

Privacy Policy for be Swarovski

Swarovski Japan Ltd., 12th Floor, Ichibancho Tokyu Building, 21 Ichibancho, Chiyoda-ku, Tokyo, 102-0082 Japan (“Swarovski”) attaches great importance to the protection of personal data and collects, processes and uses and 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 operates the customer programme, be Swarovski, (“be Swarovski”) and collects, processes and uses personal data of members of the be Swarovski customer programme (“Members”) for the implementation of this programme. The information is not shared with any third parties other than 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 customer database:

2.1 Customer data from the application form

Swarovski collects and saves the obligatory data provided on the be Swarovski application form plus any data provided voluntarily by Members on the application form (“Data”).

2.2 Purchase history and benefits

Swarovski 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 personal membership number is presented at the checkout in stores participating in be Swarovski. The participating stores in Japan and other countries at which the purchase history is recorded comprise stores operated by Swarovski itself, with the exception of

outlet stores and some concession stores. Certain authorized dealers operated by Swarovski sales partners and the online store based in Switzerland also participate in be Swarovski.

In the online store Members' purchase history is recorded if the be Swarovski personal membership number is quoted when making a purchase.

At the start of their membership, Members receive an e-mail containing a link to an overview of all currently participating stores. This overview of participating stores is also available to view online.

Swarovski also collects and saves the benefit received.

3. Use of collected data

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

- 1) provision of benefits;
- 2) Member verification;
- 3) provision of related after-sales services;
- 4) communication with Members (postcards, telephone calls, e-mails etc.); and
- 5) statistical use of questionnaires, surveys, data analyses etc. for the purpose of service improvement.

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 be Swarovski personal membership number, the store employee can call up the Member's purchase history data and provide the Member with additional sales advice on the basis of his or her past purchases.

On presentation of the be Swarovski personal membership number or of an official ID document together with Member's unique identification attributes (such as birthdate, address etc.), 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 customer database to invite selected Members to special events and promotions, such as the presentation of new products or discounts. In addition, Swarovski also uses the data saved in the customer database to send Members birthday congratulations.

3.3 Evaluation of benefit offers

Swarovski also uses the data collected in the purchase history to grant the Members the membership benefits. Based on the data saved in the purchase history, Swarovski evaluates if the benefit is granted to the relevant Member.

3.4 Personalized product information and exclusive offers

If a Member has given Swarovski his or her relevant consent, Swarovski may send the Member further information about Swarovski, product information and exclusive offers by e-mail and/or by post. Based on the Form Data and the purchase history reported by participating stores, Swarovski may personalize the information sent to the Member so that the Member particularly receives, where possible, information which Swarovski deems interesting for the relevant Member. For this purpose, Swarovski analyses the Form Data collected at the start of membership and takes account of the saved information relating to age, sex, interests and preferences, as well as the type and number of benefits received, and other information that can be gleaned from the purchase history.

4. Contract data processing

The customer database in which all data described in Section 2 is saved, is operated on behalf of and in accordance with Swarovski's instructions by a company associated with Swarovski, D. Swarovski KG, Swarovski Straße 30, 6112 Wattens, Austria. Swarovski is the controller under applicable 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.

For the purpose of giving the Member the same services in other countries, the member data may be accessed by participating stores in other countries by presenting the personal membership number in the relevant stores.

Members' personal data can never be accessed by companies outside of the Swarovski Group of companies unless contractually bound to the Swarovski Group of companies regarding the protection of data of any member. Member data shall only be used for the purposes as stated in this Privacy Policy and the be Swarovski General Terms and Conditions.

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 Japan Ltd., 12th Floor, Ichibancho Tokyu Building, 21 Ichibancho, Chiyoda-ku, Tokyo, 102-0082 Japan or customer_relations.jp@swarovski.com or calling 0120 10 8700. 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, they may revoke this consent with future effect at any time and free of charge by contacting customer_relations.jp@swarovski.com.