

**Last updated: 01 July 2021**

## **1. Data controller and general presentation of the Policy**

Data controller: Vestiaire Collective, a limited liability company governed by French law, registered under number 517 465 225 RCS Paris, whose registered office is located at 255 boulevard Pereire, 75017 Paris, France, represented by its Chairman and Chief Executive Director (hereinafter "**Vestiaire Collective**" or "**we**").

Vestiaire Collective, through its website [www.vestiairecollective.com](http://www.vestiairecollective.com) and its mobile applications "Vestiaire Collective" available on IOS and Android (together the "**Platform**"), collects and processes certain personal data relating to its users ("**you**" or the "**user**").

Personal data are any information relating to an identified or identifiable natural person, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, an online identifier, or to one or more specific elements such as his or her physical, economic, cultural or social identity (the "**personal data**").

In accordance with the General Regulation of the European Parliament and of the Council on Data Protection No. 2016/679 of 27 April 2016 (the "**GDPR**") and Law No. 78-17 of 6 January 1978, known as the "Data Protection Act", in its current version, the purpose of this privacy policy (the "**Policy**") is to inform you about the data we collect about you, the processing we carry out and its purpose, the periods of retention of your data, the recipients of your data as well as the rights you have.

The Policy completes the contractual conditions which govern the Platform and which you accept by using the Platform (in particular the general conditions of use, the "buyers" general conditions, the "sellers" general conditions which you will find here: [see the main conditions](#) as well as the other conditions which you accept for specific services or according to your status, hereafter together the "**Terms**").

Modification of the Policy: the Policy can be modified at any time. The current version is the one available on the Platform. In the event of a significant change to the Policy, we will inform you within a reasonable period of time (by email or by banner - or "push" - on the Platform).

Vestiaire Collective may ask you at any time and by any means that can be recorded to confirm that you have read and understood the Policy.

## **2. Personal data collected on the Platform**

We collect your data mainly from you directly, but also from third parties who want you to benefit from our services, advertising partners and social networks depending on the authorizations you provide them directly.

On our Platform, the mandatory nature of the data to be provided is indicated to you at the time of collection (for example, by an asterisk). If you do not fill in the mandatory fields, we will not be able to provide you with all our services.

You will find below a list of all the data that we may collect and process about you, depending on your use of the Platform and the authorizations you provide.

**Information related to your identity and the creation of your account**: Full name; Username; Email address; Password; Date of birth or confirmation of majority; Gender; Profile picture; Type of contract you have signed up for (standard, conciergerie, professional); Business name and legal representative identity of professional sellers; VAT number of professional sellers; Information you choose to provide in your biography.

Only if you connect via Facebook - Facebook will provide us with your consent: Profile picture; First and last name; Gender; Email address; Date of birth.

**Information about your device, account and activity**: IP address; Session information; Cookies and trackers; Consent and refusal, date and time of consent; User profile; Language; Preferences; Browser used by your device; Content and URLs you connect to; Date and time of your connections; Model and manufacturer of your device; Operating system used by your device (iOS, Android);

**Information about your interactions with the Platform and other users**: Name of the user you are communicating with; Messages; Date and time of messages; Photos shared; Other data indicated in messages; Reviews; Rating; Date and time of review; Response to review; Your comments and public messages on the

Platform; Activation/deactivation of vacation mode; Your favorite items; Followed users; Your preferences; Badges obtained; Your responses to our satisfaction surveys; Your consumption habits;

**Information related to your listed items and/or you items on deposit:** Description of the item; Photographs of the item; Price of the item; Photograph of the invoice or receipt; Photograph of the certificate of authenticity;

**Payment information:** Item price; Customs and transportation charges; Withholding tax rate based on buyer's location; Payment method information; Bank account number; First six and last four digits of your credit card number; Expiration date; Security code number (CVV/CVC); Invoice.

**Information about your sales:** History of items put on sale, sold, refused; reason for refusal; revenue generated on the Platform.

**Information relating to the transportation of items:** Delivery option; Address of the shipping point and the delivery point of the package; Tracking number of the package; Confirmation of the delivery of the package; Date and time of delivery of the package; Location of the package; Other delivery information required by a chosen transportation service provider; In the event of a dispute with the carrier: a sworn statement and a copy of your ID.

**Anti-fraud information: Information contained in a photo of the credit card:** full name, expiration date of the card and the last four digits of the card number, and other information visible on the front of the card if you choose not to blur it; Information contained in a photograph/screen shot of the bank statement listing the most recent charges: date and description of the most recent Platform-related charges and other payment information if you choose not to blur it; The information contained in the proof of address: first and last name of the cardholder, physical address, date of issuance of the proof, and other information that you have not blurred.

**Information relating to the management of the messages you write to us,** the management of disputes and inappropriate behavior: Messages (requests, complaints) sent to customer service or by contacting us on social networks (private or public message, including by "tagging" us); Type of warning received by the user; Date of receipt of the warning by the user; Information contained in judicial requests; Complaint from a user (content, reason, date and time).

**Information you provide about other people:** The name of the person you wish to sponsor and their email address; Your relationship to the sponsored person.

**Sensitive Data:** We do not collect sensitive data. Any sensitive personal data collected and/or processed by us will be done so only with your explicit consent and never without your knowledge. In any case, we invite you to communicate only strictly necessary information - in particular in the free comment zones.

**Specific to online applications:** Full name; Email address, Phone number; Resume; Cover letter; Authorization to work in France; Work permit; Salary expectations; Other information you provide.

### **3. Processing that we carry out to execute pre-contractual measures and our General Conditions**

We process your personal data to:

- Allow you to create an account on the Platform;
- Help you manage your account;
- Enter into contracts with us;
- Provide you with our services (direct shipping, integrated seller-buyer messaging service, integrated customer service messaging service, integrated negotiation tool, item controls etc.);
- Display your listings on the Platform;
- Allow you to carry out transactions and payments;
- Allow you to make deliveries via our carriers;
- Notify you of any event related to your account, from its creation to its deletion (by emails and notifications);
- Notify you when we update (add, modify, delete etc.) our General Conditions, the Policy, our commission grid, and more generally our services and features (by emails and notifications);
- Inform you that there are items in the process of being deposited in your account and awaiting your validation;
- Notify you about the status of your transactions (status of your purchase, status of your sale, status of the payment, status of the quality control, status of the shipping label, notification or confirmation of deposit abandon, existence of a litigation, status of the shipping etc.) (by emails and notifications),
- Notify you when Vestiaire Collective and/or its partners need to carry out some additional verifications (identity, proof of residence etc.) (by emails and notifications);

- Notify you when you have obtained or lose a badge or a status on our Platform (by emails and notifications);
- Notify you when we have detected a problem that is blocking or may block your use of the Platform (by emails and notifications);
- Send you coupons and make you benefit from our offers (personal or by user category) (by emails and notifications);
- Answer your questions, requests, complaints addressed to the customer support department (by emails and notifications).

Specific to online applications:

- process and analyze your online application;
- contact you for example for a possible interview (by email or telephone);
- ask you for additional information according to the needs of the position (by email or telephone).

#### **4. Processing that we carry out on the basis of our legitimate interests**

This category of processing is based on our legitimate interests. In order to legally base a processing operation on legitimate interest, three cumulative conditions must be met: (i) the interest pursued must be legitimate (i.e. lawful, clearly and precisely determined, real and present); (ii) the processing carried out must be necessary and; (iii) the processing must not adversely affect the rights and interests of data subjects.

For your complete information, we detail below the processing operations and the corresponding legitimate interests. We have ensured that these processing operations do not infringe your fundamental rights and freedoms.

We process your personal data to:

**Give you advice**, e.g. by emails and notifications, for example on the way to write a product sheet, on the price of your item, to suggest price drops after a certain time, **and inform you that a user has contacted you or interacted with one of your articles**, because we have a legitimate interest in facilitating and increasing the sales between our users to increase the user satisfaction on the Platform;

**Remind you that items are being deposited on your account**, by email, because we have a legitimate interest that you validate this deposit in order to enrich the catalog of products on sale available on the Platform;

**Present you content, products and information that may be of interest to you**, e.g. by emails and notifications, based on the content you view, as we have a legitimate interest in seeking the best possible user experience and improving our Platform, services and features, to personalize the experience for everyone, to provide you with special offers, to allow everyone to make eco-responsible choices, to facilitate and increase sales and satisfaction; if you have items for sale, you will be punctually informed of the sales operations conducted by Vestiaire Collective so that you can participate in them, as this is part of the services that we have a legitimate interest in offering to our sellers ;

**Offer you to participate in surveys** (e.g. satisfaction, opinion, poll...), e.g. by emails and notifications, because we have a legitimate interest in collecting feedback from our users to improve the Platform. You are free to participate or not, without any consequences. Your answers are then processed on the basis of your consent;

**To allow other users to have access to certain information about you** (user name, date of registration, such as country where the item is located, number of products sold, badges earned by a seller, seller's rating etc.), as we have a legitimate interest in building trust between users, between our users and us, and in enabling everyone to make environmentally responsible choices, and to facilitate and increase sales and user satisfaction on the Platform;

**Solve issues and litigation, send warnings, temporarily or permanently suspend a user account, e.g.** by emails and notifications, because we have a legitimate interest in fighting inappropriate behavior and illegal content, ensuring compliance with our Terms and Conditions, fighting fraud and counterfeiting, ensuring the security of the Platform and users, resolving disputes between our users and to defend the rights and interests of Vestiaire Collective;

**To implement detection measures to fight against fraud and ask you to perform security checks on your account**, particularly during transactions, and, in case of detected anomalies, to give rise to an automatic suspension of your transaction. A review is then carried out by our anti-fraud department which may contact you to verify your identity. We have a legitimate interest in guaranteeing the security of the Platform and that of users and to fight against all forms of fraud;

**Access and moderate content, messages and conversations**, because we have a legitimate interest to

improve the security and quality of this service, to ensure compliance with our Terms and Conditions, to detect illegal, unsolicited content or malware, to improve the functionality of the messaging system, to resolve disputes between users, to process reports and complaints sent by users, to fight against fraud and counterfeiting and to protect our users;

**Allow professional sellers to issue your invoices**, because we have a legitimate interest in allowing our professional sellers to fulfill their legal and accounting obligations.

**To perform marketing and performance statistics and analysis** in order to understand how you use the Platform and our services, because we have a legitimate interest in seeking the best possible user experience and improving our Platform, services and features, and to personalize the experience for everyone;

#### **5. Processing we carry out only with your consent:**

We process your personal data to:

**Subscribe you to our newsletters.** You can deactivate them at any time through the link provided in the newsletters or directly from your account.

**Send you the product alerts you have set up from your account.** You can deactivate your alerts directly from your account. that you have programmed directly from your account. You can deactivate them at any time from your account.

**Customize the ads** that appear on third-party sites, so that you are not exposed to ads that are not relevant to you. You can disable them by changing your cookie settings (see the "Cookies" section of the Policy).

Analyze the answers you agree to share with us when you respond to our surveys (satisfaction, poll, feature test, etc.).

**Analyze the answers** you agree to share with us when you respond to our surveys (satisfaction, poll, feature testing etc.).

**Share your strictly necessary data with our partner brands** when you agree to participate in operations. In this case, you will be given information specific to the operations and partner brands.

#### **6. Processing we carry out to comply with our legal obligations**

We process your personal data to:

**Comply with our legal and regulatory obligations**, for example as part of Vestiaire Collective's legal obligation to cooperate with the tax or judicial authorities acting in particular in the context of their control and investigation missions; to keep certain documents such as your invoices even after your account has been closed; to verify the identity of sellers and, if applicable, buyers, when products containing precious metals transit through our warehouses, etc.

**[For French residents only] Generate your annual sales summary** and send it to you, share certain information with the French tax authorities in accordance with Article 242 bis of the French General Tax Code;

**Process your requests** to exercise your rights under the GDPR (see section "Your Rights" below);

#### **7. Length of time personal data is kept**

Vestiaire Collective retains your personal data for the strict period of time necessary to fulfill the purpose of the processing concerned. Thus:

- The data collected and used for the creation and the management of your account are kept during all the duration of the commercial relationship and until your account is deleted; however, if you remain inactive during three (3) years (i.e. absence of connection on the Platform, absence of opening of the sent emails etc.), your account could be regarded as inactive and we reserve the right to delete it after a notification by email remained without action from you during 3 (three) months;

- The data relating to the sending of newsletters and alerts are kept as long as you do not withdraw your consent by unsubscribing, and for a period of 3 (three) years from their collection or the last contact with the user (connection to the Platform, opening a newsletter);

- The data collected in the context of the conclusion of specific contracts are kept for the duration of the execution of the latter, and are then archived for the strict legal prescription periods applicable;
- The data collected in the context of our legal, fiscal and accounting obligations are kept for the applicable legal, fiscal and accounting retention periods. For example: (i) invoices are kept for 10 (ten) years, (ii) the precious metals police book for 6 (six) years ;
- The data collected in the context of tax reporting obligations are kept until they are sent to the tax authorities once a year, and then archived for the strict limitation periods applicable;
- The data related to the management of complaints, disputes and litigation are kept for the duration necessary to resolve the dispute and for the duration of any applicable statute of limitations;
- The documents necessary for the identity verifications which take place within the framework of the fight against fraud are preserved during the time necessary for the verifications and are removed within 3 (three) days;
- The answers to surveys are kept for the time necessary for the survey and are then anonymized if they were not already;
- The data collected in the context of specific partnerships with partner brands are kept for the time necessary to carry out the said commercial operation and are then anonymized; If you consent to participate in some specific commercial operations (for example, "resale as a service operations"), a dedicated privacy policy may apply and then will be available on the dedicated webpage of the operation.
- The data collected through cookies and tracers on the Platform are kept in accordance with the "cookies" section of the Policy);
- The data collected can be kept in a form that does not allow your identification (anonymization) for analytics and statics purposes, without limitation of duration;
- The data related to online applications are kept for 2 (two) years and then deleted;

In some cases, we may retain certain personal data about you even if you delete your account, by legal obligation, or if we have an overriding legitimate interest in retaining some of your data (ex. there is an issue with the account, the presence of an unresolved claim or dispute, the defense and exercise of our rights etc.). In this case, the data necessary for the resolution of the case will be kept for as long as the dispute lasts within the limit of the applicable rules on prescription.

## **8. Recipients to whom your data is transmitted**

In the course of processing your personal data, we may pass it on to certain personnel of Vestiaire Collective and its group. We ensure that only those persons who are authorized to do so by virtue of their duties or functions have access to your data. The recipients of your data are listed below:

- Vestiaire Collective's internal departments: anti-fraud department, transport and logistics department, product control department, customer service department, legal department, data protection officer, human resources defor online applications;
- to the other entities of the Vestiaire Collective group when the transaction is international: Vestiaire Collective Italia Srl, Vestiaire Collective GmbH, Vestiaire Collective UK Ltd, Vestiaire Collective HK Ltd, Vestiaire Collective Singapore Pte Ltd, Vestiaire Collective USA, Inc. (including future entities);

In addition, we may transmit your data to our service providers and to third parties, such as listed below:

- our transportation and logistics service providers;
- our anti-fraud service providers;
- our service providers managing our customer relations;
- our moderation service providers;
- our communication service providers;
- our IT, technical and hosting service providers;
- our external legal counsel;
- advertising platforms and business partners with your consent;
- banking and payment service providers;
- to authorized third parties, in particular in the context of investigations of offences;
- to your seller or buyer, especially in the case of direct mailing;

- to the professional sellers so that they can comply with their legal, fiscal or accounting obligations or for any other reason subject to your consent;
- to third parties, buyers or investors, in the event of a restructuring of the Vestiaire Collective group, including the total or partial sale of assets, mergers, acquisitions, spin-offs and, more generally, any capital operation;
- to public bodies and the tax authorities in the context of our legal obligations (in France and abroad);
- to our partners within the framework of certain services that we provide to brands present on the Platform.

Your data will not be sold to third parties under any circumstances.

Some of these recipients are responsible for the processing of the personal data that we communicate to them. They process the data in accordance with our agreements and their personal data protection policy.

This is notably the case for:

- Service providers who allow you to carry out banking transactions on the Platform (non-limited list): Adyen, Oney, Ingenico, Klarna, Splitit, Currencycloud, American Express, PagaMasTarde, Affirm, Paypal and its subsidiary Hyperwallet;
- From our provider in the fight against payment fraud: Riskified: <https://www.riskified.com/privacy/>;
- Partner brands within the framework of commercial operations when you wish to participate;
- Professional sellers as part of their own legal obligations.

## **9. Cookies**

### What is a cookie?

A cookie is a small file stored by a server in a user's terminal (computer, telephone, etc.) and associated with a web domain (i.e. in most cases with all the pages of a single website).

Generally speaking, the cookie contains certain directly or indirectly identifying information, such as the name of the server that deposited it, a session identifier, an expiry date, or even information on navigation within the site you are visiting, such as the pages you have visited, for example, a terminal identifier, an advertising identifier, etc.

Cookies have many uses: they can be used to remember your advertising ID, the contents of your shopping cart, the language in which the web page is displayed, to track your browsing for statistical or advertising purposes, to personalise content etc. For the sake of simplicity, we use the term cookies to refer to all types of tracers.

### 2) Who can place cookies on my terminal?

-> Vestiaire Collective

-> Vestiaire Collective's partners: these are third-party companies, such as advertising agencies, fraud prevention service providers or our partners' clients. You can consult the [list of partners](#) (also available via the cookie management platform).

Cookies may be deposited when you browse our Platform or when you click on our advertising spaces from our Platform or partner sites.

### 3) How do I set my cookies?

#### a) The Vestiaire Collective banner

When you first connect to the Platform, a banner is displayed to inform you about the categories of cookies that are used and to give you the possibility of accepting or refusing cookies related to (i) audience measurement, (ii) content customisation, (iii) personalised advertising and (iv) sharing on social networks.

Once you have made your choices, a necessary cookie is placed on your terminal in order to keep them in memory for 6 months. This prevents us from asking you to set your cookies each time you visit our Platform.

If you wish to change these settings at a later date, you must empty your browser's cache so that the banner appears again or access the cookie management platform.

#### b) Setting your browser or terminal

You can also set your browser or terminal to manage cookies in general, regardless of the website or application concerned. The configuration of each browser is different. It is described in the help menu of your browser,

which will allow you to know how to modify your wishes with regard to cookies. Rejecting or deleting cookies may prevent the site in question from functioning properly.

The CNIL informs you here: [les-conseils-de-la-cnil-pour-maitriser-votre-navigateur](https://www.cnil.fr/fr/les-conseils-de-la-cnil-pour-maitriser-votre-navigateur)

c) Youronlinechoices.com (for advertising cookies)

Finally, you can connect to the Youronlinechoices site, proposed by digital advertising professionals grouped together within the European Digital Advertising Alliance (EDAA) and managed in France by the Interactive Advertising Bureau France (IAB). You will be able to find out which companies are registered with this platform and which offer the possibility of disabling interest-based advertising by using the tool provided on this site. This does not mean that you will no longer receive advertisements when you browse the Internet, but that what you see on the websites you visit will no longer be particularly relevant to you and your interests, and may therefore be less relevant.

#### 4) What cookies and processing are used on Vestiaire Collective?

##### 4.1) Necessary cookies (not configurable)

These cookies are installed by default: you cannot set them via the Platform. These cookies are either necessary for the operation of our Platform, or installed as a response on our part to actions that you have carried out and that constitute a request for services. These cookies are based on Vestiaire Collective's legitimate interest in allowing the Platform to function as well as possible and ensuring its security.

Retention period: their life span is generally the time of the session and a maximum of several months.

Consequence in case of blocking: you may no longer be able to access the Platform and/or the Platform's services.

Details of the purposes:

- retain your expressed choice on the deposit of tracers;
- to allow you to remain connected when you navigate from one page of the Platform to another;
- to keep track of the contents of your shopping cart or to charge for the product(s) and/or service(s) purchased;
- customise the user interface (e.g. for language selection or presentation of our services); save the format and dimensions of your screen and windows in order to correctly display our Platform;
- authenticate you to a service, including those aimed at ensuring the security of the authentication mechanism, for example by limiting robotic or unexpected access attempts;
- combat spam and phishing attempts, by enabling us to identify computers used to create large numbers of fake accounts;
- detect computers infected with malware and prevent them from causing damage
- implement security measures, for example when you are asked to log in again to a content or service after a certain period of time;
- detect navigation problems and therefore improve the usability of our services;
- to secure transactions and fight against fraud (prevention of payment fraud, identity theft, etc.);
- to balance the load of equipment contributing to a communication service;
- to route traffic between servers and to understand the loading speed of our pages;
- facilitate communication via the Platform;
- measure the audience, traffic and carry out statistics of our Platform and its services, in particular to improve the functionality of the Platform.

##### 4.2) Audience cookies (subject to your prior consent):

These cookies allow us to collect information about your use of the site (number of visits, pages visited, time spent on the site, etc.) in order to carry out statistical analyses, on an aggregate basis, of the number of users and the way in which you navigate our Platform.

Retention period: The life of these cookies does not exceed 13 months.

Consequence in case of blocking: No consequence for the user but by accepting them, you contribute to the improvement of our Platform and our services.

To block this cookie directly via Google: [Google Analytics opt-out browser add-on - Analytics Help](#)

Detail of the purposes:

- to measure the audience, traffic and performance of our Platform and its services and to improve the functionality of the Platform;
- to analyse traffic in greater depth.

4.3) Content personalisation cookies (subject to your prior consent):

These cookies do not directly store personal data, but are based on the unique identification of your browser and terminal. These cookies allow us to deduce your user profile and recommend products, services and content that best suit your preferences, and to offer you certain promotional offers on our Platform.

Retention period: Their life span is very short, generally the time of the session, a few hours and a maximum of 13 months.

Consequence in case of blocking: No consequence on the use of the Platform. On the other hand, their deletion will have the effect of displaying content that does not take into account your centres of interest. By accepting these cookies, you benefit from an enriched and personalised experience.

Details of the purposes:

- to offer you content, products and services that are personalised according to your preferences, interests and your browsing and use of the Platform;
- to identify your visit to our Platform, track the pages you visit and the links you click; to understand your user profile to better tailor our Platform and the advertisements displayed on it to your interests. If you have given us permission to send you advertising emails (such as newsletter sign-ups) or push notifications, we will also use this information to personalise these (targeting or advertising cookies).

4.4) Personalised advertising cookies (subject to your prior consent):

These cookies may be set within our Platform by our advertising partners. They may be used by these companies to profile your interests and deliver relevant and personalised advertising on other websites. These cookies allow us to display ads that best match your preferences. Your profile is also enriched with information from your interactions with our partners or with other publishers who are clients of these partners.

Retention period: Their life span is very short, generally the time of the session, a few hours and a maximum of 13 months.

Consequence in case of blocking: No consequence on the use of the Platform. On the other hand, their deletion will not lead to the cessation of advertising on the Internet. It will only result in the display of advertising that does not take your interests into account. By accepting these cookies, you will benefit from an enriched and personalised experience.

Detail on the purposes:

- to offer you personalised content, products and services based on your preferences, interests and your browsing and use of the Platform;
- to count the total number of advertisements displayed by us on our advertising spaces, to identify these advertisements, their respective number of displays, the number of users who clicked on each advertisement and, if applicable, the subsequent actions taken by these users on the pages to which these advertisements lead;
- to adapt the advertising content of our Platform through our advertising spaces as well as our offers, according to the navigation on our Platform, or third party sites, the purchases you may make and/or according to the location data (longitude and latitude) transmitted by your terminal (with your prior consent);



- to associate this data with browsing information in order to send you, for example, electronic prospecting or to display on your terminal, within advertising spaces that we issue, personalised advertisements that are specifically intended for you and likely to interest you personally.

#### 4.5) Social network sharing cookies (subject to your consent):

We may include on our site, computer applications from third parties, which allow you to share content from our site with other people or to let these other people know your consultation or your opinion concerning a content of our Platform. This is notably the case of the "Share" and "Like" buttons from social networks such as "Facebook".

The social network providing such an application button is likely to identify you thanks to this button, even if you did not use this button when visiting our site. Indeed, this type of application button may allow the social network concerned to track your browsing on our site, simply because your account with the social network concerned was activated on your terminal (open session) during your browsing on our site.

We have no control over the process used by these third parties to collect information relating to your browsing on our site and associated with the personal data they hold. We invite you to consult the privacy protection policies of these social networks in order to learn about the purposes for which they may use the browsing information they may collect through these application buttons, particularly for advertising purposes. These protection policies must allow you to exercise your choices with these social networks, in particular by configuring your user accounts for each of these networks.

Retention period: The retention period of the sharing cookies is determined by each social network but must not exceed 13 months.

Consequence in case of blocking: No consequence on the use of the Platform. However, deactivating these cookies will prevent any interaction with the network(s) concerned.

### **10. How is your personal data protected?**

Vestiaire Collective is committed to implementing and maintaining appropriate technical and organizational measures for the processing and security of personal data, in accordance with Articles 32 to 34 of the GDPR, to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access. We pass on these obligations to our service providers and subcontractors.

### **11. Transfer of personal data outside the European Union**

Some of the data collected, mainly identification data (personal and professional identity), data relating to personal preferences, data necessary for payment, and data relating to the follow-up of the commercial relationship, are transferred to recipients, service providers and/or entities of the Vestiaire Collective group, which may be located within the European Union (EU), or in third party countries.

Prior to any transfer outside the EU, Vestiaire Collective has ensured that:

- (i) the destination countries provide an adequate level of protection for personal data recognized by the European Commission; or
- (ii) appropriate safeguards have been adopted (for example, by signing, with the recipient, the standard contractual clauses adopted by the European Commission or authorized by a supervisory authority).

As of the date of the update of the Policy, the non-EU countries concerned are: the United States of America, the United Kingdom, Hong Kong, Singapore, the Philippines, Madagascar, Australia, Israel.

### **12. Your rights**

In accordance with the GDPR, you have the following rights:

- a right of access and rectification allowing you to modify, complete or update your personal data;
- a right of deletion of inaccurate, incomplete, ambiguous, outdated data, or whose collection, use, communication or storage is prohibited;
- a right to object to the processing of your data for legitimate reasons;
- a right to object, without any reason, to the use of your data for prospecting purposes;
- a right to define directives concerning the fate of your personal data after your death.

- a right to data portability, in a structured, commonly used and machine-readable format; however, this right can only be exercised (i) with respect to the data concerning you that you have provided, as well as (ii) with respect to automated processing;

- a right to the limitation of processing, under the terms and conditions referred to in Article 18 of European Regulation No. 2016/679 of 27 April 2016;

- the right to lodge a complaint with the competent supervisory authority (the Commission Nationale de l'Informatique et des Libertés - the "CNIL").

To exercise your rights - excluding your right to lodge a complaint with the CNIL - you are invited to contact the Data Protection Officer by e-mail: [dataprivacy@vestiairecollective.com](mailto:dataprivacy@vestiairecollective.com). We will respond to your request by email as soon as possible and at the latest within one (1) month (subject to the longer deadlines provided for by the GDPR).

To facilitate your request, we ask you to write us from the email address you used to create your account on the Platform. Otherwise, we would not be able to verify your identity (or verify that you are the person who holds the account for which you wish to activate your rights). In this case, we may ask you to prove your identity by completing a form and providing a copy of an official identity document.

**Important information on identity checks:** In case of doubt or to fight fraud, we may ask you for proof of identity, address, purchase/sale or bank card. We will tell you how to provide us with these documents so that only the information we strictly need is transmitted to us (e.g.: copy of the identity card in black and white, photograph of part of a document, etc.). Only the departments that need to see these documents will process your data. We only keep these documents for the time necessary to verify them and then delete them immediately.

### **13. Contact**

If you have any further questions about how Vestiaire Collective collects and processes your personal data, please send an e-mail to the following address: [dataprivacy@vestiairecollective.com](mailto:dataprivacy@vestiairecollective.com).

For any other question, our customer service is at your disposal: [Send a message to customer service](#)