

PRIVACY POLICY

- Effective Date: August 2, 2021
- Revisions
 - Improved user readability
 - Application of personal information validity period for dormant members
 - Minimized personal data collected, when joining membership
(before): Email address, password, name, address/postal code, phone number
(after) : Email address, password, name

ITX Korea Limited (hereinafter referred to as the “Company” or “We”) establishes and discloses this Privacy Policy in order to protect personal information of the users (hereinafter referred to as “You”) and resolve related grievances in accordance with Personal Information Protection Act (hereinafter referred to as “PIPA”) and related regulations. This Privacy Policy shall be applicable to our use of your personal data, regardless of the channels or means (hereinafter referred to as the “Platform”) that you use to interact with us.

1. WHY WE PROCESS YOUR PERSONAL DATA?

We process personal data for the following purposes. The personal data we process will not be used for any purposes other than the followings, and in case the purpose of use is changed, we will take necessary actions such as obtaining your consent in accordance with Article 18 of PIPA.

- (i) To manage your registration as user of the Platform

We process personal data to identify you as a user of the Platform, grant you access to its various functionalities, products and services available to you as a registered user, prevent illegal use of the Platform and send various notifications.

- (ii) For the provision of goods and services

We process personal data for the purpose of sales and delivery of goods, provision of service, manage payment and settlement and analysis of usability and quality to improve our service.

- (iii) Customer service

We process personal information for the purpose of managing or resolving your request or application.

- (iv) For marketing purposes

We process personal data for the purpose of providing customized services, introducing new products and services or performing promotional actions.

2. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

(a) We retain and use your personal data for the statutory period under relevant laws and regulations, or for the period which you have given consent to us.

(b) The retention period of each personal data are as follows:

- (i) To manage your registration as user of the Platform
 - We will process your data until you decide to unsubscribe.
 - (ii) For the provision of goods and services
 - We will process your data for the time necessary to manage the purchase of the products or services, or until you terminate your account.
 - (iii) Customer service
 - We will process your data for the time necessary to meet your request or application, or until you terminate your account.
 - (iv) For marketing purposes
 - We will process your data until you unsubscribe or cancel your subscription to newsletter.
- (c) Certain data will be kept longer than the period mentioned above, as stipulated by relevant laws as follows:
- (i) Under the Protection of Communication Secrets Act:
 - Service usage record, access log, IP information: 3 months
 - (ii) Under the Act on the Consumer Protection in E-commerce:
 - Records related to marks and advertisements: 6 months
 - Records related to cancellation of contracts or subscription, etc.: 5 years
 - Records related to payment for and supply of goods, etc.: 5 years
 - Records related to resolution of consumer complaints or disputes: 3 years

3. DO WE SHARE YOUR DATA WITH THIRD PARTIES?

(a) To achieve the purposes mentioned in this Privacy Policy, we give access to your personal data to third parties that provide us in the services as below:

Domestic Outsourcee

Name of the outsourcee	Details of the outsourced work
Zara Retail Korea Co., Ltd.	Customer Service related to order, shipment, return, etc.
NHNKCP	Payment Gateway
NICEPAY	Payment Gateway
LF Logistics	Managing delivery and return
CJ Logistics Corporation	Delivery
Lotte Global Logistics Co., Ltd.	Delivery
Hanjin Transportation Co., Ltd.	Delivery
Logen Co., Ltd.	Delivery

Overseas Outsourcee

Name of the Outsourcee / Contact Information of Data Officer	Industria de Diseño Textil, S.A. (Inditex, S.A) dataprotection@zara.com
Personal Data to be Transferred	email address, password, name, address/ZIP code, phone number, payment method, the location data, the device identification number, type of browser, IP address from which payment is made, preference related to the historic purchase and browsing history, advertising ID
Country / Date and Method of Transfer	Spain When the customer provides personal information through E-Commerce website/app, subsequent to the collection of personal information, such personal information may be transferred via telecommunication network or other electronic or paper based means as deemed necessary
Purpose of Transfer / Retention Period	Corporate policies fulfilment and compliance Until the purposes of using personal information are attained, meaning until a maximum of 5 years after the customer uses the service/withdraw his/her membership

Name of the Outsourcee / Contact Information of Data Officer	ITX Merken B.V. dataprotection@zara.com
Personal Data to be Transferred	email address, password, name, address/ZIP code, phone number, payment method, the location data, the device identification number, type of browser, IP address from which payment is made, preference related to the historic purchase and browsing history, advertising ID
Country / Date and Method of Transfer	Netherlands When the customer provides personal information through E-Commerce website/app, subsequent to the collection of personal information, such personal information may be transferred via telecommunication network or other electronic or paper based means as deemed necessary
Purpose of Transfer / Retention Period	Technology development and electronic commerce platform support Until the purposes of using personal information are attained, meaning until a maximum of 5 years after the

	customer uses the service/withdraw his/her membership
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(b) We specify the matter stipulated in the PIPA when executing contract with any outsourcee and supervise whether they process your personal data securely.

(c) We will inform you any changes of this section via amending this Privacy Policy.

4. WHAT YOUR RIGHTS ARE WHEN MAKING YOUR DATA AVAILABLE TO US?

(a) You may exercise the right to access, rectify, erase or limit processing your personal data at any time.

(b) You have the opportunity to exercise the rights directly through your device or the Platform (for example, you can change your personal information in “My Account” section). You may also exercise your rights by writing us an email to our email address (dataprotection@zara.com). We will take necessary actions upon your request without delay.

(c) You may exercise your rights under this section through a legal representative or an attorney. In such cases, you shall submit a power of attorney by using the Attached Form No.11 under ‘Notice on Personal Information Processing Method’.

(d) The rights to access or limit processing personal data may be restricted in accordance with Article 35 (4) and Article 37 (2) of the PIPA.

(e) The rights to rectify or erase personal data cannot be exercised if we are obligated to collect such data under relevant laws.

(f) We verify whether the person requested to exercise the rights is the subject of such rights or a legitimate representative.

5. WHAT KIND OF PERSONAL DATA DO WE PROCESS?

We process following items of persona data:

- (Mandatory items): email address, password, name
- (Optional items): email address, phone number, address/ZIP code, payment method, field of interest, social networks ID, video image
- In the process of using the service, the following personal information can be automatically generated and collected: the location data, the device identification number, type of browser, IP address from which payment is made, preference related to the historic purchase and browsing history, advertising ID

6. WHEN DO WE DELETE YOUR PERSONAL DATA?

(a) Once each of the potential actions is time-barred we will proceed to delete the personal data. In addition, according to the personal information validity period policy, we will immediately destroy your personal data if you have not used the Platform for the period of 1 year.

(b) Notwithstanding the above, the personal data which needs to be kept in accordance with relevant

laws shall be preserved separately.

(c) Personal data in electronic files shall be permanently erased not to restore data and paper documents containing personal data shall be shredded or incinerated.

7. MEASURES TO ENSURE THE SECURITY OF DATA

We apply the following security measures to protect your data:

1. Conduct regular audits

To ensure the stability of personal data, we conduct regular self-audits.

2. Minimizing and training of employees who process personal data

We take measures to manage personal data by designating a limited number of employees with access to personal data.

3. Establishment of Internal Management Plan

We have established and implemented an Internal Management Plan to process personal data securely.

4. Technical measures against cyberattack

We install, periodically update and inspect security programs to prevent leakage or damage of personal data caused by hacking, computer viruses, etc. We also keep our systems in facilities where access from outside is restricted.

5. Encryption of personal data

Your password is encrypted for storage and management. In addition, we apply security measures to protect other important data.

6. Storage of access records and prevention of forgery.

We keep records of access to personal information processing system according to relevant laws and regulations. Also, we implement security measures to prevent forgery, theft or loss of such records.

7. Restricting access to personal data

We implement necessary measures to control access to personal data by granting, changing and cancelling access rights to the personal data processing database system. We use an intrusion prevention system to control unauthorized access from outside.

8. Use of lock for document security

We keep documents or auxiliary storage media that contains personal data in a safe and locked place.

8. 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. We do not collect your personal data via Cookies, nor information contained in Cookies can be associated with other data to identify an individual. Please read our Cookies Policy to understand with greater detail the cookies and similar devices that we use, their purpose, how to manage your preferences, as well as other information of interest.

9. DEPARTMENT IN CHARGE

The Company has designated Data Protection Officer (“DPO”) and a department in charge of personal information protection.

- Data Protection Department
TEL: 080-479-0880
Email: dataprotection@zara.com

10. REGULATORY AUTHORITY

We inform you that you have the right to file a claim before the responsible data protection regulatory authority.

- KISA Personal Information Infringement Reporting Center (privacy.kisa.or.kr / 118)
- Personal Information Dispute Mediation Committee (www.kopico.go.kr / 1833-6972)
- Supreme Prosecutor’s Office Cybercrime Investigation Department: (www.spo.go.kr / 02-3480-3573)
- Korean National Policy Agency Cyber Bureau (cyberbureau.police.go.kr / 182)

11. WHAT HAPPENS WHEN YOU PROVIDE US WITH DATA OF THIRD PARTIES OR IF A THIRD PARTY HAS PROVIDED US WITH YOUR DATA?

We offer functionalities or services that require us to process the personal data of a third party that you, as a user or as a customer, must provide, such as in the case of activation and sending of the Gift Card, the management of the application for the Gift Voucher (where these features are available), or when you authorize a third party to collect an order in our stores or partner establishments. If you provide us with personal data of third parties or if it is necessary that we request them for a third party to collect an order in your name, you confirm that you informed them of the purposes and of the manner in which we need to process their personal data. If a third party has provided us with your data or you have provided them yourself as a result of a feature or service requested by one of our users, we will use them to manage the feature or service in question in each case, within the limits of the purposes listed in this Privacy and Cookies Policy, a link to which is always included in our communications.

12. Amendment of Privacy Policy

(a) This Privacy Policy is entering into force on August 2, 2021.

(b) The previous version of this Privacy Policy is available at the link below:

- Effective before [August 2, 2021](#)
- Effective before [May 14, 2021](#)

COOKIES POLICY

BEFORE YOU START...

In this Cookies Policy you will find information on how we use cookies and similar devices installed on the terminals of our customers and users.

INFORMATION ABOUT COOKIES

1. What is a Cookie?

A cookie is a small text file that a website, app or other platform stores on your computer, tablet, smartphone or any other similar device, with information on your browsing and use, like a tag that identifies your device. Cookies are necessary, for example, to facilitate browsing and understand how users interact with platforms so they can be improved. They are also useful to provide advertising according to user preferences, as well as for other purposes detailed below. Cookies do not damage your computer or device.

By “Cookies” we are also referring to other, similar technologies used to install and/or collect information on or from your device such as flash cookies, web beacons or bugs, pixels, HTML5 (local storage), and SDK technologies for apps. The term Cookies also applies to the use of fingerprinting, in other words, techniques used to combine information that help us identify your device. These technologies sometimes run alongside cookies to collect and store information, either to provide you with certain features or services on our Platform, or to display third-party advertising according to your browsing.

This explanation is a general overview of what Cookies means and is for informational purposes only. The specific Cookies we use are detailed in the cookies settings panel on our Platform.

2. What type of Cookies are there?

Please check this section which provides an overview of the type of Cookies that can be used in an online environment.

Cookies can be classified as follows, depending on the owner:

- a. First-party cookies: Are sent to the user's computer or device from a computer or domain managed by the editor, and which provides the platform or service requested by the user.
- b. Third-party cookies: Are sent to the user's computer or device from a computer or domain not managed by the editor, but rather by another entity that processes data obtained from the cookies.

Cookies can be classified as follows, depending on the purpose:

- a. Strictly necessary cookies (technical): The cookies that allow the user to browse a website, platform or app, and use the various options or services on it. For example, control traffic, identify data or session, access restricted access sections or content, remember the elements of an order, complete an order purchase process, manage payment, control fraud related to service security, use security elements during browsing, complete an application to register or participate in an event, store content for publishing videos and audio, enable dynamic content (for example, loading animation of a text or image) and share content on social media. As they are strictly necessary, technical cookies are downloaded by default when they are needed to display the platform or provide the service requested by the user.
- b. Functionality or customisation cookies: These cookies are needed to remember information so that the user can access the service or platform with specific characteristics that can differentiate their experience from that of other users. For example, language, number of results

displayed when the user runs a search, appearance or content of the service based on the type of browser used, or the region from where the service is accessed, etc. Not accepting cookies may cause slow website performance or poorly adapted recommendations.

- c. Analysis cookies: These cookies can quantify the number of users, sections visited on the platform and how users interact with it to carry out statistical measurement and analysis on use, in order to implement improvements based on the analysis of data on how users use the platform or service.
- d. Behavioural advertising cookies: Are those which store information on user behaviour obtained from continuous observation of their browsing habits, which allows us to develop a specific profile for displaying advertising adapted to these habits. These cookies allow for the most effective management possible of any advertising space the editor has included directly or in collaboration with third parties.

3. What are Cookies used for on our Platform?

Cookies are an essential part of our how Platform works. The main goal of our Cookies is to make your browsing experience as easy and efficient as possible. For example, they are used to remember your preferences (language, country, etc.) when browsing and during future visits. We also use our Cookies to continuously improve our services and Platform, and to offer customised advertising according to your browsing habits.

Information collected on Cookies also allows us to improve our Platform by making estimates on statistical data and patterns of use (number of visits, most visited sections, visit time, etc.), gain a statistical understanding of how users interact with the Platform so as to improve our services, and to adapt the Platform to your individual interests, accelerate searches, etc.

We may sometimes use Cookies to obtain information that enables us to display advertising, from our Platform, third-party platforms or any other means, based on an analysis of your browsing habits (products visited, sections consulted, etc.).

In any case, the Cookies we use never store sensitive information such as passwords, credit or debit card details, etc.

4. How can I manage the use of Cookies on this Platform?

In the Cookies settings panel, available at all times on our Platform, you can find all the information on the Cookies used by this Platform, along with information on the purpose, duration and management (first or third-party) of each Cookie, so you can enable or disable the use of Cookies that are not strictly necessary for Platform functioning.

Alternatively, if you are browsing the Internet, you can disable the use of Cookies on your browser. Here is how to do this on the most popular browsers:

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari](#)

You can prevent the use of Cookies at any time.

Please remember that both managing the Cookies settings panel and opting to reject Cookies is specific to each browser you are using. Therefore, if you configure Cookies one way on one device and want

your option to apply equally to another device, you must enable the same option on the other device.

Additionally, regarding third-party Cookies used to provide advertising based on your interests, please note that certain third parties may be members of some of the following self-regulatory programmes for online behavioural advertising, with the relevant voluntary exclusion options:

- Network Advertising Initiative (NAI) - <http://www.networkadvertising.org/choices/>
- Google Analytics - <https://tools.google.com/dlpage/gaoptout>

5. Who uses the information stored on Cookies?

The information stored on our Platform Cookies is only used by us, except those identified in section 2 as “Third-party cookies”, which are used and managed by external entities to provide us services aimed at improving our services and the user experience when browsing on our Platform. More information in the Cookies settings panel available at all times on our Platform.