

## PRIVACY AND COOKIES POLICY

### OUR PRIVACY AND COOKIES POLICY AT A GLANCE

1. **WHO WE ARE.** We are SAS BAINS, and we process your personal data as joint controllers. This means that we are jointly responsible for how we process and protect your data. See more.
  2. **WHAT WE USE YOUR DATA FOR.** We will use your data (collected online or in person), among other purposes, to manage your registration as a user, to manage your purchases of products or services, to respond to your queries, and, if you wish, to send you our customized communications. See more.
  3. **WHY WE USE YOUR DATA.** We have legal standing to process your data for various reasons. The main reason is that we need to process your data to perform the contract that you accept with us when you register and when you make a purchase or enjoy any of our services or functionalities. We also use your data for other reasons, for example, to respond to your queries or to send you newsletters that you have asked to receive from us. See more.
  4. **WHO WE SHARE YOUR DATA WITH.** We share your data with service providers who provide us with assistance or support, or third party providers, both inside and outside the European Union. See more.
  5. **YOUR RIGHTS.** You have the right to access, rectify or delete your personal data. In certain cases, you are also entitled to other rights, such as, for example, to object to us using your data, or to transferring your data, as explained in depth below. See more.
- We encourage you to read our full Privacy and Cookies Policy below to understand in depth the manner in which we will use your personal data and your rights over your data.

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### BEFORE YOU START ...

\* In this Privacy and Cookies Policy, you will find all relevant information applicable to our use of our users' and clients' personal data, regardless of the channel or means (online or in person) of LES BAINS that you use to interact with us.

\* We are transparent about what we do with your personal data, to help you to understand the implications of the way in which we use your data, and the rights you are entitled to in relation to your data:

- We permanently make available for you all the information included in this Privacy and Cookies Policy, that you can check when you consider appropriate, and in addition,
- you will also find further information on how we use your data as you interact with us.

\* These are some terms we regularly use in this Privacy and Cookies Policy:

When we speak about our Platform, we refer, in general, to any of the channels or means, digital or in person, you may have used to interact with us. The main ones are:

- Our Websites, [www.lesbains-paris.com](http://www.lesbains-paris.com), [www.laboutiquelesbains.com](http://www.laboutiquelesbains.com) and [www.lesbainsguerbois.com](http://www.lesbainsguerbois.com)
- In person, at Hôtel Les Bains or at La Boutique Les Bains in Paris

### 1. WHO IS THE CONTROLLER OF YOUR DATA?

Your data controllers are:

- SAS BAINS
- Postal address: 7 rue du Bourg l'Abbé, 75003 Paris, France.
- E-mail of Data Protection: [contact@lesbains-paris.com](mailto:contact@lesbains-paris.com)

## 2. WHY WE PROCESS YOUR PERSONAL DATA

Depending on the purpose for which we process your data from time to time, as explained above, we need to process one or other data, which will in general be, depending on each case, as follows:

- your identity data (for example, your name, surname, language and country from which you interact with us, contact data, etc.);
- economic and transactions information (for example, your payment or card data, information on your purchases, orders, returns, etc.);
- connection, geolocation and/or browsing data (if you interact with us from your mobile phone, for example);
- commercial information (for example, if you have subscribed to our newsletter),
- information about your tastes and preferences.

Remember that, when we ask you to fill in your personal data to give you access to any functionality or service of the Platform, we will mark certain fields as compulsory, since this is information that we need to be able to provide the service or give you access to the functionality in question. Please take into account that, if you decide not to make such data available to us, you may be unable to complete your user registration or may not be able to enjoy those services or functionalities.

Depending on how you interact with our Platform, i.e., depending on the services, products or functionalities that you wish to enjoy, we will process your personal data for the following purposes:

1. To manage your registration as user of the Platform.

If you decide to become a registered user of our Platform, we need to process your data to identify you as a user of the Platform and grant you access to its various functionalities, products and services available to you as a registered user. You may cancel your registered user account by contacting us through Customer Support.

2. For the development, performance and execution of the purchase or services contract that you executed with Us on the Platform. This purpose includes processing your data, mainly:

- To contact you for updates or informative notices related to the contracted functionalities, products or services, including quality surveys and to be able to establish the degree of customer satisfaction with the provided service;
- To manage payment of the products that you purchase, regardless of the payment procedure used. For example:
  - If on purchasing any of our products through the Website, you opt to activate the functionality of save your card data for future purchases, we need to process the indicated data for activation and development of that functionality. Consent to the activation of this functionality enables your autocompleted payment data to appear in subsequent purchases so that you do not need to introduce them in each new process, and these data will be deemed valid and effective for subsequent purchases. You may change or cancel your cards at any time through the section on payment information, either of your Website registered user account, or of the Wallet functionality of the ZARA App.
  - Activate the necessary arrangements in order to control and prevent potential fraud against you and against us during the purchase process. If we consider that the transaction can be fraudulent, this processing may cause the blocking of the transaction.
  - To manage potential returns after you have purchased and manage requests of availability information for articles, reservations of products through the Platform, depending on the availability of such options from time to time.
  - For invoicing purposes and to make available to you the tickets and invoices of the purchases you have made through the Platform.

- To ensure that you are able to use other available functionalities or services, such as the purchase, management and use of the Gift Card.

3. To meet requests or applications that you make through the Customer Support channels. We only process the personal data that are strictly necessary to manage or resolve your request or application.

4. For marketing purposes.

This purpose includes the processing of your data, mainly, for:

- If and when you subscribe to our Newsletter, we will process your personal data to manage your subscription, including to send customized information on our products or services through various means (such as e-mail or SMS).
- Accordingly, please take into account that this data processing implies analysis of your user or customer profile to establish your preferences and therefore which products and services are most fit to your style when sending you information. For example, based on your purchases and browsing history (i.e., depending on the articles that you clicked), we will make you suggestions on products that we believe may interest you.
- Remember that you may unsubscribe from the Newsletter at any time without cost via email at [boutiques@lesbains-paris.com](mailto:boutiques@lesbains-paris.com).
- To perform promotional actions (for example, for the organization of competitions or to send the list of items stored to the e-mail you designate). On participating in any promotional action, you authorize us to process the personal data that you have shared with us depending on the promotional action and disclose them through different media such as social networks or the Platform itself. In each promotional action in which you participate you will have available the terms and conditions where we will be providing more detailed information about the processing of your personal data.
- To disseminate in the Platform or through our channels in the social networks photographs or pictures that you shared publicly, provided that you expressly give us your consent for the purpose.

5. Analysis of usability and quality to improve our services

If you access our Platform, we inform you that we will treat your browsing data for analytic and statistic purposes, i.e., to understand the manner in which users interact with our Platform and thus be capable of introducing improvements in the Platform.

In addition, we occasionally perform quality surveys and actions to know the degree of satisfaction of our customers and users and detect those areas in which we may improve.

### 3. HOW WE ARE LEGALLY PERMITTED TO PROCESS YOUR DATA?

The legal terms on which we are permitted to process your personal data also depends on the purpose for which we process them, as explained in the following table:

1. To manage your Platform user registration

We process your data because this is necessary on the terms regulating the use of the Platform. In other words, for you to be able to register as a user on the Platform, we need to process your personal data, since we would otherwise be unable to manage your registration.

2. Development, performance and making of the purchase or services contract

We process your data because their processing is necessary for us to make the purchase or services contract with you.

Certain processing of data related to the purchase process is activated only because you request or authorize it, as is the case of the storage of payment (card) data for future purchases. In these cases, our processing of your data is supported by your own consent.

We consider that we have a legitimate interest to carry out the necessary verifications to detect and prevent potential fraud when you make a purchase. We understand that the processing of these data is positive for all the participating parties when a purchase is paid and in particular for you, since this allows us to establish measures to protect you from fraud attempts by third parties.

### 3. Customer Support

We consider that we have legitimate interest in answering the requests or queries raised by you through the existing different contact channels. We understand that the processing of these data is also beneficial to you to the extent that it enables us to assist you adequately and answer to the queries raised.

When you get in touch with us, in particular, for the management of incidents related to your order or the product/service acquired through the Platform, the processing of your data is necessary to perform the purchase contract.

When your request is related to the exercise of your rights on which we inform you below, or to claims on our products or services, we are legally permitted to process your data for compliance with our legal obligations.

### 4. Marketing

We are legally permitted to process your data for marketing purposes due to the consent that you give us, for example when you accept receiving customized information through multiple channels, when accepting the legal terms and conditions to participate in a promotional action or to publish your pictures on the Platform or on our social networks' channels.

In order to show you customized information we consider that we have a legitimate interest to conduct a profiling with the information that we have about you (such as your browsing, preferences or purchase history) and the personal data that you have provided us, such as the age range or language, since we understand that the data processing of these data is also beneficial to you because it allows you to improve your user experience and access the information in accordance with your preferences.

### 5. Analysis of usability and quality

We consider that we have a legitimate interest in analyzing the Platform usability and the user's satisfaction degree, since we understand that that the processing of these data is also beneficial for you because the purpose is to improve the user experience and provide a higher quality service.

## 4. HOW LONG WILL WE KEEP YOUR DATA?

The time for which we will keep your data will depend on the purposes for which we process them, as explained below:

#### 1. To manage your Platform user registration

We will process your data for the time during which you remain a registered user (meaning, until you decide to unsubscribe).

#### 2. Development, performance and execution of the purchase or services contract

We will process your data for the time necessary to manage the purchase of the products or services that you buy, including potential returns, complaints or claims related to the purchase of the product or service in question.

Sometimes, we will only process the data until the time when you decide, as is the case of payment (card) data that you requested us to store for future purchases.

### 3. Customer Support

We will process your data for the time necessary to meet your request or application.

#### 4. Marketing

We will process your data until you unsubscribe or cancel your subscription to the newsletter. If you participate in promotional actions, we will keep the data during a six (6) months period from the end of the action.

#### 5. Analysis of usability and quality

We will process your data occasionally for the time during which we proceed to carry out a specific quality action or survey or until we anonymize your browsing data.

Notwithstanding the fact that we will process your data for the time strictly necessary to achieve the purpose in question, we will subsequently keep them duly stored and protected for the time during which liability may arise for their processing, in compliance with legislation in force from time to time. Once each of the potential actions is time-barred we will proceed to delete the personal data.

#### 5. DO WE SHARE YOUR DATA WITH THIRD PARTIES?

To achieve the purposes mentioned in this Privacy and Cookies Policy, we must give access to your personal data to entities of SAS BAINS and to third parties that provide us with support in the services that we offer you, i.e.:

- financial institutions,
- anti-fraud detection and prevention entities,
- technological service providers,
- logistic, transport and delivery partners and service providers,
- providers of customer support related services,
- advertising and marketing related partners and service providers.

For service efficiency purposes, some of these providers are located in territories outside the European Economic Area that do not offer a level of data protection comparable to that of the European Union, in other words, the United States of America. In such cases, we inform you that we will transfer your data with adequate safeguards and always keeping your data safe:

- Some providers are certified Privacy Shield, which certification you may consult through the following link: <https://www.privacyshield.gov/welcome>
- With other providers, we have agreed Standard Contractual Clauses approved by the EU Commission, the content of which you may consult through the following link: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

#### 6. WHAT YOUR RIGHTS ARE WHEN MAKING YOUR DATA AVAILABLE TO US

We undertake to keep your personal data confidential and to ensure that you may exercise your rights. Bearing that in mind, we Joint Controllers have agreed that you may exercise your rights free of charge by writing us an e-mail to a single e-mail address ([contact@lesbains-paris.com](mailto:contact@lesbains-paris.com)), simply informing us of the reason for your request and the right that you wish to exercise. If we consider this necessary to be able to identify you, we may request you to provide a copy of a document evidencing your identity.

In particular, notwithstanding the purpose or legal basis we use to process your data, you have the following rights:

- To request access to your personal data that we hold. We remind you that where you are a Platform registered user you may also consult this information in the relevant section of your online account.
- To request that we rectify the personal data that we hold. Please bear in mind that if you are a registered user on the Platform, you may also access the relevant personal data section of your

online account to change or update your personal data. In any case, please take into account that, on actively making your personal data available to us through any procedure, you guarantee that they are true and accurate and you undertake to notify to us any change or modification of your data. You will be liable for any loss or damage caused to the Platform or to the person responsible for the Platform or to any third party by reporting erroneous, inaccurate or incomplete information in the registration forms. Please remember that, as a general rule, you must provide us only with your own data, not with those of third parties, other than to the extent otherwise permitted in this Privacy and Cookies Policy.

- To request that we erase your personal data to the extent that they are no longer necessary for the purpose for which we need to keep processing them, as we have explained above, or when we are no longer legally permitted to process them.
- To request that we cancel or limit the processing of your personal data, which entails that in certain cases you can request us to temporally suspend the processing of the data or that we keep them longer than necessary.

If you have given us your consent to process your data for any purpose, you also have the right to withdraw such consent at any time. Some of the circumstances in which you may withdraw your consent are detailed in section 2 where we explain for which purposes we process your data.

When we are legally permitted to process your data due to your consent or to for the purposes of a contract, as explained in section 3, you will also have the right to request the portability of your personal data. This means that you will have the right to receive the personal data that you made available to us in a structured, commonly used and machine-legible format, to be able to transmit them to another entity directly without impediments on our part.

In addition, where the processing of your data is based on our legitimate interest, you will also have the right to object to the processing of your data.

## 7. WHAT HAPPENS WHEN YOU PROVIDE US WITH DATA OF THIRD PARTIES?

If you provide us with personal data of third parties, you confirm that you informed them of the purposes and of the manner in which we need to process their personal data.

## 8. CHANGES TO THE PRIVACY AND COOKIES POLICY

We may amend the information contained in this Privacy and Cookies Policy when we consider this appropriate. Should we do so, we will notify you by various procedures through the Platform (for example, through a banner, a pop-up or a push notification), or we may even send you a notice to your e-mail address when the change in question is relevant to your privacy, for you to be able to review the changes, assess them and, as the case may be, object or unsubscribe from any service or functionality. In any case, we suggest you to review this Privacy and Cookies Policy from time to time in case minor changes are made or we make any interactive improvement, taking the opportunity that you will always find it as a permanent point of information on our Website.

## 9. INFORMATION ON COOKIES

We use cookies and similar devices to facilitate your browsing in the Platform, understand how you interact with us and, in certain cases, to be able to show you advertisements in accordance with your browsing habits.

What is a Cookie?

A Cookie is a small text file that a website stores on your PC, telephone or any other device, with information about your navigation on that website. Cookies are necessary to facilitate browsing and to make it more user-friendly, and they do not damage your computer.

While this Policy uses the general term "Cookies", as they are the main method for storing information used by this website, the browser's "Local Storage" space is also used for the same

purposes as the Cookies. All the information included in this section is also applicable to this "Local Storage".

What are Cookies used for on this website?

Cookies are an essential part of how our website works. The main purpose of our Cookies is to improve your browsing experience. For example, they are used to remember your preferences (language, country, etc.) while browsing and on future visits.

The information collected by the Cookies also enables us to improve the site by estimating numbers and patterns of use, the suitability of the website to the individual interests of the users, quicker searches, etc. On occasion, if we have obtained your informed consent in advance, we may use Cookies, tags or other similar devices to obtain information that enables us to show you, either from our own website or from third-party websites or any other means, advertising based on the analysis of your browsing habits.

What are Cookies NOT used for on this website?

We do not store sensitive personal information, such as your address, your password, your credit or debit card data, etc. in the Cookies we use.

Who uses the information stored in Cookies?

The information stored in the Cookies from our website is used exclusively by us, except for those identified below as "third-party cookies", which are used and managed by external entities to provide services requested by us to improve our services and the experience of the user when browsing our website. The main services for which these "third-party cookies" are used are to obtain access statistics and to guarantee the payment transactions that are carried out.

How can I avoid using Cookies on this website?

If you prefer to avoid the use of Cookies on this page, taking into account the above-described limitations, you must first disable the use of Cookies in your browser and then delete the Cookies saved in your browser associated with this website. You may use this option for preventing the use of Cookies at any time.

How do I disable and prevent the use of Cookies?

You may restrict, block or delete the Cookies from this website at any time by changing the configuration of your browser following the steps indicated below. While the settings are different in each browser, Cookies are normally configured in the "Preferences" or "Tools" menu. For further details on configuring Cookies in your browser, see the "Help" menu in the browser itself.

Which particular Cookies does this website use and for what purpose?

The chart below shows the Cookies, tags and other similar devices used by this website, together with information on the purpose, duration and management (proprietary and by third parties) of each one of them.