

Privacy Notice:

This Privacy Notice gives you an overview of how Zalando processes your data. (As at: 08/2023)



How you can read this Privacy Notice: We offer you various options for reading this document. Firstly, you can find very basic information in this section. Then we have sorted this Privacy Notice into topics relevant for you and divided it accordingly into individual chapters.

We have prefixed each chapter with a short overview. This overview briefly summarises the content of the chapter. If you just want a quick high-level overview of all data processing, it is advisable to read the overviews. If you want to familiarize yourself with the details, you can read the complete contents of the chapter below the relevant overview.

We have avoided cross-references wherever possible. That way you get all information coherently explained, regardless of which chapter you are currently reading. If you read this Privacy Notice from start to finish, you may find that parts of the text are repeated.

What you will learn in this Privacy Notice:

- Which data Zalando stores.
- What we do with this data and what it is needed for.
- Which data protection rights and options you have.
- Which technologies and data we use for advertising, including the tracking technologies we use.

If you have a question regarding this Privacy Notice or the topic of data protection at Zalando in general, you can contact our Privacy Team by sending an email to datenschutz@zalando.de.

1. Which data does Zalando process?

Zalando offers you a wide range of services, which you can also use in a wide range of ways. Depending on whether you contact us online, by phone or otherwise and on which services you use, various data from different sources may come into play. Much of the data we process is provided by you yourself when you use our services or contact us, for example when you register and provide your name or email address or address. We do, however, also receive technical device and access data which is automatically collected when you interact with our services. This may, for example, be information on which device you are using.

When we talk about “your data”, we are referring to personal data. This includes all information which allows us to identify you straight away or by combining it with other information. Examples: Your name, your telephone number, or your email address. All information which cannot be used to identify you (even by combining it with other data) is classified as non-personal data. Non-personal data is also referred to as anonymous data. If we combine your personal data with anonymous data, all the data in this record counts as personal data. If we delete the personal data from a piece of information or a record on your person, the remaining data in this record no longer counts as personal data. This procedure is referred to as anonymisation. The following generally applies: If we request that you share particular personal information with us, you may of course refuse to do this. You can decide which information you share with us. We may, however, be unable to provide you with the desired services (at least not optimally). If particular information is required in connection with a service (mandatory information), we will inform you by marking it accordingly.

[More]

1.1 Profile Information

Profile information is personal and demographic information on your person (so-called master data). Your profile data includes, for example:

- Your first and last names
- Your contact details

Mandatory information is usually your name, your email address and a password you choose yourself.

Your user name and the password will later constitute your login details.

1.2 Contact details

If you contact us, we collect your data. Depending on how you contact us (e.g. by phone or by email), your contact details may include your name, postal addresses, telephone numbers, fax numbers, email addresses, details on your social network profiles, user names and similar contact details.

1.3 Messages, conversation content

If you communicate with us or other users regarding products and other topics by phone, post, social media, contact forms or any other medium, we collect the content of your messages.

We may forward your messages to the office responsible for your concerns, perhaps to partner companies or manufacturers. If your messages are forwarded to another company (e.g. if you provide us with feedback on the manufacturer of a product), you of course have the option to tell us that the data should only be used by Zalando. If so, we will not forward your information to the responsible office, or will only do so without your personal information, provided that your concerns can be processed in this way.

If you transmit messages to us for other users via functions provided for this purpose (e.g. product evaluations), we may publish these within the scope of our services.

Zalando also uses social network services such as LinkedIn and YouTube to communicate with customers and users. We use these popular platforms to offer you further contact and information options beyond our in-house communication channels. Please bear in mind, however, that we do not have any influence on the terms of use for social networks and the services they offer, and only limited influence on their data processing. We therefore ask you to carefully check which personal data you share with us via social networks. We cannot influence the behavior of social media operators, other users or third parties who may work with the operators of the social networks or also use these services.

1.4 Social network data

Zalando maintains profile pages on various social networks. Additionally, Zalando services may incorporate social networking features. These can be social links.

Please also refer to the notes on the processing of social network data related to social network features under ["Info on websites"](#) and ["Information about Social Media Pages"](#).

Zalando currently uses social links for the following social networks:

- LinkedIn Corp., 1000 W. Maude Ave., Sunnyvale, California 94085, USA ("LinkedIn"). The link to LinkedIn's privacy policy is available here: [LinkedIn's Privacy Policy](#).
- YouTube by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland. The link to Google's privacy policy is available here: [Google's Privacy Policy](#).

1.5 Device and access data

When using online and mobile services, it is inevitable that technical data will be generated and processed in order to provide the features and content offered and to display them on your device. We refer to this data as "Device and Access Data". Device and Access Data are created whenever online and mobile services are used. It does not matter who the provider is. Device and Access Data are therefore created, for example, when using:

- Websites
- Social media pages
- Email newsletters (i.e. if your newsletter interaction is recorded)
- Location-based services

Zalando collects device and access data for online and mobile services offered by Zalando itself (e.g. Zalando Shop). Additional information is available under [“Information about Social Media Pages”](#).

Device and access data includes the following categories:

- General device information, such as information on the device type, operating system version, configuration settings (e.g. language settings, system authorisations), information on internet connection (e.g. name of the mobile data network, connection speed) and on the app used (e.g. name and version of the app).
- Identification data (IDs), such as session IDs, cookie IDs, unambiguous device ID numbers (e.g. Google advertising ID, Apple Ad ID), third party account IDs (if you use social plug-ins or social logins or pay by PayPal) and other common internet technologies, to facilitate recognition of your web browser, your device or a particular app installation.
- Access data automatically transmitted by apps and web browsers whenever you access web servers and databases (within the framework of so-called HTTP requests). This is standardized information on the required content (such as the name and file type of a retrieved file) as well as further information on server access (such as amount of data transferred and error codes) on your device (e.g. device type, operating system, software versions, device identifications, IP address, the site previously visited and the time of access).

2. What does Zalando use my data for?

Zalando processes your data in accordance with all applicable data protection laws. Of course, we observe the principles of data protection law for the processing of personal data. We therefore generally only process your data for the purposes explained to you in this Privacy Notice or shared when we collect the data.

In this chapter, we also inform you of the legal basis on which we process data for the individual purposes. Depending on the legal basis for our processing of your data, you may have additional data protection rights alongside your permanent rights such as the right to information. For example, in individual cases you have the right to object to the processing of your data. You can find further information under [“Which data protection rights do I have?”](#)

[\[More\]](#)

2.1 Provision of online services

We process your data in the necessary scope to fulfill contracts and to provide and execute further services requested by you, as described in this Privacy Notice. The purposes of the necessary data processing therefore depend on the purpose of the contract agreed with you (including our General Terms and Conditions and any service-specific terms and conditions or terms of use) or services requested by you. The most important purposes are:

- The provision of messages, reports, newsletters and other direct communication, insofar as these are an integral component of our contractual services or the services requested by you. The guarantee of the general security, operability and stability of our service including defense from attacks.
- Non-promotional communication with you on technical, security-related and contractually relevant subjects (e.g. fraud warnings or account blocking).

Legal basis: Insofar as the purpose relates to the execution of a contract agreed with you or the provision of a service requested by you, the legal basis is Article 6 (1) b GDPR. Otherwise, the legal basis is Article 6 (1) f GDPR, whereby we may use your personal data for the above purposes if we deem it necessary to do so for our legitimate interests.

2.2 Fraud prevention

In order to combat the risk of data security breaches, data pertaining to users of our services is encrypted in transmission. This applies both to ordering and to registering for a customer account. For this we use the coding system SSL (Secure Socket Layer). Encryption prevents third parties from viewing the data. To provide additional protection from external attacks, we rely on special security technologies which constantly check our systems and identify and report anomalies. We also use technical and organizational measures to secure our systems against loss, destruction, unauthorized access or distribution of customer data by unauthorized persons. In this manner we wish to keep the risk of unauthorized access as low as possible, because protecting your data is our top priority. However, we - like other companies - cannot guarantee absolute protection.

Legal basis: If your data is processed to prevent fraud at your expense, the legal basis is Article 6 (1) b GDPR. This processing of your data otherwise occurs on the basis of Article 6 (1) f GDPR, based on our legitimate interest and that of other users in the identification and prevention of fraud and clarification of criminal offenses.

2.3 Business management and business optimisation

We transmit and process your data where necessary for administrative and logistical processes and to optimize business processes within Zalando Group in order to design these in a more efficient and legally secure way and to fulfill our contractual and legal obligations (e.g. retention obligations under commercial and tax law). Many systems and technologies are shared within Zalando Group. This allows us to offer a more economical, secure, unified and personalized service. Therefore, various companies within the Zalando Group have access to your data in so far as this is necessary for the fulfillment of the purposes named in this Privacy Notice.

Example

If you contact Zalando customer service, your request is forwarded to Zalando Customer Care DACH SE & Co. KG and processed there. Zalando Customer Care DACH SE & Co. KG is responsible for customer service in the German-speaking area within the Zalando Group. If this is necessary for the processing of your concern, a customer service employee from Zalando Customer Care DACH SE & Co. KG may access the data stored on you by other Zalando companies, for example your order data (e.g. in order to clarify your questions regarding a return).

Data processing for business management and business optimisation also includes, for example, the following purposes:

- The execution and improvement of customer service.
- The prevention and clarification of criminal offenses.
- Guaranteeing the security and operability of our IT systems.

Legal basis: The legal basis for the processing of your data for business management and optimisation is Article 6 (1) f GDPR, whereby our legitimate interests are in the above purposes. Where we process your data on the basis of legal specifications, e.g. retention obligations and money laundering tests under tax law, the legal basis is Article 6 (1) c GDPR.

2.4 On the basis of your consent

If you have given us your consent for the processing of personal data, your consent is the primary basis of our data processing. Which of your data we process on the basis of your consent depends on the purpose of your consent. Typical purposes include:

- Subscription to a newsletter.
- Participation in surveys.
- The processing of particularly sensitive data, containing e.g. your political opinions, religious or

ideological convictions or state of health.

- The recording of telephone conversations which you have e.g. with our hotline.
- The transmission of your data to third parties or to a country outside the European Union.

Notices of withdrawal

You can withdraw consent at any time with effect for the future, e.g. by email, letter or fax.

If the relevant service supports this function, you can adjust and withdraw consent to receive newsletters and other notifications in the preference center. You can find the link to the preference center in each newsletter. Each newsletter also contains a corresponding unsubscribe link.

You can find further instructions under [“Which data protection rights do I have?”](#)

2.5 Other purposes

If data protection law allows it, we can use your data for new purposes such as carrying out data analyses and developing our services and content without your consent. It is a prerequisite for this that these new purposes which the data is to be used for were not fixed or foreseeable when the relevant data was collected and the new purposes are compatible with the purposes for which the relevant data was originally collected. For example, new developments in the legal or technical sphere and new business models and services may lead to new processing purposes.

3. Info on websites

We use your data to provide access to the Zalando websites. Along with the device and access data collected whenever you use these services, the type of data processed as well as the processing purposes depend especially on how you use the functions and services provided via our services. We also use the data collected when you use our services to find out how our online offering is used. We use this information to improve our services.

[\[More\]](#)

3.1 Providers

You can find the responsible service provider in the imprint of the relevant website.

3.2 Which data is collected?

We generally collect all the data which you directly share with us via our services.

Device and access data

Whenever you access our services and databases, we collect device and access data and record it in so-called server log files. The IP address it contains is anonymised shortly after the end of the relevant session, as soon as storage is no longer required to maintain the functionality of the relevant website.

If it is available and activated on your device, we also collect a device-specific ID number (e.g. a so-called “promo ID” if you are using an Android device or an “ad ID” if you are using an Apple device). This device ID is issued by the manufacturer of your operating system and can be read by websites and apps and used to present content on the basis of your usage habits. If you do not want this, you can deactivate it at any time in your device’s browser settings or system settings.

Login

We may set up password-protected personal access for users who register for a customer account or another service. If you do not log out again after logging in with your login details, most services automatically keep you logged in. Depending on the type of service, a cookie or similar technology is used for this. This function allows you to use part of our services without having to log in again every time. For security reasons, however, you will be asked to enter your password again if, for example, you want to change your profile information.

Social Links

Our services may include social links from various social networks. With the help of these hyperlinks you can, for example, share content or recommend products. By clicking on the link, the social network receives the information that you have visited the corresponding website and collects your access and device data. If you are logged in to the social network, this can also assign the visit to your account in the respective social network. The purpose and scope of the data collection, and the further processing and use of the data by the particular social networks and your rights and configuration options concerning this to protect your privacy, can be found in the privacy notices of the respective social networks and websites. You can find the links to these below.

LinkedIn social links

We use social links by the social network LinkedIn Corp., 1000 W. Maude Ave., Sunnyvale, California 94085, USA ("LinkedIn"), on several websites. You can find the link to LinkedIn's privacy policy here: [LinkedIn's Privacy Policy](#).

YouTube social links

We use social links by YouTube by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("YouTube"). You can find the link to Google's privacy policy here: [Google's Privacy Policy](#).

Info on website cookies and comparable technologies

Our websites use cookies and comparable technologies, which are provided either by Zalando or by third-party service providers.

What are cookies and similar technologies?

Cookies are small text files which are saved by your web browser and which save particular settings and data for exchange with our web server. Similar technologies are in particular web storage (local / session storage) fingerprints, tags or pixel.

Cookies are not used to execute programs or load viruses onto your computer. The primary purpose of cookies is to provide an offer tailored to you and to make our services as time-efficient as possible. Most browsers are set by default to accept cookies and similar technologies. However, you can usually adjust your browser settings so that cookies or similar technologies are rejected or only stored with your prior consent. If you reject cookies or similar technologies, it is possible that not all of our offers will function properly for you.

This website uses the following cookies and similar technologies:

- **Necessary cookies:** These cookies are required for optimal navigation and operation of the website. The necessary cookies also serve to save particular inputs and settings which you have made so that you don't have to constantly repeat them, and to adapt Zalando content to your individual interests. Only limited use of the website is possible without necessary cookies.

You can find more information about the necessary cookies in the Data Preferences.

Legal basis: The legal basis for the processing of your data is Article 6 (1) f GDPR, to enable comfortable and personalized use of our website. In certain cases, these tools may also be required for the fulfillment of a contract or for the execution of pre-contractual measures, in which case processing is carried out in accordance with Art. 6 (1) b GDPR.

- Web Performance and Analytics: In order to improve our website, we use tools for the statistical collection and analysis of general user behavior based on access data ("Analytics Tools"). We also use Analytics Tools to evaluate the use of our various marketing channels.

You can find more information about the Analytics Tools in the Data Preferences.

Legal basis: The legal basis for the Web Performance and Analytics cookies is - unless otherwise stated - your consent according to Art. 6 (1) a GDPR. In the event that personal data is transferred to the USA or other third countries, your consent expressly extends to the data transfer (Art. 49 (1) a GDPR). If personal data is transferred to these third countries, there is a risk that personal data may be collected and analyzed by authorities and that data subjects' rights guaranteed under EU law may not be enforced. If you consent to the use of cookies, your consent also extends to these data transfers to third countries and the processing there.

4. Information about social media pages

Zalando maintains social media profiles on social networks. We regularly publish and share content, offers and product recommendations on our social media pages. The operators of the social networks record your usage behavior via cookies and similar technologies upon every interaction on our social media pages. Social media page operators can view general statistics about the interests and demographic characteristics (e.g. age, gender, region) of social media page visitors. When you use social networks, the nature, scope and purposes of processing social network data are determined primarily by the social network operators.

[\[More\]](#)

4.1 Provider / responsible party

The responsible Zalando company, which acts as the content provider responsible for a social media page, is visible in the Legal Info of the respective social media page.

Insofar as you communicate directly with us via our social media pages or share personal content with us, Zalando shall be responsible for processing your data.

4.2 Which data is collected?

When you visit our social media pages, Zalando collects all communications, content and other information that you provide us directly, e.g. when you post something on a social media page or send us a private message. Of course, if you have an account on the social network, we can also see your public information, such as your username, information in your public profile, and content that you share with a public audience. For more information, see ["Which data does Zalando process?"](#)

Usage Insights

Whenever you interact with social media pages, cookies and similar technologies are used to track the usage behavior of site visits. On this basis, social media page operators receive usage insights. Usage insights contain only statistical, depersonalized (anonymised) information about visitors to the social media page, which can therefore not be assigned to a specific person. We do not have access to the personal information social media companies use to create Usage Insights. Selection and processing of

Usage Insights data is performed exclusively by the social media companies.

Usage insights offer us information about how our social media pages are used, what interests visitors to our social media pages have, and what topics and content are particularly popular. This allows us to optimize our social media activities, e.g. by better tailoring to the interests and usage habits of our audience when planning and selecting content.

Legal bases: If you have given consent to the creation of Usage Insights data to social media companies, the legal basis is Article 6 (1) a GDPR (Consent). Otherwise, the legal basis is Article 6 (1) f GDPR, whereby our legitimate interests are in the above purposes.

4.3 Which data protection rights do I have?

Of course, your privacy rights that are described in "[Which data protection rights do I have?](#)" also apply to the processing of your data in connection with our social media pages.

5. Newsletter

We offer you various newsletter services. When you register for a newsletter service you will receive information on the topics dealt with by the individual newsletters. When you use our newsletters we also connect device and access data.

[More]

5.1 How do I register?

When sending out our notifiable newsletters (such as the Zalando shop newsletter), we use the so-called double opt-in procedure or single opt-in procedure (country-dependent), i.e. we will only send you the newsletter if you have given explicit prior consent to us activating the newsletter. If a double opt-in is required in your country, you must also have confirmed that the email address you have shared with us belongs to you. For this purpose we will send you a notification email and ask you to confirm by clicking on one of the links in this email that you are the owner of the email address you have shared with us. We may waive this measure if you have already confirmed to us in this way for another purpose that you are the owner of this email address.

5.2 Unsubscribing

If you no longer wish to receive emails from us, you can withdraw your consent at any time without incurring any costs other than the transmission costs according to basic tariffs. A notification in text form (e.g. email, fax, letter) to the Zalando company responsible for the relevant newsletter is sufficient for this. Of course, you will also find an unsubscribe link in every newsletter.

5.3 Which data is collected?

If you subscribe to a newsletter, we automatically save your IP address and the time of your subscription and confirmation. This way we can prove that you actually subscribed and identify any unauthorized use of your email address.

We collect device and access data which arise when you interact with a newsletter. However, this data will not be evaluated.

6. Who is my data forwarded to?

Zalando only forwards your data if this is allowed by German or European law. We work particularly closely with certain service providers, for example in the area of customer service (e.g. hotline service providers), with technical service providers (e.g. running computer centers). These service providers may generally only process your data on our behalf under special conditions. Where we use them to process orders, the service providers only receive access to your data in the scope and for the time period required for provision of the relevant service.

[\[More\]](#)

6.1 Zalando Group companies

Many systems and technologies are shared within the Zalando Group. This allows us to offer you a more economical, secure, unified and personalized service. Therefore, companies within the Zalando Group which require access to your data to fulfill our contractual and legal obligations, or to fulfill their respective functions within the Zalando Group, receive this access.

Examples

When you contact Zalando customer service, your request is forwarded to Zalando Customer Care DACH SE & Co. KG or Zalando Customer Care International SE & Co. KG and processed there. Both these Zalando companies are responsible for customer service within the Zalando Group. Where this is necessary to process your concerns, these two Zalando companies may access your data stored by other Zalando companies, for example your order data.

6.2 Technical service providers

We work with technical service providers in order to be able to provide our services. These service providers include, for example, Telekom Deutschland GmbH, Salesforce.com EMEA Ltd. and Amazon Web Services, Inc. If they process your data outside the European Union, this may mean that your data is transmitted to a country with a lower data protection standard than the European Union. In such cases Zalando will ensure that the relevant service providers contractually or otherwise guarantee an equivalent data protection level.

6.3 Authorities and other third parties

If we are obliged by an official or court decision or it is for prosecution purposes, we will if necessary forward your data to prosecution authorities or other third parties.

7. Which data protection rights do I have?

You have the following legal data protection rights under the relevant legal conditions: Right to information (Article 15 GDPR), right to deletion (Article 17 GDPR), right to correction (Article 16 GDPR), right to restriction of processing (Article 18 GDPR), right to data portability (Article 20 GDPR), right to lodge a complaint with a supervisory authority (Article 77 GDPR), right to withdraw consent (Article 7 (3) GDPR) as well as the right to object to particular data processing measures (Article 21 GDPR). If you want to exercise your data protection rights you can reach out to our Privacy Team by sending an email to datenschutz@zalando.de. For more information see [“Contact”](#).

[\[More\]](#)

Important information:

- In order to ensure that your data is not disclosed to third parties in the course of requests for information, please attach sufficient proof of identity to your request by email or post.

Tip

It is generally sufficient for this if you send your request to us using the email address saved to your account.

- You can change most of your information yourself in your customer account. For other cases please contact customer service.
- The responsibilities of the data protection authorities depend on the seat of the competent authorities. You may, however, contact the data protection authority, which will then forward your **complaint** to the responsible authority. The authority responsible for Zalando is the Berlin Commissioner for Data Protection and Freedom of Information, Alt-Moabit 59-61, 10555 Berlin, Germany.
- If you have given consent for the processing of your data, you may **withdraw** it at any time. Withdrawal has no effect on the admissibility of the processing of your data which took place before the withdrawal.
- You may **object to** the processing of your data for **advertising** purposes, including **direct marketing** (including in the form of data analysis) at any time without giving reasons.
- If we are processing your data on the basis of balancing of interests according to Article 6 (1) f GDPR (e.g. the reporting of creditworthiness to an external credit agency), you may **object to** the processing. When asserting your objection, we ask you to give the reasons why you do not wish us to continue processing your data. In the event of a justified objection, we will check the state of affairs and either stop or adjust the processing, or inform you of the urgent reasons worthy of protection why we are entitled to continue the processing.

8. When will my data be deleted?

We will store your personal data as long as is necessary for the purposes named in this Privacy Notice, especially for the fulfillment of our contractual and legal obligations. We may also store your personal data for other purposes if or as long as the law allows us to store it for particular purposes, including for defense against legal claims.

If you close your customer account, we will delete all the data we have stored regarding you. If it is not possible or necessary to completely delete your data for legal reasons, the relevant data will be blocked for further processing.

What does blocking mean?

If data is blocked, restriction of access rights and other technical and organizational measures are used to ensure that only a few employees can access the relevant data. These employees may also only use the blocked data for the above purposes (e.g. for submission to the tax office in the event of tax audit).

Deletion may be waived in the cases allowed by law if the data is anonymous or pseudonymous and deletion would rule out or seriously hinder processing for scientific research or statistical purposes.

9. How does Zalando protect my data?

We transmit your personal data securely using encryption. This applies to your order and your customer login. We do this using the coding system SSL (Secure Socket Layer). We also use technical and organizational measures to secure our website and other systems against loss, destruction, access, change or dissemination by unauthorized persons.

10. Changes to this Privacy Notice and points of contact

Further development of our websites and apps and the implementation of new technologies to improve our service for you may require changes to this Privacy Notice. We therefore recommend that you re-read this Privacy Notice from time to time.

You can reach out to our Privacy Team for general questions on privacy and in order to exercise your data protection rights by sending an email to datenschutz@zalando.de.

In order to directly contact our Data Protection Officer, please send your inquiry to the following postal address indication that it is “for the attention of Data Protection Officer”:

Datenschutz
Zalando SE
Valeska-Gert-Straße 5
10243 Berlin
Germany

Telefax: +49 (0)30 2759 46 93

E-Mail: datenschutz@zalando.de