

**Last Updated: 19/06/2023**

## 1. Presentation of the data controller

**Vestiaire Collective**, a *société anonyme* governed by French law, registered under number 517 465 225 RCS Paris, whose registered office is located at 53 rue de Châteaudun, 75009 Paris, France, represented by Maximilian Bittner as Chairman and CEO (hereinafter "**Vestiaire Collective**" or "**we**").

## 2. Presentation of the Privacy Policy

This privacy policy (the "**Policy**") applies to any Personal Data (as defined below) collected by Vestiaire Collective through the Vestiaire Collective x Partner 's dedicated website (the "**Webform**") within the provision of a resale service of items bearing the Partner's trademark (the "**Service**", as described in the "RESALE AS A SERVICE - TERMS AND CONDITIONS" (the "**Terms**"). To render the Service, Vestiaire Collective needs:

- to collect and process certain personal data relating to its users ("**you**"), and
- depending on your use of the Service, to transfer some personal data to the Partner.

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 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.

For clarity, 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**").

This Policy completes the Terms.

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

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

## 3. Personal data collected on the Webform

We collect your personal data from you directly.

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

You will find below a list of all the data that we may collect and process about you:

**Information related to your identity:** Title, Full name; Email address; Country of residence; Postal address; Phone number;

**Information related to your items:** Description of the item; Photographs of the item; Price; Photographs of the invoice, receipt, or the certificate of authenticity;

**Information about your sales:** History of items put on sale, sold, refused; reason for refusal; receipts and invoices;

**Information relating to the transportation of items:** Address of shipping point and delivery point; Tracking number; 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 the ID;

**Information contained in the messages you write to us** and the management of any disputes;

**Technical data:** token (see section "cookies and "tracers")

**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.

#### 4. Why do we process your personal data?

##### Processing that we carry out to execute pre-contractual measures and our Terms

We process your personal data to:

- ensure the creation and management of your account on the Webform,
- render the Service,
- contact you in relation with your item submission,
- propose a price for your item,
- organize the shipment of the item to Vestiaire Collective's premises (and to send you back the item when the sale is not validated),
- finalize the sale if any,
- inform you on important information regarding the Service (including changes to our Terms and developments in our services and features available);
- answer your questions, requests, complaints addressed to the customer support;

Your email address or telephone number will never be used to send you marketing communications, unless you have expressly consented to it on the Webform and/or on Vestiaire Collective's own website or app.

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

This category of processing is based on our legitimate interests. For your complete information, we detail below the processing operations and the corresponding legitimate interests. We ensure that these processing operations do not infringe your fundamental rights and freedoms.

We process your personal data to:

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

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

**To keep records** because we have a legitimate interest in resolving disputes with our users and to defend the rights and interests of Vestiaire Collective.

##### Processing we carry out only with your consent

We process your personal data to:

**Analyze your answers to surveys.** You can oppose at any time. There will be no consequence if you refuse to participate in the surveys.

##### 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 (i) Vestiaire Collective's obligation to cooperate with the tax or judicial authorities acting in particular in the context of their control and investigation missions, (ii) fight against fraud and against money laundering, (iii) fight against counterfeiting, (iv) tax obligation declarations etc.;

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

#### 5. Duration: how long we keep your personal data

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

- the data of users registered on the Webform are kept until the account is deleted, being specified that the account of a user will be automatically erased 3 (three) years after the last log in;
- data collected within the framework of our legal tax obligations are kept until they are sent to the tax authorities once a year, then archived for the strict applicable prescription periods;
- Other data, in particular statistics, are kept in a form that does not allow your identification.
- Data related to the management of complaints, disputes and litigation are kept for the duration necessary to resolve the dispute, then archived for the strict applicable prescription periods;
- Invoices are kept for five (5) years from their issue;
- The documents necessary for the verifications which take place within the framework of the fight against fraud and counterfeiting are retained during the time necessary for the verifications, then archived for the strict applicable prescription periods;
- The answers to surveys are kept for the time necessary for the survey and are then anonymized;

For clarity, Vestiaire Collective may retain certain personal data about you even if your account is deleted, if:

- It is required by a legal obligation, or
- we have an overriding legitimate interest in retaining some of your data (e.g. issue with the account, presence of an unresolved claim or dispute, necessary for the defense and exercise of our rights).

In this case, the data is kept for the duration necessary for the resolution of the case then archived for the strict applicable prescription periods.

## 6. Transfer of your personal data to the Partner

According to the Terms when the purchase agreement is confirmed the following personal data will be transfer to and share with the Partner:

The data shared with the Partner	Reasons for the sharing	How long will the Partner keep the data?	Legal basis
Your full name, email address and the resale value of the item.	To enable the Partner to issue the agreed multi-purpose voucher and to enable the Partner to link the multi-purpose voucher to User's email address	For the entire duration of the multi-purpose voucher validity (unless you use it before expiry) and following the Partner's own privacy policy.	Execution of the Terms. If you oppose, Vestiaire Collective may cancel the sale and the Partner will not issue your multi-purpose voucher.

Vestiaire Collective and the Partner have agreed on a specific data sharing agreement for the purpose of rendering the Service to the Users.

To know more about the data processing which is under the responsibility of the Partner, please read the Partner's privacy policy available on the Webform.

## 7. Transfer of your personal data to other recipients

Vestiaire Collective may transfer your data to certain of its personnel (including within the Vestiaire Collective's 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: pricing teams, anti-fraud, transport and logistics department, product control department, customer service, legal department, data protection officer;
- to the other entities of the 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 US, 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 your professional seller so that he can respect his fiscal and accounting obligations
- 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 Webform;

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.

## 8. Cookies and tracers

### 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 personalize content etc. For the sake of simplicity, we use the term cookies to refer to all types of tracers.

### 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](#) available via the cookie management tool.

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

### How do I set my cookies?

#### a) The Webform banner

When you first connect to the Webform, 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.

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 Webform.

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 Webform.

#### 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](#)

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 Webform 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.

#### What cookies and processing are used on the Webform?

##### Necessary cookies (not configurable)

These cookies are installed by default: you cannot set them via the Webform. These cookies are either necessary for the operation of our Webform, 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 our legitimate interest in allowing the Webform 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 Webform and/or the Webform's services.

Details of the purposes:

- allow you to access the Webform (token for email verification);
- ensure the security of the Webform and your account;
- retain your expressed choice on the deposit of tracers;
- detect navigation problems and therefore improve the usability of our services;
- measure the audience, traffic and carry out statistics of our Webform and its services, in particular to improve the functionality of the Webform.

##### 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 Webform.

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 Webform 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 Webform and its services and to improve the functionality of the Webform;
- to analyse traffic in greater depth.

## 9. 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.

## 10. Transfer of personal data outside the European Union

Some of the data collected, mainly identification data (personal and professional identity), 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 in countries outside the European Union.

Prior to any transfer, 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: United States of America, United Kingdom, Ireland, Hong Kong, Singapore, Philippines, Madagascar, Israel (country benefiting from a European Union adequacy decision).

## 11. Your rights

In accordance with the RGPD, 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;
- of 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 RGPD).

To facilitate your request, we ask you to write us from the email address you used to create your account on the Webform. 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.

## 12. 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](#)