

## Privacy Policy

This Privacy Policy provides information about personal data processing – how we collect, process and store your personal data. We understand the importance of personal data processing, therefore, we respect the privacy of our customers and other data subjects (hereinafter – data subjects) and protect personal data.

### 1. Data Controller

Information about the controller of your personal data by trademark:

Data Controller	Trademark
UAB Apranga LT, registered office: Ukmergės g. 362, Vilnius	Zara
UAB Apranga HLT, registered office: Ukmergės g. 362, Vilnius	Zara Home
UAB Apranga BPB LT, registered office: Ukmergės g. 362, Vilnius	Bershka
UAB Apranga PLT, registered office: Ukmergės g. 362, Vilnius	Pull&Bear
UAB Apranga SLT, registered office: Ukmergės g. 362, Vilnius	Stradivarius
UAB Apranga MLT, registered office: Ukmergės g. 362, Vilnius	Massimo Dutti
UAB Apranga OLT, registered office: Ukmergės g. 362, Vilnius	Oysho
APB Apranga, registered office: Ukmergės g. 362, Vilnius	All other trademarks, except those listed above

### 2. Personal data categories, purposes and legal grounds of processing

#### 2.1. Conclusion and performance of contracts with customers, compliance with accounting requirements

Legal basis for data processing	Categories of data subjects
Performance of contracts, compliance with legislation	<p><b>Conclusion and performance of contracts with customers (natural persons and legal entities):</b> name, surname, position, e-mail and/or telephone number, date of birth and personal ID of the customer, its employee or representative. For the purpose of conclusion and performance of contracts with natural persons, the following additional personal data may be processed: address, customer's dimensions necessary to produce a custom-made garment, information about the custom-made garment.</p> <p>The categories of the customer's personal data processed in a specific case depend on the nature of the contract that is made and performed. In any case, personal data shall be processed to the extent necessary to perform the contract or properly comply with legislation.</p> <p><b>Compliance with accounting requirements:</b> The personal data processed for invoicing – name, surname, address and other data, if wished by the customer. For the purpose of administration of incoming invoices, the personal data to be provided under the requirements set out in legislation shall be processed.</p>

#### 2.2. Direct marketing and participation in loyalty programmes

<b>Legal basis for data processing</b>	<b>Categories of data subjects</b>
Consent	Name, surname, date of birth, address, city, telephone number, e-mail address, details of the social network account, trademark of interest to the customer. Data about the date of birth and address shall be processed only when the person agrees to provide them, also when information is provided by customers of the stores involved the loyalty programmes Prestige, City and Karen Millen. Information shall also be processed in relation to the goods purchased by customers when the information of direct marketing content is communicated to the participants of a loyalty programme or when a person gives consent to receive information about offers related to the discounts, promotions, sales, new collections and events for participants of loyalty programmes.

### **2.3. Transfer of personal data to franchise partners**

Where you agree, your personal data shall be transferred to the franchise partners that hold the trademarks Max Mara, Marella, Marina Rinaldi, Pennyblack and Weekend Max Mara (Max Mara s.r.l., Marella S.r.l., MANIFATTURE DEL NORD s.r.l., MARINA RINALDI s.r.l. or other companies of Max Mara Fashion Group) so that they could improve the quality of your servicing. On the basis of your consent, your e-mail address may be transferred to the franchise partner that holds the trademark MANGO (PUNTO FA, S.L.) in order to communicate information about the offers of MANGO stores in relation discounts, promotions, and sales.

<b>Legal basis for data processing</b>	<b>Categories of data subjects</b>
Consent	Name, surname, city/town, telephone number, e-mail address.

### **2.4. Processing of the personal data of the Company's shareholders, beneficial owners, management bodies and their members for internal administration and legal compliance purposes**

<b>Legal basis for data processing</b>	<b>Categories of data subjects</b>
Compliance with legislation	Name, surname, personal ID number, date of birth, residence address, information about the securities held and other personal data to be processed under legislation

Compliance with legal obligations shall include in this case:

- legal obligations related to the registration and processing of the data of the Company's shareholders, accounting of shares, compliance with tax and other obligations applicable to them;
- legal obligations related to the formation of the Company's management bodies, arrangement of their activities, submission and registration of the data of the Company's management bodies and their members to/in public registers, compliance with the requirements set out in the Law on Financial Reporting by Undertakings of the Republic of Lithuania.

### **2.5. Electronic commerce**

<b>Legal basis for data processing</b>	<b>Categories of data subjects</b>
<b>Performance of contracts</b>	Name, surname, e-mail address, mobile phone number, method of payment, data of the payment card holder, payment card number, validity date of the payment card, delivery address, goods bought, their price, purchasing date and time, access data provided when registering the account in the electronic store, operations in the account, including technical data of browsing (IP address, technical information of log-in and browsing), shopping cart data, data of the identity document if the goods ordered are collected at the store.

## 2.6. Video surveillance in order to protect the property

<b>Legal basis for data processing</b>	<b>Categories of data subjects</b>
Legitimate interest to protect property	Video recordings when customers are within the scope of video cameras.

## 2.7. Dealing with requests to return goods

<b>Legal basis for data processing</b>	<b>Categories of data subjects</b>
Compliance with legislation	Name, surname, contact details (telephone number or e-mail address), data about the goods returned, reason for returning the goods, bank account number. Contact details and bank account data shall be processed only when required and necessary. When poor quality goods are returned, it shall be requested to provide data about the customer's name, surname, contact details (telephone number or e-mail address), requests concerning the goods (replace, repair the defect, take back and refund the money). Taking into account the legal requirements applicable in a specific situation, it may be requested to provide only part of the above-referred data rather than all. Other data related to the request (data of the purchasing receipt, other information) may also be provided in the request or together with it.

## 2.8. Dealing with other requests, inquiries and complaints

<b>Legal basis for data processing</b>	<b>Categories of data subjects</b>
Performance of contracts, compliance with legislation	Name, surname, contact details (telephone number or e-mail address), content of the inquiry, request or complaint (event, its circumstances, customer's request, claim or feedback, loyalty card number, other information). Other data provided together with the inquiry, request or complaint (data of the purchasing receipt, other information).

## 2.9. Selection to employment and assessment of candidates

<b>Legal basis for data processing</b>	<b>Categories of data subjects</b>
Consent	<u>General personal data of candidates to employees</u> : name, surname, date of birth, data about the place of residence, e-mail address,

	<p>telephone number, information about working experience (place of employment, period of employment, position, responsibilities, achievements), information about education (education institution, period of studies, acquired education, qualification), information about professional development (completed training, certificates obtained), information about the languages the candidate knows and their proficiency level, IT, driving skills, other competencies, other information that the candidate to employees provides in his/her CV, letter of motivation (if any) or other documents of the candidate to employees.</p> <p><u>Wishes of candidates to employees</u>: position of interest, desirable working schedule, desirable working time per day or week, other information provided by the candidate in the section “Comments”.</p> <p><u>Feedback by employers about the candidate to employees, letters of reference</u>: the person who gives feedback or letter of reference, his/her contact details, content of the feedback or letter of reference.</p> <p><u>Information of assessment of the candidate to employees</u>: summary of the interview with the candidate to employees, opinions and observations by the person who carries out the selection, results of the tests undertaken by the candidate (if any).</p> <p><u>Personal data of special categories</u> shall be collected only in case and only to the extent necessary for the selection to a specific employment position and only as much as allowed under effective legislation.</p>
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## 2.10. Administration of the data base of candidates to employees and submission of job offers

We get personal data of candidates to employees from the candidate himself/herself or from employment agencies, online job search portals and/or other entities that provide job search, selection and/or intermediation services.

Legal basis for data processing	Categories of data subjects
Consent	<p><u>General personal data of candidates to employees</u>: name, surname, date of birth, data about the place of residence, e-mail address, telephone number, information about working experience (place of employment, period of employment, position, responsibilities, achievements), information about education (education institution, period of studies, acquired education, qualification), information about professional development (completed training, certificates obtained), information about the languages the candidate knows and their proficiency level, IT, driving skills, other competencies, other information that the candidate to employees provides in his/her CV, letter of motivation (if any) or other documents of the candidate to employees.</p> <p><u>Wishes of candidates to employees</u>: position of interest, desirable working schedule, desirable working time per day or week, other information provided by the candidate in the section “Comments”.</p> <p><u>Feedback by employers about the candidate to employees, letters of reference</u>: the person who gives feedback or letter of reference, his/her contact details, content of the feedback or letter of reference.</p> <p><u>Information of assessment of the candidate to employees</u>: summary of the interview with the candidate to employees, opinions and observations by the person who carries out the selection, results of the tests undertaken by the candidate (if any).</p> <p><u>Personal data of special categories</u> shall be collected only in case and</p>

	only to the extent necessary for the selection to a specific employment position and only as much as allowed under effective legislation.
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### **3. Where do we get personal data from and in which cases we transfer your personal data?**

In many cases, personal data are provided directly by the data subject himself/herself. In certain cases, we get personal data from third persons – employment agencies, online job search portals and/or other entities that provide job search, selection and/or intermediation services.

Your personal data may be provided to state and municipal authorities and other persons carrying out statutory functions, if such obligation is provided for in legislation. We transfer your personal data at their request or in order to pursue our legitimate interest to establish, exercise or defend legal claims.

#### The transfer of personal data to franchise partners, for the purpose of direct marketing and participation in loyalty programmes

Based on your consent, when necessary to provide you with information about discounts, promotions, sales and new collections, ensure you the opportunity to participate in our loyalty programmes, your personal data may also be transferred to the following third persons:

- companies belonging to APRANGA Group when they are responsible for the performance of certain functions necessary to provide offers to you;
- companies providing advertising, media planning, public relations and event organising services;
- companies providing SMS sending services;
- companies providing IT maintenance and support services.

On the basis of your consent, your personal data may also be provided to our partners – Companies of Max Mara Fashion Group and PUNTO FA, S.L. More information about the transfer of personal data to our partners is available in p. 1.3 “Transfer of personal data to franchise partners”.

#### Transfer of personal data for the purpose of selection to employment and assessment of candidates, administration of the data base of candidates to employees and submission of job offers

Personal data may be transferred to third persons who help us carry out the selection of candidates or provide us with selection, candidate assessment and internal administration services (e.g., providers of personnel selection and assessment services, suppliers of data base software, providers of data base administration services, providers of data centre, hosting and clouding services, etc.). We may also transfer the personal data of candidates to employees to other companies belonging to Apranga Group, if they are involved in the procedure of assessment of the employees in managerial positions. Where personal data are processed by us for the purpose of administration of the data base of candidates and for the submission of job offers, we may transfer the personal data of any candidate to employees to other companies belonging to Apranga Group, if a particular candidate can be suitable for being employed in a position in these companies. In such a case, personal data shall be provided only to the extent necessary for a particular task or a particular service.

### **4. What are the rights of the data subject and how to exercise them?**

You have the right to access your personal data and know how they are processed, request their rectification, supplementing or destruction, as well as stop their processing operations (revoke your consent). You also have the right to request the personal data processor to restrict the processing of personal data, the right to data portability, file a complaint to the State Data Protection Authority (contact details are available on the website [www.ada.it](http://www.ada.it)) and object to the processing of the personal data provided. Information about the exercise of these rights is provided by e-mail [dataprotection@apranga.it](mailto:dataprotection@apranga.it).

## 5. How long do we store personal data?

We store personal data not longer than required for data processing purposes or by legislation, in case they provide for a longer storage period. Personal data may be stored longer where that is provided for in legislation or where necessary for the defence by the Company against the asserted claims or legal actions, also when personal data are necessary for an investigation or as an item of proof in civil, administrative or criminal proceedings.

<b>Purposes of data processing</b>	<b>Data storage period</b>
<b>Conclusion and performance of contracts with customers, compliance with accounting requirements</b>	Accounting and tax documents shall be stored for legislative compliance in accordance with the time limits specified in the legislation. Other purchasing documents shall be stored for 5 years after the day of the shopping transaction.
<b>Direct marketing</b>	For the purpose of sending offers to loyalty programme participants, personal data shall be processed for 3 years after the last shopping transaction using a loyalty card but not longer than the customer's participation in the loyalty programme or the validity of his/her consent, whichever period is shorter. In other cases, personal data shall be processed for 3 years after the day of the consent or until the consent is valid, whichever period is shorter.
<b>Administration of participation in loyalty programmes</b>	3 years after the last shopping by using the loyalty card or until the consent is valid, whichever period is shorter.
<b>Transfer of personal data to franchise partners</b>	No longer than stated in the consent.
<b>Processing of personal data of the Company's shareholders, beneficial owners, management bodies and their members for internal administration and legal compliance purposes</b>	No longer than required for data processing purposes or provided for by legislation, also taking into account the time bars specified therein.
<b>Electronic commerce</b>	Until the account is being used. Where legislation provides for a longer data protection period, the period specified in the legislation shall apply.
<b>Video surveillance in order to protect property</b>	Up to 30 calendar days.
<b>Dealing with inquiries, requests and complaints, including requests for the return of goods</b>	12 calendar months after the inquiry, request or complaint has been disposed of
<b>Selection to employment and assessment</b>	If the person indicates the employment

<b>of candidates</b>	position he/she seeks as a candidate when providing his/her personal data, his/her personal data shall be stored while the selection to the chosen employment position(s) continues. If the person does not indicate the employment he/she seeks as a candidate when providing his/her personal data, his/her personal data shall be stored while the selection to the employment position(s) offered is being carried out but not longer than for 6 months.
<b>Administration of the data base of candidates to employees and submission of job offers</b>	2 years

## 6. Amendment to the provisions of the Privacy Policy

We reserve the right to amend the provisions of this Privacy Policy. Notices about any amendments or supplements to this Privacy Policy shall be published on the website [www.aprangagroup.lt](http://www.aprangagroup.lt).

This version of the Privacy Policy was updated on 12 June 2019.