

## **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 address and mobile phone number.

### **1. Data controller for the operation of Be Swarovski**

Swarovski Hong Kong Co., Ltd. (“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, mobile phone number 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, Figurines and Collections 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, duty free stores and some partner stores. Certain mono-brand stores operated by SWAROVSKI sales partners and other authorized specialist dealers as well as the SWAROVSKI online store ([www.swarovski.com](http://www.swarovski.com)) 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 a message via text message or any other appropriate communication means chosen by SWAROVSKI 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](http://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 text message or in any other appropriate communication means 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 Customer Relations Department, 9/F 1063 King's Road, Quarry Bay, Hong Kong, or hotline (852) 2969 6500 or sending email to [customer\\_relations.hk@swarovski.com](mailto:customer_relations.hk@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. Within four weeks of receipt of the request, we will notify you as to whether and, if so, to what extent, we will comply with

your request. If, for any reason we do not comply with your request, we will notify you as to the reasons for us not complying with your request.

## **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 Swarovski Customer Relations Department, 9/F 1063 King's Road, Quarry Bay, Hong Kong, or hotline (852) 2969 6500 or sending email to [customer\\_relations.hk@swarovski.com](mailto:customer_relations.hk@swarovski.com).

## **6. Miscellaneous**

For any uncertainties regarding the transfer of personal information overseas, the storage and security of your personal information and other privacy issues that are not explicitly stipulated under the Be Swarovski Privacy Policy, please refer to the General Privacy Policy of Swarovski respectively for your country where you resident in. In case of any disparity between the Be Swarovski Privacy Policy and the General Privacy Policy, the General Privacy Policy shall prevail.