

PRIVACY POLICY AND COOKIES ZARA

1. Every time you use this website, you will be bound by the then current Privacy Policy and you should review this text every time you use the website to be sure you agree with it.

2. Personal data you provide us with will be processed and stored in a file under the responsibility of ZA GİYİM İTHALAT İHRACAT VE TİCARET LİMİTED ŞİRKETİ ("ZARA") for the purposes of:

- I. The development, performance and enforcement of the purchase and sale contract over the products you have purchased, or of any other contract between you and us;
- II. attending to your requests; If you decide to use the WhatsApp customer service channel, where available on our app by clicking the access button, it also entails that if you have the WhatsApp app installed in your device, and you acknowledge and agree that ZARA will transfer your mobile/cellular phone number to WhatsApp Inc. to verify if your number relates to a current user of the WhatsApp platform. Such verification service described above includes transmitting data back to Us so you can use this channel. We recommend that you review your privacy settings and read the WhatsApp's privacy policy for more detailed information about how WhatsApp manages your personal data in relation to their services;
- III. with your consent, providing you with information about ZARA products or of any other brands and/or companies belonging to the Inditex Group (whose activities are related to the decoration, textile, finished fashion and homeware products sectors, as well as other complimentary sectors such as cosmetics and leather goods, and the development and support of e-commerce related businesses), including, as regards the above-mentioned products, the sending of commercial communications via e-mail or any other equivalent electronic communication means (such as SMS) or through phone calls. If you are a registered user, you can change your preferences in respect of receiving such communications by logging into the MY ACCOUNT section of this website and editing your preferences. You can also unsubscribe at the Newsletter section;
- IV. in the event you provide us with personal data of a third party, you will be responsible of having informed them about the processing and use of their personal data, as well as having obtained the relevant express consent for this information to be provided for the purposes explained above. In the event that you have purchased a product or a gift card, the personal data of the third party provided by you, will be used for the following purposes: (i) managing the delivery and/or verification of correct receipt of the corresponding product and; (ii) attending any query or suggestion you or the third party may have;
- V. in the event you have a Gift Voucher and you wish to return the goods associated with it through the website, we will use the personal details provided by you on the return form only for (a) managing the request and processing the door to door collection of goods, (b) meeting any requests related to the Gift Voucher or the return you request, and (c) confirming acceptance of the return and then, sending the Store Credit Card with the refund amount via e-mail or any other equivalent electronic means;
- VI. should you choose to save your card, you expressly give your consent for the data indicated to be used as necessary for its activation and development. The card's CVV is only used for purchases

which are being processed, and will not be stored or used at a later date as part of the card's details.

Consenting to the activation of this feature will allow your autocompleted details to appear in later purchases, therefore it will not be necessary to introduce your details in each new process, and they shall be considered valid and operative for later purchases.

You will be able to change your cards, as well as withdraw your consent for their processing, at any moment via the section My Account Cards. ZARA stores and transmits data in accordance with the principal international confidentiality and security standards for credit and debit cards. The use of this feature may require the modification of your password for security reasons. Please remember that security when using the website also depends on the correct use and conservation of certain sensitive codes.

- VII. Activate the mechanisms necessary to prevent and detect unauthorised uses of the website, for example, during the purchase and returns process as well as potential fraud being committed against You and/or against us. If we consider that the transaction may be fraudulent or we detect abnormal behaviour which indicates attempted fraudulent use of our features, products or services, this processing may result in consequences such as the blocking of the transaction or the deletion of your user account.
- VIII. For invoicing purposes and to make available to you the tickets and invoices of the purchases you have made through the website or in any of our brick-and-mortar stores of ZARA.
- IX. Personalise the services we offer you and enable us to give you recommendations based on your interactions with ZARA on the website and an analysis of your user profile (for example, based on your purchase and browsing history). Likewise, show you ads on the Internet which you may see when visiting websites and apps, for example, on social media. The ads you see may be random, but on other occasions they may be ads related to your preferences or purchase and browsing history.
 - If you use social media, we may provide the companies with which we collaborate certain information so that they can show you ZARA ads and, in general, offer you and users like you advertisements which take into account your profile on said social media sites. If you want information about the use of your data and how advertising works on social media, we recommend you review the privacy policies of the social media sites on which you have profiles.
 - We also use your data to carry out measurement and segment analyses on the ads which we show users on some of our collaborators' platforms. To do this we collaborate with these third parties who offer us the necessary technology (for example, cookies, pixels, SDK) to use these services. Keep in mind that, although we do not provide identifying personal data to these collaborators, we do give them some form of identifier each time (for example, the advertising ID associated with the device, an identifier associated with a cookie, etc.) If you would like more information in this respect, please review our Cookies Policy. Likewise, you can reset your advertising ID or disable personalised ads on your device (if you have our App installed on an iOS device you can adjust your preferences in Settings/Privacy/Ads. If your device is Android, access Settings/Google/Ads).
- X. Data enrichment: When we gather your personal data from a variety of sources, we may consolidate them under certain circumstances for the purpose of improving our understanding of your needs and preferences related to our products and services (including for the purposes of

analyses, generating user profiles, marketing studies, quality surveys and improving our interactions with our customers). This refers, for example, to the way we may combine your information if you have a registered account and, using the same email linked to your account, you make a purchase as a guest, or to information which is automatically compiled (such as IP and MAC addresses or metadata) which we may link with the information you have provided us directly through your activity on the website or in any of our stores (for example, information related to your purchases, whether in brick and mortar stores or online, your preferences, etc.).

3. ZARA with registered address at MM Plaza; Nispetiye Mahallesi, Aytar Caddesi, Başlık Sokak, no:3, kat: 4, 34340, Istanbul, being data controller of the file, undertakes to keep your personal information confidential and to ensure the exercise of your access, rectification, erasure and objection rights by sending an e-mail to dataprotection@zara.com, to the attention of "Data Protection – Zara Turkey". If necessary, we will ask you to provide us with a copy of your ID card, passport or other valid identity document.

As a data subject, you are also entitled to apply to the data controller entity mentioned above to exercise your following rights:

- to learn whether your personal data is being processed,
- to learn the purposes for which your data is processed and whether your data is used for those purposes,
- to learn about third parties to whom your personal data is transferred to and whether your data is transferred outside Turkey,
- to request correction of your personal data if you think that it is processed incompletely or inaccurately,
- to request deletion or destruction of your personal data if you think that the purposes of processing no longer exist,
- to object to negative consequences for you as a result of the processing of your personal data by automatic means,
- to request indemnification if you suffer damage as a result of illegal processing of your data.

4. To achieve the purposes indicated in the above section 2, we may need to disclose or transfer the information that you have provided us with to the holding company of the Inditex Group [Industria de Diseño Textil, S.A., (Inditex, S.A.)] and to certain other companies that are part of the Inditex Group in Spain and Ireland (with activities related to the above-mentioned sectors). A list of these companies is available upon request through the above stated contacts. You are hereby informed that by registering and providing us with information via this website, you are expressly giving us your authorization to disclose and/or transfer such data to the aforementioned companies of the Inditex Group.

We may also disclose this information to subsidiaries and affiliates of Inditex, S.A., third-party processors, fulfillment centers, financial institutions or other third-party-service providers who help with our business operations (such as fraud investigations, bill collection, affiliate and rewards programs, suppliers of technological services, financial transaction management, logistics services, transportation, order

management and customer service, and / or analysis of the transactions made through the website in order to provide our users with sufficient guarantees in purchasing transactions, etc.) or as necessary to process your purchases. By providing information in this website or otherwise to us, you expressly authorize us to disclose and process your information as described. Your consent to this access/disclosure includes those cases where, for efficiency of the provision of the services, providers may be located outside Turkey.

5. The user (You) hereby guarantees that the personal data provided are true and accurate and undertakes to notify us of any change or alteration of them. Any loss or damage caused to the website or to the person responsible for the website or to any third person through the provision of erroneous, inexact or incomplete information on the registration form, will be the exclusive responsibility of the User.

6. Information about Cookies: We use cookies in this website, which are small text files with information on your navigation in this site, whose principal objective is to improve your experience in the website. Please, continue reading, to find further information on the cookies 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 occasions, 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, first you must 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 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.

COOKIES	PURPOSE	DURATION	MANAGEMENT
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

<p>Google Analytics (__utma, __utmb, __utmc, __utmd, __utmv, __utmz, _ga...)</p>	<p>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, https://support.google.com/analytics/answer/6004245?hl=en, 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.</p>	<p>Persistent</p>	<p>Third party</p>
<p>Optimizely (optimizelySegments; optimizelyEndUserId optimizelyPendingLogEvents ; optimizelyBuckets...)</p>	<p>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 https://help.optimizely.com/hc/en-us/articles/200040335, to obtain more information regarding the cookies they use, as well as how to disable them through the following link https://www.optimizely.com/opt_out. Please, remember that we are not responsible for the content or the accuracy of these third-party websites.</p>	<p>Persistent</p>	<p>Third party</p>

Conversion pixels and SDKs	<p>These tools allow us to follow a user's browsing with the goal of implementing measuring services through the technology offered by third parties (Facebook, for example) and to offer personalised ads on these social media sites and other web pages such as Google.</p> <p>For more information on this technology and how to deactivate it (keeping in mind that we are not responsible for the content or accuracy of third-party websites), continue reading:</p> <p>Information on these technologies:</p> <ul style="list-style-type: none"> - Facebook: https://www.facebook.com/ads/about/?entry_product=ad_preferences - Google: https://policies.google.com/technologies/ads?hl=es <p>If you have our App installed and do not want us to show you ads, you can change your preferences on your mobile device by resetting your advertising ID or disabling personalised ads on your device as follows: If you have the Zara App installed on an iOS device you can adjust your preferences in Settings/Privacy/Ads. If your device is Android, access Settings/Google/Ads</p>	Persistent	Third Party
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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.