

Privacy Notice EEA, SWITZERLAND AND UK

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TABLE OF CONTENTS

I. INTRODUCTION

1. GENERAL PROVISIONS
2. CONTROLLER
3. HOW TO CONTACT US

II. WHO WE COLLECT AND PROCESS PERSONAL DATA FROM?

III. HOW WE USE PERSONAL DATA

- a. To provide You with the products purchased
- b. To provide You with the services requested
- c. To provide You with relevant information and a personalized marketing content
- d. To respond to all Your requests as part of our customer service and support services and to manage Your relationship with SWAROVSKI
- e. To improve the knowledge of our customers, to analyse patterns and trends and to optimize of our marketing and communication strategy
- f. To display You with personalized advertising
- g. To prevent frauds, to guarantee the security of our services, to protect our activities, employees and assets
- h. To ensure We comply with applicable laws and to establish, exercise or defend legal claims.

IV. COOKIES

V. TO WHOM WE DISCLOSE YOUR PERSONAL DATA

VI. INFORMATION ABOUT THE TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA ("EEA").

VII. FOR HOW LONG WE KEEP YOUR DATA?

VIII. SPECIFIC PROVISIONS FOR SWAROVSKI LOYALTY PROGRAMS

IX. BUSINESS TO BUSINESS RELATIONSHIPS

X. WHAT RIGHTS DO YOU HAVE IN RELATION TO YOUR DATA?

1. YOUR RIGHTS
2. HOW TO EXERCISE YOUR RIGHTS
3. UNSUBSCRIBE FROM THE NEWSLETTER AND MARKETING COMMUNICATION
4. SUPERVISORY AUTHORITY

XI. PROTECTION OF YOUR DATA

XII. HOW TO CONTACT US

XIII. AMENDMENTS

ANNEXES

ANNEX I - List of SWAROVSKI Legal entities

ANNEX II - List of Countries/Regions

ANNEX III - Description of categories of personal data

ANNEX IV - Targeted advertising by sharing of first party data

I. INTRODUCTION

1. GENERAL PROVISIONS

Thank You for visiting our website <https://www.kristallwelten.swarovski.com> . SWAROVSKI is committed to respecting Your privacy and complying with applicable laws and regulations to ensure that Your personal data is kept secure and processed fairly and lawfully.

In this privacy policy You will find relevant information on the handling of Your personal data by the Swarovski group of companies (collectively referred to as "**SWAROVSKI**", "**We**", "**Us**") by interacting through our Swarovski Group stores (hereinafter referred to as "**SWAROVSKI stores**"), our customer loyalty programs (hereinafter referred to as "**SCS**", "**Swarovski Club**", jointly also referred to as "**Swarovski Loyalty programs**"), our Websites (defined below), applications, products or any other services that link to this Privacy Policy.

You will find a description of what personal data (those that identify You in any way – hereinafter referred to as "**Personal Data**") is collected by SWAROVSKI, what We do with Your Personal Data, what legal basis is applicable to the processing of Your Personal Data, with whom We share it, what are Your rights and what You can do if You do not agree to it. Please note that in this privacy policy, We use the official definitions of the European General Data Protection Regulation ("**GDPR**"), which are explained in Art. 4 GDPR.

If We wish to use Your Personal Data for purposes other than those set out in this Privacy Policy, We will notify You accordingly and, where required, We will obtain Your prior consent.

By accessing and using one of our online stores in Europe (this includes the European Economic Area ("**EEA**"), Switzerland and the UK) beginning with "<https://www.swarovski.com>", including applications owned by and/or operated on behalf of the SWAROVSKI Group, by registering for an account with Us, by signing-up to SWAROVSKI newsletter and/or Swarovski Loyalty programs and services, by using the chatbots and by interacting with SWAROVSKI pages on social networks, multimedia portals or digital content (each referred to as the "**Website**" or "**Websites**") on Your computer or mobile device, by placing an order with Us, or by contacting Us to receive assistance from Our customer service, You acknowledge that You have read and understood this Privacy Policy.

Our contact information can be found in Section I.3 "How to Contact Us" of this Privacy Policy.

2. CONTROLLER

SWAROVSKI is a group of companies, which means that various companies around the world belong to the SWAROVSKI Group. A list of the relevant companies and affiliates of SWAROVSKI can be found in ANNEX 1. This list may be updated from time to time.

Every Website (including online-shops and mini sites for special offers), every presence on social media, multimedia portals, chatbots and every application of SWAROVSKI (each a WEBSITE) has a Controller within SWAROVSKI responsible for collecting Personal Data according to the GDPR, the Swiss Data Protection Act or comparable provisions according to applicable data protection laws. Unless provided otherwise on the Website (according to the imprint, the terms of use, etc.) or in this Privacy Policy, the responsible Controller for the Online-Shops www.swarovski.com is Swarovski Crystal Online AG, Alte Landstraße 411, 8708 Männedorf, Switzerland, the responsible Controller for the Swarovski Group WEBSITES is Swarovski Aktiengesellschaft, Dröschstrasse 15, 9495 Triesen, Liechtenstein.

The respective subsidiary or affiliate is the controller in the event SWAROVSKI communicates through other means of communication (such as email, letter, telephone, in person) and the communication does not fall within an activity for which SWAROVSKI has appointed a specific Controller within this Data Protection Notice or otherwise.

Should a SWAROVSKI company or affiliate disclose personal data to another SWAROVSKI company or affiliate for specific purposes of the receiving company or affiliate, such company or affiliate is the controller.

Pursuant to Article 27 of the GDPR, the representative for all SWAROVSKI companies and affiliates domiciled outside of the European Economic Area is D. Swarovski Distribution GmbH, Legal Department, Swarovskistrasse 30, 6112 Wattens, Austria.

CCTV DATA. Some stores and premises of SWAROVSKI are under surveillance cameras. The controller of personal data collected on surveillance recordings with respect to collecting personal data is the SWAROVSKI entity indicated in the SWAROVSKI premises.

3. HOW TO CONTACT US

If You want to exercise any of Your rights regarding newsletter subscriptions, loyalty programs, data access or data deletion, please do not hesitate to contact our Customer Care team (service.kristallwelten@swarovski.com), who will be happy to answer any questions You may have.

Any queries or concerns about our privacy policy or the processing of Your personal data can also be addressed to The Group Data Privacy Team at dataprivacy@swarovski.com.

Except for the SWAROVSKI companies in Germany and Spain, SWAROVSKI has not appointed a Data Protection Officer in accordance with Article 37 of the GDPR. The contact details of Our Data Protection Officer for the SWAROVSKI companies in Germany and Spain can be found here:

Germany: **Swarovski (Deutschland) GmbH**, Hüttenstrasse 27, 87600 Kaufbeuren, Germany, Email: dataprivacy@swarovski.com

Spain: **Swarovski Ibérica S.A.**, C/ Llacuna, 10-20 1ª Planta, 08005, Barcelona, Spain, Email: dataprivacy@swarovski.com

In the case of topics specific to promotional e-mails, You can unsubscribe at any time using the "unsubscribe" link included in each electronic communication.

If You applied to a position with Swarovski and its affiliates (**CANDIDATE**) and You want to know how Swarovski processes Your personal data, You can contact us by email at corporatehr.communication@swarovski.com or dataprivacy@swarovski.com.

II. WHO WE COLLECT AND PROCESS PERSONAL DATA FROM

This Privacy Policy describes how SWAROVSKI, in accordance with applicable laws, collects, uses, and otherwise processes Personal Data about You as a:

- Customer
- Person who visits our WEBSITES;
- Person who registers on our WEBSITES for example by creating an online account;
- Person who purchases or receives products or services from SWAROVSKI;
- Person who contacts Our Customer Service via e.g. chatbot, telephone, post or e-mail;
- Recipient of our newsletter and personalized marketing communication;
- Participant in research campaigns and opinion polls conducted by Us;
- Participant at SWAROVSKI events;
- Person who interacts with Us via social media networks and/or multimedia portals;
- Person who uses the WIFI access provided by Us in Our SWAROVSKI Stores or other locations;
- Customer who joined our customer loyalty programs «SCS» and/or «Swarovski Club»;
- Participant at our SWEEPSTAKES and PROMOTIONAL ACTIVITIES

hereinafter referred to as "**CUSTOMER**" and Personal Data also as "**CUSTOMER DATA**".

III. HOW WE USE PERSONAL DATA

SWAROVSKI processes Personal Data for various purposes including to provide You with our products and services and to offer You a personalized customer experience in our communication, on our WEBSITES and in our stores.

In this section We describe why SWAROVSKI collects and processes Your Personal Data.

1. To provide You with the products purchased

When You make a purchase with Us on our WEBSITES and/or through our Applications, when You reserve online Your ticket to the SWAROVSKI Kristallwelten, and whenever You request a service from Us as a return or repair, SWAROVSKI will use Your Personal Data to provide You with the products and/or services requested to perform Our obligations under the contract with You.

This covers various activities related to the placement of Your order including all management activities connected with as, for example:

- the administrative management of the contract including invoicing;
- the transfer of the information related to Your order to our partners for the purposes of the delivery;
- the tracking of the delivery of the purchased products;
- the management of any claims, the handling of returns, exchanges and refunds.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing. For a detailed overview of the Personal Data included in the different categories, please see Annex III below.

Purpose	Categories of Personal Data	Legal basis of the processing
Provision of products purchased and related services	• Your Identification and Contact Information Data • Your Purchase and Order Information Data • Your Payment Information Data In addition, depending on the specific circumstances, SWAROVSKI may also process: • Your Communication Data • Information about third parties when You make a gift to someone else or wish to deliver Your purchase to someone else's address	Necessity of the performance of the contract with You

1.2 To provide You with the services requested

If You wish to make use of Our services on our WEBSITES, as booking an appointment online or in one of our SWAROVSKI stores, contact Your Crystal expert online or in the store (where available), or use the Virtual features available on our WEBSITES, SWAROVSKI will process Your Personal Data for the provision of the requested services.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing. For a detailed overview of the Personal Data included in the different categories, please see Annex III below.

Purpose	Categories of Personal Data	Legal basis of the processing
Provision of services requested	• Your Identification and contact information • Your Communication data • Your Location data • Your Virtual features data	Necessity of the performance of the contract with You

2. Payment management, fraud prevention and creditworthiness checks

When You make a purchase with Us on our WEBSITES, We process your Personal Data for the processing of Your payment including, to verify your identity by checking Personal Data You provide during the ordering process in appropriate third-party databases. For purchases made on our WEBSITES, our respective Terms and Conditions will apply.

In addition, We process Your Personal Data to detect and prevent unauthorized uses of our WEBSITES as well as potential frauds from being committed against You and/or against SWAROVSKI. For example, during the purchase and return process, if we consider that a transaction may be fraudulent or We detect anomalous behavior which indicates attempted fraudulent use of our features, products or services, We may block the transaction, oppose to a charge back request or reject a refund request.

Also, We implement various technical and organizational measures that allow Us to detect security threats and prevent, as much as possible, harmful consequences for You and for SWAROVSKI. Please note that for this purpose SWAROVSKI may also be required to verify Your identity.

The creditworthiness of CUSTOMERS may be evaluated automatically by the third parties payment providers through which We offer in our online-shops the purchase on account payment method. Where this payment method is made available to You, the credit rating is evaluated based on information from an external credit rating agency, which will provide with a credit score of the respective CUSTOMER. The agency will calculate the score based on a secret formula based on data on the payment history of the CUSTOMER, its debt and insolvency history and possible limitations of its legal capacity (hereafter "**Creditworthiness Data**"). If the rating is below a certain threshold, no purchase on account will be offered. Please note that by paying on our WEBSITES, You consent to the verification of Your creditworthiness by means of inquiries by the selected payment provider to officially approved credit protection associations, credit institutions, credit agencies and third parties commissioned by those payment providers. Should the score be below a certain threshold no payment by invoice will be offered. You can contact the contact person shown on the imprint of the respective WEBSITES of the online-shop if You are not ready to accept the decision.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing. For a detailed overview of the personal data included in the different categories, please see Annex III below.

Purpose	Categories of Personal Data	Legal basis of the processing
Creditworthiness check Fraud prevention Security of our services	• Your Identification and contact information • Your Purchase and order information data • Creditworthiness data • Your Payment information data • Your Communication data • Data concerning the use of our WEBSITES	Necessity of the performance of the contract with You Our Legitimate Interest

Please note that where We rely on our legitimate interests, We will only do so to the extent that Your own interests or fundamental rights do not override SWAROVSKI's interests.

3. To respond to Your requests as part of our customer service and support services and to manage Your relationship with SWAROVSKI

When You are contacting Us, either online or via another channel, SWAROVSKI processes Your Personal Data to reply to Your questions and enquiries. The exact categories of Personal Data processed for such purpose depends on the type of assistance You require from Us.

To provide You with the best customer experience, SWAROVSKI relies on Large Language Model solution(s) (hereafter also "LLM") supporting our Customer Service in responding You in a timely and accurate manner. SWAROVSKI puts in place technical and organizational measures to exclude the processing of Your Personal Data via these LLMs. Whenever such exclusion is not possible, SWAROVSKI ensures to have agreements in place that the third party service providers of these solutions do not process Personal Data for their own purposes but exclusively for the provision of the services to SWAROVSKI and do not retain any Personal Data processed longer than needed for the provision of the services themselves.

Please note that where available, Swarovski uses an automated response service (i.e., a "bot") as well as connecting with a live customer service representative. We use a third party service provider for this chat feature who processes Your Personal Data on our behalf.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing. For a

detailed overview of the personal data included in the different categories, please see Annex III below.

Purpose	Categories of Personal Data	Legal basis of the processing
Responding to Your requests and enquiries	- Your Identification and Contact Information; - Your Purchase and order information data - Communication data	Your consent Necessity of the performance of the contract with You Compliance with legal obligations
Enhancement of Customer Experience	- Your Identification and Contact Information; - Communication data	Our Legitimate Interest

Please note that where We rely on our legitimate interests, We will only do so to the extent that Your own interests or fundamental rights do not override SWAROVSKI's interests.

4. SWEEPSTAKES and other PROMOTIONAL ACTIVITIES

The following provisions shall be applicable for the processing of data by SWAROVSKI in connection with customer SWEEPSTAKES and other PROMOTIONAL ACTIVITIES.

With respect to SWEEPSTAKES and other PROMOTIONAL ACTIVITIES, SWAROVSKI processes the Personal Data of participants for carrying out the competition; contacting winners and price redemption; publication of the contact details of the winners; promoting winners on social media, and other promotional and marketing activities.

Further information regarding the SWEEPSTAKE and other PROMOTIONAL ACTIVITIES can be found in the specific terms and conditions applicable to each SWEEPSTAKE and PROMOTIONAL ACTIVITY, as published and organized from time to time.

Purpose	Categories of Personal Data	Legal basis of the processing
Carrying out the competition; contacting winners, redemption of prizes	SWEEPSTAKE and other promotional activities Data	Necessity for the performance of the contract with You
Publication of the contact details of the winners		Compliance with legal obligations

Promoting winners on social media and other promotional and marketing activities.		Your consent
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5. To manage Your SWAROVSKI Loyalty Memberships

If You have requested Us to create a Swarovski Club and/or a Swarovski Crystal Society account (hereafter also “**Swarovski Loyalty Programs**”), your Personal Data linked to your profile is processed as described in Section IX of this Privacy Policy.

6. To provide You with personalized marketing content

If You have given your consent, which can be withdrawn at any time, and registered to receive our Newsletter and personalized marketing communications, SWAROVSKI may send You by e-mail or in any other way chosen by SWAROVSKI (including by text, telephone or post) further up-to date information about our products, promotions, advertising, catalogues and invitations to events, concerning SWAROVSKI and SWAROVSKI products.

Please note that SWAROVSKI aims to provide You with information that is of interest to You and to share with You tailored contents including advertisement and information about products We think You may like, promotions You might be interested in or events You would like to attend.

For this purpose, SWAROVSKI analyses Personal Data including information that can be gleaned from the purchase history, inferred from interactions with our WEBSITES and browsing activity on our WEBSITES collected via cookies or analogous tracking technology (see Section IV for more information on how We use cookies) or by analysing usage behavior of newsletter subscribers (e.g., newsletter open rate, click rates, time of interaction, visited online web pages on our WEBSITES, social media interaction).

For the provision of this personalized information interesting for You, We may make inferences about You, as derived from Personal Data We hold on You, including profiling. Profiling is defined as any kind of automated processing of personal data to evaluate certain personal aspects relating to a natural person, to analyse or predict elements as preferences, interests or likely behavior of that natural person as, for example, whether You would be interested in receiving information about a specific product or collections. You can object at any time from such profiling by opting-out from receiving our Newsletter and personalized marketing communication.

In accordance with applicable law, SWAROVSKI may install coding in newsletters and other marketing email which allow it to determine if the recipient has opened an email or downloaded pictures contained in the email. However, the recipient may block this application in his/her email application. In any case he/she consents to the application of this technology by way of receiving newsletters or other marketing related emails.

Non-marketing communication may still be sent if You have opted-out from Newsletter and personalized marketing communication as this may be necessary for us to perform a contract with You, to comply with legal obligations or security requirements.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing. For a detailed overview of the personal data included in the different categories, please see Annex III below.

Purpose	Categories of Personal Data	Legal basis of the processing
Sending of the SWAROVSKI Newsletter and personalized marketing communications including profiling	• Your Identification and contact information; • Your Demographic Data • Your Preferences Data • Your Purchase and order information data • Your Newsletter and Interaction data • Your Location data • Data concerning the Use of our WEBSITES • Other voluntary provided data and survey data • Inferences data	Your consent

6.1 To show You personalized and targeted advertising on SWAROVSKI and third parties' websites and platforms

We may show You advertisements that We think might be interesting to You on Our WEBSITES or on third-party websites or platforms as described below.

Personalized advertising on our WEBSITES

SWAROVSKI places personalized advertisement about SWAROVSKI's products during Your visits on our WEBSITES. The personalized advertisement is generated thanks to information collected with Your consent by means of cookies and similar tracking technology (Data concerning the Use of our WEBSITES) as, for example, in connection with products for which You showed an interest in the online-shop, products purchased or based on interactions with our offers, newsletter and marketing communications.

If You want to know more about SWAROVSKI's use of Cookies, please see Section IV below. Please note that consent to Personalization and Marketing cookies can be withdrawn anytime by clicking on "Reject All" in our "Cookie Consent" management tool at the bottom of <https://www.kristallwelten.swarovski.com>.

Personalized and targeted advertising on third parties' websites and platforms

Thanks to cookies and similar tracking technologies from companies specializing in the use of such advertisements including Meta and Google (see Annex IV for a more detailed description), SWAROVSKI shows You personalized and targeted advertisements of our products on third parties' websites, social media platforms and other platforms. These

third-party cookies are set through our WEBSITES with Your consent that can be withdrawn anytime. They allow to recognize You based on uniquely identifying Your browser and device to show You relevant advertisements from SWAROVSKI on other sites or platforms on SWAROVSKI's behalf as well as be used by these companies for their own purposes, including to build a profile of You based on your interests. The companies owning the third party websites and platforms have their own privacy policies in place, and SWAROVSKI's privacy policy does not extend to the processing activities carried out by these third parties where they act on their own account. Please visit the respective privacy policies to know how they process Your Personal Data.

In this context, SWAROVSKI relies on The Trade Desk (hereafter also "**TTD**") services to display ads to users who have shown an interest in our websites or who have specific characteristics (e. g. interests in certain products or certain demographic characteristics) for the purposes of targeted advertising. TTD helps SWAROVSKI to manage digital advertising campaigns by ensuring that the advertisements You see on the internet are relevant to You (personalizing ads) and by measuring and evaluating the effectiveness of our marketing campaigns (measurement and analytics; reporting; clicks and conversion).

For these purposes, the TTD's technology (hereafter also "**TTD Platform**") collects and processes pseudonymized – i.e. non-directly identifying – data about users, devices and ads, as well as where they are shown. The processed data include: Cookie ID, Mobile Device ID, IP address, interest information, web browser and device information, information about which advertisements You have already seen, how You responded to ads, location information, timestamps and website URLs.

If You are based in the European Economic Area (EEA), the United Kingdom or Switzerland, the UK Trade Desk Ltd. is responsible for processing Your personal data. For the provision of the services to Us, TTD may disclose information to third parties, including third parties based in the United States, as described in The Trade Desk privacy policy available at <https://www.thetradedesk.com/us/privacy>.

In the event that SWAROVSKI places advertisements of third parties on the WEBSITE (e.g. banners) or places an own ad on the website of a third party, Data processing for the purposes of targeted advertising is carried out based on Your consent (Art. 6 (1) (a) GDPR). You can revoke Your consent at any time with effect for the future by changing Your defined preferences in our "Cookie Consent" manager available at the bottom of <https://www.kristallwelten.swarovski.com> or by visiting <http://www.adsrvr.org/> to opt-out of the Trade Desk services. In this case, the so-called opt-out setting means that You will no longer be shown targeted advertising across TTD customers / partners.

Detailed information on the Trade Desk's data processing activities, including the purposes for which TTD processes personal data on its own behalf, is available in the Trade Desk's privacy available here: <https://www.thetradedesk.com/us/privacy>.

Targeted advertising by sharing of first party data

Display of personalized and targeted advertising on third-party websites, social media platforms such as Facebook, Instagram (Meta) or Internet search engines like Google can also occur, with Your consent (that can be withdrawn anytime), by means of securely sharing Personal Data We hold on You as your hashed email address and other information We may hold on You like your Purchase and order information data. The third parties will match their databases with the hashed data shared by Us and, if this match is successful, be

able to display personalized advertisements of SWAROVSKI's products to You based on criteria and instructions We set as part of our marketing campaigns. There is also the possibility that the identification will result in You not being advertised with our advertisements. Please note that the processing of Your personal data will occur in compliance with the privacy policies of these websites and SWAROVSKI privacy policy does not extend to the processing activities carried out by these partners where the latter are acting on their own account. Please visit the respective privacy policies to know how they process Your Personal Data.

A list of third parties to whom SWAROVSKI shares first party data as well as a description of the processing can be found in ANNEX IV of this Privacy Policy.

Please note that even if You do not consent to tracking technologies for the purpose of personalized and targeted advertisement, You still may receive advertisement displays of SWAROVSKI which are not targeted to You if, for example, You fall in a certain audience group based on demographic criteria (e.g. country, age, gender). No personal information about You will be shared in these cases by SWAROVSKI to third parties and the processing of your Personal Data will occur in compliance with the privacy policies of these websites. Please visit the respective privacy policies to know how they process your Personal Data.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing. For a detailed overview of the personal data included in the different categories, please see Annex III below.

Purpose	Categories of Personal Data	Legal basis of the processing
Display of personalized and targeted advertising	- Your Identification and contact information; - Your Newsletter and Interaction data - Your Preferences Data - Demographic Data - Inferences Data - Your Purchase and order information data - Data concerning the use of our WEBSITES	Your consent

7. To improve the knowledge of our customers, to analyse patterns and trends and to optimize our marketing and communication strategy

SWAROVSKI processes Personal Data collected for internal purposes to better understand the interests and preferences of our key customer audiences so We can consistently improve our products and services, for internal reporting purposes and to ensure adequate

and appropriate products and resources. For this purpose, We analyse how promotions, sales, marketing campaigns, contests or events performed.

We may also use statistical functions provided by Our social media partners on how our users use our fan pages. These data statistics are based on Personal Data collected during a user's visit, or on the user's interaction with Our contents.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing. For a detailed overview of the personal data included in the different categories, please see Annex III below.

Purpose	Categories of Personal Data	Legal basis of the processing
Improve SWAROVSKI services and products	• Data concerning the use of our WEBSITES • Preferences Data • Purchase and order information data • Social Media data • Newsletter and Interaction data • Other voluntary provided data and survey data	Our legitimate interest

Where We rely on our legitimate interests, We will only do so to the extent that your own interests or fundamental rights do not override our interests.

8. To protect our activities, employees and assets

SWAROVSKI may implement certain measures to protect and defend our rights and property including our intellectual property rights, our premises, our systems and networks, our employees and our business partners in compliance with applicable laws and regulations.

Some premises and stores of SWAROVSKI are under video surveillance. The purpose of the video surveillance is ensuring security in the premises and protecting the property of SWAROVSKI. Recordings are overwritten after a lapse of a short period of time unless they include events that could be potentially subject of legal claims. In such a case personal data shall be processed for a period of limitation of any claims.

In addition, our Sites may also utilize "session replay" technology for the purposes of detecting errors occurring on our WEBSITES that may impact your experience. Such tracking includes recorded sessions, which we may play back for these purposes. We collect this data, via our service providers, which may change from time-to-time, who will use the data on our behalf and for this purpose. The data collected for this purpose does not include any information entered in forms such as your name, the delivery address or the credit card data, as these inputs are being masked out in session videos. You may withdraw your consent to these "session replay" technologies, that are not necessary for the technical

performance of the WEBSITE, at any time by disabling cookies – please see section IV. 2. below.

For a detailed overview of the personal data included in the different categories, please see Annex III below.

Purpose	Categories of Personal Data	Legal basis of the processing
Guarantee of the security of our services Protection of our activities, employees, and assets	• Anti-Counterfeit data • CCTV Data • Operational Data	Our legitimate interest Your Consent

Where We rely on our legitimate interests, We will only do so to the extent that your own interests or fundamental rights do not override our interests.

9. To ensure We comply with applicable laws and to establish, exercise or defend legal claims.

SWAROVSKI maintains your Personal Data, including a record of the purchases You make for internal accounting reasons and to comply with our legal and tax obligations. Please note that SWAROVSKI is a global company and these obligations and retention periods differ from country to country. If You wish to know more about it, please contact Us (Section I.3 above).

Moreover, We maintain your Personal Data to be able to respect Your choices as in cases You request Us not to receive any more any marketing communication from Us or to be able to show compliance with Your instructions as required, for instance, when You are consenting to receive our personalized marketing content.

Finally, We may process your Personal data to establish, exercise or defend legal claims in accordance with applicable laws. This means that we may retain any Personal Data related to your purchases and services received as well as any related communication and attached documentation as evidence in case of legal claims from or against Us for the time such a claim could be filed by or against Us and for the duration of the related litigation.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing. For a detailed overview of the personal data included in the different categories, please see Annex III below.

Purpose	Categories of Personal Data	Legal basis of the processing
Compliance with applicable laws	- Your Identification and contact information - Your Purchase and order information data - Your Payment information data - Your Communication data	Compliance with legal obligations
Establishment, defense and exercise of legal claims		Our legitimate interest

Where We rely on our legitimate interests, We will only do so to the extent that your own interests or fundamental rights do not override our interests.

IV. COOKIES

1. Cookies and device identifiers general information

Cookies are small pieces of information which are sent to your device or accessed from your web browser or device's memory. A cookie typically contains the name of the domain (internet location) from which the cookie originated, the "lifetime" of the cookie (i.e. when it expires) and a randomly generated unique number or another identifier. A cookie allows generally to collect information about your device, such as user settings, browsing history and activities conducted while using our WEBSITES and Applications. By linking the information in these cookies with other Personal Data that You provide to Us, for example, when You log-in to Our WEBSITES or Applications, We may be able to identify the cookie information related to You.

We use cookies on our WEBSITES for different purposes including to:

- Allow You to use essential features of our WEBSITES such as storing Your product selections to Your shopping bag whilst You continue to shop and/or navigate to different pages of the WEBSITES and accessing secure areas of the WEBSITES.
- Help Us improve the WEBSITES by measuring any errors which occur during Your browsing experience;
- Provide You with improved site functionalities;
- Allow You access to Our additional services as for example booking an appointment online or in one of our SWAROVSKI stores, contact Your Crystal expert online or in the store, use the Virtual features available on our WEBSITES or to find a specific SWAROVSKI store with Our Store finder functionalities. If You choose not to accept these cookies, You will be unable to use that services;
- Remember You if You have visited Us before and preferences You have applied so that We can enhance Your future visits to our WEBSITES;
- Restore what is in Your shopping bag if You wish to return on a subsequent browsing session;
- Offer You a customised browsing experience by providing You with interest-based services and products both on our WEBSITES and on third parties websites too.
- Present You with targeted advertising of SWAROVSKI products and services which may be of interest to You;

- Analyse effectiveness of our advertising by e.g. identifying what You click, from which website You arrive and if You make a purchase;
- Provide feedback to Our selected third-party partners that one of our visitors also visited their website (including details of any products You bought).

On our WEBSITES we use the following categories of cookies:

- **Technically necessary cookies.** Your consent is not required for these cookies to be dropped, as they are technically necessary for the operation of the WEBSITES and its functions. The data these cookies collect is necessary for the technical performance of our WEBSITES, to provide the basic shopping functions including the processing of Your payments, as well as for security and fraud prevention purposes. These cookies are in particular:
 - **Session cookies** that store certain of Your settings (e.g. the shopping cart, language settings or log-in data),
 - Cookies that are used by integrated payment **service providers** (regardless of a specific payment method) to prepare possible payments or to check a payment legitimation,
 - **Web analytics service as essential** that is used to monitor the proper functioning and measure the performance of the website. Please note that based on our configuration, only anonymized data that cannot be tracked back to an individual person is collected on SWAROVSKI servers in the European Union. This means that it is not possible for Us to recognize You as a user if You return to our website at another time, as only a so-called session cookie is set, which is automatically deleted when You close your browser. It is also not possible to recognize You as a user across devices and no user profiles are created.
- **Statistical cookies.** These cookies allow us to understand how users navigate and interact with our WEBSITES so we can measure and improve their performance. They help us to know which pages are the most and least popular and see how visitors move around the WEBSITES. Information these cookies collect is aggregated and therefore anonymous.
- **Personalization cookies.** Based on your interactions with the WEBSITES, your preferences and Your purchasing behavior, We may show You personalized content that reflects these preferences. For this We need your consent, which You can revoke at any time.

In addition, SWAROVSKI relies on these personalization cookies, with your consent which can be withdrawn anytime, for the delivery of some of Our customized experiences. The acceptance of these cookies allows SWAROVSKI to locate You, to put You in contact with SWAROVSKI and to give You the possibility of exchanging with SWAROVSKI (via chat or video calls). The use of this technology allows Us to locate You and give You the option of interacting with Us via personalized chat or video calls, where we can highlight and recommend products that best reply to Your expectations. This use will be associated with the tracking of Your experience on the WEBSITES (including live tracking of Your navigation on the WEBSITES or mobile application), to allow SWAROVSKI to assist You while navigating on <https://www.kristallwelten.swarovski.com>.

- **Marketing cookies.** These cookies may be set by Our advertising partners through Our WEBSITES and may be used to create a user profile based on your behavior on Our WEBSITES to show You relevant advertisements on other websites and platforms. These cookies identify your browser or Your end device. If You do not consent to the use of these cookies, You will not receive our personalized and targeted advertising on other websites.

Further information about the exact list of cookies SWAROVSKI uses can be found on our WEBSITES, in the Legal section “Cookie Consent”.

2. Managing cookies in Your browser and in Your Apps and devices. Please note that most browsers allow You to manage how cookies are set and used as You’re browsing, and to clear cookies and browsing data. Also, Your browser may have settings letting You manage cookies on a site-by-site basis. For example, Google Chrome’s settings at <chrome://settings/cookies> allow You to delete existing cookies, allow or block all cookies, and set cookie preferences for websites. Most browsers also offer Incognito mode, which deletes your browsing history and clears cookies on your device after You close your Incognito windows. Most mobile devices and applications allow You to manage how other technologies, such as unique identifiers used to identify a browser, app or device, are set and used. For example, the Advertising ID on Android devices or Apple’s Advertising Identifier can be managed in Your device’s settings, while app-specific identifiers may typically be managed in the app’s settings.

Please check your browsers, Apps and devices settings to manage your preferences. However, please note that restricting certain cookies or other device identifiers may affect your user experience and prevent Your use of certain parts of Our WEBSITES.

You can also reject cookies by clicking on the “Cookie Consent” link available at the bottom of our WEBSITES, in the “Legal” section.

V. TO WHOM WE DISCLOSE YOUR PERSONAL DATA

To the extent permitted by applicable laws and as necessary depending on the purpose of processing, SWAROVSKI may share your Personal Data with third parties. Please find below the different categories of third parties with whom SWAROVSKI may share your Personal Data.

1. **SWAROVSKI GROUP OF COMPANIES.** Please be aware that Swarovski is not just a single company. Swarovski is a group and We may share Your Personal Data with other SWAROVSKI Companies (see list of companies belong to the SWAROVSKI Group in **APPENDIX 1**). This can happen for the following reasons:
 - a. To provide You with the best SWAROVSKI customer service wherever You are;
 - b. For the provision of IT services including the storage, maintenance and IT support required for our systems to work;

- c. To manage the SWAROVSKI Loyalty Programs including the possibility to count towards Your tier calculation purchases You make in SWAROVSKI's Stores in participating countries;
- d. To improve our marketing strategy and efforts;
- e. Other purposes as collaboration, corporate reorganization, mergers and acquisitions.

ACQUISITIONS. In the event that part or all of the SWAROVSKI group of companies is restructured, sold or licensed to a third party, We may transfer Personal Data to the new company, buyer or licensee.

2. **Wholesalers, Retailers and dealers.** As part of the processing of your Personal Data for SWAROVSKI Loyalty Programs, We may share your Personal Data with our business partners. This includes Our participating retail stores or other authorized resellers that may use the Personal Data received exclusively for providing You the products and services requested and for the management of your account as a SWAROVSKI Loyalty Program Member.

Please note that certain points of sale carrying out their business under the SWAROVSKI name, may act as independent data controllers and are able to determine "why" and "how" they use the Personal Data You share with them. Please be aware that our privacy policy does not extend to services provided by these companies on their own account. They have their own privacy policies in place, so remember that any personal data You provide them will be subject to their rules and not ours.

SWAROVSKI may also share your Personal Data with our selected business partners for the purposes of fulfilling your Buy Online Pick-Up in Store and Buy Online and Return in Store purchases where the store selected for the pick-up is a selected business partner's store.

4. **Logistics providers, fulfilment companies.** These partners enable Us to fulfill your order and deliver it to You and handle returns. Only the information necessary for the delivery purposes will be provided to them. Please note that these companies may also act as independent controllers for the provisions of their services and therefore process your Personal Data also for their own purposes. Further information can be found in the privacy policy on the websites of the respective service provider.
5. **Payment Service Providers.** Payment service providers enable Us to provide You with the products and services You have requested by ensuring your bank can proceed with payment, by accepting payments on Our behalf and then by transferring the funds paid by You to SWAROVSKI. When You make payments on Our WEBSITES or Applications, they are processed through Our third-party payment service providers based on your payment method selection. Your Personal Data will be passed on for the purpose of payment processing with the payment service provider to the extent it is necessary for the processing of the payment. This means that after selecting the desired payment method, You enter Your payment data directly with Our payment service provider and We cannot view and do not store this data. In case you allow us to remember your

payment data, we will only store a token and will not have visibility of your payment data.

Please note that such partners may also carry out processing activities for their own purposes, acting as independent data controllers. In this respect, our privacy policy does not extend to the processing activities carried out by these partners. If You want to know more about their use of your Personal Data, please visit the respective privacy policies.

6. **Fraud Prevention Providers.** When You purchase products on our WEBSITES, the payment service provider used for the payment of the purchase may proceed with fraud detection, prevention and monitoring processing activities as described in their respective privacy policies. For more information on how they process your Personal Data for this purpose, please visit the respective privacy policies of the payment providers.

In some circumstances, SWAROVSKI may also determine the necessity of performing an additional check for the security of the payment. In these circumstances, We share your Personal Data, including transactional data, device data, and location data, with our fraud prevention providers who perform fraud detection and prevention services related to your purchases. In Europe, the provider of these services is:

- **Riskified Ltd., Tel Aviv, Israel.** Riskified will process Your transaction's details (i) in order to review purchases for possible fraudulent activity; (ii) by storing Your transactions' details in its database for use in enhancing its anti-fraud services; and; (iii) to develop additional services, all in accordance with [Riskified's Privacy Policy](#). Riskified will process Your transaction details by automated means and will aggregate them with other Personal Data relating to transactions concluded by You on other e-commerce platforms, to assess the regularity of the payment, according to pre-determined criteria defined by Riskified.

7. **Communication (email, SMS, MMS, chat messages) providers, Marketing and media services, advertising and data analysis providers.** SWAROVSKI may share your Personal Data with these third parties to provide You with relevant information, updates and communications including to send You the confirmation of your purchase. Please note that We may also use postal delivery providers. In addition, We may also share certain limited personal data with companies that assist Us with other services, such as analyzing Personal Data to more accurately determine patterns in customer behavior and help Us improve our marketing and communication strategies. In addition, data analysis providers may enable Us to provide You with relevant information, updates and marketing content (e.g. by analysing Your answers to a survey, providing insights and helping Us to evaluate trends and improve our products and services).

8. **IT service providers.** SWAROVSKI may share your Personal Data with IT service providers enabling Us to:

- Provide You with the products and services You have requested (e.g. by managing our e-commerce website and our applications) and manage Your account (e.g. by making sure it is available at any time when You interact with us, and linking Your purchases to it);
- Provide You with relevant customer service (e.g. by allowing You to use chat services and other communication channels);

- Assess and better understand our business (e.g. by providing Personal Data visualisation tools);
- Optimise and manage our WEBSITES and other means of communication (e.g. by ensuring that our website is always available);
- Strengthen the security and functionality of our WEBSITES; and
- Support SWAROVSKI with the storage and the maintenance, functionality, performance, and management of SWAROVSKI's IT systems.

The categories of personal data shared with these partners depend on the type of service provided and is the strictly minimum necessary for the performance of the services.

9. Hosting and Content Delivery Networks SWAROVSKI WEBSITES are hosted by external service providers (hosts). Personal data collected on our WEBSITES are stored on the servers of the host. These may include, but are not limited to, IP addresses, contact requests, metadata and communications, contract information, contact information, names, web page access, and other data generated through a website. The host is used for the provision of secure, fast and efficient online services to You. Our host will only process your Personal Data to the extent necessary to fulfil its performance obligations and to follow our instructions with respect to such data.

10. Target Group-Oriented Advertising Service Providers and social media networks. Targeted advertising is a form of advertising that is addressed at a specific target group. The target group-oriented advertising is placed, for example, on social media networks (as Facebook, Twitter, Instagram, TikTok), search engine platforms as Google and other websites in such a way that the advertising is shown to the selected target group. For more information of this activities, please see Section III 6.1 above.

11. Audit, law firms and similar corporate professional service providers. SWAROVSKI may share your personal data with these third parties to better understand and conduct our business, to comply with our legal obligations, to initiate and defend claims. These recipients include accountants, lawyers and auditors who may need to use your Personal Data for the performance of their services to Us.

12. Legal disclosure obligations. In certain circumstances, We may need to disclose your Personal Data in order to comply with legal requirements. We may, in limited cases, transfer your Personal Data to governmental agencies and regulators (e.g. tax authorities), courts, and government authorities, all in accordance with applicable law. Anti-Counterfeit Data may be shared with third parties, including government authorities and companies legally authorized to use the SWAROVSKI trademarks for the purpose of investigating infringing activity and taking action to prevent the infringement of SWAROVSKI's intellectual property rights.

VI. INFORMATION ABOUT THE TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA ("EEA").

Data recipients as set out in Section V above may involve a transfer of your Personal Data to territories that do not provide the same level of data protection. Applicable legal and regulatory requirements are taken into consideration before any cross-border transfer of your Personal Data:

- Personal Data transfers within SWAROVSKI will ultimately be covered by Swarovski's Intragroup Data Transfer Agreement;
- Any data transfers outside your jurisdiction that do not provide an adequate level of data protection will be secured through appropriate transfer mechanisms in compliance with applicable laws and regulations, such as EU Standard Contractual Clauses.
- The transfer of Personal Data may also be based on your consent, to benefit from a unique SWAROVSKI's experience across the world.

SWAROVSKI may disclose your Personal Data within SWAROVSKI as well as to third parties and in every country/region worldwide, including namely all countries/regions in which SWAROVSKI is represented by Group companies, affiliates or other offices and representatives (see ANNEX 2, as updated from time to time) as well as to countries/regions in which service providers of SWAROVSKI process data (see ANNEX 2, as updated from time to time).

As far as reasonable, SWAROVSKI will transfer Your personal data only to countries recognized as guaranteeing an adequate level of data protection. If Your Personal Data needs to be transferred to countries/regions not providing such an adequate level of protection, less stringent data protection rules may apply as there is a risk that personal data is processed by authorities, for control and surveillance measures, possibly without legal remedies. If Your Personal Data is disclosed to countries/regions that do not guarantee adequate protection, SWAROVSKI will ensure that data disclosed is adequately protected and transferred in accordance with current legally recognized data transfer mechanisms, such as appropriate standard contractual clauses approved by the European Commission (see https://commission.europa.eu/publications/standard-contractual-clauses-international-transfers_en) or required revisions thereof (e.g Switzerland), binding corporate rules, or transferring data pursuant to consent, conclusion or performance of a contract, or in connection with the determination, exercise or enforcement of legal claims, or pursuant to overriding public interests, or in order to protect the integrity of these individuals. You can obtain a copy of the contractual guarantees from or will be advised where to obtain such copies by the contact points named above (see para. 1 above). SWAROVSKI reserves the right to redact such copies for applicable legal or secrecy reasons.

VII. FOR HOW LONG WE KEEP YOUR PERSONAL DATA

General principles. We do not retain your Personal Data for longer than is necessary for the purposes for which data is processed. Notwithstanding the general principle, SWAROVSKI may process personal data for longer periods subject to the following rules and obligations:

1. SWAROVSKI is obligated to do so (by way of contract, law or other provisions). Please note that it may be necessary for Us to retain certain personal data even

after an online account has been closed or deleted, as when further processing is necessary for the fulfilment of our legal obligations (for example our accounting and tax obligations which vary from country to country based on local legal requirements); or

2. SWAROVSKI has an overriding interest (e.g. an interest for reasons of proof in case of claims, documentation of compliance with certain legal or other requirements) as for the assertion, exercise or defense of legal claims. Also, if You have objected to receiving SWAROVSKI newsletters, we may also keep the relevant documents relating to Your objection to ensure that we will be able to respect Your wishes in the future and will no longer contact You.

As a rule, for contract related CUSTOMER DATA and PARTNER DATA (including business records and communication) SWAROVSKI retains Personal Data as long as the contractual relation is ongoing and for ten years after the termination of the contractual relationship unless (i) a shorter or longer statutory storage obligation is applicable on a case-by-case basis, (ii) the retention is required for reasons of proof or another valid reason based on applicable law, or (iii) the deletion of the data is required earlier (because e.g. the data is no longer required or SWAROVSKI is required to delete the respective data).

Please find below an overview of our retention policy:

Purchase and order information data and Payment and information data: The data will be stored for a maximum of 10 years (the period begins with the collection of the respective date).

Operational Data. In the case of Operational Data containing Personal Data (e.g. protocols, logs), SWAROVSKI retains Personal Data for a period of 3 - 12 months.

Telephone conversations. Recorded telephone conversations will be retained for 60 days, unless it is appropriate in the circumstances or required by law to retain these recordings for a longer period (e.g. due to a possible litigation, complaint or ongoing customer service request).

Video Surveillance. Some of our company premises and offices are under video surveillance. Recordings are overwritten after a lapse of a short period of time unless they include events that could be potentially the subject of legal claims. In this case, Personal Data will be stored until the limitation period of any claims.

When the applicable retention period has been reached and/or SWAROVSKI no longer requires your Personal Data for any of the purposes stated above, your Personal Data will be deleted.

VIII. SPECIFIC PROVISIONS FOR SWAROVSKI LOYALTY PROGRAMS

The following provisions shall be applicable for the processing of data by SWAROVSKI in connection with the Swarovski Loyalty Programs.

1. Responsible for the Personal Data (Controller)

The Personal Data in connection with the Swarovski Loyalty Programs' memberships 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, or, if different, the Swarovski entity to which Your membership is assigned and (ii) the controller of SWAROVSKI Aktiengesellschaft, Dröschstrasse 15, 9495 Triesen, Liechtenstein.

2. Processing of Personal Data and Source

SWAROVSKI collects and retains the Personal Data provided on the Swarovski Loyalty Programs sign-up form plus any Personal Data provided voluntarily by Swarovski Loyalty Members during their membership on the member page, their account or when interacting with Us in store, via telephone, email, chat or online. This includes Personal Data as date of birth, styles/interests (e.g. in Jewelry and Accessories, Home and Style, Wedding, Figures and Collectables and/or Watches; Classic style), data related to appointments, social media accounts (and related information collected through social log-in if available), wish lists, gender, IP address and online identifiers.

In addition, and where available, with Your consent, when chat and video functionalities are activated by accepting cookies, SWAROVSKI offers the possibility to communicate with Us (via chat or video calls). The use of this technology allows Us to locate visitors and give them the option of interacting with Us via personalised chat or video calls, where we can highlight and recommend products that best meet a visitor's expectations and preferences. This use will be associated with the tracking of Swarovski Loyalty Members' experience on the WEBSITE (including live tracking of their navigation on the WEBSITE or mobile application) to allow SWAROVSKI to assist Swarovski Loyalty Members while navigating on <https://www.kristallwelten.swarovski.com> and <https://www.swarovski.com>.

SWAROVSKI also saves Personal Data on Swarovski Loyalty Member's purchase history in the form of items purchased (product designation, price, discount), place and time of purchase and membership number (Purchase and Order Information Data). The purchase history is recorded if the Swarovski Loyalty Programs membership number is communicated at the checkout for purchases in participating stores.

In the online store Swarovski Loyalty 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 the Swarovski Loyalty Programs membership.

SWAROVSKI also collects and saves all vouchers sent to the Swarovski Loyalty Member and, as the case may be, further data about the Swarovski Loyalty 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).

A list of all participating stores in the Swarovski Club program is available at <http://www.swarovski.com/store-finder>.

3. How do we use personal data? Purposes of processing and legal basis

SWAROVSKI uses your Personal Data for various purposes including to provide You with Our services, to enhance your customer experience and to offer You a personalized customer experience on Our WEBSITES and in Our stores.

In this section We describe why SWAROVSKI collects and processes your Personal Data specifically as a Swarovski Loyalty Member:

a. To register, manage and keep up to date Your Swarovski Loyalty membership account

When You decide to become a Swarovski Loyalty member, SWAROVSKI needs to collect and process your Personal Data to register You into the SWAROVSKI customer database (e.g. by completing our form in a participating Swarovski store or registering online on our WEBSITES) and to manage and maintain it updated (Form Data). This to be able to provide You with the exclusive services and benefits reserved to registered members in compliance with the relevant Terms and Conditions of the Swarovski Loyalty Programs.

Please note that for registering as a Swarovski Club Member only your email address is required whereas for Swarovski Crystal Society loyalty program, SWAROVSKI will also process your postal address and Payment Information Data, where necessary for the payment of Swarovski Crystal Society Membership fees. In addition, your preferred communication language will have to be provided.

All other Personal Data is provided on a voluntary basis based on your consent.

Where SWAROVSKI believes that two different Swarovski Loyalty Program Memberships belong to the same individual, or where a valid request is received, SWAROVSKI may merge them.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing:

Purpose	Categories of Personal Data	Legal basis of the processing
Registration, management and maintenance of Your membership	• Form Data • Payment Information Data	Necessity for the performance of the contract with You

b. To operate the Swarovski Loyalty Programs

As a Swarovski Loyalty Member, SWAROVSKI offers You advantages and awards You special conditions. This may include for example sending You birthday congratulations and discount vouchers, invite You to special events and promotions reserved for members or, in participating stores, to take advantage of an extended customer advice in which, upon presentation of the membership number or name, the store employee can call up the Personal Data saved in your account and provide You with additional sales advice based on your past purchases, style/interests selected or wish list.

If available, SWAROVSKI may also use Personal Data of elected Members to propose them personalized assistance and advice and to be in contact with a dedicated Crystal Expert with any requests they may have via phone (including via SMS and one -to - one messaging applications as for example WhatsApp), email or via any other preferred contact channel(s) communicated to Swarovski. Members can decide if they wish to benefit from such services. Please note that by providing certain information to Swarovski such as a telephone number or email address You are consenting to and authorizing Swarovski and its affiliates,

to contact You from time to time by telephone, SMS and/or one-to-one messaging applications (even if your phone number(s) may be on a Do-Not-Call list), or e-mail for the provision of the benefits linked to your Swarovski Loyalty Program membership as services, special offers, and invitations to activities. This consent can be withdrawn at any time.

Please note that SWAROVSKI processes your Personal Data also for the sending of non-marketing communication which includes but is not limited to: changes related to our Privacy Policy, General Terms and Conditions and/or Terms of Use; general changes to product and service offering; account verification; password reset; or an information related to incidents that could affect Our services.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing:

Purpose	Categories of Personal Data	Legal basis of the processing
Operation of the Swarovski Loyalty Programs	• Identification and contact information • Form Data • Purchase and order information data • Preferences Data • Communication data	Necessity for the performance of the contract with You
One-to-one personalized assistance and advice via phone and/or online		Your consent
Participation in surveys	• Survey Data	Your consent
Sending of non-marketing communications	• Identification and contact information • Purchase and order information data • Form Data • Communication data	Necessity for the performance of the contract with You

c. To provide You with relevant information and personalized marketing content and to optimize SWAROVSKI's marketing and communication strategy

If You have given your consent, which can be withdrawn at any time, and registered to receive our Newsletter and personalized marketing communications, SWAROVSKI may send You by e-mail or in any other way chosen by SWAROVSKI (including by text, telephone or post) further up-to date information about promotions, advertising, catalogues and invitations to events, concerning SWAROVSKI and SWAROVSKI's products.

SWAROVSKI may personalize the information sent to the Member so that the Member particularly receives, where possible, information which SWAROVSKI deems interesting for the Member.

For this purpose, SWAROVSKI analyses Personal Data collected at the start of Membership as well as information relating to your age, gender, country of residence, interests and preferences selected or voluntarily provided by You (Demographic and Preferences data), interactions with our newsletters (such as newsletter open rate, click rates, time of interaction) or social media interactions, interactions with our WEBSITES and browsing activity collected via cookies or analogous tracking technology (see Section IV for more information on how We do use cookies), as well as the vouchers received, and any other information that can be gleaned from the purchase history, inferred from interaction data or has been voluntarily given to SWAROVSKI at any later time.

For the provision of this personalized information interesting for the Member, SWAROVSKI may perform profiling activities. Profiling is defined as any kind of automated processing of personal data to evaluate certain personal aspects relating to a natural person, to analyze or predict elements as preferences, interests or likely behavior of that natural person.

Non-marketing communication may still be sent if You have opted-out from certain marketing communication as this may be necessary for Us to perform a contract with You, to comply with legal obligations or security requirements.

Also, SWAROVSKI may process your Personal Data for statistical and research purposes, including for better understanding of Swarovski Loyalty Members, consumer and market analysis, improvements to the Swarovski Loyalty Programs and the development of new products and services.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing:

Purpose	Categories of Personal Data	Legal basis of the processing
Provision of relevant information and personalized marketing content	• Identification and contact information; • Purchase and order information data • Preferences Data • Inferences Data • Newsletter and Interaction Data • Location Data • Data concerning the use of our WEBSITES • Communication data	Your consent
Optimization of SWAROVSKI's marketing and communication strategy		Our legitimate interest

Where We rely on our legitimate interests, We will only do so to the extent that your own interests or fundamental rights do not override our interests.

d. To display You with targeted advertising by sharing first party data

SWAROVSKI processes Your personal data for the display of personalized advertising on third-party websites, social media platforms or other platforms as described in Section III 6.1 above of this Privacy Policy.

e. To unify Your customer experience across channels

SWAROVSKI processes your Personal Data to unify your customer experience across Our channels (SWAROVSKI's stores, swarovski.com, e-mail communication, social media) to allow You to get the most out from Our offers and make sure We provide You with the benefits linked to your membership. This occurs by matching data provided from different sources e.g. transactional data, data provided at the time of creation of your Swarovski Loyalty Program's account, data linked to it, your preferences and /or tracking data provided You consented to these when accessing our WEBSITES or applications.

Please find in the table here below a description of all the categories of Personal Data processed for this purpose and the legal basis We rely upon for such processing:

Purpose	Categories of Personal Data	Legal basis of the processing
Unification of customer experience	• Identification and contact information • Purchase and order information data	Legitimate interest

Where We rely on our legitimate interests, We will only do so to the extent that your own interests or fundamental rights do not override our interests.

4. Disclosure of Personal Data

While processing personal data in connection with Swarovski Loyalty Programs, SWAROVSKI may namely disclose Your 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 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/region worldwide and they may use data received from SWAROVSKI only for the purpose of operating Swarovski Club, including personalized offers to and communication with Members on behalf of SWAROVSKI;
- Third parties including social media and marketing partners for the purposes of providing personalized marketing content as well as to optimize our marketing and communication strategy;
- to a Swarovski company for the purposes of operating the Swarovski Loyalty Programs in cases where You join the Swarovski Loyalty Program in a country/region different from Your country/region of residence or to determine Your Swarovski Loyalty rewards based on Your purchases in countries or regions different from Your country/region of residence.

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

SWAROVSKI may disclose your Personal Data within SWAROVSKI as well as to third parties and in every country/region worldwide, including namely all countries/regions in which SWAROVSKI is represented by Group companies, affiliates or other offices and representatives (see ANNEX 2, as updated from time to time) as well as to countries/regions in which service providers of SWAROVSKI process their data (see ANNEX 2, as updated from time to time). If that is the case, SWAROVSKI will ensure an adequate level of protection according to Section VI above.

5. Rights of Data Subjects

The Swarovski Loyalty 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. Further information about the rights of Data Subjects is provided in Section X.

6. Data Retention

Personal Data will be held and used for the duration of the Swarovski Loyalty 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. As exception to this rule, the purchase history on Swarovski Crystal Society exclusive products will be kept during the entire duration of the Swarovski Crystal Society Membership to recognize member life-time value to the Society. Should a Swarovski Crystal Society Member not wish to have his or her SCS exclusive product history stored above 5 years, he/she can request deletion by contacting Customer Service informing of his/her explicit wish to have this history deleted.

Further information regarding Swarovski Loyalty Programs can be found in the General Terms and Conditions of the respective Swarovski Customer Loyalty Program on <https://www.swarovski.com>.

IX. BUSINESS TO BUSINESS RELATIONSHIPS

Within the framework of its business relationships SWAROVSKI may access, collect, store, process, use, disclose, transfer or delete (hereinafter collectively referred to as "use") Personal Data about natural persons working for or acting as our business customer, service providers, contractors, partners, suppliers (hereinafter natural persons shall be referred to as "**PARTNERS**" and their data as "**PARTNER DATA**").

SWAROVSKI processes the following categories of PARTNER DATA:

- Identification and contact Information
- Information regarding the role as the title, position, function
- Information relating to the previous contact with PARTNERS
- Attendance when entering facilities or SWAROVSKI's events

- Communication data
- Data regarding marketing activities (e.g. receipt of newsletters)
- Data related to the use of our WEBSITES
- Electronic identification data including login passwords, IP addresses and other online identifiers
- Log data
- Information regarding business transactions, financial information including contract, invoice and bank account information, requests, offers, tenders, conditions and contracts, information related to professional or other interests of the PARTNERS
- Reports on PARTNERS' financial position

We will use PARTNER DATA for the purposes described in this section, in compliance with the applicable data protection laws and relying on the legal basis set out below. Where We rely on our legitimate interests, We will only do so to the extent that your own interests or fundamental rights do not override our interests.

Depending on the circumstances, We process PARTNERS DATA for the following purposes:

Purpose of the processing	Legal basis of the processing
Organisation and management of our procurement and contractor selection process	Performance of a contract Or our legitimate interest (where applicable) to identify and select the most adequate contractor for fulfilling the assignment at stake
Execution of background checks to ensure We are not precluded from working with PARTNER or the legal entity that employs PARTNER	Compliance with a legal obligation to which SWAROVSKI is subject. Or our legitimate interest if this is not required by law but to comply with SWAROVSKI internal processes and policies
Execution of background checks to evaluate the creditworthiness of our PARTNERS	Our legitimate interest
Establishment and execution of the contractual obligations	Performance of the contract
Communication in relation to service-related matters, including after sale services, enquiries and requests	Performance of a contract
Update of our records and management of our relationships, including PARTNERS' account with Us	Our legitimate interest
Send out of marketing communications including newsletters	Consent

Analysis of the behavior on our WEBSITES	Consent
Provision of access to our information systems, internal platforms, applications or for hardware loaned to enable performance of services	Performance of a contract
Provision of trainings	Performance of a contract Our legitimate interest
Implementation of prevention, detection and investigation measures to ensure physical security and cybersecurity	Our legitimate interest
Business analytics & financial reporting	Our legitimate interest
Implementation of activities related to the protection of intellectual property rights and management of litigation cases	Our legitimate interest
Archiving and keeping of records of relevant documentation in order to comply with our legal obligations	Compliance with a legal obligation to which SWAROVSKI is subject.
Compliance with our legal, financial or accounting management obligations, and in particular to share necessary information with auditors, law firms, or similar corporate professional service providers	Compliance with a legal obligation to which SWAROVSKI is subject.
Sale or reorganization of any of our business or assets	Our legitimate interest

Within the framework of their business relationship, PARTNERS will be required to provide PARTNER DATA necessary for the establishment and execution of the contractual relationship and the fulfilment of the associated contractual obligations or if required by law. Without these data, SWAROVSKI will generally not be able to conclude or execute the contract with the respective PARTNER as contracts in principle cannot be concluded and processed without information on their employees and other contacts.

As any access to the WEBSITES is logged, connection data (such as the IP address) will always be logged; this is done automatically during the use and cannot be deactivated for individual PARTNERS.

We mainly obtain information directly from You or through the legal entity that employs You. From time to time, and in compliance with applicable data protection laws, We may also collect information on You from publicly available sources as LinkedIn, or the website of the legal entity that employs You. Finally, to comply with Our obligations in terms of anti-corruption, anti-money laundering or export restrictions, SWAROVSKI may also have to consult public registers in order to verify that your company or its legal representatives are not subject to any prosecution, criminal convictions or on a restricted list.

We retain your Personal Data only for as long as it is needed and, generally, retain your Personal Data for the duration of the cooperation, partnership or agreement entered into with Us and, after the expiration or termination of this agreement for any reason, until legal claims under that agreement become subject to the applicable statutes of limitations.

To know what your rights in relation with PARTNER DATA are, please see below Section X.

If You have any questions related to the use of PARTNER DATA, please see "How to contact Us" Section I. 3.

Specific SWAROVSKI privacy policies may apply to PARTNER DATA. If this is the case, these policies will be communicated or made available to PARTNERS by SWAROVSKI separately.

X. WHAT RIGHTS DO YOU HAVE IN RELATION TO YOUR DATA?

1. YOUR RIGHTS.

As a data subject, when your Personal Data is processed by Us You have the following rights:

- a. **Right of Access.** You have the right to inquire about the processing of your Personal Data by Us.
- b. **Right to Data Portability.** You may request Us to forward your stored Personal Data in a common format to another Controller, insofar as this is technically possible.
- c. **Right to Rectification / Completion.** You have the right to request the correction of inaccurate Personal Data as well as to request the completion of incomplete Personal Data, taking into account the purposes of the processing.
- d. **Right to Erasure.** You have the right to demand SWAROVSKI to delete your Personal Data; SWAROVSKI is obliged to delete Personal Data if one of the following reasons applies:
 - Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed;
 - You revoke your consent and there is no other legal basis for the processing,
 - You object to the processing and there are no overriding legitimate reasons for the processing.

Based on the above, please be aware that if You make a request to erase your Personal Data, SWAROVSKI may not delete all your Personal Data. We may still process your Personal Data if it is necessary or required by law.

- e. **Right to Object.** You have the right to object to the processing of your Personal Data at any time for reasons arising from your situation. We will then no longer process your Personal Data unless We can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the purpose of asserting, exercising or defending legal claims.

If Personal Data is processed for direct marketing purposes, You have the right to object at any time to the processing of your Personal Data for the purpose of such advertising; this also applies to profiling insofar as it is related to such direct marketing.

- f. **Right to restriction of processing.** You have the right that we limit or restrict the processing of your Personal Data, for example, while a data accuracy dispute is being resolved.
- g. **Right to withdraw Your consent at any time.** When the processing of Personal Data is based on your consent, You have the right to revoke your declaration of consent at any time with effect for the future vis-à-vis SWAROVSKI (see Section X.2 below "How to exercise your rights").
- h. **Right not to be subject to a decision based solely on automated processing, including profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning You or similarly significantly affects You unless:
 - it is necessary for entering into, or performance of, a contract between You and Us;
 - it is authorised by Union or Member State law to which the respective controller is subject, and which also lays down suitable measures to safeguard Your rights and freedoms and legitimate interests; or
 - is based on the data subject's explicit consent that You can withdraw at any time (see Section X.2. "How to exercise your rights").

2. **HOW TO EXERCISE YOUR RIGHTS.**

If You wish to exercise any of the rights mentioned above, You can contact our service.kristallwelten@swarovski.com at any time . If You have an online customer account with Us, You can access, change or update your Personal Data yourself or change your preferences by logging into your account on Our WEBSITES and editing your details as requested.

Please note that We may require You to verify your identity to process a request made to exercise your rights in relation to your Personal Data. If we are unable to match this information, We may ask You to provide additional identifying information.

You may designate a third party to act on your behalf provided they have appropriate written authority to do so.

3. **UNSUBSCRIBING FROM THE SWAROVSKI NEWSLETTER AND MARKETING COMMUNICATIONS**

If You no longer wish to receive Our newsletter and marketing communications, You can withdraw your consent at any time by sending an email to Our Customer Service, by Unsubscribing from it in your account, or by clicking on the unsubscribe link included in all email newsletters.

Please note that for technical reasons, We need some time (maximum 28 days after receipt of Your request to complete the unsubscription process) to stop sending You newsletters.

Even if You have unsubscribed from our newsletter, We may continue to send You non-marketing messages. These are, for example, transaction notifications about the shipment and delivery of the products You have ordered, birthday greetings, e-mails about terms and conditions / privacy policy changes, e-mails about Your account, shopping cart reminders and/or e-mails to ask You for feedback on SWAROVSKI. We will only use your contact information as permitted by applicable law.

Please also note that the termination of one newsletter does not necessarily entail the termination of other newsletters to which You have subscribed.

4. SUPERVISORY AUTHORITY.

If You are not satisfied with our processing of Your Personal Data, You can contact Your local data protection supervisory authority (Switzerland: Federal Data Protection and Information Commissioner in Switzerland (<https://www.edoeb.admin.ch/en>), Austria: Austrian Data Protection Authority (<https://www.dsb.gv.at/>), UK: Information Commissioner's Office: <https://ico.org.uk/>). for other EEA Supervisory Authorities https://www.edpb.europa.eu/about-edpb/about-edpb/members_en).

XI. PROTECTION OF YOUR DATA

1. PROTECTION AND LINKING TO OTHER WEBSITES.

SWAROVSKI has implemented various technical and organizational measures to ensure an appropriate level of data security while processing your Personal Data.

We take appropriate technical and organizational measures to secure your Personal Data against loss, destruction, and unauthorized access. The technical and organizational measures implemented include encryption of Personal Data at rest as well as in transmission, pseudonymization of Personal Data whenever possible, application of the "need-to-know-principle" (access to your Personal Data is strictly limited to personnel who require access to provide the requested products and services), obligations of confidentiality for SWAROVSKI's employees and partners.

Please note that effective protection of your Personal Data depends also on You. Please store the login credentials to access your online account securely and do not share them with anyone. Do not use the same password for different services. Be extremely careful in responding to emails asking You to provide your login credentials and other information (e.g. credit card data). These are almost always "phishing emails" trying to gain unauthorized access to your Personal Data.

Please note however that the transmission of information via the Internet is not completely secure, so such transmission of Personal Data is at your risk.

2. PROTECTION OF CHILDREN'S DATA.

Our WEBSITES are not directed to children. You must be at least 18 years of age to use Our WEBSITES. If You are under the age of 18 or are considered a minor in your country of

residence, your parent or guardian must provide their Personal Data and acknowledge to this Privacy Policy on your behalf.

Special Provisions for the Processing of Children's Personal Data in Swarovski Kristallwelten

At Swarovski Kristallwelten, we offer special programs and events for children, such as birthday parties, workshops, and educational excursions for school classes. The protection of children's privacy and personal data is of utmost importance to us.

1. Collection and Processing of Data

Personal data of children is collected and processed exclusively in connection with the organization and implementation of the aforementioned events. This includes in particular:

- Name and age of the child
- Contact details of the legal guardians (e.g., name, telephone number, email address)
- Information on special needs or allergies (if relevant for the event)
- Photos or videos, only with the explicit consent of the legal guardians

2. Legal Basis

The processing of children's personal data is carried out solely on the basis of the consent of the legal guardians or a legal representative (Art. 8 GDPR). Without such consent, no personal data of children will be processed.

3. Purpose of Processing

The collected data is used exclusively for the following purposes:

- Organization and implementation of the respective event
- Communication with the legal guardians
- Fulfillment of legal obligations (e.g., supervision, accident prevention)
- Publication of photos/videos only with explicit consent

4. Disclosure and Storage

Children's personal data will not be disclosed to third parties unless this is necessary for the execution of the event (e.g., external service providers) and the legal guardians have been informed accordingly. The data will only be stored for as long as necessary for the execution and handling of the event and will be deleted thereafter, unless statutory retention obligations exist.

5. Rights of Legal Guardians

Legal guardians have the right at any time to obtain information about the data stored about their child, to request correction or deletion of such data, and to withdraw any consent given.

XII. AMENDMENTS

SWAROVSKI reserves the right to change this Privacy Policy from time to time and without prior notice or announcement. The latest version posted on the Our WEBSITES shall be applicable, so please check our privacy policy regularly.

If required by applicable law, We will notify You of any material changes to this Privacy Policy prior to its effective date, either on Our WEBSITES or in a personal notice. The changes shall be deemed to have been acknowledged and understood if You do not object within thirty (30) days of receipt of the notification.

Status of this privacy policy: July 2025

ANNEX I - List of SWAROVSKI Legal entities

Australia	Swarovski Australia Pty Ltd Unit 1, 4D Huntley Street, Alexandria NSW 2015, Australia
Austria	D. Swarovski Distribution GmbH Swarovskistrasse 30, 6112 Wattens, Tirol, Austria
	D. Swarovski KG, Swarovskistrasse 30, 6112 Wattens, Tirol, Austria
	D. Swarovski Tourism Services GmbH Swarovskistrasse 30, 6112 Wattens, Tirol, Austria
	Swareflex GmbH Swarovskistrasse 30, 6112 Wattens, Tirol, Austria
	Swarovski Mobility GmbH Swarovskistrasse 30, 6112 Wattens, Tirol, Austria
Belgium	Swarovski Belgium N.V. Louizalaan 50b, 1050 Brussels, Belgium
Brazil	Swarovski Cristais Ltda. Edifício Spazio Centrale, Alameda Itu, N° 852 Conjunto 132 13° Andar, 01421-002 São Paulo, Brazil
Canada	Swarovski Canada Limited 66 Wellington Street West, Suite 5300, TD Bank Tower, Toronto ON M5K 1E6, Canada
Chile	Swarovski Chile Limitada Marchant Pereira 150, Providencia Santiago, Región Metropolitana, Chile
Chinese Mainland	Swarovski (Guangzhou) Trading Co. Ltd Taikoo Hui, No. 385 Tianhe Road, Tianhe District, 510620, Guangzhou, China
	Swarovski (Shanghai) Trading Co. Ltd. Unit 2803, 2805 and Floor 27, Building 4, No 1, Lane 838, South Huangpi Road, Huangpu district, Shanghai, 200025, China
Costa Rica	Swarovski Global Business Services Americas SRL., Escazú Village Corporate Center, Avenida Central, 10201 San José, Costa Rica
Czech Republic	Swarovski Bohemia spol. s r.o. Kateřinská Business Center, Kateřinská 466/40, Prague 2, Nové Město, 120 00, Czech Republic
France	Swarovski France S.A.S. 13 Ter Boulevard Berthier, 75017, Paris, France
Germany	Swarovski (Deutschland) GmbH Hüttenstr. 27, 87600, Kaufbeuren, Bayern, Germany
Greece	Swarovski Hellas Single Member Industrial & Commercial S.A. 114, Vouliagmenis av. & 5 Spetson str., Athens, Glyfada, GR 16674, Greece
Hong Kong SAR	Swarovski Greater China Limited CITI TOWER, ONE BAY EAST NO. 83 HOI BUN ROAD, Hong Kong SAR, Hong Kong

	Swarovski Hong Kong Limited 8th Floor, Citi Tower, One Bay East No. 83 Hoi Bun Road, Ngau Tau Kok, Kowloon, Hong Kong, Hong Kong
	Swarovski Taiwan Ltd CITI TOWER, ONE BAY EAST NO. 83 HOI BUN ROAD, Hong Kong SAR, Hong Kong
Hungary	Swarovski Hungary Retail Limited Liability Company, Népfürdő street 22, Building B 13th Floor, Budapest, 1138, Hungary
India	Swarovski India Private Limited One Horizon Centre, 12th Floor, DLF Phase V, Sector 43, 122002, Gurgaon, Haryana, INDIA
Ireland	Swarovski Ireland Limited 70 Sir Rogerson's Quay, Dublin, Dublin, Ireland
Italy	Swarovski Internazionale d'Italia S.r.l. Via Santa Margherita 16, 20121 Milano
Japan	Swarovski Japan Ltd. 1-12-1 Kojimachi, Chiyoda-ku, Tokyo, 102-0083, Japan
Liechtenstein	Swarovski Aktiengesellschaft Dröschstrasse 15, Triesen, 9495, Liechtenstein
	Swarovski International Distribution AG, Dröschstrasse 15, Triesen, 9495, Liechtenstein
Luxemburg	Swarovski Luxembourg Sarl Grand-Rue 49, Luxembourg, 1661, Luxembourg
Republic of Korea	Swarovski Korea Ltd 10,11,12F BaekYoung Bldg. 456 Dosan-daero, Gangnam-gu/ Seoul, 06062, Korea, Republic of
Macao SAR	Swarovski Macao Ltd. Avenida da Praia Grande, no 429 Edificio Centro Commercial da Praia Grande, 23° andar B. em Macau, Macao SAR, Macao
Malaysia	Swarovski Global Business Services Asia SDN. BHD, Unit 1.01, GBS@Mayang, Jalan Mahsuri, Bandar Bayan Baru, 11900 Bayan Lepas, Penang, Malaysia
	Swarovski Malaysia Trading Sdn Bhd Arcc Offices Pavilion Tower Level 16, Pavilion Tower, Jalan Raja Chulan, 50200 Kuala Lumpur, Malaysia
Mexico	: Swarovski Crystal SA de CV Av. Ejército Nacional Mexicano No. 579 Piso 11, Col. Granada, Del. Miguel Hidalgo, D.F., Mexico City, 11520, Mexico
Netherlands	Swarovski Netherlands B.V. Dam 6, 1012, NP Amsterdam, Netherlands
New Zealand	Swarovski International (NZ) Limited, 3/45 Queen Street, Auckland, 1010 New Zealand
Poland	Swarovski Global Business Services Sp. z o. o. ul. Cypriana Kamila Norwida 5, "Yoko" Building, 80-280, Gdansk, Poland
	Swarovski Poland Sp. z o.o., ul. Wronia 10, 00-840 Warsaw, Poland
Portugal	Swarovski Ibérica S.A - Sucursal Em Portugal Rua Garret 28-30, 1200-204, Lisboa, Lisboa, Portugal

Serbia	Swarovski Subotica d.o.o., Subotica Batinska 94, Subotica, 24000, Serbia, Republic of
Singapore	Swarovski Singapore Trading Pte Ltd. DELTA HOUSE, 2 ALEXANDRA ROAD, #03-01, SINGAPORE 159919, Singapore
South Africa	Swarovski South Africa (Pty) Ltd 300 Acacia Road, Darrenwood, Randburg, Gauteng, 2194, South Africa
Spain	Swarovski Ibérica, S.A, C/ Llacuna, 10-20 1ª Planta, 08005, Barcelona, Spain
Sweden	Swarovski Sweden AB, Vasagatan 38, 111 20 Stockholm, Sweden
Switzerland	Crystalon Finanz AG Alte Landstrasse 411, 8708 Männedorf, ZH, Switzerland
	DSW Leitungsgesellschaft AG Alte Landstrasse 411, 8708 Männedorf, ZH, Switzerland
	Swarovski (Schweiz) AG Alte Landstrasse 411, 8708 Männedorf, ZH, Switzerland
	Swarovski Brand License AG Alte Landstrasse 411, 8708 Männedorf, ZH, Switzerland
	Swarovski Crystal Online AG Alte Landstrasse 411, 8708 Männedorf, ZH, Switzerland
	Swarovski Immobilien AG Alte Landstrasse 411, 8708 Männedorf, ZH, Switzerland
	Swarovski International Holding AG Alte Landstrasse 411, 8708 Männedorf, ZH, Switzerland
Taiwan Region	Swarovski Taiwan Ltd. Taiwan Branch, FU TSU CONSTRUCTION BUILDING, 9F, No. 27, Chung Shan North Road, Sec. 1, Taipei City, Taiwan region, 10441, Taiwan
Thailand	Swarovski Gemstones (Thailand) Ltd, 333 Moo 17 Bangplee Industrial Estate, Bangna-Trad Road, Bangsaothong, Samutprakan, 10570, Thailand
	Swarovski Manufacturing (Thailand) Co., Ltd. 200 Moo 1, Hi-Tech Industrial Estate (FZ), Baanlane DIST, Bang Pa-In, Ayutthaya, 13160, Thailand
	Swarovski (Thailand) Limited 849 Vorawat Building, 16th Floor, Room 1601-1602, Silom Road, Bangrak, Bangkok, 10500, Thailand
	Swarovski SCST Limited 849 Vorawat Building, 12th Floor, Silom Road, Silom Sub-dist, Bangkok, 10500, Thailand
Turkey	Swarovski Kristal Ticaret Limited Sirketi, Nisbeteiye Mahallesi, Nisbeteiye Mah. Nisbeteiye Cad. No:24 İç Kapı No:3, Istanbul, 34340 Turkey
United Arab Emirates	Swarovski Middle East FZE R/A No. 6, P.O.Box 17128, Jebel Ali, Dubai, United Arab Emirates
United Kingdom:	Swarovski UK Limited 1st Floor, Building 4, Chiswick Park, 566 Chiswick High Road, London, England and Wales, W4, 5YE, United Kingdom

United States	Swarovski North America Limited 50 Sharpe Drive, Cranston RI 02920, United States
	Swarovski Retail Ventures Ltd., 50 Sharpe Drive, Cranston RI 02920, United States
	Touchstone Crystal, Inc., 50 Sharpe Drive, Cranston RI 02920, United States
Vietnam	Swarovski Manufacturing Vietnam Limited Liability Company Lot 204, AMATA Industrial Park, Bien Hoa City, Dong Nai Province, 70000, Vietnam

Annex II - List of Countries/Regions

- Australia
- Austria
- Belgium
- Brazil
- Canada
- Chile
- Chinese Mainland
- Costa Rica
- Czech Republic
- France
- Germany
- Greece
- Hong Kong SAR
- Hungary
- India
- Ireland
- Israel
- Italy
- Japan
- Korea, Republic of
- Liechtenstein
- Lithuania
- Luxembourg
- Macao SAR
- Malaysia
- Mexico
- Netherlands
- New Zealand
- Poland
- Portugal
- Serbia
- Singapore
- Spain
- Sweden
- South Africa

- Switzerland
- Taiwan region
- Thailand
- Turkey
- United Arab Emirates
- United Kingdom
- United States of America
- Vietnam

ANNEX III - Description of categories of personal data

When We talk about Personal Data, We are referring to all information which allows Us to identify You straight away or by combining it with other information as well as any information associated to You. Examples: your name, your telephone number, your customer number, order numbers or your email address.

Please find here below a table providing You with the overview of the personal data We may process, based on the specific circumstances and purposes described in this policy.

Personal data categories	Description
Anti-Counterfeit data	To protect our trademarks and other intellectual property rights, We may collect and store information on companies or individuals who commit or are likely to commit acts that violate our intellectual property rights: (i) identification data; (ii) postal address; (iii) email addresses; (iv) domain names; (v) telephone numbers; (vi) and other information related to counterfeit and infringing activities, together with any documents and information relating to court proceedings.
CCTV Data	Footage that contains images of people and associated information as location and time.
Communication data	(i) Identification and Contact Information; (ii) Date and time of the message; (iii) Records of communication including its content (information provided by You in the message or processed by SWAROVSKI to reply to You); (iv) Channel of communication used; (v) Feedbacks provided if any. Please note that Your calls with Swarovski might be recorded to enable Us to better serve our customers, for quality assurance purposes, training and improvement purposes. In addition, and where available, with Your consent, when chat and video functionalities are activated by accepting cookies, We offer the possibility to communicate with SWAROVSKI via chat or video calls. The use of this technology allows Us to locate You and give You the option of interacting with Us via personalized chat or video calls, where We can highlight and recommend products that best reply to Your expectations. This use will be associated with

	the tracking of Your experience on the WEBSITES (including live tracking of Your navigation on the WEBSITES or mobile application), to allow SWAROVSKI to assist You while navigating on on the WEBSITES.
Data concerning the use of our WEBSITES	When You visit our WEBSITES, in line with Your cookie choices (if and when applicable), We may collect and process the following personal data in relationship to Your use of our WEBSITES: (i) Your internet provider, the operating system, browser information including browser type, location information, version, chosen language, domain names of the computers You use to visit our Website, type of device, such as laptop or smart phone, information shared by the device as chosen by the end user, log files, URIs (Uniform Resource Identifiers) of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical status code of the server reply (successful, error, etc.) (ii) Internet Protocol Address ("IP Address") and other online identifiers as for example the username of social media; MAC address of smartphones or computers; cookies, pixel or web beacons, Your internet browser, Your Location Data based on a unique identifier as the IP Address; (iii) Browsing activity data which includes date and time of WEBSITES visits, visited pages and contents, links that are clicked, referring websites, sites or apps visited before coming to our WEBSITES, the amount of time You spend viewing or using our WEBSITES, the number of times You return, or other click-stream or site usage data; (iv) Device cookie settings and information on consent to cookies; (v) Social log-in data. The collection of this data is performed via tracking technology including cookies and pixels. For more information about it, please read Section IV of this privacy policy.
Identification and Contact Information Data	Title, First name and last name, email address, date of birth, User ID (e-mail address), Address and contact details (address, telephone number, e-mail address), Permitted type of contact (telephone, e-mail, postal address); communication language

Demographic Data	This can include, among others, criteria as age, gender, location (country and/or city), education
Loyalty Programs Form Data	(ii) Identification and Contact Information Data (iii) Correspondence language (required for Swarovski Crystal Society)
Inferences Data	We may create inferences to create a profile about You reflecting Your preferences, behavior, satisfaction with our services and products and interests. Inferences data is drawn from categories of personal data including: (i) Data concerning the use of our WEBSITES (ii) Location Data (iii) Newsletter and Interaction Data (iv) Purchase and Order Information Data (v) Social Media Data (vi) Preferences Data If You consented to benefit from personalized services including marketing communication from Us, We may use this information to personalize our services to You to provide advertisements about goods and services likely to be of interest to You.
Information about third parties	When You wish to make a gift to someone else or wish to deliver Your purchase to someone else's address, SWAROVSKI collects and processes the following Personal Data of this person: (i) Name and surname, address and contact details of recipient for delivery of goods or services (such as sending a gift or virtual gift card), if different from Yours Please note that You may only provide Us with information about others with their permission. If You provide SWAROVSKI with another person's Personal Data, such as the recipient of a gift, please make sure that You have permission to do so and that the other person agrees to do so.
Location Data	When You visit our WEBSITES and/or use the location services offered by Us, for example, to search for a SWAROVSKI store near to You or to obtain more detailed content for a specific location, We may collect Location data by one of the following methods:

	(i) location based on the address information You provide, for example, to search for the nearest SWAROVSKI store using Your zip code; (ii) determining the country/region in which You are currently located based on a unique identifier of Your device (e.g. the IP address); or (iii) if You have enabled Your mobile device's location services, We may determine Your real time location based on the longitude and latitude of Your mobile device, through GPS signals, Bluetooth or Wi-Fi connection information including MAC addresses perceived by Your device, where this is available. Please be aware that for location services on mobile devices, You can change Your location settings at any time by managing Your device settings and prevent the sharing of Your location data with the websites You are visiting or applications You are using.
Newsletter and Interaction Data	If You subscribe to our newsletter and personalized marketing communications to receive information on our products, promotions, collections, special events, campaigns, We collect and process the following Newsletter and Interaction Data: (i) Consent to receive Our communications and opt-out (ii) Channel preferences; (iii) Preferences Data; (iv) Date and time of opening the message and Your interactions with the communication, if any (newsletter open rate, click rate, clicking on links contained therein, end device, operating system, browser), approximate location of the advertisement via the assigned IP address; (v) Data concerning the use of our WEBSITES when You consented to Cookies (vi) Demographic Data (vii) Inferences Data (viii) Purchase and Order Information Data.
Partner Data	(i) Identification and contact Information; (ii) Information regarding the role as the title, position, function; (iii) Information relating to the previous contact with PARTNERS; (iv) Attendance when entering facilities or SWAROVSKI's events; (v) Communication data; (vi) Data regarding marketing activities (e.g. receipt of newsletters);

	(vii) Data related to their use of our WEBSITES; (viii) Electronic identification data including login passwords, IP addresses and other online identifiers; (ix) Log data; (x) Information regarding business transactions, financial information including contract, invoice & bank account information, requests, offers, tenders, conditions and contracts, information related to professional or other interests of the PARTNERS.
Payment Information Data	This includes: i. Payment method used including information related to Your credit card, debit card, card issuer and card type (credit or debit card number), expiration date, CVV code and/or billing address; and/or other payment information to process payments in connection with Your orders; ii. Data related to Your online payment account such as Your last name and first name, payment provider ID, email address and address if You choose to pay Your online purchase by using an external online payment provider (e.g. Apple Pay, Paypal, Google Pay); iii. Payment status from the selected payment service provider regarding the confirmation or cancellation of Your payment, as applicable.
Preferences Data	Preferred products (e.g. Jewelry, Watches, Decorations), preferred store
Purchase and Order Information Data	This includes: (i) Order number, purchased products information (name, size, color, quantity, prize), place and time of purchase, billing and shipping address, shipping method, discounts and promotions used, voucher ID; (ii) Logistical information as Your order status, purchase frequency; (iii) Transaction ID, Partner ID, Point of Sale, Cash Register, Sales, Point-of-Sale ID, Currency, VAT; (iv) Messages and communication relating to purchases including information, queries and complaints relating to products and services ordered and purchased, information and queries and complaints relating to products and services, or respective contracts entered into such as warranty claims, returns, after sales services, repairs, customer care and services, rescissions and disputes. (v) Delivery and return status

Social Media Data	Interactions like liking a post, commenting on a post, or sharing a post, tagging SWAROVSKI SWAROVSKI makes also use of statistic and aggregated reports services made available to Us by Social Media Platforms based on their Terms and conditions and privacy policies to analyze e.g. reach, page views, time spent on videos if available
Survey Data	Swarovski might send to You surveys to better understand how Your customer experience in our stores or online was, Your preferences, or any feedback related to an interaction with our products or services. Taking part to these surveys is voluntary. In case Swarovski is sending You such surveys or You decide to provide feedbacks to Swarovski, the following Personal Data is collected: (i) Date and time of sending the invitation to a survey or data and time You submit Your feedback; (ii) Topic and content of the survey; (iii) Your responses ; (iv) Number of surveys sent to You and number of surveys You replied; (v) IP address when opening the survey and the postal code derived from it. If more or different Personal Data is collected, We will inform You when asking to participate to such surveys.
Swarovski Loyalty Programs Data	Access codes / Credentials Contract Data which includes Swarovski Loyalty Programs agreement and related acceptance of Terms and Conditions with date and duration of Your membership, place, customer number, preferred language and type of communication, status of the account. Type of registration, date of registration, point of sale of registration Membership Tier Status and benefits data which includes tier level, vouchers and benefits receipt and redemption and/or use.
SWEEPSTAKE and other promotional activities Data	When You participate in a SWEEPSTAKE or another promotional activity, SWAROVSKI may collect and process the following personal data: (i) Identification and Contact Information;

	(ii) Data concerning the use of our WEBSITES if the sweepstake or promotional activity is proposed on our WEBSITES; (iii) Winner or loser status, prizes awarded, prizes redeemed; (iv) Communication data in connection with the sweepstake or promotion; (v) Preferences, preferred products and wish lists created in the context of the SWEEPSTAKE or promotion if applicable.
Virtual features data	If You use features as Virtual "Try-On" on our WEBSITES, SWAROVSKI relies on third-party software to determine the coordinates of Your facial features / body features and measure them. These measurements lead to the formation of a generic model within the application that corresponds to the dimensions, shape and current expression of the detected face. This model is then used as a basis for displaying content adapted to the shape of Your face (for example, overlaying an image of SWAROVSKI glasses or jewelry). Neither the Application nor SWAROVSKI will be able to uniquely identify You from this data, and neither SWAROVSKI nor the third party collects or otherwise record your Personal Data from this Application, including any images of You. The Personal Data generated by the Virtual Try-On application is stored locally on your device and can be deleted by You. The image uploaded by You and enriched with SWAROVSKI products will also be stored in Your browser and can be deleted by You. If You are offered the opportunity to have this Personal Data sent to You by e-mail, your e-mail address will be temporarily stored and deleted after the Personal Data has been sent. The use of the Virtual Try-On Software is voluntary, and You have the option to allow or deny access to your device's camera for use in the Try-On Application. The application will not have access to Your device's camera until You enable the Try-On application and allow access to your device's camera.

ANNEX IV - Targeted advertising by sharing of first party data

For the purposes of targeted advertising by sharing of first party data, SWAROVSKI uses the advertising services listed here below.

1) Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google") for:

Google Customer Match: Customer Match helps Us targeting ads to You and other customers like You. Customer Match helps Us reaching and re-engaging with You across Search, the Shopping tab, Gmail, YouTube, and Display using information that You have shared with Us. We have the option of transmitting your e-mail address to Google as a hash value (the hash value is a conversion of your e-mail address into another value and thus a pseudonymization of your e-mail address). The hash value of the e-mail address is used by Google for the purpose of identifying You on Google's websites / apps (e.g. YouTube) and for displaying our personalized advertisements to You. There is also the possibility that the identification will result in You not being advertised with our advertisements.

- **Enhanced Conversions:** Enhanced Conversions helps Us improving the accuracy of conversion measurement (meaning having a better understanding of purchasing behavior of users to whom We displayed our advertisements). by allowing Us to instruct Google to match our customers to Google accounts and report the online conversions (e.g. purchases) driven by interactions with Our advertisement displayed on Google websites and/or applications. When a customer completes a purchase on Our WEBSITES, this data can be captured, hashed, sent to Google in its hashed form, and then used to help Us better measure conversions.

For the use of these services, We rely on your consent that can be withdrawn anytime.

Google Ireland Limited is responsible for the permanent storage and further processing of the hash values. In this context, Google Ireland Limited, as the sole controller under data protection law, may store the hash values in the USA. The European Court of Justice has found that the USA is a country with an inadequate level of data protection. In this context, there is a particular risk that Your data will be processed by American institutions / authorities for control and surveillance purposes without sufficient legal remedy on Your part. You can find more information about data protection at Google [here](#). Here You will also find the possibility of asserting Your rights as a data subject (e.g. right to erasure) against Google Ireland Limited.

2) Meta Platforms Ireland Limited, 4 Grand Canal Square, Dublin, Ireland ("Meta") for:

- **Conversion API:** Conversion API helps Us addressing You ads that more likely will be relevant to You with an improved personalization,

optimisation and measurement across Meta technologies. It is integrated into our WEBSITES. With your consent, that can be withdrawn anytime, it enables Us to share with Meta Your email address ("**Contact Information**") as a hash value (the hash value is a conversion of Your e-mail address into another value and thus a pseudonymization of Your e-mail address) and other information We hold about You as actions You take on our WEBSITES, our applications or in Our stores as e.g. your purchases online or in one of our stores ("**Event Data**") for measurement, analytics services and targeting Our advertisement to You.

Your hashed email address is used for "matching", meaning to determine whether You have a Meta's user profile. This matching is performed by Meta. Event Data may be used for measurement and analytics services as well as for targeted advertising.

Swarovski and Meta are joint controllers for the collection of Event Data. In addition, Meta is an independent controller for the use of Event Data for the purposes of targeting ads; delivering commercial and transactional messages to You; improving ad delivery, personalizing features and content, and improving and secure the Meta products. In this context, Meta may aggregate Event Data and use it for its own advertising purposes as well as for advertising purposes of third parties. For example, Meta may for advertising purposes combine the information collected via the Conversion API with other information that Meta has collected about You via other websites and/or in connection with the use of the social network "Facebook" and "Instagram", so that a profile about You can be stored by Meta Platforms Ireland Limited. You can find more information about data protection at Meta [here](#). Here You will also find the option of asserting Your rights as a data subject (e.g. right to erasure) against Meta Platforms Ireland Limited.

- **Meta Custom Audiences List Upload:** With your consent, that can be withdrawn anytime, We have the option of transmitting your e-mail address (Contact Information) to Meta as a hash value (the hash value is a conversion of Your e-mail address into another value and thus a pseudonymization of Your e-mail address). The hash value of the email address will be used by Meta for the purpose of identifying You on Meta's websites/apps (e.g. the social network "Facebook") as well as for displaying our personalized advertisements to You on them. There is also the possibility that the identification will result in You not being advertised with Our advertisements.

For the use of these services, We rely on your consent that can be withdrawn anytime.

Meta Platforms Ireland Limited is responsible for the permanent storage and further processing of the Personal Data shared. In this context, Meta Platforms Ireland Limited, as the sole controller under data protection law, may store your Personal Data in the USA. The European Court of Justice has found that the USA is a country with an inadequate level of data protection. In this context, there is a particular risk that Your

data will be processed by American institutions / authorities for control and surveillance purposes without sufficient legal remedy on Your part. You can find more information about data protection at Meta [here](#). Here You will also find the option of asserting Your rights as a data subject (e.g. right to erasure) against Meta Platforms Ireland Limited.