

PRIVACY & COOKIES

Last modified on July 25, 2018.

This Data Privacy Notice describes the collection and further processing of personal data by companies of the Swarovski Kristal Tic. Ltd. Sirketi, İpekçi Cad. No:57 Reasürans Han E Blok Kat:5, TR-34367 Istanbul, Turkey (hereinafter referred to as "**Swarovski TR**"). The term personal data shall include all information relating to an identified or identifiable person.

This Data Privacy Notice describes in Section I processing of personal data by SWAROVSKI TR in general. Section II contains specific provisions for specific applications (e.g. online-shop, newsletter and banner advertisement).

If you provide SWAROVSKI TR with personal data of other persons, for example data about the receiver of a gift, please provide their personal data to SWAROVSKI TR only if you are allowed to do so pursuant to applicable data protection laws and only if the other person would agree to you providing its personal data to SWAROVSKI TR for the purposes the data are collected and the processing of its personal data according to our data privacy notice.

I. GENERAL PROVISIONS

1. DEFINITIONS

For the definitions and terms used in this Data Privacy Notice, meanings defined in the Law numbered 6698 on Protection of Personal Data and secondary legislations enacted within this scope. In this context:

- **Explicit Consent:** Consent that has been explained with the free will and depends upon informing, with respect to a certain subject,
- **Relevant Person:** Individual person whose personal data are processed.
- **Personal Data:** Any information on an individual person whose identity is or can be defined,
- **Processing of Personal Data:** Any kind of process effectuated on data such as obtainment, registration, saving, protection, changing, rearrangement, explaining, transmission, transferring, making obtainable, classification or prevention of usage of the personal data, through fully or partially automatic methods or otherwise non-automatic methods on condition of being part of a registration system,
- **Data Processor:** Depending on the authorization granted by the data responsible, real or legal person who process the personal data, on behalf of the data controller,
- **Data Controller:** Individual or legal person who determines the purposes and methods of processing of personal data, and is responsible for the establishment and management of data recording system.

2. CONTROLLER

Every website (including online-shops and mini sites for special offers), every presence on social media, multimedia portals, chatbots and every application of SWAROVSKI TR (each a WEBSITE) has a controller within SWAROVSKI TR with

respect to collecting personal data according to the Law on Protection of Personal Data Numbered 6698 („KVKK“).

The respective subsidiary or affiliate is the controller in the event SWAROVSKI TR communicates through other means of communication (such as email, letter, telephone, in person) and the communication does not fall within an activity for which SWAROVSKI TR has appointed a specific controller within this Data Protection Notice or otherwise.

Should SWAROVSKI TR or any affiliate of SWAROVSKI TR disclose personal data to another SWAROVSKI GROUP¹ of company or affiliate(s) for certain purposes of the receiving company or affiliate, such company or affiliate is the controller. A list of the relevant companies and affiliates of SWAROVSKI can be found in ANNEX 1, which may be updated from time to time.

We will handle all exercise of your Data Subject rights in accordance with the requirements of the applicable privacy regulation. If you have any inquiry, claim or concern regarding data protection at SWAROVSKI TR, please contact us in writing or electronically at our E-mail addresses detailed below or to dataprivacy@swarovski.com with the subject line “Personal Data Information Request”.

3. PROCESSING OF PERSONAL DATA

SWAROVSKI TR collects and processes personal data of

- users of SWAROVSKI TR registered WEBSITES;
- users registered with a SWAROVSKI TR WEBSITE (e.g. if he or she creates a user account);
- individuals purchasing and receiving/benefitting from products and services of SWAROVSKI TR;
- potential or actual parties interested in products and services of SWAROVSKI TR;
- recipients of SWAROVSKI TR newsletters;
- participants in research campaigns and opinion surveys conducted by SWAROVSKI TR;
- participants in courses, seminars and other trainings organized by SWAROVSKI TR;
- users of WIFI provided at SWAROVSKI TR stores and other locations;
- registered participants of customer loyalty programs or individuals purchasing or using customer loyalty programs of SWAROVSKI TR (CUSTOMER PROGRAM)

(together CUSTOMERS).

The personal data of CUSTOMERS is generally collected directly by SWAROVSKI TR during the course of using the WEBSITE, as well as in stores or at events of SWAROVSKI TR as well as through direct communication such as email,

¹ It has been determined on the Annex-1 (List of SWAROVSKI Legal entities).

telephone or in any other way. Personal data can also be collected indirectly, such as through third party processors, (e.g., SWAROVSKI TR's PARTNERS (as defined further below, including wholesalers, dealers, retailers, suppliers and further business partners such as customer services vendors). SWAROVSKI TR also collects data when the CUSTOMER making the purchase does not correspond with the person benefitting from the purchase or if the purchase is shipped to a different person (e.g. as a gift), based on the recommendation of a third party (e.g. recommendation by family or friends of the CUSTOMER) or through further acquisition of supplementary information from third party data sources (e.g. social media).

In particular, the following categories of personal data are processed by SWAROVSKI TR:

- **Personal data and contact information** including but not limited to first and last name, maiden name, address, residence, telephone number, email address, age, date of birth, gender, relatives, contact in case of emergency;
- **Data pertaining to orders and purchases** including but not limited to payment information, credit card details and other payment details (in accordance with other laws and regulations), billing and shipping address, products and services ordered and purchased, information and queries and complaints relating to products and services, or respective contracts entered into such as warranty claims, after sales services, repairs, customer care and services, rescissions and disputes;
- **Data in connection with product and services marketing** including but not limited to information relating to newsletter and other communication channels, opt-ins and opt-outs, invitations to and participations at events and special activities (as far as they are not part of a customer loyalty program), personal preferences and interests, and customer segmentation information;
- **Data concerning the use of the WEBSITE** including but not limited to the IP address and other user identification (e.g. user name of social media, MAC address of smartphones or computers, cookies), date and time of WEBSITE visits, visited sites and contents, and referring websites;
- **Data in connection with communication** including but not limited to preferred means of communication, correspondence and communication with SWAROVSKI TR (including records of the communication);
- **Data which was collected in connection with a customer program** including but not limited to membership numbers, access codes (including passwords), preferred language, number of gift certificate, date and duration of the membership, payment information of the CUSTOMER or a potential third party, information concerning the recipient of a gift, number of visits of the WEBSITE, purchase history, products acquired (all WEBSITE accounts, activities and events for which a CUSTOMER must register with his or her personal data and thus enter into a contract with SWAROVSKI TR shall be deemed a customer program for the purposes of this policy, other than traditional customer loyalty programs);

together **CUSTOMER DATA**.

In addition, SWAROVSKI collects:

- **Data of users of the WEBSITE**, who do not register with SWAROVSKI TR (VISITOR) but may constitute personal data for example with social media (**VISITOR DATA**), the provisions of this notice regarding data collected from a CUSTOMER in connection with the use of the WEBSITE shall apply accordingly even though the identification of a VISITOR usually is not possible for SWAROVSKI TR;
- **Information pertaining to employees and other individuals acting on the part of wholesalers, dealers, retailers, suppliers and further business partners of SWAROVSKI TR** (hereinafter natural persons shall be referred to as PARTNERS, their data as **PARTNER DATA**) including but not limited to contact details, information regarding their function, information relating to the previous contact with these individuals, data regarding marketing activities (e.g. receipt of newsletters), information regarding business transactions, requests, offers, tenders, conditions and contracts, information related to professional or other interests of the individuals.

Within the framework of their business relationship, CUSTOMERS will be required to provide CUSTOMER DATA necessary for the establishment and execution of the contractual relationship and the fulfilment of the associated contractual obligations or if required by law. Without these data, SWAROVSKI TR will generally not be able to conclude or execute the contract with the respective CUSTOMER. This also applies analogously to the PARTNER DATA as far as business relations with the wholesalers, dealers, retailers, suppliers and business partners of SWAROVSKI TR are concerned; contracts in principle cannot be concluded and processed without information on their employees and other contacts. As any access to the WEBSITE is logged, connection data (such as the IP address) will always be logged; this is done automatically during the use and cannot be deactivated for individual VISITORS, CUSTOMERS or PARTNERS.

4. PURPOSE OF PROCESSING AND LEGAL GROUNDS

4.1. PURPOSE of the processing

In accordance with applicable law, SWAROVSKI TR may process **CUSTOMER DATA** for all lawful PURPOSES including but not limited to the following:

- In connection with services offered, conclusions of contracts (for example purchases), executions of contracts (for example purchase contracts and contracts regarding the participation at customer programs and events), maintenance and development of customer relations, communication, customer service and support, promotions, advertisement and marketing (including newsletters and mailing of promotional materials);
- Management of the users of the WEBSITE and other activities in which CUSTOMERS participate, operation and enhancement of the WEBSITE (including the provision of functions which require identifiers or other personal data) and additional IT systems and identity verifications;
- protection of CUSTOMERS, employees and other individuals and protection of data, secrets and assets of and entrusted to SWAROVSKI TR, and the

protection of the safety of systems and premises of SWAROVSKI;

- compliance with legal and regulatory requirements, including the internal rules of SWAROVSKI TR, enforcement and exploitation of legal rights and claims, defense against legal claims, litigation, complaints, combating abusive conduct, engaging in legal investigations and proceedings and responding to inquiries of public authorities;
- sale or acquisitions of business divisions, companies or parts of companies and other corporate transactions and the transfer of CUSTOMER DATA associated therewith; and
- for other lawful purposes where such processing was evident from the circumstances or indicated at the time of the collection.

(together the PURPOSE OF CUSTOMER DATA PROCESSING).

4.2. LEGAL GROUNDS of processing

SWAROVSKI uses the **CUSTOMER DATA** for the PURPOSE OF CUSTOMER DATA PROCESSING based on the following LEGAL GROUNDS:

- performance of contracts;
- compliance with legal obligations of SWAROVSKI TR;
- consent of the CUSTOMER (only insofar as the processing is based on a specific query and can be withdrawn at any time, for example the receipt of newsletters for which the CUSTOMER has registered for);

legitimate interests of SWAROVSKI, including but not limited to

- o purchase and shipment of products and services, also in connection with individuals who are not direct contractual partners (such as e.g. individuals receiving a gift);
- o advertising and marketing activities;
- o efficient and effective customer support, maintenance of contact and other communication with CUSTOMERS outside of the processing of contracts;
- o understanding CUSTOMER behavior, activities, concerns and needs, market studies;
- o efficient and effective improvement of existing products and services and development of new products and services;
- o efficient and effective protection of CUSTOMERS, employees and other individuals as well as protection of data, secrets and assets of or entrusted to SWAROVSKI TR, protection and safety of systems and premises of SWAROVSKI TR;
- o maintenance and secure, efficient and effective organization of business operations including a secure, efficient and effective operation and successful further development of the WEBSITES and other IT systems;
- o reasonable corporate governance and development;
- o successful sale and acquisition of business units, companies or parts of companies and other corporate transactions;
- o compliance with legal and regulatory requirements and internal rules of SWAROVSKI;
- o concerns regarding the prevention of fraud, offences and crimes as well as investigation in connection with such offences and other improper conduct,

handling of claims and actions against SWAROVSKI TR, cooperation in legal proceedings and with public authorities as well as the prosecution, exercise of and defense against legal actions.

In accordance with applicable data protection laws, SWAROVSKI TR may process **VISITOR DATA** for the purpose of maintaining and developing the WEBSITE (including the provision of functions which require identifiers or other personal data), for statistical analysis regarding the use of the WEBSITE as well as for combating abusive conduct, for purposes of legal investigations or proceedings and for the response to inquiries of public authorities. The VISITOR DATA shall be processed in accordance with the principles set out for CUSTOMER DATA above.

In accordance with applicable data protection laws, SWAROVSKI TR may process **PARTNER DATA** for the purpose of entering into and performance of contracts and other business relationships with PARTNERS, promotions, advertisement and marketing, communication, invitation to events and participation in promotions for PARTNERS, organization of joint activities, compliance with legal and regulatory requirements and internal rules of SWAROVSKI TR, enforcement and exploitation of legal rights and claims, defense against legal claims, litigation, complaints, combating abusive conduct, engaging in legal investigations and proceedings and responding to inquiries of public authorities, for the sale or acquisition of business units, companies or parts of companies and other corporate transaction and related transfers of PARTNER DATA. The PARTNER DATA shall be processed in accordance with the principles set out for CUSTOMER DATA above.

All the purposes of processing shall be applicable for the whole SWAROVSKI Group, i.e. not only for the company which initially collected the personal data. Personal data of CUSTOMERS, VISITORS and PARTNERS is collected for the purpose of all SWAROVSKI companies subject to this data privacy notice, any other policies developed by SWAROVSKI and pursuant to applicable data protection laws.

5. TRANSFER AND DISCLOSURE OF DATA

In order for SWAROVSKI TR to be able to fulfil its obligations arising out of respective legislations including but not limited with Code of Obligation, Commercial Code, Procedural Code of Tax, Law on Identity Declaration, Law on Protection of Personal Data your personal data may be transferred to the third parties, in accordance with conditions stipulated in Article 8 and 9 of the KVKK, within the framework of applicable statutory restrictions.

In accordance with applicable data protection laws, SWAROVSKI TR may transfer CUSTOMER DATA, VISITOR DATA and PARTNER DATA to the following categories of third parties who process PERSONAL DATA in accordance with the PURPOSE OF DATA PROCESSING on behalf of SWAROVSKI TR or for their own purposes:

- service providers (within SWAROVSKI as well as external), including processors;

- wholesalers, dealers, retailers, suppliers and other business partners;
- customers of SWAROVSKI TR;
- local, national and foreign authorities;
- media;
- the public including visitors of WEBSITES and social media of SWAROVSKI TR;
- industry organizations, associations, organizations and other committees;
- acquirers or parties interested in acquiring business units, companies or other parts of SWAROVSKI TR;
- other parties in potential or actual legal proceedings;
- other Group companies of SWAROVSKI TR.

(Together THIRD PARTIES).

SWAROVSKI TR may disclose CUSTOMER DATA, VISITOR DATA and PARTNER DATA within the SWAROVSKI GROUP COMPANIES as well as to THIRD PARTIES and in every country worldwide in accordance with the conditions mentioned in Article 8 and 9 of the KVKK and/or by obtaining your explicit consent when an explicit consent is required, including namely all countries in which SWAROVSKI is represented by Group companies, affiliates or other offices and representatives (see ANNEX 1, as updated from time to time) as well as to countries in which service providers of SWAROVSKI process their data (see ANNEX 2, as updated from time to time). If data is disclosed to countries that do not guarantee adequate protection, SWAROVSKI will ensure adequate protection of data disclosed of CUSTOMERS, VISITORS or PARTNERS by putting adequate contractual guarantees in place, binding corporate rules, on the basis of the KVKK for transfers to THIRD PARTIES, or transferring data pursuant to consent, conclusion or performance of a contract, or in connection with the determination, exercise or enforcement of legal claims, or pursuant to overriding public interests, or in order to protect the integrity of these individuals. The CUSTOMER, VISITOR or PARTNER can obtain a copy of the contractual guarantees from or will be advised where to obtain such copies by the contact points named above (see para. 1 above). SWAROVSKI TR reserves the right to redact such copies for applicable legal or secrecy reasons.

Transferring of your personal data to other SWAWROVSKI entities abroad can only be made on upon the condition that you provide your explicit consent or if there is no such as an explicit consent, only within the framework provided by the law, provided that there is adequate protection as per the decision of the respective authority for Personal Data Protection in the country where the data are transferred to, if there is no adequate protection, provided that SWAROVSKI TR and the Data Controller in the relevant foreign country together undertake in a written form, to procure the adequate protection and the respective authority gives the permission in this regard.

6. RETENTION OF DATA

In general, SWAROVSKI TR retains personal data for no longer than it is necessary for the purposes for which the personal data are processed. Notwithstanding the general principle, SWAROVSKI TR may process personal data for longer periods subject to the following rules and obligations: SWAROVSKI TR retains personal data as long as SWAROVSKI TR (i) is obligated to do so (by way of contract, law or other provisions) or (ii) has an overriding interest (e.g. an interest for reasons of proof in case of claims, documentation of compliance with certain legal or other requirements, an interest in non-personalized analysis). Deviating rules are reserved with respect to anonymization or pseudonymization of personal data subject to applicable law.

As a rule for contract related CUSTOMER DATA and PARTNER DATA (including business records and communication) SWAROVSKI TR retains personal data as long as the contractual relation is ongoing and for ten years after the termination of the contractual relationship unless (i) a shorter or longer statutory storage obligation is applicable on a case-by-case basis, (ii) the retention is required for reasons of proof or another valid reason based on applicable law, or (iii) the deletion of the data is required earlier (because e.g. the data is no longer required or SWAROVSKI is required to delete the respective data).

As a rule for operational data containing CUSTOMER DATA, VISITOR DATA or PARTNER DATA (e.g. protocols, logs), SWAROVSKI TR retains personal data for a period of 6 months.

7. COOKIES, GOOGLE ANALYTICS AND SOCIAL PLUG-INS

SWAROVSKI TR uses cookies on its WEBSITE. Cookies are a widespread technique that allocates an identification to the browser of the user of a WEBSITE which the user saves and shows upon request. On the one hand, SWAROVSKI uses session cookies which are automatically erased when the user closes the WEBSITE and which enable the server to establish a stable connection to the user (so that the content of a shopping basket is not lost, for example) as long as he or she browses on the WEBSITE. On the other hand, SWAROVSKI TR also uses permanent cookies which are only erased after a period defined per WEBSITE. Permanent cookies allow the saving of certain settings (e.g. language) for several sessions or allow for an automated log-in. The user consents to the application of permanent cookies through the use of the WEBSITE and the respective functions (e.g. language settings and automated log-in). The user may block or delete the application of cookies on his or her browser but this activity may impair the use of the WEBSITE.

In accordance with applicable law, SWAROVSKI TR may install coding in newsletters and other marketing email which allow it to determine if the recipient has opened an email or downloaded pictures contained in the email. However, the recipient may block this application in his/her email application. In any case he/she consents to the application of this technology by way of receiving newsletters or other marketing related emails.

In the event that SWAROVSKI TR places advertisements of third parties on the WEBSITE (e.g. banners) or places an own ad on the website of a third party,

cookies from companies specializing in the use of such advertisement may be employed. SWAROVSKI TR will not disclose personal data to such companies, i.e. they shall only place a permanent cookie with users of the WEBSITE in order to recognize users and do so in the sole interest of SWAROVSKI TR. This allows SWAROVSKI TR to place aimed advertisements for these individuals on external third party websites (e.g. in connection with products for which these individuals showed an interest in the online-shop). SWAROVSKI TR will not disclose personal data to the operators of external websites.

SWAROVSKI TR may use Google Analytics or similar services on its WEBSITE. These applications are third party services which allow SWAROVSKI to measure and analyze the use of its WEBSITE. The provider of these services may be located in any country worldwide (in the case of Google Analytics which is operated by Google Inc. it is the U.S., www.google.com). The service provider uses permanent cookies for these applications. SWAROVSKI TR will not disclose any personal data to the service provider (who will also not save any IP addresses). The service provider may, however, monitor the use of the WEBSITE by the user and combine this data with data from other websites monitored by the same service provider which the user has visited and the service provider may use these findings for its own benefits (e.g. control of advertisement). The service provider knows the identity of the user who has registered with the service provider. In this case the processing of personal data will be the service provider's responsibility and data shall be processed pursuant to data protection and privacy laws and according to the data protection policies of the service provider (for Google see policies.google.com/privacy). The service provider will provide data on the use of the WEBSITE to SWAROVSKI TR.

In addition, SWAROVSKI TR may use plug-ins from social media networks such as Facebook, Twitter, Youtube, Google+, Pinterest or Instagram on its WEBSITE. In the default setting of the WEBSITE plug-ins are deactivated; the user can thus choose when to activate them. Should the user do so, the social media providers are able to establish a direct connection to the user during his or her visit on the WEBSITE, which allows the provider to be aware of the user's visit and may analyze the respective information. The subsequent processing of the personal data will be conducted in the responsibility of the social media provider pursuant to data protection and privacy laws and according to its data protection policies published on its website (such as www.facebook.com/; www.twitter.com/; www.youtube.com/; www.google.com/; www.pinterest.com/; www.instagram.com/).

You can find more information about Cookies used by SWAROVSKI TR and how to manage your Cookie settings on our WEBSITE.

8. RIGHTS OF THE CUSTOMER, VISITORS AND PARTNERS

Pursuant to the Law on Protection of Personal Data, through an application to the data responsible, you are entitled to:

- to be informed whether your data is being processed,
- to request information if it is processed,

- to learn the purpose of any processing of your personal data and whether it is being used in compliance with that purpose,
- to be informed of any unrelated persons residing within the country or overseas to whom the data is transferred,
- to request adjustment if the personal data is processed incorrectly or in an incomplete manner,
- to request deletion or elimination of your personal data within the scope of the conditions laid out in Article 7 of the Law,
- to request that unrelated persons are informed of the actions carried out as per your right to request adjustment, deletion or elimination,
- to object to a conclusion found against you as a result of analyzing and processing your personal data exclusively through automated systems,
- to request compensation if you suffer any loss should your personal data be unlawfully processed.

We will handle all exercise of your Data Subject rights in accordance with the requirements of the applicable privacy regulation. Should you wish to exercise any of your data subject rights please contact us in writing or electronically at dataprivacy@swarovski.com with the subject line "Personal Data Information Request".

9. DATA SECURITY

We ensure that appropriate technological and organizational measures are in place to protect your personal data from loss, misuse, alteration or unintentional destruction, as per Article 12 of KVKK.

Our personnel who have access to your personal data have been trained to maintain the confidentiality of such data. They will only be granted access to your personal data to the extent that they need this information to perform their duties properly. The persons who can consult your data are also bound by strict professional discretion.

Regular monitoring and testing of our security defenses is carried out to ensure they continue to be effective against the latest threats.

10. CHANGES TO THE DATA PRIVACY NOTICE

SWAROVSKI TR reserves the right to amend this Data Privacy Notice at any time and without prior notice or announcement. The latest version posted on the SWAROVSKI TR WEBSITE shall be applicable.

II. Specific Provisions

The following provisions shall supplement the general provisions in Section I for certain activities of SWAROVSKI TR. In the event there is any inconsistency, the following provisions shall control.

1. ONLINE-SHOPS

The creditworthiness of CUSTOMERS may be evaluated automatically in online-shops in order to offer the purchase on account based on this decision. In this case the credit rating is evaluated on the basis of information from an external

credit rating agency, which will provide SWAROVSKI TR with a credit score of the respective CUSTOMER. The agency will calculate the score based on a secret formula based on data on the payment history of the CUSTOMER, its debt and insolvency history and possible limitations of its legal capacity. Should the score be below a certain threshold no payment by invoice will be offered. In this event the CUSTOMER may contact the contact person shown on the imprint of the respective website of the online-shop if he/she is not ready to accept the decision.

Online shops of SWAROVSKI TR may automatically decide whether to enter into purchase agreements. However, SWAROVSKI does not deem this an automated individual decision. In the event the CUSTOMER does not wish such an automated entering into an agreement, it has the option to purchase products and services from SWAROVSKI TR physical stores.

2. PARTNERS, INCLUDING WHOLESALERS, RETAILERS, DEALERS, CUSTOMER SERVICE VENDORS ETC.

As previously indicated, CUSTOMER DATA, PARTNER DATA and VISITOR DATA is generally collected directly by SWAROVSKI TR but also indirectly, (e.g. when SWAROVSKI TR requests THIRD PARTIES to act as processors, such as SWAROVSKI TR's PARTNERS). In these cases, SWAROVSKI's PARTNERS process personal data on behalf and under instruction of SWAROVSKI TR and are bound by specific processor agreements covering the terms and conditions of their duties in a manner to ensure the protection of the rights of our CUSTOMERS, PARTNERS and VISITORS and the processing and security of their personal data in accordance with applicable data protection laws.

3. NEWSLETTER AND BANNER ADVERTISEMENT

SWAROVSKI TR may send newsletters or other commercial communications in connection with its products and services to CUSTOMERS and PARTNERS. However, the respective customers and business partners may object to a further mailing of newsletters or other commercial communications at any time through their account on the respective WEBSITE or through the link indicated in every mailing. However, the termination of one newsletter may not entail the termination of other newsletters.

SWAROVSKI TR reserves the right to place personalized advertisement during WEBSITE visits. Such banner advertisements displayed to the CUSTOMER contains products offered on the WEBSITE which have previously been looked at by the CUSTOMER. The advertisement is generated by SWAROVSKI TR by the means of cookies (see Section I para. 6 above).

4. SWEEPSTAKES and other PROMOTIONAL ACTIVITIES

The following provisions shall be applicable for the processing of data by SWAROVSKI TR in connection with customer SWEEPSTAKES and other PROMOTIONAL ACTIVITIES.

The data in connection with the SWEEPSTAKE and other promotional activities is processed by (i) the controller of the SWAROVSKI TR which sponsors, promotes

and organizes the sweepstake. Other companies and affiliates of SWAROVSKI TR may however use the collected personal data for their purposes according to Section I para. 3 above.

With respect to SWEEPSTAKE and other PROMOTIONAL ACTIVITIES, SWAROVSKI TR processes the personal data of participants according to Section I para. 2 above. for the purposes listed under that respective provision, and in particular also for the following purposes in accordance with applicable laws:

- carrying out the competition;
- contacting winners;
- publication of the contact details of the winners
- promoting winners on social media, and
- other promotional and marketing activities.

Further information regarding the SWEEPSTAKE and OTHER PROMOTIONAL ACTIVITIES can be found in the specific terms and conditions applicable to each SWEEPSTAKE and PROMOTIONAL ACTIVITY, as published and organized from time to time.

Annex 1 – List of SWAROVSKI Legal entities

Name	Address
SWAROVSKI Argentina Sociedad Anónima, Comercial e Industrial	Av. Juan B. Justo 637, 4to Piso, CP 1425 Ciudad de Buenos Aire, Argentina
SWAROVSKI Australia Pty Ltd	Unit 1, 4D Huntley Street, AU-2015 Alexandria, NSW
D. SWAROVSKI Distribution GmbH	SWAROVSKIstrasse 30, AT-6112 Wattens
D. SWAROVSKI KG	SWAROVSKIstrasse 30, AT-6112 Wattens
D. SWAROVSKI Tourism Services GmbH	SWAROVSKIstrasse 30, AT-6112 Wattens
Swareflex GmbH	Josef-Heiss-Strasse 1, AT-6134 Vomp
SWAROVSKI Austria Vertriebsgesellschaft m.b.H.	Feldkreuzstrasse 3, AT-6063 Rum
SWAROVSKI Austria Vertriebsgesellschaft m.b.H. & Co. KG	Feldkreuzstrasse 3, AT-6063 Rum
SWAROVSKI Mobility GmbH	SWAROVSKIstrasse 30, AT-6112 Wattens
SWAROVSKI Multibrand Distribution GmbH	SWAROVSKIstrasse 30, AT-6112 Wattens
S.A. SWAROVSKI Belgium N.V.	Nieuwstraat 47, BE-1000 Brussel

SWAROVSKI Cristais Ltda.	Alameda Itú, 852, 8th Floor, BR-01421-001 São Paulo
SWAROVSKI Crystal Components Ltda.	Alameda Itú, 852, 13th Floor, BR-01421-001 São Paulo
SWAROVSKI Canada Limited	80 Gough Road, Unit # 2, CA-L3R 6E8 Markham, ON
SWAROVSKI Chile Limitada	Marchant Pereira 150, Region Metropolitana, CL-Providencia, Santiago
Signity Hong Kong Ltd	1063 King's Road, 20th Floor, Quarry Bay, CN-Hong Kong
SWAROVSKI (Guangzhou) Trading Co. Ltd	02-07 Room, 17 Floor, Central Tower, No.5, Xiancun Road, Guangzhou, 510623, China
SWAROVSKI (Macao) Ltd.	Avendia da Amizade, n 555, Edificio Landmark, CN-Macau
SWAROVSKI (Shanghai) Trading Co. Ltd.	168 XiZang Road (M), Room 1601, The Headquarters Building, Huang Pu District, CN-200001 Shanghai
SWAROVSKI Greater China Limited	1063 King's Road, 9th Floor, Quarry Bay, CN-Hong Kong
SWAROVSKI Hong Kong Limited	1063 King's Road, 9th Floor, Quarry Bay, CN-Hong Kong
SWAROVSKI Global Business Services Americas SRL	Escazu Village Building 8th floor, San Rafael, Escazu, San José
SWAROVSKI Bohemia spol. s r.o.	Štětkova 1638/18, CZ-14000 Prague
SWAROVSKI France S.A.S.	15 Boulevard de Poissonnière, FR-75002 Paris
SWAROVSKI (Deutschland) GmbH	Hüttenstrasse 27, DE-87600 Kaufbeuren
SWAROVSKI Hellas S.A.	114, Vouliagmenis av. & 5 Spetson str., Glyfada, GR-16674 Athen
SWAROVSKI Hungary Retail Limited Liability Company	Hermina ut. 17, HU-1146 Budapest
PT Crystallized Elements	Cyber 2 Tower, 31st Floor Unit B, JL HR. Rasuna Said, Blok X5 No. 13 Ku - ID 12950 Jakarta
SWAROVSKI India Private Limited	1A-D, Vandhna , 11, Tolstoy Marg, IN-110 001 New Delhi
SWAROVSKI Ireland Limited	70 Sir Rogerson's Quay, IE-Dublin
SWAROVSKI Internazionale d'Italia S.p.A.	Via G. Giulini 3, IT-20123 Milano ;

Signity Japan Ltd	Daisan Watanabe Building 6F, 2-1-33 Shiba, Minato-ku, Tokyo 105-0014
SWAROVSKI Japan Ltd.	Ichibancho Tokyu Building 12F, 21 Ichibancho Chiyoda-ku, Tokyo 102-0082
SWAROVSKI Korea Ltd	10,11,12,13F Baekyoung Bldg. 456 Dosan-daero, Gangnam-gu, KR-135-949 Seoul
SWAROVSKI Aktiengesellschaft	Dröschstrasse 15, FL-9495 Triesen
SWAROVSKI International Distribution AG	Dröschstrasse 15, FL-9495 Triesen
SWAROVSKI Global Business Services Asia SDN BHD	Unit 1.01, GBS@Mayang, Jalan Mahsuri, Bandar Bayan Baru, 11900 Bayan Lepas, Pulau Pinang
SWAROVSKI Malaysia Trading Sdn Bhd	Suite 19-03, 19th Floor, Menara Keck Seng, 203, Jalan Bukit Bintang, MY-55100 Kuala Lumpur
SWAROVSKI Crystal SA de CV	Av. Ejército Nacional Mexicano No. 579 Piso 11, Col. Granada, Del. Miguel Hidalgo, MX-11520 Mexico City
SWAROVSKI (Europe) Holding B.V.	Dam 6, NL-1012 NP Amsterdam
SWAROVSKI Handelsonderneming Benelux B.V.	Oosterdoksstraat 80, NL-1011 DK Amsterdam
SWAROVSKI International (NZ) Limited	3/45 Queen Street, Auckland 1010 New Zealand
SWAROVSKI Poland Sp. z o.o.	Crown Tower, ul. Hrubieszowska 2, PL-01-209 Warsaw
SWAROVSKI Ibérica, S.A - Sucursal EM Portugal, Lisbon	
OOO SWAROVSKI Russia	Dolgorukovskaya street 7, RU-127006 Moscow
SWAROVSKI Brand License AG	Alte Landstrasse 411, CH-8708 Männedorf
SWAROVSKI Immobilien AG	Alte Landstrasse 411, CH-8708 Männedorf
SWAROVSKI Subotica DOO	Batinska 94, 24000 Subotica Republic of Serbia
SWAROVSKI Management Pte Ltd	2 Alexandra Road, # 03-01 Delta House, SG-159919 Singapore
SWAROVSKI Singapore Trading Pte Ltd.	2 Alexandra Road, # 03-01 Delta House, SG-159919 Singapore
SWAROVSKI Ibérica, S.A	C/ Llacuna, 10-20, 1a planta, ES-08005 Barcelona

SWAROVSKI Sweden AB	c/o Matrisen (Redovisning&Rådgivning), Box 22059, SE-10422 Stockholm
Daniel SWAROVSKI Corporation AG	Alte Landstrasse 411, CH-8708 Männedorf
SWAROVSKI (Schweiz) AG	Alte Landstrasse 411, CH-8708 Männedorf
SWAROVSKI Crystal Online AG	Alte Landstrasse 411, CH-8708 Männedorf
SWAROVSKI (Thailand) Limited	849 Vorawat Building, 16th Floor, Room 1601-1602, Silom Road, Silom Sub-district, Bangrak District, TH-10500 Bangkok
SWAROVSKI Kristal Ticaret Limited Sirketi	Abdi İpekçi Cad. No:57 Reasürans Han E Blok Kat:5, TR-34367 Istanbul
Chamilia Europe Limited	Unit 48 Hoults Yard, Walker Road, Newcastle Upon Tyne, NE6 1AB, England - UK
SWAROVSKI International Limited	21 Sackville Street, London, England, W1S 3DN
SWAROVSKI Middle East FZE	Roundabout No. 6, P.O. Box 17128, AE-Jebel Ali Free Zone, Dubai
SWAROVSKI UK Limited	1st Floor, Building 4, Chiswick Park, 566 Chiswick High Road, GB-W4 5YE London
SWAROVSKI Digital Business USA Inc.	1 Kenney Drive, US-02920 Cranston, R.I.
SWAROVSKI Digital Business USA Inc.	1 Kenney Drive, US-02920 Cranston, R.I.
SWAROVSKI Financial Services Corp.	1 Kenney Drive, US-02920 Cranston, R.I.
SWAROVSKI North America Limited	1 Kenney Drive, US-02920 Cranston, R.I.
SWAROVSKI Retail Ventures Ltd.	1 Kenney Drive, US-02920 Cranston, R.I.
Amazar Americas, Inc	1 Kenney Drive, US-02920 Cranston, R.I.
Chamilia, LLC	1 Kenney Drive, US-02920 Cranston, R.I.
Signity Americas Ltd	1 Kenney Drive, US-02920 Cranston, R.I.
SWAROVSKI Lighting, Ltd	61 Industrial Blvd., US-Plattsburgh, NY 12901
Touchstone Crystal Inc	1 Kenney Drive, US-02920 Cranston, R.I.
Marigot Vietnam LLC	Lot 204, Amata IP, Bien Hoa City, Dong Nai Province, Vietnam

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Singapore, Spain, Sweden, Switzerland, Thailand, Turkey, United Arab Emirates, United Kingdom, United States of America, Vietnam.