



HERMÈS

HERMÈS PRIVACY POLICY

Effective Date: 15 September 2023

1. General Statement and Scope

We take the privacy of our customers very seriously and we undertake to take all necessary actions and measures to protect the security and confidentiality of our valued customers' personal data in accordance with our Hermès Group practices, in line with the following principles in Article 4 of the Law No. 6698 on the Protection of Personal Data ("**Law**") and to process your data in a secure and transparent manner.

- Compliant with the law and good faith rules.
- Being accurate and, where necessary, up to date.
- Being processed for specific, explicit and legitimate purposes.
- Being relevant, limited and proportionate to the purpose for which they are processed.

Being retained for the period stipulated in the relevant legislation or required for the purpose for which they are processed.

As Hermès Group Companies, we believe that you should be aware of which personal data we collect and use and the rights you have in respect of your personal data.

Hermès Istanbul Çantacılık Tekstil ve İpek Ürünleri Ticaret Limited Şirketi imposes the necessary technical and administrative measures by using its technological and infrastructural facilities to ensure that personal data is processed lawfully and kept securely within the framework of the Law.

This Privacy Policy ("**Privacy Policy**") explains our policies and practices regarding how we process your personal data collected through our stores, through our websites, electronic forms, mobile applications ("**Hermès Digital Platforms**"), through social media and networks ("**Social Platforms**") or during our events or any interactions you have with us. This Privacy Policy also explains you how you can exercise your rights as personal data owners.

We recommend that you read this Privacy Policy carefully as it consists of important information about your personal data.

Our Privacy Policy is regulated so that you can easily reach the section you are interested in.

You may also ask for a copy of our Privacy Policy in any of our stores.

Do not hesitate to contact us should you have any questions or remarks about our Privacy Policy (See section "*How to contact us?*" below).

ÜNALAN MAHALLESİ LİBADIYE CAD. NO:82F EMAAR SQUARE OFİS KULESİ NO:9
ÜSKÜDAR, İSTANBUL, TÜRKİYE
TEL 00 90 216 629 8757 - FAX 00 90 212 241 2394



2. Who We Are?

“Hermès”, “Company”, “we” “us” and “our” refer to Hermès International, and to Hermès İstanbul Çantacılık Tekstil ve İpek Ürünleri Ticaret Limited Şirketi as the data controllers, unless otherwise stated in this Privacy Policy.

- Hermès International is a French limited partnership with shares (“*Société en commandite par actions*”) with a capital of 53,840,400.12 euros, having its registered office at “24, rue du Faubourg Saint-Honoré, 75008 Paris, France”, registered with the Paris Trade and Companies Registry under number 572 076 396 RCS Paris.
- Hermes İstanbul Çantacılık Tekstil ve İpek Ürünleri Ticaret Limited Şirketi is a Turkish limited liability company incorporated and existing under the laws of the Republic of Turkey having its registered office at “Emaar Square Office Tower Ünalán Mah. Libadiye Cad. No: 82-F Kat:5 Interior Door No: 009, 34700 Üsküdar, İstanbul” and registered with the İstanbul Trade Registry under number 694353.

Hermès International and Hermes İstanbul Çantacılık Tekstil ve İpek Ürünleri Ticaret Limited Şirketi are companies of the Hermès Group. Hermès International is the parent company of Hermès Group. For further details on Hermès Group, please visit <http://finance.hermes.com>. A list of the Hermès Group's organizations and locations can also be found in Annex 3 of our BCRs (Binding Corporate Rules) at www.hermes.com.

You can find our contact details in section “How to contact us?” below.

3. What Personal Data Do We Collect and By Which Methods?

Personal data is information about a specific or identifiable natural person. For example, it may include an individual’s name, address and gender.

We may collect personal data either directly from you (for example when you purchase a product or a service in a store) or indirectly (for example from your electronic devices that interact with our Digital Platforms).

3.1. Information You Provide Directly To Us

You may be able to share some of your personal data with us in the following situations:

- When you create an account online electronically or physically or in our stores,
- When you subscribe to our newsletter,
- When you use our Digital Platforms,
- When you purchase products or services on our Digital Platforms or in our stores,
- When you visit our stores,
- When you participate in one of our events,
- When you contact our customer-services.



Depending on the category of personal data you provide us with, such information may include:

- Your identity data (including your first name, last name, Turkish ID number, place and date of birth, gender, image, nationality, marital status, passport details);
- Your contact details (including your postal address(es), email address(es), phone number(s), residence address(es), delivery address(es)),
- Your personal status (including your title),
- Your purchases and renovations (including purchase history, order details such as purchase date, date, time, quantity, content, etc.),
- Your preferences (including your size number),
- Certain payment information (including billing information, payment type or method, charge or credit card number),
- Other information you may provide by filling forms or by contacting us (including your feedbacks, or other communications with us about possible adverse reactions to our cosmetic products, which may include health data).
- Other (Image, CCTV)

We will inform you when your information is required in order to process your requests, to respond to your queries or to provide you with our products and services. Your failure to provide necessary information may delay or prevent us from processing your request, responding to your query or providing our products or services to you.

As a Company, we hope to ensure that the personal data we process is always accurate and current at all times and therefore we encourage you to update your information in case any changes have occurred to that data. We also may ask you to update your information from time to time.

We recommend that you only share the personal data that has been requested or is essential for your query, with the exception of any special category of personal data such as data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, membership of an association, foundation or trade union, data concerning health, sex life or sexual orientation, criminal conviction, security measures.

3.2. Information Indirectly Collected

We may collect some of your information when you use our Digital Platforms, such as your IP address or other browsing information (including but not limited to browser, operating system, device model), through cookies or similar technologies placed on your device. Please read the [Cookie Policy](#) available on the Digital Platform you are visiting to know more.

We may also collect information about you through third parties authorized by you to do so on your behalf, from fraud detection and prevention service providers and/or through public sources (Internet websites, social networks) to meet legal and regulatory requirements, for fraud detection and prevention purposes, and for campaign and events performance analysis.



If you provide personal data to Company about a third party, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by data protection laws, we may collect, use and disclose such information in line with the purposes described in this Privacy Policy. For example, you should ensure that the related person of whom you share personal data is aware of the various matters detailed in this Privacy Policy. The related person must also provide the necessary consents set out in this Privacy Policy in respect of the processing or sharing of his/her personal information.

3.3. Minimum Age

Without prejudice to any local legislation regulating a different minimum age limit, we would like to remind you that we do not directly or indirectly collect personal data from persons under the age of 18. Therefore, we kindly ask you not to share with us the personal data of persons who do not meet this requirement.

4. Why Do We Collect Your Personal Data and How Do We Process It?

We collect and process your personal data in line with the following legal grounds set out in articles 5 and 6 of the Law, based on one or many of the following legal basis:

- for processing (if necessary) within the framework of the explicit consent obtained from your side (for example, when you subscribe to our newsletter). Please do not forget that for this specific legal basis, you have the right to withdraw your consent at any time (see below “*What rights do you have on your personal data?*”),
- if you share personal data with us (for example, if you provide your phone number to inquire about the availability of a product),
- where the processing is necessary in connection with any contract executed or to be executed between you and Hermès (provided that it is directly related to our performance obligation arising from that contract) (for example, when you make a purchase or buy a service),
- where we need to process personal data in order to establish or allow you to exercise a right on your behalf and to protect that right;
- when we have a legitimate interest in carrying out the processing and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms (for example, to prevent payment fraud), where it is necessary for us to process your personal data to comply with applicable laws and regulations and to fulfil a legal obligation.

Depending on the context, we may process your personal data for the following purposes:

- provide you with the products or services you requested, including facilitating the delivery of such products and services,
- conduct checks to identify you and verify your identity,
- process, authenticate and complete your orders and payments; send you “Promotional Communications” with your prior consent (see “Promotional Communications” section),
- provide you after-sale services and managing return processes,



- respond to your queries, requests and suggestions including enabling you to exercise your rights as a data subject,
 - manage complaints and civil and/or criminal lawsuits against the Company,
 - manage the events you registered and/or participated in,
 - identify, prevent and combat any fraudulent or illegal activity, including, but not limited to, protecting your business transactions from payment fraud, taking action against counterfeiting and taking action against the retail sale of our products in violation of our terms of sale and/or outside of our distribution network,
 - protect you, our employees and other individuals in our stores as well as in our properties;
 - manage the stock of certain types of rare products to allow a fair allocation of the products we sell,
 - monitor and improve our Digital Platforms,
 - in particular, to perform statistical analysis to tailor our product offer (including the use of your nationality after anonymization),
 - conduct IT development and data quality management services (such as standardisation and deduplication of data);
 - conduct statistical analysis;
 - host and carry out marketing and business studies and marketing campaigns;
 - improve our products and services,
 - provide you with a consistent level of service across all Hermès group companies;
 - facilitate sales, mergers or reorganisations of Hermès and/or any other member of the Hermès group;
 - establish, exercise or defend our legal rights or legitimate interests (for example, in civil or criminal legal proceedings);
 - fulfil our legal and regulatory obligations corresponding to preventing and combating fraud (including payment fraud) and money-laundering;
 - provide information to relevant regulatory bodies when legally required to comply with our legal obligations, in particular in relation to preventing and combating fraud, money laundering and terrorist financing.
- ensure compliance with any and all applicable laws, rules, regulations, regulatory policies, guidelines, industry codes, judgments, orders, requests, notices or directions issued by any court, legal or regulatory bodies, anywhere in the world, including but not limited to rules and regulations relating to anti-money laundering and countering the financing of terrorism and the carrying out of audit checks, surveillance and investigations.

5. Promotional Communications (newsletter, invitations, etc.)

With your express prior consent (usually obtained by ticking a specific box in a form), you may receive information concerning offers, services, products or events sent by Hermès and/or by other Hermès Group Companies (“**Promotional Communications**”). In such a case, you also accept that your contact information is shared with other Hermès Group Companies for this purpose. Please visit <http://finance.hermes.com> for details about Companies of Hermès Group. A list of the Hermès Group's organizations and locations can also be found in Annex 3 of our BCRs (Binding Corporate Rules) at “*www.hermes.com*”.



We rely on your consent to process the personal data you provide to us for this purpose. Therefore, if you no longer wish to receive such information, you have a right to withdraw your consent at any time (see below “*What rights do you have on your personal data?*”).

We may ask you to confirm or update your preferences regarding Promotional Communications if you instruct us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

6. How Long Do We Keep Your Personal Data?

Your personal data are processed for the period necessary for the purposes for which they have been collected, to comply with legal and regulatory obligations and for the duration of any period necessary to establish, exercise or defend any legal rights.

In order to determine the most appropriate retention periods for your personal data, we have specifically considered the amount, nature and sensitivity of your personal data, the reasons for which we collected your personal data, the service you deserve and expect from us together with the applicable legal requirements. For example:

- With regard to our prospects (potential customers): your personal data is stored for three years from your last action and then it will be deleted at the end of this period or, if applicable, it will be archived to comply with legal retention obligations,
- With regard to our customers: your data is stored for the duration of our commercial relationship and for up to ten years and then it will be deleted or archived at the end of this period to comply with legal retention obligations,
- With regard to the cookies used on Digital Platforms: they are stored for the duration specified in the Cookie policy available on each Digital Platform.

7. How Do We Disclose and Transfer Your Personal Data?

We may disclose your personal data only to the parties indicated below and for the following reasons:

- We disclose your personal data to Hermès employees that need to have access to your personal data and are authorized to process it in order to achieve the aforementioned purposes and who are committed to confidentiality.
- We may disclose your personal data to Hermès Group Companies, in charge of customer relationship, retail, e-commerce, communication, internal audit and IT management for the purposes set out in our Privacy Policy and to provide you with a consistent level of service across all Hermès Group Companies. This may include providing you with the products and services that you have requested, improving the services provided and – with your consent – sending you Promotional Communications concerning offers, services, products or events (for such purpose, you have a right to withdraw your consent at any time – see section “*What rights do you have on your personal data?*” below).

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For the specific purpose of combating payment fraud, your personal data are communicated to Hermès Sellier in order to process your order and to fight against online payment methods fraud attempts. As part of our legitimate interest to fight against fraud with payment methods, Hermès Sellier, acting as data controller, can transmit your financial information to an external service provider with a fraud detection tool in order to authenticate a payment. Such service provider is committed to confidentiality.

Hermès Istanbul Çantacılık Tekstil ve İpek Ürünleri Ticaret Limited Şirketi may transfer personal data to Hermès Group Companies only for the purposes and legal reasons specified in this Privacy Policy and in accordance with Articles 8 and 9 of the Law. It undertakes to take necessary and sufficient measures during this transfer.

The Hermès Group Companies are located worldwide. As a result, personal data may be transferred outside the country where you are located. This includes transfers to countries outside the European Union (“EU”) and to countries that do not have laws that provide adequate protection for personal data according to the European Commission.

To ensure lawful transfers of data, the Hermès Group has implemented Binding Corporate Rules (“BCRs”) designed to allow Hermès Group Companies to transfer personal data from the European Economic Area (“EEA”) to other Hermès group companies located outside of the EEA in compliance with the European data protection law. These BCRs have been approved by the European data protection authorities. For more information on Hermès group’s BCRs, please visit [this link](#).

For countries where BCRs are not fully recognized as adequate mechanism, transfers are made on the basis of appropriate contractual clauses approved by the data protection authorities. To obtain a copy of the relevant adequate safeguards, you can send us your request (see below “*How to contact us?*”).

Please visit <http://finance.hermes.com> for more details about Companies of Hermès Group.

- We may also disclose personal data to third-party service providers acting on behalf of Hermès and approved by Hermès. All such processing and disclosing of data based on our prior instructions set out in a binding contract that is compliant with the requirements of applicable law. Such disclosures are made for different purposes including:

- IT development and support,
- Hosting and carrying out marketing and business studies and marketing campaigns,
- Verifying your information, authenticating payments and processing orders and payments, to third parties that provide credit reporting, payment or order fulfilment services,
- Delivery services,
- Data quality management services (standardization, deduplication...)

These third-party service providers are committed to confidentiality obligations and are not permitted to use your personal data for any other purposes. We also require them to use appropriate security measures to protect your personal data.



Part of those service providers are located outside of your country, notably outside the EU. Hermès Group have taken steps to ensure all personal data is provided with adequate protection and that all transfers of personal data, including outside the EU are done lawfully. Where we transfer personal data outside of the EU to a country not determined by the European Commission as providing an adequate level of protection for personal data, the transfers will be under an agreement which covers the EU requirements for the transfer of personal data outside the EU, such as the European Commission approved standard contractual clauses.

To obtain a copy of the relevant adequate safeguards, you can send us your request using the details in Section “How to contact us?” below.

- We may be required by the binding requirements of an applicable law, or for the purposes of responding to legal proceedings or other lawful requests to disclose your personal data to relevant authorities or third parties.
- We may also disclose or otherwise process your personal data, in accordance with applicable law, to defend our legitimate interests (for example, in civil or criminal legal proceedings). For example, we may disclose such personal data as necessary to identify, contact or bring legal action against a person or entity who may be violating our Terms and Conditions of Sale and Use, or who may be causing injury to, or interfering with, other users of our Digital Platforms.
- In the event that Hermès or Hermès Group Companies, or all or part of its or their assets, are acquired by a third party, your personal data may be included in the transferred assets.
- We may also transfer your data abroad upon your explicit consent.

8. How Do We Protect Your Personal Data?

All your personal data is strictly confidential and will only be accessible, on a need-to-know basis, to duly authorized personnel of Hermès and other entities of the Hermès Group and third providers acting on our behalf with appropriate technical and organizational security safeguards.

. The Hermès group has implemented security measures to protect your personal data against accidental, unlawful or unauthorized access, destruction, alteration, disclosure, acquisition, loss or use. We follow appropriate security procedures in the storage and disclosure of your personal data so as to prevent unauthorized access by third parties and to prevent your data being accidentally lost. We limit those who have the right to access your personal data to those who have a genuine business need to access it. Those who will have access to your personal data are subject to a duty of confidentiality towards Hermès.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

We also require the third parties to whom we transfer your personal data to comply with the same rules.

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9. What Rights Do You Have on Your Personal Data?

Your rights as personal data owners pursuant to Article 11 of the Law are listed below;

- Learn whether your personal data is being processed,
- Requesting information if your personal data has been processed (Your right of access)
- To learn the purpose of processing your personal data and whether they are used in accordance with their purpose,
- To know the third parties to whom your personal data is transferred domestically or abroad,
- To request correction of your personal data in case of incomplete or incorrect processing (Your right to rectification)
- To request the deletion or destruction of your personal data within the framework of the conditions stipulated in Article 7 of the Law (Your right to be forgotten)
- In cases of correction of incomplete or incorrect processing of your Personal Data or deletion or destruction of your Personal Data, to request notification of this transaction to third parties to whom your Personal Data has been transferred,
- Your right to restriction of processing: the right to ask us to limit the processing of your personal data - in certain circumstances, for example, when you contest the accuracy of the data.
- To object if the analysis of your Personal Data processed exclusively through automated systems leads to a result that is unfavourable to you,
- Your right to object to processing: right to object:
 - To the processing of your personal data for direct marketing (including customer profiling) at any time;
 - In certain other cases, to the ongoing processing of your personal data, e.g., processing based on our legitimate interests.
- To claim damages if you have suffered damage as a result of unlawful processing of your Personal Data.

In cases where the processing of your personal data is based on your explicit consent (especially in cases where your personal data is processed for marketing purposes and in cases where your sensitive personal data is processed), you may decide to withdraw your consent at any time. However, the fact that you have withdrawn your consent will not prevent the processing of your data within the scope of other existing personal data processing reasons (provided that it is directly related to the establishment or performance of the contract, if it is stipulated in the law, if data processing is mandatory for the establishment, exercise or protection of a right) within the scope of the legal processing reasons specified in the cases.



If you no longer wish to receive our marketing/promotional information, we remind you that you may withdraw your consent to direct marketing at any time directly from the “unsubscribe link” included in each electronic promotional message we send to you. If you do so, we will promptly update our databases, and will take all reasonable steps to meet your request at the earliest possible opportunity. However, we may continue to contact you to the extent necessary for the products you have requested or the services to be provided to you.

You also have the right to lodge a complaint with your local data protection authority in case of alleged infringement of the data protection rules applicable to you.

To exercise any of those rights, please contact us using the contact information below (see “*How to contact us*”).

Please note that upon exercising any of the rights listed above, you will be requested to let us know what right you want to exercise and provide information for identification purposes in order to process your request and protect you against fraudulent requests from third parties.

10. How To Contact Us?

- To withdraw your consent or assent to any matter relating to your account, to ask general questions or to lodge a complaint, please contact our Customer Service below:
- By email: customerservice.istanbul@hermes.com
- By phone: +90 216 629 87 57
- By post: Emaar Square Ofis Kulesi Ünalın Mah. Libadiye Cad. No: 82-F Kat:5 İç Kapı No: 009, 34700 Üsküdar, İstanbul

In issues specifically related to Promotional Communications, we remind you that you can, at any time, directly unsubscribe through the “unsubscribe” link in any electronic promotional messages we send to you.

If you have any questions or concerns about our Privacy Policy or data processing, you may contact our group Data Protection Officer at: privacy@hermes.com.

11. Changes To Our Privacy Policy

Our Privacy Policy reflects our current practices and is subject to change and update from time to time. When we post changes to our Privacy Policy, we will modify the "Effective Date" at the top of this document to indicate when such changes have come into effect.

If we change our Privacy Policy in a material way, we will inform you through a notice advising of such change at the beginning of this Privacy Policy and by posting it on the “*Hermes.com*” website homepage.