
5. **YOUR RIGHTS** You have the right to access, amend or delete your personal information. In some cases you may also have other rights, for example, to object to our using or saving your information as explained in further detail below. [View more.](#)

We invite you to read our following complete **Privacy Policy** to understand in detail how we use your personal information and your rights available in relation to it.

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## BEFORE WE BEGIN...

- In this **Privacy Policy** you will find **all the relevant information** that applies to the **use** we make of the **personal information** of our **clients and users**, independent of the **ZARA** channel or means you use to interact with us.
- **We are transparent** about what we do with your personal information so you understand the implications of the uses we carry out or the rights that are available to you as related to your information:
  - We make available to you on a **permanent basis all the information** in this Privacy and Cookies Policy that you may consult whenever is convenient for you and
  - you will also find **information** about management of your personal information that is **in conformity should you continue to interact with us**.
- Some definitions that we will use in this Privacy and Cookies Policy:
  - When we speak of our **Platform**, we are referring in general to whichever of our channels or digital media or in person that you may have used to interact with us, the primary ones being:
    - Our **Website**, [www.zara.com](http://www.zara.com).
    - Our **ZARA App**, or Zara's application that may be installed on your mobile phone.

## 1. WHO IS RESPONSIBLE FOR THE HANDLING OF YOUR INFORMATION?

We are responsible for the handling of your information:

- **ITX MERKEN, B.V.**, a company pertaining to Grupo Inditex, ("ITX MERKEN" or "We"):
  - Address: Nieuwezijds Voorburgwal 307, 1012 RM Amsterdam, The Netherlands
  - E-mail address of the Data Protection Officer: [dataprotection@zara.com](mailto:dataprotection@zara.com)

## 2. WHAT IS THE PURPOSE OF OUR MANAGING YOUR PERSONAL INFORMATION?

Depending on the purpose for which we manage your information, as will be explained below, we must handle some information that in general is, depending on the situation, the following:

- your **identification information** (for example, your first name, last name, language and country from which you interact with us, contact information, etc.)
- **connection and browsing** information
- **commercial** information (for example, if you subscribe to our newsletter)
- information about your **tastes and preferences**

Remember when we ask you to fill out your personal information in order to give you access to a feature or service of the Platform, we label some fields as mandatory, as it is information we need to be able to give you the service or access to the feature in question. Please remember that if you decide to not give us this information, it is possible that you may not enjoy certain services or features.

Depending on how you interact with our Platform, we handle your personal information for the following purposes:

PURPOSE	+ info
<p>1. To fulfill the requests or inquiries that you may make via the <b>Customer Service</b> channels</p>	<p>We only use the personal information that is <b>strictly necessary</b> to manage or resolve your request or inquiry.</p>
<p>2. For <b>marketing</b> purposes</p>	<p>This includes using your information mainly to:</p> <ul style="list-style-type: none"> <li>▪ In the means by which you subscribe to our Newsletter, we use your personal information to <b>manage your subscription</b>, including <b>sending personalized information</b> about our products or services by various means (such as e-mail or SMS). As such, we are able to provide you this information by way of <i>push</i> notifications if you have activated them on your mobile phone. <ul style="list-style-type: none"> <li>▪ As such, keep in mind that this use of information carries with it an <b>analysis of your profile</b> as a user or client to determine your preferences and which products or services may pertain to or fit your style at the time we send you information.</li> <li>▪ Remember that <b>you can unsubscribe from the Newsletter at any time</b> without any penalty by visiting the “Newsletter” section of the Platform, or also by using the links we provide in each communication.</li> </ul> </li> <li>▪ To carry out <b>promotional events</b> (for example, contest roll-outs or shipping notifications sent to the email address you provided). To participate in a promotional event, you authorize us to use the information you provided in function of each promotional event and we may notify you of them by different means such as social media or on the Platform itself. For each promotional event in which you participate you will have legal basis available where we provide more detailed information about the use of your information.</li> <li>▪ To broadcast on the Platform or our social media channels photographs or images you have publicly shared if you have given us your consent.</li> </ul>
<p>3. <b>Usability and quality analysis</b> in order to improve our services</p>	<p>If you access our Platform, you will be notified of our use of your browsing information for <b>analytical and statistical purposes</b> in order to understand how our users interact with our Platform and as such be able improve it.</p>

	Also, occasionally we carry out <b>events and surveys</b> to understand the degree of our clients' and users' satisfaction and to discover those areas where we may improve.
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### 3. WHAT IS THE JUSTIFICATION FOR THE USE OF YOUR INFORMATION?

The legal base that allows us to use your personal information also depends upon the purpose for which we use it, as the following table explains:

Purpose	Justification
<b>1. Customer Service</b>	<p>We have a legitimate interest in servicing your requests or inquiries you make via the current various means of contact. We understand the use of this information also benefits you insofar as you allow us to adequately serve you and resolve the inquiries made.</p> <p>When you contact us specifically to manage incidents related to an item or service acquired via the Platform, the use of your information is necessary to <b>execute the purchase agreement</b>.</p> <p>When your inquiry is related to the exercise of rights about which we will explain below, or with claims related to our products or services, the <b>fulfillment of legal obligations</b> justifies our use of your information.</p>
<b>2. Marketing</b>	<p>The legitimate reason to use your information for marketing purposes is based on your <b>consent</b> given to us, for example when you accept the receipt of personalized information by different means, or when you accept the legal basis to participate in a promotional event or to publish your photographs on the Platform or our social media networks.</p> <p>To provide you with personalized information we believe we have a <b>legitimate interest</b> to create a profile with the information we have about you, such as your browsing habits and the personal information you have provided such as your age range or language. We understand the use of this information is also benefits you as it allows you to improve your user experience and access information according to your preferences.</p>
<b>3. Usability and quality analysis</b>	<p>We have a <b>legitimate interest</b> in analyzing Platform usability and the degree of user satisfaction while understanding the use of this information benefits you</p>

	as the purpose is to improve user experience and offer better quality service.
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#### 4. HOW LONG WILL WE KEEP YOUR INFORMATION?

The **length of retention** of your information will depend on the purposes for which we use it, according to the following:

Purpose	Length of retention
<b>1. Customer Service</b>	We will use your information as long as necessary to handle your request or inquiry.
<b>2. Marketing</b>	We will use your information until you unsubscribe from or cancel your subscription to the newsletter.
<b>3. Usability and quality analysis</b>	We will duly use your information during the time in which we proceed to fulfill an action or concrete quality survey or until we anonymize your browsing information.

Independent of using your information for a period when it is strictly necessary to complete a corresponding purpose, we will maintain it thereafter, properly guarded and protected, for the period in which responsibilities derived from handling it may arise, in accordance with current regulations at any time. Once the possible actions for each case have lapsed, we will then remove your personal information.

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

To fulfill the purposes indicated in this Privacy Policy, we need to give access to your personal information to **entities within Grupo Inditex** and to **third parties** that support us in services we offer, such as:

- **Technology service** providers,
- **customer service** related providers,
- providers and collaborators of services related to **marketing and publicity**.

For service efficiency, some of the above-mentioned providers are located in territories outside the European Economic Space that do not match the level of protection of information comparable to the European Union, such as the United States. In these cases, we will notify you that we are transferring your information with **appropriate guaranties and always maintaining the security of your information**:

- Some providers are certified with **Privacy Shield**, which you can learn about via the following link:

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

- With other providers we have signed **Contractual Clauses** approved by the Commission, the contents of which you can review in 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)

Furthermore, we would like to inform you that we will need to share your information with our matrix, **Industria de Diseño Textil, S.A. (Inditex, S.A)**, the holding company of Grupo Inditex, in order to fulfill the obligations of the matrix.

## 6. WHAT ARE YOUR RIGHTS WHEN YOU PROVIDE US YOUR INFORMATION?

We are committed to respecting the confidentiality of your personal information and to guaranteeing you the **exercise of your rights**. You may exercise them **free of charge** by sending an email to a **unique email address** [dataprotection@zara.com](mailto:dataprotection@zara.com), simply tell us the reason for your request and the right that you wish to exercise. If we deem it necessary to identify you, we may request a copy of an accredited identity document.

In particular, independently of the purpose or legal base in virtue of which we use your information, you have the right to:

- Request **access** to the information we have about you.
- Request that we **amend** the information we have. Above all please remember that, by actively providing us your personal information via whichever means, you guarantee that it is **correct and accurate** and you promise to notify us of any change or modification to it. Any loss or damage caused to the Platform or to those responsible for the Platform or any third party by motive of a communication of information that is incorrect, inaccurate or incomplete in its forms, will be the sole responsibility of the user. Please remember as a general rule that you may only provide your own personal information and not that of third parties, except as provided for in this Privacy Policy.
- Requesting that we **delete** your information as long as it is no longer needed for the purpose for which we may have used them based on the above explanations, or we no longer have any justifiable reason not to.
- Requesting that we **limit the handling** of your information, which assumes in certain cases that you may ask that we temporarily suspend its use or that we save it for a future use at a time when you may need it.

If you have not given your **consent** to the use of your information for any purpose, **you have the right to remove it at any time**. Some of the forms in which you can retract your consent are explained in part 2 where we explain for what purposes we use your information.

When our ability to use your information is by means of your **consent** or the **execution of a contract**, per part 3, you also have the right to request the **transfer of your personal information**. This means that you have the right to receive the personal information you have provided in a structured format, of common use and machine readable, able to be transmitted directly to another entity, provided it is technically possible.

Moreover, when the use of your information is based on our **legitimate interest**, you also have the right to **oppose** the use of your information.

Lastly, you have the right to **file a claim** before **the control authority** in the matter of protection of pertinent information.

## **7. WHAT HAPPENS IF YOU GIVE US THIRD PARTY INFORMATION?**

We offer functions or services that require the use personal information of a third party that you provide us, such as sending information about products to third parties.

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

We may modify the information contained in this Privacy Policy when we deem it necessary. Should we modify it, we will notify you by various means via the Platform (for example, by a banner or pop-up), or we may send you an email when the change in question is significant to your privacy, in a manner that you may review the changes, evaluate them and, as the case may be, oppose or unsubscribe from a service or function. In any case, we suggest that you review this Privacy Policy from time to time should there be any minor changes, or should we introduce an interactive improvement, while remembering you may always find it on our Website as a permanent point of information.

## **9. INFORMATION ABOUT COOKIES**

We use cookies and similar devices to facilitate your browsing of the Platform, to know how you interact with us and, in some cases, to show you ads in keeping with your browsing habits. Please read our Information about Cookies to understand in better detail the cookies and similar devices 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 places on your PC, phone or any other device, which contains information about your navigation on that site. Cookies are needed to make browsing easier and make a website more user-friendly. They do not harm your computer.

This policy uses the generic term “cookie”, as it is the main method for information storage used by this website. The “Local storage” browser space is also used for the same purpose as cookies. All the information included in this section therefore also applies to this “Local storage”.

### What are cookies used for on this website?

Cookies are an essential part of how this website operates. The main purpose of our cookies is to enhance your browsing experience. For example, to remember your preferences (language, country, etc.) during browsing and for future visits.

The information collected by cookies also allows us to improve our website, by estimating the amount of visits and patterns of use, adapting the website to individual user interests, increasing the speed of searches, etc.

Occasionally, if you have provided us with your informed consent, we may use cookies, tags or other similar devices to collect information to show you, from our website, 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?

The cookies we use do not store sensitive personal identification information such as your address, password, credit card or debit card data, etc.

### Who uses the information stored in cookies?

The information stored in cookies that comes from our website is used exclusively by us, except for those cookies identified below as "third-party cookies" which are used and managed by external entities in order to deliver services authorized by us which are used to improve our services and the user's browsing experience on the website. "Third party cookies" are mainly used to gather statistics regarding traffic to the website and payment transactions.

### Can I disable the use of cookies on this website?

If you prefer not to allow the use of cookies on this website considering the above limitations, you must first disable the use of cookies and, secondly, eliminate the saved cookies associated to this website on your browser.

You can change your cookies settings at any time.

### How do I disable and eliminate cookies?

You can restrict, block or eliminate cookies from this website at any time by changing your browser settings following the steps outlined below. While the configuration of each browser is different, in most cases the cookie settings can usually be located in the "Preferences" or "Tools" menu. For further information on the cookies settings in your browser, consult the "Help" menu.



What specific cookies does this website use and for what purposes?

Below is a table with the cookies, tags or similar devices used by this website, in addition to information about the purpose, duration and management of each (internal or third party).

<b>Technical and personalization cookies: identification and authentication, browsing, interface personalization, favorites, etc.</b>			
These cookies are used to identify the user during the session, make it unnecessary for the user to repeat the authentication process for the website, speed up some of the processes on the website, remember choices made during the session or in subsequent sessions, and recall the pages they visit, etc.			
<b>COOKIES</b>	<b>PURPOSE</b>	<b>LENGTH</b>	<b>MANAGEMENT</b>
User identification	Are used to identify and authenticate the user. It also contains technical data about the user's session, such as, connection timeout, session identification, etc.	Session	Internal
Session identification	Identifies the user's http session. It is common to all web applications and identifies user's requests in a session.	Session	Internal
Browsing status	Enables identification of the user's browsing status (start of session, first page, first time they have accessed, scroll status, vote status, etc.).	Session	Internal
User selections	Store session choices made by the user such as store location, language, currency, products, size, etc.	Session	Internal
Favorites and latest selections	Registers the user's favorite choices (such as store location) or their latest selections (store location, products, cookies consent, etc.) for subsequent access to the website.	Persistent	Internal
Protocols	Enables management of changes between secure (https) and insecure (http) domains (protocols).	Session	Internal

### Browsing analysis cookies

These cookies gather generic information about user access to the website (not the content itself), providing subsequent aggregated user access information for statistical purposes.

COOKIES	PURPOSE	LENGTH	MANAGEMENT
Origin (WC_GASource)	Used to register where the user arriving at this page came from. For example, whether they came from a product detail page from a product grid, from a search engine or from an external web page.	Persistent	Internal
Google Analytics (__utma, __utmb, __utmc, __utmd, __utmv, __utmz, _ga...)	Enables the website to be monitored through the Google Analytics tool, which is a service provided by Google to obtain information on user access to websites. Some of the data kept for subsequent analysis are: number of times a user visits the website, dates of the first and latest user visit, duration of visits, the user's previous page before coming to the website, user's search engine to reach the website or link the user clicked, which part of the world the user access came from, etc. The information generated by a cookie about your use of the website will be sent directly and archived by Google Inc (company located in the United States). The configuration of these cookies is predetermined by the service provided by Google, so we suggest that you see the Google Analytics privacy page, <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 more information about the cookies it uses and how to disable them (with the understanding that we are not responsible for the content or accuracy of third party websites).	Persistent	Third party

This information table will be updated as soon as possible when there are changes in the services offered by this website. However, it may sometimes be the case that, during such an update, the information table may not include a cookie, tag or other similar instrument, although they will always be instruments with identical purposes to those described in this table.