

## INDIA GENERAL PRIVACY POLICY

This India General Privacy Policy (“**Privacy Policy**”) applies to all personal data collected by Swarovski India Private Limited and their related corporations (“**Swarovski**”), including without limitation, by way of this Website, and explains how we handle personal data and comply with the requirements of applicable Indian privacy laws.

This Privacy Policy applies in addition to (where applicable) the privacy policies specific to the Swarovski Crystal Society (“**SCS**”) or Swarovski Club 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 Swarovski Club programs respectively, the provisions of this Privacy Policy shall prevail.

### Collecting your personal data

We collect personal data from customers (existing and prospective), suppliers, contractors, employees and 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 data 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, exchange, return or similar transaction, your credit card, password or banking details (**sensitive personal data or information**).

In particular, Swarovski may collect personal data (including sensitive personal data or information):

- when you contact us or our authorized 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 authorized retailers;
- when you submit information through this 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) or our social media channels;
- when you join the SCS, Swarovski Club (or similar membership groups); or
- when you use this Website, in which case our system may automatically collect information relating to your visit to this Website, such as your IP address.

If you do not provide Swarovski with all requested personal data, 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, Swarovski Club (or similar membership groups).

Where practicable, we will collect personal data directly from you.

### 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 this 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 this 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 this Website.

### Use, processing and disclosure of your personal data

We will only use, process and disclose your personal data (including sensitive personal data or information) in accordance with applicable Indian privacy laws, this Privacy Policy and (where applicable) the privacy policies specific to the SCS or Swarovski Club programs (collectively, our “**Privacy Policies**”).

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

- develop, enhance, market and provide you with our products and/or services (including repairs and returns);
- respond to your queries if you are seeking information about our products or services;
- communicate with you about our products and services;
- conduct promotions and competitions;
- conduct market research and analysis;

- 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, Swarovski Club and other similar Swarovski-related memberships;
- comply with legislative and regulatory requirements;
- operate our business efficiently; and
- create, develop, operate and deliver and improve our products and services.

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

By agreeing to this Privacy Policy, you agree and consent that we may collect, handle, process, use, store, transfer, exchange, share, disseminate, destruct, or otherwise make use of your personal data (including sensitive personal data or information). Notwithstanding anything to the contrary, you further unequivocally agree and consent that we may use your personal data (including sensitive personal data or information) for the purposes set out in the Privacy Policies.

In carrying out our business, it may be necessary to share information about you (including the sensitive personal data or information) with and between our related bodies corporate, our authorized retailers and organizations that provide services to us. We would not otherwise disclose sensitive personal data or information to any other third party or other organization(s), without your consent (which you provide by agreeing to the terms of the Privacy Policies) unless:

- the disclosure is for one of the purposes described in or otherwise permitted by our Privacy Policies;
- the disclosure is required or permitted by law;
- we believe the disclosure is necessary to provide you with products or services which you have requested;
- we believe the disclosure is 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 authorized 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 or delivery of our products, will sometimes have access to personal data (including sensitive personal data or information) held by us and may use and/or process it on behalf of us. We require our service providers to adhere to strict privacy guidelines and not to use and/or process the information for any unauthorized purposes.

#### **Using your personal data for marketing**

We may use and/or process personal data 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 data 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, Swarovskistrasse 30, 6112 Wattens, Austria. Swarovski ensures compliance with the applicable Indian privacy laws.

In order to deliver products and services to you and to improve our products and services, we may sometimes disclose your personal data 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.

Swarovski will not otherwise use, process or disclose any information (including sensitive personal data or information) about you without your consent, which you provide by agreeing to the terms of the Privacy Policies, unless:

- the use, processing or disclosure is for one of the purposes described in or otherwise permitted by our Privacy Policies;
- the use, processing 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 data (including sensitive personal data or 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 data, please contact us using our contact information below.

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

If you wish to have your personal data 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.

### **Security and storage of your personal data**

Swarovski will protect your personal data (including sensitive personal data or information) in its possession or under its control by making reasonable security arrangements in accordance with the standards prescribed under the applicable Indian privacy laws, to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. 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 data, we cannot guarantee the security of any information you transmit to us through this Website and you use this Website at your own risk.

Your personal data 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 data held by Swarovski.

### **Username and passwords**

You can play an important role in keeping your personal data secure by maintaining the confidentiality of any password and accounts used on this 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 username 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 this 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 this Website. Before disclosing your personal data 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: Data Protection Team  
 Email: [SSG.DPO@swarovski.com](mailto:SSG.DPO@swarovski.com)

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.

### **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 its Privacy Policies at any time by posting an updated version on this Website. Please therefore keep checking these policies to ensure you are aware of the current terms. If at any point Swarovski decides to use and/or process personal data 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 this Website, and where necessary we will seek your prior consent.