PRIVACY POLICY

Effective date: 30 June 2026

OUR PRIVACY POLICY AT A GLANCE

1. **WHO WE ARE.** We are ITX E-Commerce (Shanghai) Co., Ltd, Massimo Dutti Commercial (Beijing) Co., Ltd., and Massimo Dutti Commercial (Shanghai) Co., Ltd. (hereinafter collectively referred to as "We") and we process your personal information as "personal information processors". This means that we are jointly responsible for how we process and protect your personal information. See more.
2. **WHAT PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT.** We will collect your personal information online or in person for specific reasons (including to manage your registration as a user, to manage your purchases of products or services, to respond to your queries, and if you ask specifically, to send you our customised communications). The main reason is that we need to process your personal information to perform the contract that you accept with us when you register and when you make a purchase or enjoy any of our services or functionalities. We also use your personal information for other purposes, for example, to respond to your queries or to send you newsletters that you have asked to receive from us. See more.
3. **WHO WE SHARE YOUR PERSONAL INFORMATION WITH.** We share your personal information with service providers who provide us with assistance or support. See more.
4. **YOUR RIGHTS.** You have the right to access, rectify or delete your personal information. In certain cases, you are also entitled to other rights, such as, for example, to object to us using your personal information, or to transferring your personal information, as explained in depth below. See more.

We encourage you to read our full **Privacy Policy** below to understand in depth the manner in which we will use your personal information and your rights over your personal information.

BEFORE YOU START…

- **In this Privacy Policy, you will find all relevant information applicable to our use of our users' and customers' personal information, regardless of the channel or means (online or in person) that you use to interact with us.**
- If you would like information about how we use cookies and similar devices that may be installed on the terminals of our customers and users, we recommend you consult the Cookies Policy.
- **We are transparent** about what we do with your personal information, to help you to understand the implications of the way in which we use your personal information, and the rights you are entitled to in relation to your personal information:
    - We **permanently** make available for you all the information included in this Privacy Policy, that you can check when you consider appropriate, and in addition,
    - you will also find **further information** on how we use your personal information **as you interact with us**.
- These are some terms we regularly use in this Privacy Policy:
    - When we speak about our **Platform**, we refer, in general, to any of the channels or means, digital or in person, you may have used to interact with us. The main ones are:
        - Our **Website**.
        - Our **App**, this is, including both the mobile application you installed on your device and others we may use in our Platform.
        - In person, in any of our Brick-and-Mortar Stores.
        - Certain information collected through **WeChat Official Account, WeChat Mini-Programme, and Tmall Official Flagship Store, JD Official Flagship Store or other third-party platforms**.

1. WHO IS THE PROCESSOR OF YOUR PERSONAL INFORMATION?

The following entities are the personal information processors ("PIPs") of your personal information.

- **ITX E-Commerce (Shanghai) Co., Ltd.**:
    - Registered address: Room 1, 29F, Block 1, No. 399 Kaixuan Road, Changning District, Shanghai
    - E-mail of Data Protection Officer: privacy.massimodutti@cn.inditex.com
- **Massimo Dutti Commercial (Beijing) Co., Ltd.**:
    - Registered address: Unit SA-30、SA-32、BS-31、BS-33, Solana, No.6 ChaoYang GongYuan Road, Chaoyang District, Beijing
    - E-mail of Data Protection Officer: privacy.massimodutti@cn.inditex.com

- **Massimo Dutti Commercial (Shanghai) Co., Ltd.**:
    - Registered address: Unit 706, No.6, Lane 113 Changshu Road, Jing'an District, Shanghai
    - E-mail of Data Protection Officer: privacy.massimodutti@cn.inditex.com

In other words, the above-mentioned companies (jointly "We", "Us" or "the PIPs"), are **PIPs** of your personal information. This means that we are jointly responsible for processing and protecting your personal information.

2. WHAT PERSONAL INFORMATION WE COLLECT AND HOW WE USE IT?

For the purpose of this Privacy Policy, personal information refers to all types of information, whether recorded in electronic or other formats, relating to an identified or identifiable natural person, excluding anonymised information. ***Sensitive personal information refers to personal information that, once leaked or illegally uses, may easily cause harm to the dignity of natural persons or endanger personal or property safety, including but not limited to biometric, religious belief, specific identity, medical and health care, financial account, location tracks and other information, as well as personal information of minors under the age of 14.***

We commit to collecting your sensitive personal information on a strictly-needed basis and to the extent possible we highlight in **bold and underline** the sensitive personal information that we collect and process for your special attention. We will always ensure that sensitive personal information to be collected is sufficiently necessary to achieve the purposes stated in this section, sensitive personal information will be processed in such way of having the least impact on your rights and interests, and proper security measures will be put in place to protect data security. **You acknowledge and agree that we may collect process your sensitive personal information for the purposes stated in this Privacy Policy**. **Where applicable laws and regulations require any additional voluntary and specific consents from you in the collection of sensitive personal information with respect to any channels of our Platforms, we commit to seeking additional standalone consents from you at the point of collection.**

When you access or interact with our Platform, we may collect and use your personal information mainly under the following three circumstances (i) it is necessary to provide or fulfil a transaction or service by or for you in accordance with a contract that you executed with us ("Basic Functionality"); (ii) you have given us your explicit consent for better shopping experience or any other value-added services ("Value-Added Functionality"); and (iii) it is necessary for other legitimate interests pursued by us in accordance with applicable laws and regulations ("Other Legitimate Interests").

Remember that, when we ask you to fill in your personal information to give you access to any functionality or service of the Platform, we will mark certain fields as *compulsory*, since this is information that we need to be able to provide the service or give you access to the functionality in question. Please take into account that, if you decide not to make such personal information available to us, you may be unable to complete your user registration or may not be able to enjoy relevant services or functionalities.

Notice that, in order to identify your device ID, prevent malicious programs and anti-fraud, improve service security, and ensure operation quality and efficiency, we will collect your device information (including IMEI, MEID, Android ID, IMSI, GUID or MAC address) and information about your running processes. In specific cases, a third party may have provided us with information about you by using a feature or service on the Platform, for example by sending you a gift card or shipping an order to your address. In these cases, we only process your personal information where relevant to this feature or service, as stated in this Privacy Policy.

In other cases, we may collect information passively, as we may use tracking tools like browser cookies and other similar technology on our Platform and in communications we send you.

1) <u>Basic Functionality</u>

Personal information	Purpose	Legal standing
Mobile phone number, email address, password, user ID, IP address, information of the device when applicable (Android ID, WeChat OpenID, etc.), language and market from which you interact with us	1. To manage **your registration as user of the Platform**	If you decide to become a registered user of our Platform, we need to process your personal information to **identify you as a user** of the Platform and **grant you access** to its various functionalities, products and services available to you as a registered user. In other words, for you to be able to register as a user on the Platform, we need to process your personal information, since we would otherwise be unable to manage your registration. We process your personal information because this is **necessary on the terms regulating the use of the Platform**. You have the option to use the login or sign in through a social network or another collaborator that enables this service (social login) when it is available on our login/sign in screen, either to link the social login to your account or by registering a new one. In that case, your login credentials, as well as your name and email / phone number (you might need to authorize it), will be imported from your social network or collaborator account. By using this login option, these third parties may send us certain additional information about your public profile, such as: your name, gender, approximate age or **<u>profile photograph</u>**, according to the terms of use and privacy policies from the social network / collaborator, which we recommend you read carefully. Unless you give us your authorization, we will not retain this additional data. Likewise, the use of this functionality may imply that you provide certain information about your activity to the social network or the collaborator. In any case, we recommend that you review your privacy settings and the privacy policies of the collaborator or social network to learn how these third parties process your data. If you opt to use the access or login through a social network, we are legally permitted to process your personal information given the **consent** that you give when authorising the sharing of your personal information from the social network. You may cancel your registered user account by contacting us through Customer Service.
Mobile phone number,	2. To perform or execute	This purpose includes processing your personal

Personal information	Purpose	Legal standing
first name, last name, email address, physical address (street, postal code, province, region), user ID, bank name, **account number,** payment information (payment amount, payment ID, payment institution, etc.), information about the device you use to access our Platform or type of browser you are using, IP address, historic purchase, language and market from which you interact with us.	**the purchase or services contract** that you executed with us on the Platform	information, mainly: ▪ **To contact you** for updates or informative notices **related to the contracted functionalities, products or services**. ▪ To manage potential exchanges or **returns** after you have purchased and manage **requests of availability information for articles**, **reservations of products through the Platform**, depending on the availability of such options from time to time. ▪ For invoicing purposes and to make available to you the tickets and invoices of the purchases you have made through the Platform. ▪ To ensure that you are able to use **other available functionalities or services**, such as the purchase, receipt, management and use of the **Gift Card** or of the **Gift Voucher**. We process your personal information because their processing is necessary for us **to make the purchase or services contract** with you. We consider that it is necessary for us **to make the purchase or services contract** with you, or process refund to you as needed.
Mobile phone number, first name, last name, email address, physical address (street, postal code, province, region), user ID, social networks ID, username, purchase records and historical transactions, communication records with respect to purchases, IP address, language and market from which you interact with us.	3. To meet requests or applications that you make through the **Customer Support** channels	We only process the personal information that is **strictly necessary** to verify your identity, and to manage or resolve your request or application. If you contact us via telephone, the call may be recorded for quality purposes and so that we can respond to your request. If it is available and you choose to communicate with Customer Support through the chat service of a **social network** or another collaborator, some of your personal information such as your **name or username**, will be imported from your social network or collaborator account. Also, bear in mind that the data you submit on this service will be available to your social network or collaborator and subject to their privacy policies, therefore We recommend you review your privacy settings and to read the social network or collaborator privacy policies to obtain more detailed information about the use they make of your personal

Personal information	Purpose	Legal standing
		information when using their services We process your personal information based on your **consent** or **to make the purchase or services contract** with you in terms of answering the requests or queries raised by you through the existing different contact channels. When you get in touch with us, in particular, for the management of incidents related to your order or the product/service acquired through the Platform, the processing of your personal information is necessary **to perform the purchase contract**.

2) <u>Value-added Functionality</u>

Personal information	Purpose	Legal standing
Mobile phone number, first name, last name, gender, birthday, location (country, Province, City, District), address (street, postal code, province, region), preferences, occupation, language and market from which you interact with us, WeChat nickname (if authorized), WeChat profile picture (if authorized)	1 To join **Massimo Dutti Feel** program	If you register with the Massimo Dutti Feel programme, you agree that the data we gather regarding your activity (including <u>membership registration, purchases and benefits information</u>), which have been collected through the different channels of the Platform or third parties platforms where Massimo Dutti has an official account (including <u>official website, App, mini program, Tmall official flagship store and JD official flagship store</u>),shall remain linked to your Massimo Dutti Feel account so that all the information can be accessed together. If you are a user of Massimo Dutti Feel, the basis for legitimacy are the **terms and conditions you accept** when participating in this loyalty programme.
Through WeChat Mini Program: Mobile phone number, first name, last name, **<u>device location (if authorized)</u>**, appointment store, appointment date and time slot, appointment type, product section preference, notes (if any)	2. To **make a reservation of store services**	In order to make a reservation of store services in a specific store with a determined date time, **you, as a user of Massimo Dutti Feel**, agree that we collect the necessary information for the store appointments, covering your identity, contact information, and appointment details. We are legally permitted to process your personal information for store service reservations due to the **consent** that you give us, for example proactively filling out and submitting the reservation form.
Through Website or		In order to make a reservation of store services in a

Personal information	Purpose	Legal standing
App: **Device location (if authorized)**, appointment store and the city, appointment date and time slot, appointment type, notes (if any), product size preference (if any)		specific store with a determined date time, you agree that we collect the necessary information for the store appointments, covering your appointment details. We are legally permitted to process your personal information for store service reservations due to the **consent** that you give us, for example proactively filling out and submitting the reservation form.
Photos, comments	3. To enable **the User Generated Content (UGC) function**	In order to have the full services of User Generated Content (UGC) function, **you, as a user of Massimo Dutti Feel,** agree that we collect necessary information to provide the content posting services by UGC function, including your photos and comments. We are legally permitted to process your personal information for UGC services due to the **consent** that you give us, for example proactively taking or uploading photos by authorizing the device access rights, and posting comments.
Age (optional), height, weight, body type, preferred size type	4. **Size Recommendation**	In order to provide you with products or services that are more in line with personal needs and interests, and improve the shopping efficiency and experience, we will conduct statistical analysis based on the previous personal information, to recommend or display the appropriate product or service based on the provided size information. We are legally permitted to process your personal information due to your active filling in and the **consent.** After login, **through "MY SIZE IS …" under product pages of Massimo Dutti website, App, and WeChat Mini Program, you can turn on, edit or turn off this feature at your discretion.**
Mobile phone number, first name, last name, email address, IP address, user ID, language and market from which you interact with us, preferences related to the historic purchase and **browsing history**, MAC addresses or metadata, information of the device (i.e. Android	5. For **marketing purposes**	This purpose includes the processing of your personal information, mainly, for: ▪ If and when you subscribe to our Newsletter, we will process your personal information to **manage your subscription**, including to **send subscribed information** on our products or services through various means (such as e-mail or SMS). We may also make available to you this information through push notifications in case you have activated them in your device. ▪ Remember that **you may unsubscribe from the**

Personal information	Purpose	Legal standing
ID).		**Newsletter at any time** without cost through the "Newsletter" section of the Platform, in addition to through the instructions that we provide you with in each notice. If you do not want to receive push notifications, you can deactivate this option in your device. ▪ Show you **ads on the Internet** which you may see when visiting websites and apps, for example, on social media. The ads you see will be random. ▪ If you use social media, we may provide the companies with which we collaborate certain information so that they can show you our brand 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 personal information and how advertising works on social media, we recommend you review the privacy policies of the social media sites on which you have profiles. ▪ In order to show users ads on some of our collaborators' platforms, we collaborate with those 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 information 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 the ads push functionality on your device, adjusting your preferences in settings section of your device. ▪ Data enrichment: When we gather your personal information 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 or**

Personal information	Purpose	Legal standing
		mobile phone number 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 Platform or in any of our stores (for example, **information related to your purchases**, whether in brick and mortar stores or online, **your preferences**, etc.). ▪ To perform **promotional actions** (for example, for the organization of competitions or to send the list of items stored to the e-mail you designate). On participating in any promotional action, you authorise us to process the personal information that you have shared with us depending on the promotional action and disclose them through different media such as social networks or the Platform itself. In each promotional action in which you participate you will have available the terms and conditions where we will be providing more detailed information about the processing of your personal information. ▪ To enjoy the advantages of the **Massimo Dutti Feel program**. On participating the Massimo Dutti Feel program, you authorize us to collect and process your personal information on your purchase and browsing history on the Platform or third parties' platforms where Massimo Dutti has an official account, as well as the information that you may provide directly. **We consider we may link to your account your purchases and the data collected through different channels of the Platform about your activity based on your consent.** We are legally permitted to process your personal information for marketing purposes due to the **consent** that you give us, for example when you accept receiving subscribed information through multiple channels, when you accept receiving push notifications on your device, when you configure it in the privacy settings of your device, when you consent through the cookies settings or when accepting the legal terms and conditions to participate in a promotional action or to publish your pictures on the Platform or on our social networks' channels.

Personal information	Purpose	Legal standing
		To engage in data enrichment on our Platform or those of third parties, we process your personal information based on your **consent** to centrally manage the user account with the information that we have about you (such as your browsing, preferences or purchase history) and the personal information that you have provided us, such as the age range or language, to improve the user experiences through different channels. If you are a user of Massimo Dutti Feel, we consider we may link to your account your purchases and the data collected through different channels of the Platform about your activity based on your **consent**.
User ID, preferences related to the historic purchase and **browsing history,** language and market from which you interact with us.	6. **Analysis of usability and quality** to improve our services	If you access our Platform, we inform you that we will treat your **browsing data** for **analytic and statistic purposes**, i.e., to understand the manner in which users interact with our Platform and with the actions we implement on other websites and Apps, so we can improve our services. In addition, we occasionally perform **quality surveys and actions** to know the degree of satisfaction of our customers and users and detect those areas in which we may improve. We are legally permitted to process your personal information for the purposes of analysing the Platform usability and the user's satisfaction degree due to the **consent** that you give us.
Payment data, **device location**, and contact data	7. **Better shopping experience** to improve customer satisfaction	Certain processing of data related to the purchase process is activated only because you request or authorise it, as is the case of the storage of payment data for future purchases or the processing of data necessary to provide you with the Coming Soon / Back Soon functionalities (where these functionalities are available). In addition to this, to be able to offer you through the **App** specific services (such as item finder, reserve a fitting room, etc.) available in some Brick-and-Mortar Stores, we may collect and process your **device location** and contact data. In these cases, our processing of your personal information is supported by your own **consent**.

3) Device Access Permissions

In order to ensure the normal implementation of relevant business functions, we need to request the corresponding necessary device permissions according to the specific service scenarios, and ask for you consent with a permission alert before collecting the data. For specific permission requests, please refer to the following <Device Access Permission List>:

iOS Access Permissions

Channel	Permission	Purpose	Permission Alert?	Allow to Revoke?
Massimo Dutti App	Camera	To scan products or purchase receipts, search products (In-store service)	When using the "Camera" function for specific services	Yes
	Microphone and Voice Recognise	To enable the voice-searching functionality	When using the "Microphone" function for specific services	Yes
	Location	To provide store service reservations and for some specific services (such as item finder, reserve a fitting room, etc.) available in some Brick-and-Mortar Stores.	When using the App for the first time; When making store service reservations; or When using the specific services available in Stores	Yes
	Notification	To send information about orders or commercial events.	When using the App for the first time.	Yes
	Device Sensors	To identify whether you are a real user or to meet information security requirements, orientation sensor, gravity sensor, and accelerometer sensor information is obtained. Please understand that device sensor data alone does not involve any personal location	No	No

		information and cannot be combined with other information to identify a specific natural person.		
Massimo Dutti WeChat Mini Program	Location	To provide store service reservations and for some specific services (such as item finder, reserve a fitting room, etc.) available in some Brick-and-Mortar Stores.	When using the WeChat Mini Program for the first time; When making store service reservations; or When using the specific services available in Stores	Yes
	Photo	To provide UGC's content creating or editing services.	When using the image upload function of UGC for the first time	Yes
	Camera	To provide UGC's content creating or editing services.	When using the image upload function of UGC for the first time	Yes

Android Access Permissions

Channel	**Permission**	**Purpose**	**Permission Alert?**	**Allow to Revoke?**
Massimo Dutti App	Camera	To scan products or purchase receipts, search products (In-store service)	When using the "Camera" function for specific services	Yes
	Location	To provide store service reservations and for some specific services (such as item finder, reserve a fitting room, etc.) available in some Brick-and-Mortar Stores.	When using the App for the first time; When making store service reservations; or When using	Yes

			the specific services available in Stores	
	Notification	To send information about orders or commercial events.	When using the App for the first time.	Yes
	Microphone and Voice Recognise	To enable the voice-searching functionality	When using the “Microphone” function for specific services	Yes
	External Storage *READ_EXTERNAL_STORAGE* *WRITE_EXTERNAL_STORAGE*	To read images from SDCard	When writing invoices to the SDCard; or When asking for picture search	Yes
	Application List	To read the list of installed applications (Android system internal permission to know which cameras, galleries or common apps has the device installed)	No	No
	Device Sensors	To identify whether you are a real user or to meet information security requirements, orientation sensor, gravity sensor, and accelerometer sensor information is obtained. Please understand that device sensor data alone does not involve any personal location information and cannot be combined with other information to identify a specific natural person.	No	No
	App Push *RECEIVE_BOOT_COMPLETED* *com.baidu.android.pushservice.PushServic*	To receive pushes from Huawei market and/ or Baidu market	No	No

	eReceiver *ACTION_POWER_DISCONNECTED*			
	Writing *WRITE_SETTINGS*	To adjust the screen brightness	No	No
	VIBRATE (if applicable)	To vibrate buttons upon press	No	No
	Network *ACCESS_NETWORK_STATE* *CHANGE_WIFI_STATE* *ACCESS_WIFI_STATE*	To enable the Internet connection and read the connection status	No	No
	Foreground Service *FOREGROUND_SERVICE* *WAKE_LOCK*	To enable Android's foreground service	No	No
Massimo Dutti WeChat Mini Program	Location	To provide store service reservations and for some specific services (such as item finder, reserve a fitting room, etc.) available in some Brick-and-Mortar Stores.	When using the WeChat Mini Program for the first time; When making store service reservations; or When using the specific services available in Stores	Yes
	Album	To provide UGC's content creating or editing services.	When using the image upload function of UGC for the first time	Yes
	Camera	To provide UGC's content creating or editing services.	When using the image upload function of UGC for the	Yes

			first time	

You can choose to turn off some or all the permissions in “Settings” of the device, however, it may cause the corresponding business functions to not be displayed or to achieve the expectations.

4) <u>Other Legitimate Interests</u>

In accordance with the applicable laws, regulations and national standards, in order to pursue public interests and other legitimate interests, we may collect and use your personal information without obtaining your consent under the following circumstances:

(1) It is necessary in order to perform a statutory duty or legal obligation;

(2) It is necessary in order to respond to an unexpected public health incident or, in an emergency, to protect the lives, health or property of natural persons;

(3) It is done in the public interest for purposes such as providing news reports and monitoring public opinion, and the extent of the processing is reasonable;

(4) The personal information has been made public by you or has otherwise been lawfully made public, and we will conduct reasonable processing of your personal information to the extent permissible under applicable laws and regulations; and

(5) Other circumstances provided under laws and regulations.

For instance, we may collect and use your personal information to activate the mechanisms necessary to prevent and detect unauthorised uses of the Platform (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. We understand that the processing of these data is positive for all the parties involved: for you, as it allows us to put in place measures to protect you against attempted fraud perpetrated by third parties; for us, as it allows us to avoid unauthorised uses of the Platform; for all our customers and society, as it also protects their interest by ensuring that fraudulent activities are discouraged and detected when they do occur.

3. HOW LONG WILL WE KEEP YOUR PERSONAL INFORMATION AND WHERE?

The **time for which we will keep** your personal information will depend on the purposes for which we process them, as explained below:

Purpose	Time for which the data are kept
1. To manage your Platform user registration	We will process your personal information for the time during which you remain a registered user (meaning, until you decide to unsubscribe).

Purpose	Time for which the data are kept
2. Development, performance and execution of the purchase or services contract	We will process your personal information for the time necessary to manage the purchase of the products or services that you buy, including potential returns, complaints or claims related to the purchase of the product or service in question. Sometimes, we will only process the data until the time when you decide, as is the case of payment data that you requested us to store for future purchases (where this feature is available).
3. Customer Support	We will process your personal information for the time necessary to meet your request or application.
4. Massimo Dutti Feel program	If you are a Massimo Dutti Feel user, we will process your data until you leave this program (meaning, until you cancel the Massimo Dutti Feel user account, or based on third party platform's rules when cancel the platform's user account which is directly binding with the Massimo Dutti Feel user account).
5. User Generated Content (UGC)	We will process your personal information for the time during which you remain a Massimo Dutti Feel user (meaning, until you decide to unsubscribe) to provide necessary services of User Generated Content (UGC).
6. Marketing	We will process your personal information until you unsubscribe or cancel your subscription to the newsletter. Likewise, we will show you ads until you change your device, browser and/or cookies settings so that permission to do so is revoked. If you participate in promotional actions, we will keep the data during a six (6) months period from the end of the action.
7. Analysis of usability and quality	We will process your personal information occasionally for the time during which we proceed to carry out a specific quality action or survey or until we anonymise your browsing data.

Notwithstanding the fact that we will process your personal information for the time strictly necessary to achieve the purpose in question, we will subsequently keep them duly stored and protected for the time during which liability may arise for their processing, in compliance with applicable laws and regulations. Once each of the potential actions is time-barred we will proceed to delete or anonymize the personal information.

Our Platform is located within People's Republic of China and the personal information you provide through the Platform is stored on severs located in the People's Republic of China. We always strictly follow the applicable regulatory requirements of cross-border data transfer and compliance requirements from monitoring authorities, to process your personal information. If under those data cross border transfer and/or access of your personal information, and where applicable laws and regulations require any additional voluntary and specific consents from you, we commit to seeking additional standalone consents from you at the appropriate time.

4. HOW WE ENTRUST THE PROCESSING, SHARING, TRANSFER AND PUBLIC DISCLOSURE OF YOUR PERSONAL INFORMATION

To achieve the purposes mentioned in this Privacy Policy, we must give access to your personal data to **entities of the Inditex Group** and to **third parties** that provide us with support in the services that we offer you.

1) Entrustment of processing

Certain specific modules or sub-functions of our business are provided by our entrusted service providers external vendors. We will sign strict confidential agreements with the companies, organizations and/or individuals to whom we entrust the processing of PI, which will bind them to processing the PI in accordance with our requirements, this Privacy Policy and other relevant confidentiality and security measures. Such scenarios include but not limited to:

- **financial** institutions (with these entities we may share identification data and economic and transaction data)**,**
- **anti-fraud detection and prevention** entities (with these entities we share identification data, economic and transaction data, and connection, geolocation and/or browsing data),
- **technological and analytical** service providers (with these entities we may share identification data, economic and transaction data, connection, geolocation and/or browsing data, and commercial information),
- providers and partners of services related to **logistic**, **transport** and **delivery** and/or their partner establishments (with these entities we may share identification data and economic and transaction data),
- providers of **customer support** related services (with these entities we may share identification data, economic and transaction data, and commercial information),
- service providers and collaborators related to **marketing and publicity**, such as advertising agencies, advertising partners or social media (with these entities we may share identification data, connection, geolocation and/or browsing data, commercial information and information about your tastes and preferences),
- **legal entities in China, who are parts of Inditex Group** (As a member of Inditex Group, we closely collaborate with our parent company in various aspects including improving management efficiency, customer satisfaction as well as risk management. For the necessary internal management purposes, we may entrust these legal entities to process internal management data).

2) Sharing

- If you experience a security accident at a physical store (e.g. accidental injury), in order to successfully complete the relevant insurance claim process and effectively protect your legitimate rights and interests, we need to provide your name, National ID, bank account number, medical records, and other necessary information to Huatai Insurance Group.
- In case you interact with the Platform via the **App or WeChat Mini Program**, we have installed SDKs of external service providers. To review this information, please refer to the Appendix
- To fulfill your order and ensure successful delivery, we will share the recipient's name, shipping address, mobile phone number, and postal code (optional) with EMS, SF Express, JD Logistics, for delivery purposes.

- To the extent necessary for the following purposes, we will share your information with other third parties: (i) to comply with government requests, court orders, or applicable laws; (ii) to prevent illegal use of our platform or violations of our platform terms of use and our policies; (iii) to defend ourselves against third-party claims; and (iv) to assist in fraud prevention or investigation (e.g. counterfeiting).

As a member of Inditex Group, we closely collaborate with our parent company in various aspects and need to carry out necessary global order and inventory management. As a result, the following overseas entity may receive or remotely access your personal information in accordance with the following terms and conditions:

Foreign recipient:	**INDUSTRIA DE DISEÑO TEXTIL, S.A.(INDITEX, S.A.) (hereinafter, "Inditex")**
Registered address:	Avda. de la Diputación, Edificio Inditex, 15143, Arteixo (A Coruña), Spain
Email of Data Protection Officer:	dataprotection@massimodutti.com
Personal information	Order ID, Products, Product Quantity,Order Amount
Purposes of cross border data transfer	Necessary data transfers to Inditex for global order management and inventory; The operations teams based in the Netherlands are allowed to access the necessary data for providing technical development and e-commerce platform support when necessary.

In such cases, we inform you that we transfer the above-mentioned data with **adequate safeguards and always keep your personal information safe,** using the most convenient international data transfer tools, in accordance with the model contract prepared by regulators**. You may assert and exercise your rights relating to your personal information by contacting the Data Protection Officer via the email address provided above.**

You acknowledge and agree that we may share your personal information with the above-mentioned companies for the purposes stated in this Privacy and Cookies Policy and in accordance with the terms and conditions under this section. Where applicable laws and regulations require any additional voluntary and specific consents from you with respect to the cross-border sharing/access of your personal information, we commit to seeking additional standalone consents from you at the appropriate time.

3) Transfer

We will not transfer your personal information to any other PIP, except in the following cases:

(1) Obtaining your explicit consent in advance;

(2) In accordance with the laws and regulations or mandatory administrative or judicial requirements;

(3) In the case of asset transfer, acquisitions, mergers, reorganization or liquidation, if the transfer of personal information is involved, we will inform you of the situation and require new companies and organizations holding your personal information to continue to be bound by this Privacy Policy. If the purpose of the collection and use of your personal information is changed, we will require the new company and organization to regain your explicit consent.

4) Public Disclosure

In principle we will not disclose your personal information publicly. In the event of public disclosure, we will inform you of the purpose and type of the disclosure, and the sensitive personal information that may be involved and seek your explicit consent prior to such disclosure.

5) In accordance with the applicable laws, regulations and national standards, we may share, transfer or publicly disclose your personal data without obtaining your consent in the following cases:

(1) Directly related to national security and defence security;

(2) Directly related to public safety, public health and major public interests;

(3) Directly related to criminal investigation, prosecution, trial and execution of judgments;

(4) For the maintenance of your or other people's life, property and other important legitimate rights and interests, but it is difficult to get your own consent;

(5) The personal data collected is disclosed to the public by yourself;

(6) The personal data is collected from lawful and publicly disclosed information, such as: legal news reports, government information disclosure and other channels.

5. WHAT ARE YOUR RIGHTS WHEN MAKING YOUR PERSONAL INFORMATION AVAILABLE TO US?

We undertake to keep your personal information confidential and to ensure that you may **exercise your rights**. Bearing that in mind, We have agreed that you may exercise your rights **free of charge** by submitting the **Personal Information Rights Request Form** or writing us an e-mail to **a single e-mail address** (privacy.massimodutti@cn.inditex.com), simply informing us of the reason for your request and the right that you wish to exercise. If we consider this necessary to be able to identify you, we may request you to provide a copy of a document evidencing your identity, and will respond to your requests **within fifteen (15) working days**.

In addition, we may offer you with the possibility to exercise your rights and setting your privacy preferences when using some of our services, or by making available specific channels within our Platform.

In particular, notwithstanding the purpose or legal basis we use to process your personal information, you have the following rights:

- To request **access** to your personal information that we hold. We remind you that where you are a Platform registered user you may also consult this information in the relevant section of your online account.
- To request that we **rectify** the personal information that we hold. Please bear in mind that if you are a registered user on the Platform, you may also access the relevant personal information section of your online account to change or update your personal information. In any case, please take into account that, on actively making your personal information available to us through any procedure, you guarantee that they are **true and accurate,** and you undertake to notify to us any change or modification of your personal information. You will be liable for any loss or damage caused to the Platform or to the person responsible for the Platform or to any third party by reporting erroneous, inaccurate or incomplete information in the registration forms. Please remember that, as a general rule, you must provide us only with your own data, not with those of third parties, other than to the extent otherwise permitted in this Privacy Policy.
- To request that we **delete** your personal information to the extent that they are no longer necessary for the purpose for which we need to keep processing them, as we have explained above, or when we are no longer legally permitted to process them.
- To request us **to limit the processing** of your personal information, implying that in certain cases you may request us to suspend provisionally the processing of the personal information or to keep them longer than the time necessary when you may need this.

- To request us to **withdraw the consent** of your personal information processing activities. However, we may not be able to respond to your requests for information, which is necessary to realize the basic functions of our products and services or is necessary for us to perform our obligations under applicable laws and regulations. Except for such scenarios that we are unable to respond, when you withdraw your consent or authorization, we will no longer process the corresponding personal information. **Please notice, your decision to withdraw your consent or authorization will not affect our previous personal information processing activities based on your consent or authorization.**

- To request that we **cancel your account**, as a consequence of which, we will cease the offering of the goods or services to you and delete or anonymize your personal information according to applicable laws and regulations. You can cancel your account through the following methods:

  (1) Self-cancellation: through Massimo Dutti website or App, “My account – Settings – DELETE ACCOUNT” to complete the cancellation; through Massimo Dutti WeChat Mini Program, “User Settings – User Cancellation” to complete the cancellation.

  (2) Contact us: privacy.massimodutti@cn.inditex.com

- To request that we **transmit** the personal information you have provided to us in a commonly used and machine-readable format to another PIP subject to technical feasibility.

Should you not wish us to send information to third parties to show you ads, you can do it through several means such as changing your preferences on your device changing your preferences on your device, browser and/or cookies settings, reviewing the privacy policies and settings of the social media sites on which you have profiles or sending us an email to the above-mentioned email address informing us of your request.

6. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We are committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorized access, use or disclosure. For example, we store the personal information you provide on computer systems that have limited access and are in controlled facilities. When we transmit highly confidential data (such as card number or password) over the Internet, we protect it through the use of encryption.

In the event of a personal information security incident, we will promptly inform you, as required by applicable laws and regulations, of the basic situation and possible impacts of the security incident, the measures that we have taken or will take, the suggestions you may be able to prevent and mitigate the risks, and the remedies for your actions. We will timely inform you of the event through email, SMS and other channels. If it is difficult to inform the personal information subject individually, we will take a reasonable and effective way to publish the announcement. At the same time, we will take the initiative to report the disposal of information security incidents according to the requirements of local authorities.

Please take good care of your login account and password. When you use our service, we will identify you through your login account and password. Once you have disclosed the foregoing information, you may suffer loss and may have legal consequences that are unfavourable to you. If you find that your login account and/or password may or have been compromised, please contact us immediately so that we can take appropriate measures to avoid or reduce the related loss.

We have established a public user management mechanism, including the tracking procedure. If you have any questions, opinions or suggestions on this Privacy Policy, you may contact us through the postal addresses listed

in the Article 1 of this Privacy Policy. We also set up a full-time personal information protection department (or personal information protection officer) and you may contact by emailing to privacy.massimodutti@cn.inditex.com. For security purpose, we may require you to submit written application or use other methods to prove your identity. In general, after the validation of your identity, we will reply to your request **within fifteen (15) working days** or within the time limit stipulated in the laws and regulations.

If you are not satisfied with our reply, especially our processing of your personal information infringes your rights and interests, you may complain or report to relevant regulatory authorities, or bring a lawsuit before the competent court.

In principle, we won't charge you for your reasonable request. However, we will charge a certain amount of cost for repeated requests that exceed a reasonable limit. We may reject those requests that are duplicative, require excessive technical means (for example, developing new systems or fundamentally changing current practices), pose risks to the legitimate rights and interests of others, or are very unrealistic.

Notwithstanding the above agreement, we may not be able to respond your request in the following cases in accordance with the applicable laws, regulations and national standards:

(1) Directly related to national security and defence security;

(2) Directly related to public safety, public health and major public interests;

(3) Directly related to criminal investigation, prosecution, trial and enforcement of sentences;

(4) There is sufficient evidence that you may maliciously abuse your rights;

(5) Responding to your request will cause serious damage to the lawful rights and interests of other individuals and organizations;

(6) Involving business secrets.

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

We offer functionalities or services that require us to process the personal information of a third party that you, as a user or as a customer, must provide us with, such as in the case of activation and sending of the Gift Card or the management of the application for the Gift Voucher (where these features are available), or when you authorise a third party to collect an order in our stores or partner establishments. If you provide us with personal information 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 information, and that you have obtained their relevant express consent.

If a third party has provided us with your personal information 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 Policy, a link to which is always included in our communications.

8. HOW DO WE PROCESS CHILDREN'S PERSONAL INFORMATION?

Our products, websites and services are mainly adults oriented. A child shall not create his or her own user account without the consent of his or her parents or guardians.

Although the laws in different countries or regions have different definitions for children, we treat anyone under the age of 14 as a child. However, since the birthday is not the necessary information for us to provide basic services or functions, in some cases, we cannot identify the user's age. Therefore, **we ask child under the age of 14 NOT to provide us with your names, contact addresses, mobile phone numbers and/or other personal information by yourselves**. If we find ourselves collecting the child's personal information without prior consent of the parents or guardians, or if we have evidence to prove that you have violated the above agreement, we have the right to stop providing services to you, and we will try to delete the relevant data as soon as possible.

In cases where a child's personal information is collected with the consent of the parents or guardians, we will only use or disclose this information in a case where the law allows, the explicit consent of the parents or guardians has been obtained, or it is necessary to protect the children.

9. CHANGES TO THE PRIVACY POLICY

We may amend the information contained in this Privacy Policy when we consider this appropriate. If we do so, we will notify you by various procedures such as through the Platform (for example, using a banner, a pop-up or a push notification), or we may even send you a notice to your e-mail address when the change in question is relevant to your privacy, for you to be able to review the changes, evaluate them and, as the case may be, object or unsubscribe from any service of functionality. If major and substantive changes are involved, we will notify you in a significant way according to the specific situation. Major and substantial changes include but are not limited to:

1) Significant changes have taken place in our service model. Such as the purpose of processing personal information, the type of personal information processed, the use of personal information, etc;

2) Significant changes have taken place in our ownership structure and organizational structure. Such as the owner change caused by business adjustment, bankruptcy and Merger & Acquisition;

3) The main objects of personal information sharing, transfer or public disclosure have changed;

4) Your rights of personal information processing activities have changed significantly;

5) When the responsible department of personal information protection, contact information and complaint channels change;

6) When the Personal Information Protection Impact Assessment (PIA) report indicates that there is a high risk.

In any case, we suggest you review this Privacy Policy from time to time in case minor changes are made or we make any interactive improvement, taking the opportunity that you will always find it as a permanent point of information on our Website, our App and our WeChat Mini Program.

10. 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. Please read our Cookies Policy to understand with greater detail the cookies and similar devices that we use, their purpose, how to manage your cookies settings, as well as other information of interest.

APPENDIX: SDK INFORMATION

#	SDK NAME	OPERATIVE SYSTEM	FUNCTION/ PURPOSE	PERSONAL INFORMATION COLLECTED	SERVICE PROVIDER	WHY CANNOT BE STOPPED?
1	AdSupport	iOS	Marketing	Device information	Apple	
2	Akamai Bot Manager (Cyberfend)	iOS/ ANDROID	Cybersecurity	Device information, connection and location information	Akamai	It's mandatory for information security protection
3	CardinalMobile	iOS/ ANDROID	Performance or execution of the purchase or services contract	Payment information	CardinalCommerce	
4	ResponsysSDK	iOS	Marketing	Login information and location information	Oracle	
5	Colbenson	iOS	Analytics	Device and browsing information.	Empathy	
6	FitAnalytics_WebWidget	iOS	Better shopping experience	User´s measurements and device information	FitAnalytics	
7	Oracle Core	ANDROID	Marketing	Login information. Device information. Connection, location and browsing information	Oracle	
8	Oracle Push	ANDROID	Marketing	Login information. Device information. Connection, location and browsing information	Oracle	
9	Firebase	iOS	Analytics Cybersecurity	Device information and location information	Google	

10	WeChat	iOS/ ANDROID	Registration process Performance or execution of the purchase or services contract	Login information and payment information	Tencent	
11	AlipaySDK	iOS	Performance or execution of the purchase or services contract	Payment information, device and connection information.	Alibaba Group	
12	Klarna SDK	iOS/ ANDROID	Performance or execution of the purchase or services contract	Payment information	Klarna	
13	Wide Eyes	iOS/ ANDROID	Better shopping experience	Device information	Wide Eyes Technologies	
14	Baidu Push	ANDROID	Used to receive personalized messages or notifications	Device information, connection information, and location information	Baidu	
15	Baidu Map	ANDROID/ WEB	Better shopping experience (location)	Precise location information	Baidu	
16	Baidu Positioning SDK	ANDROID	Better shopping experience (location)	Precise location information	Baidu	
17	Baidu LBS SDK	ANDROID	Better shopping experience (location)	Precise location information	Baidu	
18	kotlin.coroutines	ANDROID	Asynchronous programming	Installed APP information	Jetbrains	If disabled, the codes cannot be executed correctly
19	Facebook SDK	iOS/ ANDROID	Analytics Social media account login	Login information, device information, and network information	Meta Platform Inc	
20	Trackingplan	iOS/ ANDROID/ WEB	Analytics	Device information, connection information, location information, and browsing information	Trackingplan	
21	Amap	iOS	Better shopping experience (location)	Precise location information	AutoNavi	

22	AppsFlyer	iOS	Marketing	Login information, device information, and network information	AppsFlyer Ltd.	
23	TTTAttributedLabel	iOS	Better shopping experience	Device information	Open source framework	If disabled, the codes cannot be executed correctly
24	ZBar	iOS	Bar code scanning	Device information	Open source framework	
25	Glide Image Loading	ANDROID	App development management	Device information	Open source framework	If disabled, the codes cannot be executed correctly