

# TIFFANY & CO.

## Tiffany Global Privacy Notice

Last Updated: 05/06/2018

Please [click here](#) to access the list of Tiffany & Co. retail affiliates, as referenced in this Global Privacy Notice.

We at Tiffany and Company, along with our subsidiaries and affiliates (collectively, the “Tiffany Group”), respect your concerns about privacy. References in this Global Privacy Notice to “we”, “us”, “our”, “Tiffany” and “Tiffany & Co.” are references to the entity responsible for the processing of your personal information listed [here](#), which generally is the entity that obtains your personal information. 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](#).

This Global Privacy Notice applies to the personal information we obtain via your transactions and interactions with Tiffany, including through your use of Tiffany websites, mobile applications, social media pages and other platforms that reference this Privacy Notice (“Online Channels”); your visits to our stores, including when you complete our customer information collection cards, and when you connect with us via telephone, at our events and through surveys (“Offline Channels”); and through our third-party sources, including advertising and social media networks (collectively, the “Channels”). This Global Privacy Notice does not govern the collection or use of the information you provide in connection with a Tiffany credit card account where such offering is available. We notify our credit card account holders of our privacy practices annually, or as otherwise required by law. If you are a credit card account holder, you annually receive our Privacy Notice to Tiffany & Co. Credit Card Account Holders by mail. The information you provide in connection with your Tiffany credit card account is managed solely pursuant to that notice.

## Information We Obtain

We collect personal information about you through various Channels as described above. The types of personal information we 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);
- 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;

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- information you submit in connection with a career opportunity at Tiffany, such as contact details, information in your résumé (including work history, education and language skills) and details about your current employment;
- purchase and transaction information;
- contact information you provide about friends or other people you would like us to contact;
- location data (such as data derived from your IP address, country and/or zip code) and the precise geolocation of your mobile device where we have provided notice and choice, as appropriate;
- clickstream data and other information about your online activities (such as information about your devices, browsing actions and usage patterns), including across the Online Channels and third-party websites, that we obtain through the use of cookies, web beacons and similar technologies (see our [Cookie Policy](#));
- information we may obtain from our third-party service providers; and
- other personal information we obtain through our Channels.

## *Collection with Cookies and Other Technologies*

We use cookies, web beacons (including pixels and tags), web server logs and other technologies that collect certain information about you by automated means through our Online Channels, including when you visit our websites, interact with our emails, use our apps, or interact with Tiffany-related ads, content, tools, widgets or plug-ins. You can learn more about these technologies and how to manage your preferences by visiting our [Cookie Policy](#).

The providers of third-party apps, tools, widgets and plug-ins on our Online Channels, 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.

## **How We Use The Information We Obtain**

We use the personal information we obtain as described in this policy and rely on a number of legal bases to do so as described further below, including:

- performance of a contract with you;
- our legitimate business interests;
- compliance with a legal obligation, a court order, or to exercise or defend legal claims; or
- your consent to the processing, which you can revoke at any time.

We use the information we obtain to perform a contract with you or to take steps at your request prior to entering into a contract, including to:

- transact with you and provide various products and services to you;
- process and fulfill orders in connection with our products and services and keep you informed about the status of your order;

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- manage career opportunities, including for recruitment purposes, employee onboarding and other Human Resources purposes;
- provide customer support (including repairs, alterations, cleaning and other services); and
- create and manage your account with Tiffany.

We use the information we obtain on the basis of our legitimate interests, which we can describe further upon request, including to:

- 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;
- send you promotional materials and other communications (including thank you notes, special occasion reminders and other communications from sales professionals with whom you've engaged);
- communicate with you via email, postal mail, phone and other means about, and to administer your participation in, special events, contests, sweepstakes, programs, offers, surveys and market research;
- protect against, identify and prevent fraud and other unlawful activity, claims and other liabilities;
- comply with and enforce relevant industry standards, contractual obligations and our policies; and
- respond to your inquiries.

In addition, we process your personal information to comply with and enforce applicable legal requirements to which we are subject and for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

We also use the information in other ways for which we provide specific notice at the time of collection and obtain your consent to the extent required by applicable law.

## *Use of Cookies and Other Technologies*

Where we have obtained your consent to the extent required by applicable law, we use information collected through cookies, web beacons (including pixels and tags), web server logs and other automated means for the purposes described in our [Cookie Policy](#).

We also use third-party analytics services on our Online Channels, such as those of Google Analytics, Adobe Experience Cloud and Sizmek, which use cookies and similar technologies to collect data (such as IP address) to evaluate use of and interaction with our Online Channels. To the extent required by applicable law, we will obtain your consent before using cookies for analytics purposes. 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 Experience Cloud: <http://www.adobe.com/privacy/analytics.html#1>
- Sizmek: <https://www.sizmek.com/privacy-policy>

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## *Interest-Based Advertising*

When you use our Online Channels, both we and certain third parties (such as our advertising networks, digital advertising partners and social media platforms) collect information about your online activities, over time and across third-party websites (such as on websites that serve our ads). We may use such information to provide 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. 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. 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 helps us track the effectiveness of our marketing efforts. To learn how to opt out of this ad network interest-based advertising, click [here](#). To the extent required by applicable law, we will obtain your consent before using your information for interest-based advertising.

Our [Cookie Policy](#) provides details about the purposes of this data collection via cookies and other technologies and how to exercise your choices (such as changing your cookie preferences).

## **Information We Share**

We do not disclose personal information we collect about you, except as described in this Global Privacy Notice. We 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 share your personal information within the Tiffany Group worldwide for the purposes described in this Global Privacy Notice.

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 (or contemplate the sale or transfer of) all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation).

## **How Long We Retain Personal Information**

To the extent permitted by applicable law, we typically retain personal information we obtain about you for as long as it is needed (1) for the purposes for which we obtained it, in accordance with the terms of this Global Privacy Notice, which generally means that we will keep your personal information for the duration of our relationship or as long as you keep

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your account open with us; or (2) to take into account applicable statute of limitation periods and comply with mandatory applicable laws. As described in the “Your Rights and Choices” section of this Global Privacy Notice, to the extent provided by the law of your jurisdiction, you may request that we delete your information or restrict the processing of such information by contacting us as indicated below.

## 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 at any time 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, update, amend, or delete your information, or that we restrict the processing of such information by contacting us as indicated below.

Subject to applicable law, you have the right to receive, in a structured, commonly used and machine-readable format, the personal information that you have provided to us about you, with your consent or based on a contract to which you are party. You have the right to have this information transmitted to another company, where it is technically feasible. You also may lodge a complaint with the data protection authority in your country if you are not satisfied with our responses.

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. This will not affect the lawfulness of our use of your information based on your consent before its withdrawal.

To exercise your rights, please contact us as indicated in the [“How To Contact Us”](#) section of this Privacy Notice. You also may write to the relevant Tiffany entity for your jurisdiction via the contact details listed [here](#). To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information or complying with your request. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request if we find it to be manifestly unfounded or excessive, or in case of an access request, in order to provide you with additional copies of the personal information we maintain about you.

When you use our Online Channels, 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 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. While our Online Channels 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, 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. In our [Cookie Policy](#), we provide information about how you can manage your cookie preferences and the choices you can

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make in connection with the personal information we collect about you through automated means. To learn more about managing your preferences in relation to the data we collect on an automated basis, please visit our [Cookie Policy](#).

## **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 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, including the jurisdictions in which our [affiliates](#) and service providers operate. 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 implement appropriate safeguards to help ensure that we 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 that have not been recognized as providing an adequate level of data protection. In this event, we will implement appropriate safeguards. With respect to transfers of personal information from the EU 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., pursuant to article 45 of the GDPR. Click [here](#) to view our EU-U.S. Privacy Shield Privacy Policy and access our certification.

## **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.

## **Children’s Personal Information**

Our Online Channels are designed for a general audience and are not directed to children. We do not knowingly collect or solicit personal information from children under the age of 13 (or other relevant age, as applicable pursuant to relevant law) through our websites and apps. If we become aware that we have collected personal information from a child under such age, we will promptly delete the information from our records. If you believe that a child under such age may have provided us with personal information, please contact us as specified in the “How To Contact Us” section of this Global Privacy Notice.

## **Links To Non-Tiffany Sites and Services**

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For your convenience and information, our Online Channels 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.

## **Updates To Our Global Privacy Notice**

This Global Privacy Notice (including any addenda) may be updated periodically 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](mailto:customerservice@tiffany.com). If you have any questions or comments about this Global Privacy Notice, please email us at [privacy@tiffany.com](mailto:privacy@tiffany.com). You also may write to:

Chief Compliance and Privacy Officer / Data Protection Officer  
c/o Legal Department  
Tiffany & Co.  
Customer Relations  
75-20 Astoria Blvd.  
East Elmhurst, NY 11370