

TIFFANY & Co.

TIFFANY GLOBAL PRIVACY NOTICE

Effective Date: September 20, 2016

Please click [here](http://www.tiffany.com/Shared/PDFs/Affiliates/Affiliates_US.pdf) (www.tiffany.com/Shared/PDFs/Affiliates/Affiliates_US.pdf) to access the list of Tiffany & Co. retail affiliates, as referenced in the Global Privacy Policy.

We at Tiffany and Company, along with our subsidiaries and affiliates (collectively, the “Tiffany Group”), respect your concerns about privacy. This Global Privacy Notice describes the types of personal information we collect about our consumers, how we use the information, with whom we share it and the choices available to our consumers regarding our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices.

Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements. You can view certain country-specific information by clicking [here](#).

Information We Collect

We may collect personal information about you in various ways, such as when you provide it at our stores, on our websites, through our apps and social media channels, at our events, through surveys, via text messages or on the telephone. The types of personal information we may collect include:

- Contact information (such as name, postal address, email address, and mobile or other telephone number);
- username and password;
- payment information (such as your payment card number, expiration date, authorization number or security code, delivery address, and billing address);
- purchase and transaction information;
- customer service information (such as customer service inquiries, comments, and repair history);
- photographs, comments and other content you provide;
- information regarding your personal or professional interests, date of birth, marital status, demographics, and experiences with our products and contact preferences;
- contact information you provide about friends or other people you would like us to contact; and
- information we may obtain from our third-party service providers.

In addition, when you visit our websites, open our emails, use our apps or interact with Tiffany-related tools, widgets or plug-ins, we may collect certain information by automated means, such as cookies, web beacons and web server logs. The information we collect in this manner includes IP address, unique device identifier, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on our site, and dates and times of website visits. A “*cookie*” is a file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. Through these automated collection methods, we obtain “clickstream data,” which is a log of the links and other content on which a visitor clicks while browsing a website. As the visitor clicks through the website, a record of the action may be collected and stored. We may link certain data elements we have collected through automated means, such as your browser information, with other information we have obtained about you to let us know, for example, whether you have opened an email we sent to you. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of our websites or apps.

The providers of third-party apps, tools, widgets and plug-ins on our websites and apps, such as Facebook “Like” buttons, also may use automated means to collect information regarding your interactions with these features. This information is collected directly by the providers of the features and is subject to the privacy policies or notices of these providers. To the extent permitted by applicable law, Tiffany is not responsible for these providers’ information practices.

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This Global Privacy Notice does not govern the collection or use of the information you provide in connection with a Tiffany charge card account. We notify our charge account holders of our privacy practices annually, or as otherwise required by law. If you are a charge account holder, you annually receive our Privacy Notice to Tiffany & Co. Charge Card Account Holders by mail. The information you provide in connection with your Tiffany charge card account is managed solely pursuant to that notice.

How We Use The Information We Collect

We may use the information described above to:

- Provide products and services to you;
- process your payments;
- create and manage your account;
- send you promotional materials and other communications;
- communicate with you about, and administer your participation in, special events, contests, sweepstakes, programs, offers, surveys and market research;
- respond to your inquiries;
- operate, evaluate and improve our business (including developing new products and services; enhancing and improving our services; managing our communications; analyzing our products and customer base; performing data analytics; and performing accounting, auditing and other internal functions);
- reduce credit risk and manage collections;
- verify your identity;
- protect against, identify and prevent fraud and other unlawful activity, claims and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies.

We also may use the information in other ways for which we provide specific notice at the time of collection.

In addition, we use information collected through cookies, web beacons, pixels, web server logs and other automated means for purposes such as (i) customizing our users' visits to our websites and apps, (ii) delivering content tailored to our users' interests and the manner in which our users browse our websites and apps, and (iii) managing our websites, apps and other aspects of our business. To the extent required by applicable law, we will obtain your consent before collecting information using cookies or similar automated means.

We may use third-party analytics services on our websites and apps, such as those of Google Analytics, Adobe Omniture, and Sizmek. The analytics providers that administer these services use technologies such as cookies, web server logs and web beacons to help us analyze your use of our websites and apps. The information collected through these means (including IP address) may be disclosed to these analytics providers and other relevant third parties who use the information, for example, to evaluate use of the website or app. To learn more about these analytics services and how to opt out, please visit the relevant websites listed here:

- Google Analytics: <http://www.google.com/analytics/learn/privacy.html>
- Adobe Analytics: <http://www.adobe.com/privacy/analytics.html#1>
- Sizmek: <http://www.sizmek.com/about-us/privacy>

Interest-Based Advertising

On our websites and apps, we may collect information about your online activities for use in providing you with advertising about products and services tailored to your individual interests. We also may obtain information for this purpose from third-party websites on which our ads are served. This section of our Global Privacy Notice provides details and explains how to exercise your choices.

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You may see certain ads on other websites because we engage third-party ad buying networks (such as Facebook, Rubicon and Twitter). Through such buying networks, we can target our messaging to users through demographic, interest-based and contextual means. We can track your online activities over time through demographic, interest-based and contextual means. We can track your online activities over time by collecting information through automated means, including through the use of third-party cookies, web server logs, pixels and web beacons. The networks use this information to show you advertisements that may be tailored to your individual interests. The information our ad networks may collect on our behalf includes data about your visits to websites that serve Tiffany advertisements, such as the pages or advertisements you view and the actions you take on the websites. This data collection takes place both on our websites and on third-party websites that participate in these ad networks. This process also helps us track the effectiveness of our marketing efforts. To learn how to opt out of this ad network interest-based advertising, click here (<http://www.aboutads.info/choices/>). To the extent required by applicable law, we will obtain your consent before using your information for interest-based advertising.

Information We Share

We do not disclose personal information we collect about you, except as described in this Global Privacy Notice. We may share personal information with service providers who perform services on our behalf based on our instructions. We do not authorize these service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements. Examples of these service providers include entities that process credit card payments, manage and reduce our credit risk, verify information, fulfill orders, and provide web hosting, analytics and marketing services. We also may share your personal information within the Tiffany Group worldwide and with our joint marketing partners for the purposes described in this Global Privacy Notice. In addition, unless you object by emailing us at privacy@tiffany.com, to the extent permitted by law, we may share information about you with other third parties for those parties' own purposes, such as to offer products or services that may interest you.

In addition, we may disclose information about you (i) if we are required to do so by law or legal process, (ii) to law enforcement authorities or other government officials, and (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We also reserve the right to transfer personal information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation).

Your Rights and Choices

We offer you certain choices in connection with the personal information we collect about you, such as how we use the information and how we communicate with you. To update your preferences, ask us to remove your information from our mailing lists, exercise your rights or submit a request, please contact us as indicated in the "How to Contact Us" section of this Global Privacy Notice. You can also unsubscribe from our mailing lists by following the "Unsubscribe" link in our emails. To the extent provided by the law of your jurisdiction, you may request access to the personal information we maintain about you or request that we correct, amend, delete or block the information by contacting us as indicated below. Where provided by law, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your personal information, and we will apply your preferences going forward.

To learn more about how to opt out of ad network interest-based advertising, please visit the consumer opt-out page at <http://www.aboutads.info/choices/>.

Online Tracking and How We Respond to Do Not Track Signals

When you use our websites and apps, both we and certain third parties (such as our advertising networks, digital advertising partners and social media platforms) may collect personal information about your online activities, over time and across third-party websites. Certain web browsers allow you to instruct

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your browser to send Do Not Track (“DNT”) signals to websites you visit, informing those sites that you do not want your online activities to be tracked. At this time, our websites and apps are not designed to respond to all types of DNT signals or similar mechanisms from browsers as there is no common, industry-accepted standard for doing so. Thus, information about your online activities may continue to be tracked on our site and used to maintain our website’s functionality and for our own analytics purposes described in this Privacy Notice even if your browser sends us a DNT signal. However, when we recognize a relevant DNT signal, we aim to suppress the third-party tags that are used to recognize your computer once you navigate away from our site and which are used to present you with Tiffany advertisements. As noted, since there is no uniform standard for DNT signal recognition, we may update our policy and practice as new technologies and solutions emerge. As indicated in the “Your Rights and Choices” section above, we offer you certain choices in connection with the personal information we collect about you and our interest-based advertising activities.

Notice to California Residents

Subject to certain limitations under California Civil Code § 1798.83, California residents may ask us to provide them with (i) a list of certain categories of personal information that we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, and (ii) the identity of those third parties. To make this request, California residents may contact us as specified in the “How to Contact Us” section below.

Data Transfers

We may transfer the personal information we collect about you to the United States and countries outside of the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to other countries, we will protect that information as described in this Global Privacy Notice.

If you are located in the European Union (“EU”), we will comply with applicable legal requirements providing adequate protection for the transfer of personal information to recipients in countries outside of the EU. With respect to transfers of personal information to the U.S., Tiffany and Company is certified under the EU-U.S. Privacy Shield framework developed by the U.S. Department of Commerce and the European Commission regarding the transfer of personal information from the EU to the U.S. Click [here](#) to view our EU-U.S. Privacy Shield Privacy Policy.

How We Protect Personal Information

We maintain administrative, technical and physical safeguards designed to protect the personal information you provide against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

Links To Non-Tiffany Sites and Services

For your convenience and information, our websites and apps may provide links to non-Tiffany sites, apps and services that may be operated by companies not affiliated with Tiffany. These companies may have their own privacy notices or policies, which we strongly suggest you review. Our products and services also may be made available to you through third-party platforms (such as providers of app stores) or through other third-party channels. We are not responsible for the privacy practices of any non-Tiffany sites, apps or services.

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Updates To Our Global Privacy Notice

This Global Privacy Notice (including any addenda) may be updated periodically and without prior notice to you to reflect changes in our personal information practices. For significant changes, we will notify you by posting a prominent notice on our website indicating at the top of the Notice when it was most recently updated.

How To Contact Us

If you would like us to update information we have about you or your preferences, please contact us by email at customerservice@tiffany.com. If you have any questions or comments about this Global Privacy Notice, please email us at privacy@tiffany.com. You also may write to:

Chief Privacy Officer
c/o Legal Department
Tiffany and Company
200 Fifth Avenue, 10th Floor
New York, NY 10010

Addendum

If you are a resident of the European Economic Area (“EEA”), the following EEA-specific provisions apply to our processing of your personal information in lieu of and in addition to the relevant sections of the Global Privacy Notice.

- References in the Global Privacy Notice and the EEA Addendum to “we”, “us”, “our”, “Tiffany” and “Tiffany & Co.” are references to the entity responsible for the processing of your personal information listed here (www.tiffany.com/Shared/PDFs/Affiliates/Affiliates_US.pdf).
- We may collect certain personal information by automated means, such as cookies, web beacons and web server logs. Information about these practices is available *here*.
- We may share your personal information within the Tiffany Group worldwide, which is composed of the affiliates listed here (www.tiffany.com/Shared/PDFs/Affiliates/Affiliates_US.pdf).
- We may disclose information about you (i) to law enforcement authorities and other government officials based on a lawful disclosure request and (ii) when the disclosure is in our legitimate interest and in accordance with applicable data protection law.
- Tiffany has submitted simplified registrations with the French Data Protection Authority and has obtained an authorization for its data transfers outside of the EEA.
- To exercise your rights, you may write to the relevant Tiffany entity that is the data controller for your jurisdiction via the contact details listed here (www.tiffany.com/Shared/PDFs/Affiliates/Affiliates_US.pdf).

Cookies Policy

Cookies are automated means through which we collect information on our website and by which we can sometimes track information about your use of our website. We use cookies to optimize your user experience, the functionality of our website and our service to you. When you visit our site, our web server sends a cookie to your computer, which allows us to recognize your computer to perform a variety of functions.

By proceeding to navigate beyond this page, you consent to our cookie settings and agree that you understand this Cookies Policy and our Privacy Notice. Please note that you may restrict cookies by changing your browser settings, but that such restrictions will potentially degrade and impact your user experience and functionality of our website.

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What purposes do Cookies serve?

1. Cookies Support Basic Website Functionality: Some cookies are functional and necessary cookies that support essential features of our website, such as storing your shopping cart selections while you continue to shop and navigate to different pages of our website.

2. Cookies Can Help Improve the Quality of Our Website and Services: Cookies collect information (including sometimes IP address) to assess how you use our website, so that we can improve the navigability of our site and provide you with better service. We use this information to:

- Provide aggregate and anonymous statistics on how our site is used;
- See how effective our advertisements are by identifying where you click and from which website you arrived;
- Provide feedback to carefully selected third party partners that one of our visitors also visited their website;
- Help us improve the site by capturing errors in your browsing experience.
- Provide you with improved site functionality by allowing access to additional services or restoring your shopping bag if you wish to return on a subsequent browsing session.

3. Cookies May Share Information With Our Carefully Chosen Third-Party Partners: Third-party cookies may share information with partners to provide services on our site. The information shared is only to be used to provide the service or function (such as social media “like” and “share” buttons). Certain third-party cookies can be used to offer a customized user experience, by providing you with interest-based services (see “Interest-Based Advertising”) both on this site and on some other websites as well. Some of these customized browsing experiences may be linked to services provided by third parties which provide these services to recognize that you have visited our site. This information is used to inform you of Tiffany products and services which may be of interest to you. These cookies may also link to social media networks such as Facebook or provide advertising agencies with information about your visit so that they can present you with advertisements for Tiffany products and services which may be of interest to you.

Managing your Cookie preferences

To manage the third-party cookies served on our site, please visit the relevant websites listed here:

- Google Analytics: <http://www.google.com/analytics/learn/privacy.html>
- Adobe Analytics: <http://www.adobe.com/privacy/analytics.html#1>
- Sizmek: <http://www.sizmek.com/about-us/privacy>

To manage all cookies on our site, including those that are served by us, you can change your browser settings. For additional information on how to manage all cookies please visit <http://www.allaboutcookies.org/>. Please note that disabling, blocking or deleting cookies in your browser settings may impact your ability to fully use our website.

Please see our Privacy Notice for further details about what information we collect and how we use any personal information you give us, however not all information captured by using cookies will identify you.