

## SWAROVSKI CLUB PRIVACY POLICY

The following provisions shall be applicable for the processing of data by Swarovski in connection with the customer loyalty program Swarovski Club.

### a. Responsible for the Personal Data (Controller)

The personal data in connection with the membership of the Swarovski Club is processed by two joint controllers, in particular (i) the controller of the respective local Swarovski company which issues the membership according to the sign-up form, and (ii) the controller of Swarovski Aktiengesellschaft, Dröschistrasse 15, 9495 Triesen, Liechtenstein. The collected personal data will be shared with other companies of the Swarovski Group of companies and certain third parties as described in this Privacy Policy.

### b. Processing of personal data and source

SWAROVSKI collects and retains the personal obligatory data provided on the Swarovski Club sign-up form (including but not limited to: title, name and address, and e-mail address) plus any personal data provided voluntarily by Swarovski Club Members on the sign up form: date of birth as well as styles/interests (e.g. in Jewellery and Accessories, Home and Style, Wedding, Figures and Collectables and/or Watches; Classic style) ("Form Data"). 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 Swarovski Club membership number is communicated at the checkout for purchases in stores participating in the Swarovski Club program. 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 Swarovski Club membership. Swarovski also collects and saves all vouchers sent to the Swarovski Club Member and, as the case may be, further data about the Swarovski Club Member's use of the Swarovski Group's online offerings and mailings (e.g., newsletter open rate, click rate, visited online web pages, social media interaction). Where Swarovski believes that two different Swarovski Club Memberships belong to the same individual, or where a valid request is received, Swarovski may merge them.

At the start of their membership, Members receive an e-mail containing a link to an overview of all currently participating stores in the Swarovski Club program. This overview of participating stores is also available to view online at [swarovski.com/club](https://www.swarovski.com/club).

### c. Purpose of Processing

Swarovski collects and processes the personal data of Members of the customer loyalty program particular also for the following purposes:

- administration of the Swarovski Club memberships;
- operation of the Swarovski Club, namely personalized offers, advice and communications regarding products and services of Swarovski, providing of advantages and awarding special conditions (e.g. vouchers), invitations to special events and promotions reserved for members, participating in surveys, requiring feedback and act in social media.

The personal data collected is used by Swarovski to administer and manage the membership (including also for accounting purposes), to provide the Member with the benefits and other services that come with the Membership (the legal basis for this is the Membership).

In participating stores, the Swarovski Club 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, style/interests selected or wish list.

On presentation of the Swarovski Club membership number, e-mail address or 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 and wish list.

Swarovski may also use the personal data 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 personal data to send Members birthday congratulations.

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.

Swarovski may also use and disclose personal data to deliver advertisements which are related to our products and services which may be of interest to you on the Platforms or other websites, applications or online platforms. "Platforms" means any Swarovski application we may own or operate from time to time, Swarovski's pages and accounts on third party social media platforms such as Instagram and Facebook, and Swarovski.com.

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, interaction variables (such as click rates, time of interaction or social media interaction), style/interests selected as well as other information voluntarily disclosed to Swarovski by the Swarovski Club 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, interaction variables 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.

#### d. Disclosure of Personal Data

In the course of processing personal data in connection with the Swarovski Club, Swarovski may namely disclose personal data to the following categories of recipients:

- Partners, including business, marketing and promotion partners (including social media partners) and all participating retail shops or other authorized specialists dealers, irrespective of whether the company is run by Swarovski or another sales or cooperation partner; whereas these stores may be located within any country worldwide and they may use data received from Swarovski only for the purpose of operating the Swarovski Club, including personalized offers to and communication with Members on behalf of Swarovski;

- to a Swarovski company to whom the processing of data (operation of the database) regarding the Swarovski Club has been outsourced in technical respect (processors).

Each recipient may be located in a country without an adequate level of data protection. If that is the case, Swarovski will ensure an adequate level of protection.

#### e. Rights of Data Subjects

The Swarovski Club Members have the right under applicable laws to ask Swarovski for information relating to their saved personal data, to amend, limit or delete their personal information, or ask for a copy of the personal information. Swarovski Club Members may also revoke any consent they have provided to Swarovski (e.g. to be used for promotional, advertising purposes and receive newsletters and other commercial communications) for the future.

If you want to exercise any of your rights regarding newsletter subscriptions, data access or data deletion, please do not hesitate to contact our Customer Care team at [customer\\_relations.th@swarovski.com](mailto:customer_relations.th@swarovski.com), who will be happy to answer any questions you may have. Please note that we may require you to verify your identity before allowing you to access your personal information.

#### f. Data Retention

Personal Data will be held and used for the duration of the Membership; thereafter, it will be retained as long as necessary for the aforementioned purposes, but not for more than five years, unless required for legal reasons. The purchase history is recorded for five years.

Further information regarding the Swarovski Club can be found in the [General Terms and Conditions](#) of the customer loyalty program on [www.swarovski.com](http://www.swarovski.com).

#### g. Updates and Additional Information

For updates to the information provided in this Swarovski Club Data Privacy Policy, please refer to [swarovski.com](http://swarovski.com). Swarovski reserves the right to change this Privacy Policy. Such change will be effective immediately upon posting the revision to [swarovski.com](http://swarovski.com). If we make significant changes to this privacy Policy, we will notify you (at the point of contact provided by you) at least 7 business days before the changes are to take effect.

For further country-specific mandatory information and mandatory information based on the EU Data Protection Regulation, and for any uncertainties regarding the transfer of personal information overseas, the storage, security of your personal information and other privacy issues that are not explicitly stipulated under this Data Privacy Policy, please refer to the Privacy Policy on [www.swarovski.com](http://www.swarovski.com) where applicable.