

## ZARA PRIVACY POLICY

Effective Date: October 2022

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### **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, 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.

California consumers should refer to the “Your California Privacy Rights” section below for additional information related to California law.

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### **We collect information from and about you.**

**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 your purchases of products or services, to respond to your queries, 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.

**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.

**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 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.

**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.

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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 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.

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### **We combine information we collect from different sources.**

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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 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 and/ push notifications or SMS if authorized.

**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, 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 information for security and fraud prevention 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.**

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**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 share information with our business partners.** For example, we share information with third-party advertisers, including third-party cookie providers who collect information through the Platforms for marketing, analytics or functionality purposes.

**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.**

Only in case you purchase products of ZARA HOME or MASSIMO DUTI through the ZARA Platform, We will disclose the necessary Personal Data to ITX USA LLC (the company currently operating in USA the sale of ZARA HOME) or MASSIMO DUTTI USA, INC. (the company currently operating in USA the sale of MASSIMO DUTTI) for the development, performance and execution of the purchase. The postal address of the company is the same than specified for ZARA USA in section "You can contact us if you have

questions” of this document and the email address of the Data Protection Officer is [privacy.us@zarahome.com](mailto:privacy.us@zarahome.com) or [privacy.us.@massimodutti.com](mailto:privacy.us.@massimodutti.com). The legal basis for this disclosure of data is the execution of the purchase agreement as explained in this Privacy Policy. The information about the disclosure of your data and how to exercise your personal data rights is detailed in this Privacy Policy as well.

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

Options you select are browser and device specific.

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**These sites are not intended for children.**

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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>.

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**We use standard security measures.**

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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 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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**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:

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

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## Your California Privacy Rights

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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.

### 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 write to us at the following address:

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

Alternatively, you may send an e-mail to [privacy.us@zara.com](mailto:privacy.us@zara.com) with the words "California Privacy Rights".

### California Consumer Privacy Act.

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

- In the preceding 12 months, we have collected the types of personal information described in the "We collect information from and about you" section above, which includes the following categories of personal information from California residents, regardless of the means (online or in person) they use to interact with us: Identifiers, commercial information, protected characteristics, Internet or other electronic network activity information, Geolocation data, Audio, Electronic information and inferences.
- We have collected that personal information directly from you via our Platforms or devices, and from third parties, 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.
- We shared personal information with the categories of third parties listed in section "We share information with third parties" above, including disclosures made to third parties for business purposes and "sales" of information (as that term is defined under California law, which may include disclosures where no money is exchanged) for the purposes described above.
  - In the preceding 12 months, we disclosed the following categories of personal information for a business purpose to the following categories of recipients:
    - Identifiers, which are disclosed to our affiliated companies and our parent company and our service providers.
    - Name and last name; Email; Address; Telephone number; Signature; Image/Voice; Electronic signature; Payment card data; Transactions of goods and services; Advertising ID, Purchase amount and frequency to our affiliated companies and our parent company and our service providers.
- When you navigate through our website (not currently applicable to our mobile application), we "sell" as that term is defined under the California Consumer privacy Act consumers' personal information to our business partners, meaning identifiers (including Advertising ID and hashed email), information about transactions of goods and services, purchase amounts and browsing events.

## **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 collected, used, sold, or disclosed to third parties within the past 12 months. You can exercise these rights by sending us an email to [privacy.us@zara.com](mailto:privacy.us@zara.com) and/or by contacting our Customer Service at the "Contact Us" sections of the Platform. When you submit a request, we may require additional information from you to verify your identity. You may also use an authorized agent to submit requests on your behalf. In this case, along with the request, the authorized agent must submit a copy of the consumer's signed permission to submit the specific request.

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

## **Do Not Sell My Personal Information**

In addition to the rights described above, when you navigate through our website (not currently available through our mobile application), you have the right to opt out of the sale of your personal information to third parties. You can exercise this right either by (1) clicking the link: "**Do Not Sell My Personal Information**" available at the website and following the instructions on that page or, (2) by contacting our Customer Service at the "Contact Us" sections of the Platform. You can send us an email to [privacy.us@zara.com](mailto:privacy.us@zara.com) in case you have any questions about how to exercise Do Not Sell right. 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

To our knowledge, we do not engage in the sale of personal information of consumers under 16 years of age.

We will not discriminate against you because you exercised your rights under this section of our Privacy Policy.

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## **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.