

Data-Protection Statement and Consent to Use of Data at www.zalando.de

Data Protection, One-Pager

Data protection is a matter of trust and your trust is important to us. So that you can feel secure when visiting our websites, we strictly observe the statutory regulations in processing your person-specific data and we would like to inform you here about our data acquisition and data utilization. The following data-protection statement explains to you which data is collected from you on our websites, which parts of this data we process and use and in which way, and to whom you can turn with any concerns or requests.

1. Body Responsible, and Rights of Those Affected

The body responsible for the acquisition, processing and utilization of your person-specific data, in the sense of the German Data Protection Law is Zalando SE (hereinafter referred to as Zalando). As the body responsible, Zalando can be reached by you via the following contact options:

- by post under Zalando SE, Tamara-Danz-Str. 1, D-10243 Berlin
- by fax under +49 30 2759 46 93
- by e-mail under datenschutz@zalando.de

You can request, at any time and free of charge, information about your data stored by us, and can exercise your right to correction, blockage or deletion of your data. To this end you can make use of the previously mentioned contact options.

Should you object to the acquisition, processing or utilization of your data by Zalando in keeping with the stipulations of these data-protection provisions, whether entirely or for individual measures, you can send your objection per e-mail, by fax or by letter again using the previously mentioned contact options.

2. Acquisition, Processing and Utilization of Person-Specific Data

Person-specific data describes details relating to the actual or personal relationships of a specific or identifiable natural person. Such details include, for example, your name, your telephone number, your address, and all existing data that you disclose to us during registration and when opening your customer account.

2.1 Customer Account

For each customer who registers with us via the "jetzt registrieren" [register now] function, we set up a customer account, i.e. password-protected, direct access to his or her existing data stored by us. This allows you, amongst other things, to view your already-concluded, still open and recently sent orders, or to manage your personal data and the newsletter.

2.1.1 Setup of the Customer Account

The following data must be given during the registration for a customer account (obligatory disclosures):

- your e-mail address
- your password
- your forename
- your surname
- your gender
- consent to the check on credit standing and to the data-protection provisions

Your invoice and delivery address need not be given until you order something. For your order we need your correct name, address and payment data. We need your e-mail address so that we can confirm receipt of your order and its dispatch, and so that we can communicate with you in general. We also use your e-mail address to identify you (as a log-in name), when you visit your customer account.

2.1.2. Use of the Customer Account

You can use your Zalando customer account to log-in to the various European Zalando online stores. You can also use the customer account to log-in to the offer of the Zalando Lounge (also an offer of Zalando SE) or to the other services of the Zalando business group (e.g. Zalon, Fleek or MOVMENT). We will only pass on your data to these services if you log in there. If the services are not those of Zalando SE (e.g. the Zalando Lounge), the passing on of data will even then only take place with your consent, which you can give during the respective log-in process.

If you do not log out of your customer account, you will automatically remain logged in. This function enables you to use part of our services (e.g. the "Wunschzettel Dein Zalando" wish list) even without having to log-in to the customer account again. For security reasons, however, you are asked to give your password again if, for example, your personal data is to be altered or if you would like to place an order.

2.1.3. My Preferences

In Zalando you can indicate whether and which brands or categories you find especially interesting and which brands do not interest you. To this end you have the so-called function "Meine Präferenzen" [My Preferences] available; and you can return to and adjust the details you have given in your customer account at any time. With the help of your details we are able to personalize, amongst other things, your start page, to make our service still more relevant and more interesting for you.

2.2 Acquisition, Processing and Utilization of Your Person-Specific Data

We collect, store and process your data for the entire processing of your purchase, including any subsequent guarantee claims, for our services (for example: "Meine Präferenzen" [My Preferences]), the technical administration, our own marketing purposes (more information on these under point 2.3) and to prevent criminal offences and fraud. Your person-specific data is only passed on to third parties to the extent that this is legally permissible, including the purpose of processing the contract or for invoicing, for marketing or if you have previously consented to this. When processing orders, for example, the service companies used by us (transport companies, logistics companies, banks) are sent the data they require for processing and

concluding orders. The data passed on to our service providers in this context may only be used by them for fulfilling their duties.

2.3 Use of Your Data for Advertising Purposes

Apart from the processing of your data for settlement of your purchase at Zalando, we also use your data for the following purposes: to permanently improve your purchase experience and for making this more customer-friendly and individual for you; to communicate with you about your orders, and about certain products or marketing campaigns; and to recommend products or services that might interest you.

To this end we use the information available, such as confirmations of receipts and reading confirmation of e-mails, information on the terminal device used by you, your connection to the Internet, operating system and platform, date and time of the visit to the home page, or products that you have looked at, as well as information that we have received from you (including automatically transferred or generated information). Apart from this we also make use of your order history.

The utilization of your person-specific data for advertising purposes can be objected to at any time, whether all-in-all or as regards individual measures, without any tariffs, other than the transmission costs in keeping with the basic tariffs, being thereby incurred. Notification in text form sent by one of the contact options given under point 1 (e.g. e-mail, fax, letter) is sufficient for this purpose.

2.3.1 Newsletter

For sending the Newsletter we make use of the e-mail address given by you and for this we need your confirmation that, as the owner of the e-mail address, you consent to its receipt (the so-called "double opt-in" procedure).

Should you later decide that you no longer want to receive a newsletter from us, you can object to this at any time without thereby incurring any other costs than the transmission costs in keeping with the basic tariffs. Notification in text form sent by one of the contact options given under point 1 (e.g. e-mail, fax, letter) is sufficient for this purpose. There is, of course, also a cancellation link in every newsletter.

2.3.2 Product Recommendations by E-Mail

If you have made a purchase at Zalando, you will then receive regular product recommendations from us by mail. These product recommendations are sent to you by us whether or not you have subscribed to a newsletter. In this way we want to inform you about products offered by us that, on the basis of your last purchases, might well interest you.

If you decide that you no longer want to receive product recommendations from us, or no advertising news at all, you can object to this at any time without thereby incurring any other costs than the transmission costs in keeping with the basic tariffs. Notification in text form sent by one of the contact options given under point 1 (e.g. e-mail, fax, letter) is sufficient for this purpose. There is, of course, also a cancellation link available with every e-mail.

2.3.3 Banner Ads

We also use the data collected during your visit to show you so-called banner ads. These are advertisements which we also use on third sites. It usually involves the use of so-called cookies

or pixels. Our aim here is to make the advertising offers more useful and more interesting for you, which is why you will see, in the context of the banner ads, mainly products that you have either already looked at on our site or products that are similar to those already looked at by you (so-called re-targeting). Within the framework of the banner ads we work solely with pseudonymous data; clear-text information relating to your person (e.g. your name or your e-mail address) is not used in the cookies.

You can find more information on cookies, pixels and re-targeting under point 4 and point 7 of this policy statement.

2.3.4 Prize Draws, Market Research and Opinion Polling

For prize draws we make use of your data for win notifications and for advertising our offers. More detailed information can be found in the terms of participation for the respective prize-winning game.

We also use your data for market research and opinion polling. The data collected in the context of market research and opinion polling is not used by us for advertising purposes. More detailed information (especially on the evaluation of your disclosures) can be found in the context of the respective poll, or at the location in which you make your disclosures. Your answers to opinion polls are neither passed on to third parties nor are they published.

You can object to the use of data for market-research and opinion-polling purposes at any time, whether as a whole or regarding individual measures, without any costs being thereby incurred, other than the transmission costs in keeping with the basic tariffs. Notification in text form sent by one of the contact options given under point 1 (e.g. e-mail, fax, letter) is sufficient for this purpose. There is, of course, also a cancellation link available with every opinion-poll e-mail.

3. Checking of Credit Standing

Before concluding the purchase contract we carry out a check on credit standing. This is made in order to give you a choice between various payment options. At the same time, the check on credit standing helps us to avoid loss of payments. Apart from this, the check on credit standing serves your and our security, since it prevents fraud and other criminal offences.

In the context of the check on credit standing, we check all data available to us and can thereby determine which types of payment can be offered for an order. In this connection, amongst other things, all previous orders in your customer account are checked. And checks are also made on whether the delivery address is different from the invoice address, on whether it involved a new delivery address or whether the order is to be delivered to a pack-station.

Apart from the data available to us, external service company data is also needed. In this connection we transfer the person-specific data required for a check on credit standing (forename and surname, your address and, where necessary, your date of birth) to the following credit-rating company:

infoscore Consumer Data GmbH, Rheinstrasse 99, D-76532 Baden-Baden

This credit-rating company uses the above-mentioned data transferred by us in order to undertake, on the basis of a mathematical-statistical procedure, a corresponding evaluation of your creditworthiness regarding the respective order (scoring). Furthermore, the credit-rating company uses the above-mentioned data for other businesses (e.g. other online dealers) for

purposes of address verification or identity checks, as well as for scoring applications based on these. This calculation of the probability value also makes use of your address data. In some circumstances this can lead to conclusions being drawn from hard, negative characteristics.

If you disapprove of the type(s) of payment offered to you, you can let us know about this using the contact options mentioned under point 1. We will then re-assess the decision taking account of your standpoint.

You can both revoke your consent, with respect to us, at any time with effect as to the future, using the contact options mentioned under point 1, and can be sent information on the data stored by us and by our credit-rating company (using the above-mentioned addresses).

4. Cookies

The acceptance of cookies is not a prerequisite for access to our websites. We draw your attention, however, to the fact that our website and service has only limited functionality, if you do not allow us to place cookies.

What are cookies?

Cookies are small files that are stored on your data carrier and hold certain settings and data for exchange with our system via your browser. Basically speaking there are 2 different types of cookies: the so-called session cookies, that are deleted as soon as you close your browser; and temporary/permanent cookies, that are stored on your data carriers for a longer period or without limit. This type of storage helps us to design our websites and our offers for you and makes it easier for you to use them in that, for example, certain input from you can be stored so that you are not required to enter this repeatedly.

Which cookies are used by Zalando?

Most of the cookies used by us are automatically deleted from your hard disk at the end of the browser session (hence the term "session cookies"). Session cookies are needed, for example, to make the shopping-basket function available to you over several pages. In addition to these we also make use of cookies that remain on your hard disk. On a subsequent visit it is then automatically recognized that you have previously visited us, and we know which input and settings you prefer. These temporary or even permanent cookies (lifespan of 1 month to 10 years) are stored on your hard disk and are automatically deleted after the pre-specified period. These cookies in particular serve to make our offer more user-friendly, more effective and more secure. Thanks to these files it is possible, for example, that the site shows you information that has been specially selected to match your interests. The sole purpose of these cookies is to adapt our offer to your customer wishes as well as possible and to make surfing with us as comfortable as possible for you.

What data is stored in the cookies?

In the cookies used by Zalando, only pseudonymous data is stored. On activation of the cookie this is allocated an identification number; an allocation of your person-specific data to this identification number is not undertaken. Your name, your IP address and other such data that might allow the cookie to be traced to you directly are not placed in the cookie. On the basis of the cookie technology we receive only pseudonymized information, relating for example to which of our shop pages have been visited, which products were viewed, etc.

What is on-site targeting?

On the Zalando websites data is collected on the basis of a cookie technology for optimization of our advertising and of the entire online offer. This data is not used to identify you personally but solely serves the purpose of conducting a pseudonymous evaluation of the use made of the home page. With this technology we can present advertising and/or special offers and services to you, the content of which is based on information obtained from a connection to click-stream analysis (for example, advertising that is based on the fact that during the past few days only sports shoes have been viewed). Our aim here is to make our online offer as attractive for you as possible and to present to you advertising that corresponds to your areas of interest.

Are there also cookies from third-party suppliers (so-called "third-party cookies")?

Zalando makes use of a number of web partners who help to make the Internet offer and the websites more interesting for you. This is why, when visiting the websites, the cookies of partner companies are also stored on your hard disk. These cookies are temporary/permanent cookies that are deleted automatically after the pre-specified period. These temporary or even permanent cookies (lifespan of 14 days to 10 years) are stored on your hard disk and delete themselves after the pre-specified period. The cookies of our partner companies also contain solely pseudonymous - mostly even anonymous - data. This relates, for example, to data on which products you have looked at, whether anything was bought, which products were searched for, etc. Here, some of our advertising partners also collect information from the websites on which pages you have previously visited or which products you were interested in, in order to be able to show you advertising that best complies with your interests.

Re-Targeting

Our websites make use of so-called re-targeting technologies. We use these technologies to make the Internet offer more interesting for you. This technique allows Internet users who have already shown an interest in our shop and our products to also be provided with suitable advertising on the websites of our partners. We are convinced that the use of personalized, interest-oriented advertising is generally more interesting for the Internet users than advertising that has no such personal content. The use of this advertising approach by our partners is undertaken on the basis of a cookie technology and an analysis of previous utilization behaviour. This form of advertising is completely pseudonymous.

On using our sites cookies are deployed and thereby usage data is collected from you, stored and utilized. Your data is furthermore stored in cookies beyond the end of the browser session so that it can, for example, be called up again on your next visits to the websites.

How can you prevent the storage of cookies?

In your browser you can adopt the setting that storage of cookies is only permissible when you agree to it, and thereby prevent the further storage of cookies in the future. If you want to accept only the Zalando cookies but not the cookies of our service companies and partners, you can select the browser setting "Cookies von Drittanbietern blockieren" [Block third-party cookies].

As a rule, the help function in the menu bar of your web browser will show you how to reject new cookies and how to inactivate old ones.

5. Log Files

With each access to the pages of Zalando usage data is transmitted by the respective Internet browser and is stored in record files, the so-called server log files. The records stored in this way contain the following data: date and time of the call-up, name of the page called up, IP address, referrer URL (URL of origin, from which you came to the websites), the quantities of data transferred, product information and the version of the browser used.

These log file data records are evaluated by us, to help us further improve our offer and the Zalando shop, as well as to make these more-user-friendly, to detect and correct errors more quickly and to control server capacities. At the same time we use the log-file data records to defend our Zalando shop against attacks, e.g. in the context of so-called distributed-denial-of-service attacks, which are intended to block access to our Zalando shop by overloading it with enquiries.

6. Web Analysis

In order to constantly improve and optimize our offer, we make use of so-called tracking technologies. For this purpose we enlist the services of Google Analytics and Webtrekk.

6.1 Google Analytics

This website makes use of Google (Universal) Analytics, a web-analysis service from Google Inc. (www.google.de). Google (Universal) Analytics deploys methods that make it possible to analyse the use made of the website by you, e.g. the so-called "cookies", which are text files that are stored on your computer. The information generated on your use of this website is transmitted, as a rule, to a Google server in the USA and stored there. By activating the IP-anonymize function on this website the IP address is shortened, within the member countries of the European Union or in other contracting states that were party to the agreement on the European Economic Area, before further transfer. Only in exceptional cases is the full IP address sent to a Google server in the USA and shortened there. The anonymized IP address transferred by your browser within the framework of Google Analytics is not brought together with other Google data.

You can prevent the acquisition of the data generated by the cookie and relating to your use of the website (incl. your IP address) by Google, as well as its processing by Google, in that you download and install the browser plug-in available under the following link: <http://tools.google.com/dlpage/gaoptout?hl=de> .

As an alternative to the browser plug-in you can click this link in order to prevent the recording by Google Analytics on this website in the future. In this case an opt-out cookie will be placed in your terminal device. If you delete your cookies you must then click the link again.

6.2 Webtrekk

For the statistical evaluation of the websites we also make use of the technologies of Webtrekk GmbH, Boxhagener Str. 76-78, D-10245 Berlin (www.webtrekk.de). With the help of the services of Webtrekk we gather statistical data on the use made of our web offer. This data is used to continuously improve the Zalando shop and our offers and to optimize these and thereby make them more interesting for you. In the sphere of data protection, for the Web Controlling Software used by Zalando, Webtrekk GmbH has been certified by the technical supervisory authority TÜV Saarland. Hereby the recording and processing of tracking data in particular was checked and certified for conformity with data protection and for data security. In the context of

utilization of these websites, information that your browser transmits is recorded and evaluated. This takes place by means of a cookie technology and so-called pixels, that are integrated in every website. The process records the following data: Request (name of the requested file), browser type/version, browser language, operating system used, internal resolution of the browser window, screen resolution, Java Script activation, Java on/off, cookies on/off, number of colours, URL referrer, IP address (is only collected anonymized and is deleted again directly after its use), time of access, clicks, order sum, shopping baskets and anonymized form contents (for example, whether a telephone number has been given or not). Direct person-specific tracing is at no time possible. The data gathered in this way serves in the preparation of anonymous user profiles that form the basis of web statistics. Without the separate consent of the person affected, the data collected with the help of Webtrekk technology is not used to identify the visitor to these websites personally and is at no time used together with the person-specific data on the bearer of the pseudonym.

The data collection and data storage by Webtrekk can be refused at any time, with effect for the future. To this end please call up the following link: <http://www.webtrekk.com/index/datenschutzerklaerung/opt-out.html>

On clicking the link a so-called opt-out cookie is placed on your data carrier. This cookie has a validity of 5 years. Please note that on deleting all cookies on your computer this opt-out cookie will also be deleted, i.e. if you still want to prevent the anonymized data acquisition by Webtrekk you will have to reset the opt-out cookie once again. The opt-out cookie is set for each browser and computer. If you visit our websites from home and from your place of work, or with different browsers, you will have to activate the opt-out cookie in the various browsers or on the different computers.

7. Re-Targeting and Data Acquisition by Third Parties for Banner Ads

In the context of re-targeting and banner ads, make use of the services of third parties, which set cookies on our sites. These are the following companies:

- **DoubleClick by Google**, Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; <https://www.google.de/intl/de/policies/technologies/ads/>
- **Nugg.ad GmbH**, Rotherstr. 16, D-10245 Berlin; <https://www.nugg.ad/de/datenschutz/allgemeine-informationen.html>
- **Adform Germany GmbH**; Gr. Burstah 50-52, 20457 Hamburg, Germany; <http://site.adform.com/privacy-policy/de/>
- **Facebook Inc.**, 1601 S. California Ave, Palo Alto, CA 94304, USA; <https://www.facebook.com/about/privacy>
- **Criteo CIL**, 32 Rue Blanche, 75009 Paris, France; <http://www.criteo.com/de/privacy/full-privacy-text/>
- **The Rubicon Project Ltd.**, Walmar House, 5th Floor, 296 Regent St., London, W1B 3HR, United Kingdom; <http://rubiconproject.com/privacy/consumer-online-profile-and-opt-out/>
- **Yieldlab AG**, Colonnaden 41, 20354 Hamburg, Germany; <http://www.yieldlab.de/meta-navigation/datenschutz/>

- **Xaxis, Inc.**, 132 West 31 Street, 9th Floor, New York, NY 10001, USA;
<https://www.xaxis.com/static/view/datenschutzerklaerung-von-xaxis>

8. Social Plug-Ins

This Internet presentation makes use of a social plug-in from Facebook (Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA) on several pages only. This plug-in is normally deactivated and therefore sends no data. With a click on the plug-in, or more precisely on the icon "Social Media aktivieren" [Activate Social Media], you can activate the plug-in. The plug-ins can be deactivated again by clicking in the same place again.

When this plug-in is activated, your browser makes a direct connection to the Facebook servers as soon as you call up a website containing this plug-in. The content of the plug-in is transmitted directly from Facebook to your browser and is integrated by this in the website.

With the activation of the plug-in Facebook is informed that you have called up the corresponding page of our Internet presentation. If you are logged in with the social network, this can assign the visit to your account.

For the purpose and extent of the data acquisition and further processing and utilization of the data by Facebook and your rights in this connection and the setting options for protection of your private sphere, please refer to the data-protection information provided by Facebook: <https://www.facebook.com/about/privacy/> .

Even if you are not registered with the social networks, data can be sent to the networks by websites with active social plug-ins. With an active plug-in, with each call-up of the websites a cookie with an identification is set. Since your browser automatically sends this cookie to Facebook every time you connect with a network server, the network could in principle prepare a profile on which websites the user to whom the ID belongs has visited. And it would then indeed be possible to later trace this ID to a specific person - if you were later to register with the network, for example.

9. Safer Data Transfer

Your personal data is securely transferred by us with the help of coding. This naturally also applies to your orders, as well as to the customer login. Here we make use of the coding system TLS (Transport Layer Security) or SSL (Secure Socket Layer).

With the help of both technical and organizational measures, moreover, we secure our websites and other systems against loss, destruction, access, alteration and distribution of your data by unauthorized persons.