

ZARA Privacy Policy

(Effective as of June 25, 2013)

ZARA knows that you care about how your personal information is used and shared, and we take your privacy seriously. Our Privacy Policy below applies to your use of the ZARA.COM website and co-branded versions of the website located at URLs that resolve to the domain name ZARA.COM (the "Website" or "Site"). Because we gather certain types of information about our users, we want you to understand what information we collect about you, how we collect it, how that information is used, and how you can control our disclosure of it.

By visiting our Site, submitting information, using our services, and/or purchasing any products on our Website, you acknowledge that you accept the practices and policies outlined in the then current Privacy Policy and our Terms and Conditions. You should review this Policy every time you use the Website to satisfy yourself that you are happy with it. References in this Privacy Policy to "we," "us" and "ZARA" are to ITX USA LLC (doing business as ZARA); and references to "your" or "you" include anyone who uses our Site and/or services and/or purchases products from our Site. If you do not agree with this Privacy Policy, please do not use our Site.

1. INFORMATION COLLECTED

We collect three types of information from you: i) information that you provide to us; ii) information we collect or receive from others; and iii) information that is derived through automated tracking mechanisms and technology.

We collect information when you register online or update your account, log-in, place an order, communicate with our customer service representatives, opt-in to receive our e-mails, shop online, request a catalog, participate in a sweepstakes, contest, promotion or survey or join our social networking sites. We may also collect information from you in our stores or through our catalogs or other marketing material. This information may include, but is not limited to, your contact information (for example, your name, e-mail address, billing and shipping addresses and phone number) and your credit card and debit card information. If you create an online account, you also have the option of providing your product preferences and demographic information. If you use other functionalities found on our Site, or if you choose to send an e-mail from our site to a friend, we will also collect your friend's name and e-mail address. Your friend's information is only used to send the forwarding e-mail and is not saved in our customer or marketing databases.

We may update and supplement personally identifiable information that we have collected directly from you with other information that we obtain from third parties. In addition, we may obtain personally identifiable information about individuals who are not yet users of our Site. When we associate information that we obtain from third parties with personally identifiable information that we have collected under this Privacy Policy, we will treat the acquired information in the same way we treat the information that we collected ourselves and, except as set forth in this Privacy Policy, the information will not be shared with third parties.

We may collect information through automated tracking mechanisms and technology to make our Site more interesting and useful to you and for various purposes related to our business. For instance, when you come to our Site, we may collect information about your computer, including where available your IP address, operating system and browser type. Such information may be used for system administration and to analyze the frequency with which visitors to our Site visit various parts of our sites; and we may combine such information with personally identifiable information.

We also use "cookies," Web beacons, and other tracking technologies. Cookies are small data files that are automatically stored on your computer when you visit our Website. Cookies are used to track the pages of the websites you have visited and do not retain any personally identifiable information such as your name, address or any credit/debit card information. We may use cookies to, among other things, enable you to use certain Website features, remember the items in your shopping cart, store your preferences, recognize you when you return to our Website, speed up your searches, track your orders, and monitor and maintain information about your general Internet usage and use of our Website. Cookies help us to improve our Website and to deliver a better and more customized service. They allow us to customize our Website according to your individual interests. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website or unable to use some or all of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our Site. By using our Website, you consent to our placement of cookies on your computer.

You may occasionally get cookies from our business partners or other third parties. We have no control over these cookies. We may also use cookies and other analytic systems to gather information and prepare reports on website activity and to provide other services related to your website activity and use of the Internet. By using this website you agree to the treatment of information relative to you by Google in the form and with the aims above indicated.

This Website may use tracking tags in certain pages to measure and optimize marketing campaign results. It will not store, in any event, personal user information. Web beacons are small strings of code that are placed in a website page or in an e-mail message. They are sometimes called "clear GIFs" (Graphics Interchange Format) or "pixel tags." Web beacons are most often used in conjunction with cookies to track activity on our Website. When you visit a particular page, web beacons notify us of your visit. Since web beacons are used in combination with cookies, if you disable cookies the web beacons will only detect an anonymous Website visit. When used in an e-mail, Web beacons enable us to know whether you have received the e-mail.

2. HOW WE USE YOUR INFORMATION

Personal data you provide and/or we collect will be kept by ZARA and/or its affiliated companies for, among other things:

- i. the 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, and;
- iii. providing you with information about ZARA products or of any other company belonging to ZARA and its affiliates, sending commercial communications by e-mail and/or by any other equivalent electronic communication means (such as SMS), and/or by other means of communication. You can change your preference in respect to receiving such communications by logging into the MY ACCOUNT section of this Website and changing your preferences. You can stop receiving ZARA'S newsletter by accessing the Newsletter section and choosing to unsubscribe (opt-out).
- iv. Should you choose to check the option to store your PAYMENT DATA (i.e. credit / debit card data), you expressly authorize us to process and store the data indicated as necessary for activation and development. The Card-Verification-Value-Code (CVV) will only be used to make able the purchase in progress, and will not be stored or processed subsequently as part of your PAYMENT DATA.

Giving us your consent to activate this functionality, allows your data to appear auto filled in subsequent purchases on this website, so you will not need to enter the data in each new process, and such consent shall be valid and effective for subsequent purchases.

You can change your PAYMENT DATA and revoke your consent for processing and storing at any time through My Account section – Payment Data.

ZARA stores and transmits your cards data according to the main standards of confidentiality and security of credit and debit cards, in compliance with Payment Card Industry Data Security Standard (PCI DSS).

When using this functionality, changing your password may be requested for security reasons. Remember that the safety in use of the website also depends on proper use and conservation of certain key/passwords confidential.

We also maintain a record of your purchases made on our Website and combine this with information you have provided in our retail stores or over the phone in order to serve you better. We may combine information you provide with demographic information and information that is publicly available. We may also use information about your product preferences and interests in order to improve our site design and enhance your shopping experience.

To fulfill the purposes above, we disclose the information that you have provided to us to Industria de Diseño Textil, S.A. (Inditex, S.A.), holding company of the Inditex Group to which ITX USA LLC belongs, with registered address at Avenida de la Diputación, Edificio Inditex, 15142 Arteixo, A Coruña (Spain). We may also disclose this information to 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) 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.

We may permit certain trusted third parties to track usage, analyze data such as the source address that a page request is coming from, your IP address or domain name, the date and time of the page request, the referring website (if any) and other parameters in the URL. This is collected in order to better understand Website usage, and enhance the performance of services to maintain and operate the Site and certain features on the Site. We may use third parties to host the Site, operate various features available on the Site, send e-mails, analyze data, and provide search results and links. Also, we may share personally identifiable or other information with our parent companies, subsidiaries, divisions, affiliates, consultants, contractors and sub-contractors.

We may transfer personally identifiable information as an asset in connection with a proposed or actual merger or sale (including any transfers made as part of an insolvency or bankruptcy proceeding) involving all or part of our business or as part of a corporate reorganization, stock sale or other change in control.

We use non-identifying and aggregate information to better design our website and for business and administrative purposes. We may also use or share with third parties for any purpose aggregated data that contains no personally identifiable information.

WE ARE NOT LIABLE OR RESPONSIBLE FOR THE PERSONALLY IDENTIFIABLE OR OTHER INFORMATION YOU CHOOSE TO SUBMIT IN FORUMS SUCH AS A COMMENT AREA OR ANY OTHER PUBLICLY ACCESSIBLE AREA OF THE SITE.

ZARA may disclose personally identifiable information in special cases where we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating our Terms and Conditions of use or may be causing injury or interference with our rights, property, our customers or anyone who could be harmed by such activities. You should also be aware that we may disclose specific information about you if required to do so by law, governmental request, process or court order or based on our good faith belief that it is necessary to conform or comply with such law, request or court order or to protect the users of our websites or the public.

You will receive notice when your personally identifiable information might be provided to any third party for any reason other than as set forth in this Privacy Policy, and you will have an opportunity to request that we not share such information.

3. HOW WE PROTECT YOUR INFORMATION

We are committed to protecting the information we receive from you. Any personal information you provide to us is maintained on secure servers and our internal systems. We take appropriate security measures to protect your information against unauthorized access to or unauthorized alteration, disclosure or destruction of data. To prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we maintain appropriate physical, electronic, and managerial procedures to safeguard and secure the information and data stored on our system. While no computer system is completely secure, we believe the measures we have implemented reduce the likelihood of security problems to a level appropriate to the type of data involved.

4. ACCESSING AND UPDATING YOUR PERSONAL INFORMATION AND PREFERENCES

We provide mechanisms for updating and correcting your personal information for many of our services. If you are a registered user, you may access and update your registration information and your preferences to receive e-mail or other communications from us in the account area or by sending an e-mail to contact.us@zara.com

5. E-MAIL CHOICE/OPT-OUT

If any user who receives an e-mail from the Site would prefer not to receive such communications in the future, [he or she] can do so by following the instructions in the e-mails. In addition, at any time you may access the Newsletter section on the Site and choose to unsubscribe (opt-out) or send an e-mail to contact.us@zara.com. We will make commercially reasonable efforts to implement your opt-out requests promptly, but you may still receive communications from us for up to ten business days as we process your request.

6. CHILDREN'S PRIVACY

We do not knowingly collect any personal information from children under 13. We do not sell products for purchase by children and all children's products we sell are for purchase by adults only. If you are not 18 or older, you are not authorized to use the Site. Parents should be aware that there are parental control tools available online that can be used to prevent children from submitting information online without parental permission or from accessing material that is harmful to minors.

7. DISCLAIMER TO SECURITY

By consenting to the Terms and Conditions of the Site and the Privacy Policy, you acknowledge that no data transmission over the Internet is completely secure. Although we have implemented reasonable technical and organizational measures according to our written information security policy, we cannot guarantee or warrant the security of any information you provide to us and you transmit such information to us at your own risk.

8. YOUR CALIFORNIA PRIVACY RIGHTS

ZARA collects various types of personal information about you both online and offline, as described in this Privacy Policy. Under California law, customers of ZARA 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. ZARA does not disclose personal information to unaffiliated third parties for these purposes. To make such a request, please write to us at the following address:

ITXUSA LLC: 500 5th Avenue, Suite 400, New York, NY 10110. USA

Alternatively, you may send an e-mail to contact.us@zara.com with the words "California Privacy Rights" in the subject line.

9. CUSTOMIZED ADVERTISING

Advertisements displayed to you on our websites and elsewhere on the Internet may be customized to your interests and preferences, based on information learned about you as you use our websites and the Internet in general. If you do not want to participate in this, please visit http://www.networkadvertising.org/managing/opt_out.asp to opt-out.

10. LINKS TO OTHER WEBSITES

To enhance your shopping experience, our Website may include links to other sites. Those websites will have their own privacy policies that you may wish to review. ZARA has no responsibility for these linked websites.

11. PRIVACY POLICY UPDATES

We may update our Privacy Policy from time to time. Whenever we make a change, we will post the updated Policy at this Site and we encourage you to check our Policy periodically. If we make a material change to our Privacy Policy that would lessen your privacy rights, we will either continue to honor our Prior Policy for information that we collected when it was in force, or we will ask for your consent to the change. If you have any questions or concerns regarding our Privacy Policy, please contact us at: contact.us@zara.com