

Privacy Policy for Be Swarovski

SWAROVSKI attaches great importance to the protection of personal data and collects, processes and uses any personal data solely in accordance with the principles described below and in compliance with the applicable data protection provisions. Personal data is all information relating to an identified or identifiable natural person, which includes, for example, your name as well as your postal and e-mail addresses.

1. Data controller for the operation of Be Swarovski

Swarovski Australia Pty. Ltd., 1/4D Huntley Street, Alexandria NSW 2015, Australia (“SWAROVSKI”) operates the customer programme, Be Swarovski, (“Be Swarovski”) and collects, processes and uses personal data of members of the Be Swarovski customer programme (“Members”) solely for the implementation of this programme. The information will be shared with other companies of the Swarovski Group of companies and certain third parties as described in this Privacy Policy.

2. Data collection in connection with Be Swarovski

For the operation of Be Swarovski, SWAROVSKI collects and saves the following personal data in a central customer database:

2.1 Customer data from the application form

SWAROVSKI collects and saves the obligatory data provided on the Be Swarovski application form (including but not limited to: title, name and address, and e-mail address) plus any data provided voluntarily by Be Swarovski Members on the application form: date of birth as well as interest in Jewellery and Accessories, Home and Style, Wedding, Figures and Collectables and/or Watches (“Form Data”).

2.2 Purchase history and vouchers

In Be Swarovski, SWAROVSKI also saves data on Members’ purchase history in the form of items purchased (product designation, price, discount), place and time of purchase and membership number.

The purchase history is recorded if the Be Swarovski membership number is communicated at the checkout for purchases in stores participating in Be Swarovski. The participating stores in Be Swarovski comprise stores operated by SWAROVSKI itself, with the exception of outlet stores and some concession stores. Certain mono-brand stores operated by SWAROVSKI sales partners and other authorized specialist dealers as well as the online store based in Switzerland also participate in Be Swarovski.

In the online store Members' purchase history is recorded if the membership number is quoted when making a purchase or the Member makes a purchase when logged into an online account associated with a Be Swarovski membership.

At the start of their membership, Members receive an e-mail containing a link to an overview of all currently participating stores in Be Swarovski. This overview of participating stores is also available to view online at swarovski.com/beswarovski.

SWAROVSKI also collects and saves all vouchers sent to the Be Swarovski member.

3. Use of collected data

The data stated under Section 2 is used by SWAROVSKI for the following purposes:

3.1 Personal advice

In participating stores, Be Swarovski allows Members to take advantage of an extended customer advice in which, upon presentation of the membership number, the store employee can call up the Member's purchase history data and provide the Member with additional sales advice based on his or her past purchases.

On presentation of the Be Swarovski membership number or of an official ID document together with the Member's name and date of birth (or another unique authentication attribute), the relevant store employee has access to the relevant Member's saved purchase history data.

3.2 Invitation to special events and promotions

SWAROVSKI may also use the data saved in the Be Swarovski customer database to invite selected Members to special events and promotions, such as the presentation of new products or discount promotions. In addition, SWAROVSKI also uses the data saved in the customer database to send Members birthday congratulations.

3.3 Evaluation of voucher offers

SWAROVSKI also uses the data collected in the purchase history to grant Members membership benefits in the form of Discount or Loyalty Gift vouchers. Based on the data saved in the purchase history, SWAROVSKI evaluates what type of voucher the Member is granted.

3.4 Personalized product information and exclusive offers

If a Member has given SWAROVSKI his or her consent, SWAROVSKI may send the Member further information about SWAROVSKI, product information, services and exclusive offers by e-mail or in any other way chosen by SWAROVSKI. Based on the Form Data and the purchase history reported by participating stores as well as other information voluntarily disclosed to SWAROVSKI by the Be Swarovski Member, SWAROVSKI may personalize the information sent to the Member so that the Member particularly receives, where possible, information which SWAROVSKI seems interesting for the Member. For this purpose, SWAROVSKI analyses the Form Data collected at the start of membership and, in particular, takes account of the saved information relating to age, sex, interests and preferences, as well as the vouchers received, and other information that can be gleaned from the purchase history or has been given to SWAROVSKI by the Member voluntarily at any later time.

4. Data Processing

The central customer database in which all data described in Section 2 is saved, is operated by a company associated with SWAROVSKI, D. Swarovski KG, Swarovski Straße 30, 6112 Wattens, Austria. SWAROVSKI is the controller under data protection law and ensures compliance with the provisions of data protection law and the requisite security measures in the context of contract data processing.

The member acknowledges that all data of the Member given to SWAROVSKI may be shared throughout the Swarovski Group of companies, namely Daniel Swarovski Corporation AG, Alte Landstrasse 411, 8708 Männedorf, Switzerland, Swarovski AG, Dröschstrasse 15, 9495 Triesen, Principality of Liechtenstein, Swarovski Crystal Online AG, Alte Landstrasse 411, 8708 Männedorf as well as the respective distribution companies in the countries, the Be Swarovski Loyalty program is running.

SWAROVSKI may also disclose the personal Data of a Be Swarovski Member to all participating stores, whether operated by Swarovski or any sales partner or other authorized specialist dealer, in all countries Be Swarovski is running.

SWAROVSKI may disclose personal data of the Be Swarovski member to other third parties that operate the personal data on behalf of and in accordance with SWAROVSKI's instructions (commissioned data processing).

SWAROVSKI guarantees the protection and correct handling of all personal Data of the Be Swarovski Member and only discloses the personal Data for the purpose of running the Be Swarovski Loyalty program and for the purpose of a seamless and better service of the Be Swarovski Member.

The Member acknowledges in addition that Swarovski may merge or enrich any of the members personal data given in the past or the future to SWAROVSKI or any other of the Swarovski Group Companies in order to service the Be Swarovski Member better.

5. Information on your rights

5.1 Information, correction and deletion of data

Members are entitled at any time to demand information from SWAROVSKI relating to their saved personal data, the recipients or categories of recipients receiving their data, and the purpose for which the data is saved and can do so by contacting Swarovski Australia Pty. Ltd., 1/4D Huntley Street, Alexandria NSW 2015, Australia or customer_relations.au@swarovski.com. In addition, Members may contact SWAROVSKI at any time as stated above in order to update, correct, complete or delete their saved personal data.

5.2 Right of revocation

Insofar as the Members participating in Be Swarovski have given their consent for their data to be used for advertising purposes, they may revoke this consent with future effect at any time and free of charge by contacting customer_relations.au@swarovski.com.

AUSTRALIA GENERAL PRIVACY POLICY

This Australia General Privacy Policy (**Privacy Policy**) applies to all personal information collected by Swarovski Australia Pty Ltd (ACN 000 679 416) and its related bodies corporate ("Swarovski"), including without limitation, by way of the Website, and explains how we handle personal information and comply with the requirements of applicable privacy laws.

This Privacy Policy applies in addition to (where applicable) the privacy policies specific to the Swarovski Crystal Society ("SCS") or Be Swarovski programs,

If there is any inconsistency between any of the provisions in this Privacy Policy and the provisions of the privacy policies specific to the SCS or Be Swarovski programs respectively, the provisions of this Privacy Policy shall prevail.

Collecting your personal information

We collect personal information from customers (existing and prospective), suppliers, contractors, prospective employees, and consumers and other individuals for various business and other purposes further listed below. In this section, we explain the types of personal information which we usually collect as well as how we collect this information.

The type of information Swarovski may collect from you will depend on the circumstances in which that information is collected. It may include, for example, your contact details (such as name, email address, address, phone number), date of birth, gender and where necessary to effect a purchase, layby, return or similar transaction, your credit card or banking details.

In particular, Swarovski may collect personal information:

- when you contact us or our retailers with queries or issues;
- when you participate in our promotions or competitions;
- when you fill in questionnaires, surveys or contact forms;

- when you register or provide your details with or to us or our retailers;
- when you submit information through our Website, such as when you set up a user account, retrieve log-in information, make online orders or purchases or enter into other online transactions;
- join the SCS, Be Swarovski (or similar membership groups); or
- when you use the Website, in which case our system may automatically collect information relating to your visit to that Website, such as your IP address.

If you do not provide Swarovski with all requested personal information, we may be unable to assist you or provide you with our products and/or services, you may not be able to participate in our promotions or competitions or you may be unable to join the SCS, Be Swarovski (or similar membership groups).

Where practicable, we will collect personal information directly from you. If we receive information about you from someone else (for example from someone who supplies goods or services to us), we will take reasonable steps to ensure you are aware that we have collected personal information about you and the circumstances of the collection.

Our use of cookies

Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes. Most web browsers are set to accept cookies. Swarovski uses cookies to make your use of the Website, resources and services as convenient as possible. Cookies in and of themselves do not personally identify users, although they do identify a user's browser. Cookies are useful to estimate our number of users and determine overall traffic patterns through the Website.

If you do not wish to receive any cookies, you may set your browser to refuse cookies, but this may mean you will not be able to take full advantage of the services and resources on our Website.

Use and disclosure of your personal information

We will only use and disclose your personal information in accordance with applicable privacy laws, this Privacy Policy and (where applicable) the privacy policies specific to the SCS or Be Swarovski programs (collectively, our "Privacy Policies").

Our main purposes in collecting, holding, using and disclosing information about you are to:

- provide you with our products and/or services (including repairs and returns);

- respond to queries from existing and prospective customers seeking information about our products or services;
- communicate with, existing and prospective customers, about our products and services;
- conduct promotions and competitions;
- conduct market research;
- process and assess employment applications;
- enforce agreements between you and us;
- keep you informed about our activities, products and services;
- allow you to join and participate in the SCS, Be Swarovski and other similar Swarovski-related memberships;
- comply with legislative and our policy requirements including in relation to occupational health and safety and environmental matters;
- operate our business efficiently; and
- improve our products and services.

We note that Swarovski may also use aggregated, anonymous data about its customers and/or website users as a group, for Swarovski's business purposes.

In carrying out our business, it may be necessary to share information about you with and between our related bodies corporate, our retailers and organizations that provide services to us. We would not otherwise routinely disclose personal information to another organization unless:

- the use or disclosure is for one of the purposes described in or otherwise permitted by our Privacy Policies;
- the use or disclosure is required or permitted by law;
- we believe it necessary to provide you with products or services which you have requested;
- we believe it necessary to protect the rights, property or personal safety of another person or Swarovski; or
- the assets and operations of Swarovski's business are transferred to a third party.

Retailers and service providers

Like most large organizations, we use a range of retailers to sell and service our products and service providers to help us maximize the quality and efficiency of our services and our business operations. This means that individuals and organizations outside of our organization, such as third party retailers of Swarovski products, third

parties that operate the personal data on behalf of and in accordance with Swarovski's instructions (commissioned data processing) and third parties which Swarovski commissions for repairs of our products, will sometimes have access to personal information held by us and may use it on behalf of us. We require our service providers to adhere to strict privacy guidelines and not to use the information for any unauthorized purposes.

Using your personal information for marketing

We may use personal information you have provided to us, including your email address, to provide you with information in relation to new or updated products or services or special offers, promotions or competitions in which you may be interested. We will only do so in accordance with applicable laws or with your prior consent.

If at any time you do not wish to receive such information from us, you may ask us to remove your name from our list by contacting us using our contact details below. Alternatively, if we send you such information by email, you can use the unsubscribe function in the email to inform us that you do not wish to receive such information from us by email. In either case, please allow 5 business days for your request to be processed.

Disclosing your personal information overseas

The central customer database, in which all data described in the Privacy Policy is saved, is operated on behalf of and in accordance with Swarovski's instructions by our related body corporate, D. Swarovski KG, Swarovski strasse 30, 6112 Wattens, Austria. Swarovski ensures compliance with Australia's privacy laws.

In order to deliver products and services to you and to improve our products and services, we may sometimes disclose your personal information to another company within or related to the Swarovski group (including but not limited to those located in Switzerland, the United States, Liechtenstein and Austria), affiliates and service providers.

The privacy laws of those countries may not provide the same level of protection as the privacy of the country from which the personal information was collected. However, this does not change our commitment to safeguard your privacy and we will comply with all applicable laws relating to cross-border data disclosure.

Swarovski will not otherwise use or disclose any information about you without your consent, unless:

- the use or disclosure is for one of the purposes described in or otherwise permitted by our Privacy Policies;

- the use or disclosure is required or permitted by law;
- we believe it necessary to provide you with products or services which you have requested;
- we believe it necessary to protect the rights, property or personal safety of another person or Swarovski; or
- the assets and operations of Swarovski's business are transferred to a third party.

Access and accuracy

Upon request, we will provide you with access to personal information that Swarovski holds about you, except in the limited circumstances in which it is permitted for us to withhold this information. To request access to your personal information, please contact us using our contact information below.

If at any time you wish to change personal information that is inaccurate, out of date or incomplete, or you wish to have it deleted, please contact us using our contact information below and we will amend your record.

If you wish to have your personal information deleted, please let us know in the same manner as referred to above and we will take all reasonable steps to delete it unless we need to keep it for legal, auditing or internal risk reasons.

Storage and security of your personal information

Swarovski will endeavor to take all reasonable steps to keep secure any information which we hold about you, and to keep this information accurate and up to date. When we no longer need to use your information, we will take steps to properly de-identify or destroy it.

Unfortunately, however, no data transmission over the internet can be guaranteed secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us through our Website and you use our Website at your own risk.

Your personal information is stored on secure servers that are protected in controlled facilities. We require our employees and data processors to respect the confidentiality of any personal information held by Swarovski.

Username and passwords

You can play an important role in keeping your personal information secure by maintaining the confidentiality of any password and accounts used on our Website. Please notify Swarovski immediately if there is any unauthorized use of your account by any other Internet user or any other breach of security.

You are responsible for the security of your user name and password (or other log-in information) and you take responsibility to ensure the confidentiality of this information.

Links to other websites

Swarovski provides access to third party websites through our Website. These linked websites are not under the control of Swarovski, and we are not responsible for the content or the conduct of the organization accessed via a link on our Website. Before disclosing your personal information on any website, we suggest you examine the terms and conditions and privacy policy of that website.

What to do if you have a problem, question or complaint

If you have any further queries relating to our Privacy Policies, or you have a problem or complaint, please contact us at:

Contact person: Customer Relations

Email: customer_relations.au@swarovski.com

Phone number: 1800 795 299

Address: 1/4D Huntley Street, Alexandria, NSW 2015, Australia

In most cases we will ask that you put your request in writing to us. We will investigate your complaint and will use reasonable endeavors to respond to you in writing within 30 days of receiving the written complaint. If we fail to respond to your complaint within 30 days of receiving it in writing or if you are dissatisfied with the response that you receive from us, you may have the right to make a complaint to the Commonwealth Office of the Information Commissioner.

Future changes

From time to time, Swarovski's policies will be reviewed and may be revised. Whilst Swarovski seeks to minimize changes to its policies, Swarovski reserves the right to change our Privacy Policies at any time by posting an updated version on our Website. Please therefore keep checking these policies to ensure you are aware of the current terms. If at any point Swarovski decides to use personal information in a manner materially different from that stated at the time it was collected we will notify you by email or via a prominent notice on our Website, and where necessary we will seek your prior consent.