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 and e-mail addresses.

1. Data controller for the operation of Be Swarovski

Swarovski North America Limited, Customer Service, One Kenney Drive, Cranston, Rhode Island 02920-4468, ("SWAROVSKI") operates the customer program, Be Swarovski, ("Be Swarovski") and collects, processes and uses personal data of the Members of the Be Swarovski customer program ("Members") solely for the implementation of this program. This information will be shared only 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 (including but not limited to: title, name, postal address and e-mail address), plus any data provided voluntarily by a Member, including date of birth, as well as a Member's interest in Jewelry and Accessories, Home and Style, Wedding, Figures and Collectables and/or Watches ("Form Data").

2.2 Purchase history and vouchers

In connection with Be Swarovski, SWAROVSKI also saves data on Members' purchase history in the form of items purchased (product designation, price, discount), place of purchase, time of purchase and the Member's Be Swarovski membership number.

(1) The purchase history is recorded if the Member's Be Swarovski membership number is communicated at the checkout for purchases in stores participating in Be Swarovski. The participating stores are the stores operated by SWAROVSKI, including the SWAROVSKI Online Store, certain stores operated by sales partners of Swarovski and other authorized dealers. Outlet stores and some other concession stores are excluded from participation. The complete list of all participating stores can be found online at <u>www.swarovski.com/beswarovski</u>.

When a Member makes a purchase from the Swarovski online store, the Member's purchase history is recorded if the membership number is provided at checkout or the Member makes a purchase when logged into an online account associated with a Be Swarovski membership.

At the start of their Be Swarovski membership, Members will receive an e-mail containing a link to an overview of all participating stores. This overview of participating stores is also available to view online at <u>swarovski.com/beswarovski</u>.

SWAROVSKI will also collect and save all vouchers sent to the 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, Enrollment in Be Swarovski allows the Members to benefit from extended customer service and advice. Staff member of the relevant participating store, if presented with the Member's membership number, will be able to access the Member's purchase history, which will allow the staff member, taking into account the Member's past purchases, to be able to assist the Member in selecting new products.

Upon presentation of the Member's 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 staff member will be able to access the Member's past purchases.

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 will also use the data saved in the customer database to send Members birthday congratulations.

3.3 Evaluation of voucher offers

SWAROVSKI will use 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 Member's purchase history, SWAROVSKI will be able to evaluate and determine which type of voucher the Member will be granted.

3.4 Personalized product information and exclusive offers

If a Member has given SWAROVSKI his or her consent, SWAROVSKI may send the Member additional information about SWAROVSKI, including 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, as well as other information voluntarily disclosed to SWAROVSKI by the Member, SWAROVSKI may personalize the information sent to the Member so that the Member will receive, where possible, information that SWAROVSKI deems applicable for the particular Member. For this purpose, SWAROVSKI analyses the Form Data collected at the start of membership and, in particular, takes account the saved information relating to the Member's 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 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, Dröschistrasse 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, in which Be Swarovski is running.

SWAROVSKI may also disclose the personal data of the 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 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 Member and only discloses the personal data for the purpose of running Be Swarovski and for the purpose of seamless and better service to the Member.

The Member acknowledges in addition that Swarovski may merge or enrich any of the Member's personal data given in the past or the future to SWAROVSKI or any other of the Swarovski Group Companies in order to service the 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 North America Limited, Customer Service, One Kenney Drive, Cranston, R.I. 02920-4468, or <u>customer_relations.us@swarovski.com</u>. 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 for advertising purposes, they may revoke this consent with future effect at any time and free of charge by contacting customer_relations.us@swarovski.com