

Confidentiality and Data Protection Policy

Update: September 16th, 2019

You can print out the full text of our Confidentiality and Data Protection Policy from your browser by pressing on CTRL+P in Windows and Linux or ⌘+P in Mac OS.

This policy has been updated to comply with the requirements of the General Data Protection Regulations (GDPR) which came into force on 25 May 2018.

1 Overview

1.1 The aim of this policy

CELINE is determined to respect your privacy and protect your personal data.

This Confidentiality and Data Protection Policy (the "**Confidentiality Policy**") is designed to inform you about our use of your personal data that we gather when you access the CELINE website www.celine.com (the "**Site**"), when you purchase any goods at CELINE points of sale or when you contact CELINE (the "**Services Provided By CELINE**").

It will enable you to determine the origin and the use of the information that we gather, as well as your rights and options under the applicable data protection rules and regulations.

This Confidentiality Policy is therefore important for you and we ask you to read it carefully.

To find out how CELINE uses cookies on its Site, please see our cookies policy.

1.2 Modification of this policy

CELINE may modify this policy from time to time depending on the legal and regulatory context, and to keep you informed about changes in our personal data processing practices.

CELINE therefore recommends that you always become acquainted with the latest version of this Confidentiality Policy whenever you plan on having any dealings with CELINE, by visiting this section or by clicking on the "Confidentiality Policy" link at the bottom of the home page of the Site (see "Changes and updates to the Confidentiality Policy").

1.3 CELINE's role and responsibility

Unless there are any other texts that provide otherwise with regard to certain specific instances of processing of personal data, the processing of your personal data that is described in this policy shall be performed by CELINE SA, a French public limited company with capital €2,802,576.00 ; registered address: 16 rue Vivienne, 75002 Paris, France; registered in Paris under no. B 572 034 361 ("**CELINE**"), which publishes the www.celine.com web site (the "**Site**") and which is thus the "data controller" under the data protection laws.

However, when you make a purchase in-store outside France, the CELINE boutique where you place your order and/or make your purchase shall be solely and fully responsible for any processing of your personal data performed for purposes of transaction management and invoicing in connection with your purchases.

1.4 The data protection officer

CELINE has appointed a data protection officer who is in charge of ensuring compliance with this policy and of ensuring compliance with the data protection rules and regulations in general. The data protection officer can be contacted for any question concerning this policy in accordance with the terms of the section of this policy entitled Contact us.

2 The key points of this Confidentiality Policy

The data that is gathered <i>To find out more (section 3.3)</i>	CELINE gathers your personal data when you use the Site, interact with CELINE or make purchases in-store. In addition to the information that you actively provide (e.g. when creating an account, registering for the newsletter), information is automatically gathered or generated by CELINE's systems (e.g. determination of your CELINE product reference numbers).
How your data is used <i>To find out more</i>	The data we gather enables us: <ul style="list-style-type: none">• To perform the Services Provided by CELINE as requested,

(section 3.1)	<ul style="list-style-type: none"> • To know your preferences in order to provide you with the personal welcome that you are entitled to expect in all our stores, • to send you information about CELINE's products and events that we consider most likely to be of interest to you.
	<p><i>To understand how you may oppose such a use and withdraw your consent, please consult section 3.11</i></p>
	<p>The use of Cookies on the Site enables us to improve its performances and to send you targeted advertising.</p>
	<p><i>To deactivate the use of cookies for these purposes, please click here</i></p>
	<p>Checks are moreover carried out in order to ensure the security of the Site and of the payments made on the Site.</p>
	<p><i>For more information about these checks, please consult section 3.2</i></p>
Who receives your personal data, and to whom is it transferred	<p>Your personal data is only accessible to authorised personnel working for us at CELINE's Stores and entities with which you are in contact, as well as to our Customer Service teams in France or in the CELINE entities abroad.</p>
<p><i>To find out more</i></p>	
(Section 3.4)	
Transfers abroad	<p>In order to ensure the security and confidentiality of your personal data when your personal data is transferred to CELINE entities and stores located outside the European Union we have implemented the contractual guarantees required to provide adequate protection of the data that is transferred.</p>
<p><i>To find out more</i></p>	
(Section 3.5)	
How long is your data kept	<p>In general, your personal data will be kept by CELINE for as long as you remain a client and until the expiry of the applicable warranties. It will only be kept beyond that time with your permission or to meet our legal obligations.</p>
<p><i>To find out more</i></p>	
(Section 3.6)	
Your rights and options	<p>Under the data protection laws and regulations, you have a right to access, to amend, to request the erasure and to exercise other rights over your personal data.</p>
<p><i>To find out more (Section 3.10 and 3.11)</i></p>	<p>You may review your decision as to whether to receive the CELINE newsletter at any point in time. For more information, please see section 3.11.</p>
	<p>You can also deactivate the use of cookies by clicking here.</p>
Contacting CELINE	<p>For any question or claim regarding this Confidentiality Policy, you may contact CELINE:</p>
<p><i>To find out more (Section 4)</i></p>	<ul style="list-style-type: none"> - by telephone, at the phone number indicated on the website's contact page, Monday to Saturday, from 10 am to 7 pm (except French public holidays). - by e-mail: clientservice.eu@celine.com
	<p>In case of problems, you may contact the data protection department at the following postal address : CELINE Service Clients 16 rue Vivienne 75 002 Paris or by sending an e-mail to dataprotection@celine.fr</p>

3 Our policy in detail

3.1 HOW CELINE USES YOUR PERSONAL DATA

Your personal data is only gathered when CELINE has a legal basis for doing so.

We therefore only process your personal data when this is necessary:

1/ To deal with your requests, e.g.:

- To send you information about our offers, news and events (newsletter, invitations and other publications via the channels that you will have specified beforehand – post, e-mail, telephone, SMS, instant messaging);
- To manage your requests for a meeting with a CELINE operative, to deal with your requests and complaints;
- To improve the operation of the Site by generating statistics, to personalise the interface of the Site based on your preferences, and for the purpose of targeted advertising or promotional material, in keeping with our cookies policy.

2/ To provide you with services and fulfil the orders that you place, and to comply with our contractual obligations, and in particular:

- To enable you to create a “my account” personal space and purchase CELINE products online;
- To manage your orders and their delivery as well as the corresponding warranties;
- To manage any other service, whether current or future, in connection with the Services and registered in the corresponding General Terms of Use.

3/ To foster the legitimate interests of CELINE:

- To manage our relationship with you by keeping an up-to-date centralised database of our existing and potential clients, enabling us to proactively manage the monitoring of our commercial relationship;
- To ensure that we provide high-quality services by conducting surveys and by measuring the quality of the telephone response of our call centre;
- To create survey reports and statistics, after anonymising the underlying data or after implementing processes designed to prevent the erroneous attribution of data to an identified person.
- To ensure the security of your transactions online, to prevent fraud and payment defaults.

For all these purposes founded on our legitimate interest, we take into consideration any potential impact that the gathering of this data may have upon you and upon the users of the Site in general. Should we believe that your interests or your fundamental rights and freedoms transcend our legitimate interests, we will refrain from using your personal data on this basis and may ask you for your consent on a case by case basis.

4/ Based on your specific consent

When you subscribe to the CELINE customer card to benefit from the personalised CELINE welcome in our shops worldwide, you agree that information relating to your purchases and interactions with CELINE may be used to understand your needs and preferences, establish your customer profile, and communicated to all CELINE shops and entities, including outside of the European Union in order to give you the same personalised welcome that you are entitled to expect in all our stores.

3.2 Note concerning the processing of personal data for purposes of prevention and management of payment defaults

In order to combat fraud over the Internet, information concerning your order and concerning the terminal used to place the order (such as the operating system used, the location of the machine, whether or not a proxy was used, etc.) is gathered automatically and used, subject to your consent, to analyse your transactions for purposes of fraud detection and prevention of payment defaults. The information may be transmitted to our payment service provider and to any third party that is duly authorised by law for the sole purposes of checking your identity, the validity of the order, of the payment method used and of the requested delivery address.

You may withhold or withdraw your consent at any point in time in accordance with the terms of our cookies policy. However, should you refuse to allow us to use cookies to secure the transactions, your order may not be approved automatically and will have to be reviewed manually. You may be asked for proof of identity in order to confirm your order.

For any question regarding these checks, or in case of a blockage of your account, we would ask you to contact our customer service unit (see the section entitled Contact us).

3.3 The categories of data gathered by CELINE

Information that you provide to us directly

We gather the information that you disclose to us directly when you use our Site and our Services.

This is for instance the case when you create an account online, you register to receive our news, you make a purchase online or from our Stores, or you make a telephone booking with our client advisors.

The categories of personal data that we gather directly from you include:

- Your identification and contact data (such as your family name and first name, e-mail address, telephone number, date of birth, mother tongue, preferred means of contact) needed to identify you or to contact you when you use one of the Services Provided by CELINE;
- Transaction-related information needed to process your order (items chosen, delivery and billing address, telephone number, means of payment, including your bank card details in order to enable billing – account holder name, number and expiry date – in case of payment by bank card);

- Data concerning the monitoring of our commercial relationship (your order number, the chronology of your purchases, your contacts and requests or your correspondence with our Customer Service unit);
- Socio-demographic data (such as your age, your profession, etc.);
- Data concerning your preferences and your person (preferred style, size, favourite colours, etc.).

The personal data that is indispensable for CELINE to fulfil the purposes described above is highlighted in the various pages of the Site. Should you not disclose this data in the mandatory fields, CELINE may not be able to respond to your requests and/or supply you with the products and services that you want. All other data is merely optional and enables us to know you better and to improve the way in which we communicate with you and the services that we provide to you.

In our Stores or during the events that we organise (for instance: fashion shows or private sales in your local Store), we may gather additional personal data under terms and for uses that shall be specifically notified to you at that point.

The information that CELINE gathers automatically

Other data is gathered automatically when you access the Site, use our Services or perform a transaction with us:

- Connection data concerning the terminal used: your IP address, the type of browser you use and various information about your browsing of our Site are also gathered for purposes of administration and/or to generate statistics, as detailed in our cookies policy;
- Information about your browsing habits: we use cookies and other tracking technologies to gather information concerning you, such as your preferences and interests;
- Geo-location information: when you activate this option in order to find a CELINE store;
- Recording of your calls to CELINE's Customer Service unit: should you get in touch with one of our advisors, the conversation may be recorded in order to ensure the quality of the service. You will be informed about this in the message that is played while you wait.

Information regarding third parties

In some cases, CELINE will gather information that you provide about other people, for instance when you decide to buy and send products to someone else. This information is only used to fulfil your requests and never to send marketing material to your contacts, unless they personally choose to receive information from CELINE.

3.4 The recipients of your personal data

- Management of the Site and the Services

Your personal data is processed by CELINE. It will not be transferred or made accessible to any third party other than (i) CELINE's subcontractors and service providers (for example, our Customer Service) who are involved in a purely technical or logistical capacity (carriers, providers of hosting and maintenance services to the Site, payment and fraud prevention service providers, etc.), and (ii) upon any reorganisation of our company, including a total or partial disposal of our assets, merger, takeover, acquisition, de-merger, and in general any reorganisation operation, in order to ensure the continuity of the services provided.

- Personalised client management, prospecting

Your personal data is accessible to the authorised personnel working in CELINE's Stores and entities with which you are in contact, as well as to our Customer Service teams in France or in the CELINE entities abroad.

You may thus receive from them, subject to your consent, information about the offers, news and events of our company in France and abroad.

- Protection and defence of CELINE's interests

Finally, CELINE may disclose your personal data to third parties when such disclosure is required by a law, a regulatory provision or a court ruling, or if this disclosure is necessary to ensure the protection and the defence of its interests (for instance to our external agents and counsels in case of debt recovery; to our insurance companies in case of the loan of a product).

3.5 Transfers of your data abroad

Your personal data may be transferred to our stores, entities and service providers located outside the European Economic Area in countries where the applicable data protection rules and regulations differ from those that are applicable within the European Economic Area, such as: Australia, China, the United Arab Emirates, the United States, Japan, Macau, Singapore and Taiwan.

These transfers shall only take place where this is necessary to deal with your requests and provide you with the same level of service in all the Stores with which you are in contact.

They shall only take place subject to appropriate guarantees designed to ensure a sufficient level of protection to your privacy and fundamental rights, such as the signature of the standard contractual terms adopted by the European Commission. A document detailing the guarantees put in place by CELINE shall be disclosed immediately upon receipt of a request sent to CELINE.

Moreover, your personal data may also be transferred as part of your orders to our service providers based outside the European Union that are involved in delivering your orders.

3.6 Duration of retention

CELINE shall not retain your personal data beyond the duration that is strictly necessary for the accomplishment of the purposes for which it was gathered.

- **Newsletter, contacts and complaints**

The identification data of the client that is used with the client's consent to send out newsletters and other CELINE publications shall be kept for a period of three years as of its gathering or as of the last contact initiated by the client.

Any personal data and general information about your requests (for example, opening date, closing date, subject of the request) that is gathered and processed under the section entitled "Contact us" or pursuant to contact with the Customer Service unit will only be kept for 5 years in our unique customer repository. Call recordings are kept for 6 months by our Customer Services.

CELINE may also keep for archiving purposes copies of its correspondence with the users of the Site and any response to the questions or comments sent to the users by our Customer Service unit.

- **Data concerning orders, past purchases and 'know your client'**

CELINE will keep the data concerning your orders for as long as you remain a client (i.e. have an active client account or are a regular contact of our Stores) and until the expiry of the applicable warranties. This data will only be kept beyond that time with your consent or for accounting and evidential purposes or to meet our legal obligations or, after having been anonymised, for purposes of studies and statistics.

- **Payment data**

Your payment data will be kept securely for the duration that is needed to confirm your order and payment and will then be immediately destroyed. In case of a problem with payment, your data will be kept throughout the duration of the management of the incident, then for a period of three (3) to five (5) years, depending on the severity of the incident.

- **Client account data**

Your client account on our Site will remain active until you decide to close it and for as long as you make purchases on our Site. In case of protracted inactivity on your part over a period of 3 years, this account will be deactivated.

Pursuant to the expiry of this timescale of three years, CELINE may get in contact with its clients to find out whether or not they want (i) to continue to receive newsletters and other publications from CELINE and/or (ii) to retain their client account on the Site. Your data will be destroyed within 2 working days as of your sending us a request to unsubscribe.

Clients may close their accounts and/or unsubscribe from our newsletters at any point in time. In order to do so, please contact our Customer Service unit by sending an e-mail to clientservice.eu@celine.com or by clicking on the unsubscribe link featuring in each newsletter. You may also exercise this right by filling in the "Contact us" form on our Site, stating the nature of your request, after viewing the relevant section of our Frequently Asked Questions.

Finally, the connection logs that are gathered with your consent by the cookies and other tracers implemented on our Site will be kept in accordance with the applicable regulations for a period of time that shall not exceed thirteen (13) months. For more details, see our cookies policy.

3.7 Links

The Site may contain links to third party web sites. CELINE has no control over the content, the Confidentiality Policy and the data protection policy or the actions of these third party web sites. The use of the information that you may provide to third parties on other sites or that these third parties may gather on those other web sites is not governed by this Confidentiality Policy. You should carefully examine the confidentiality and data protection policies of any third party web sites and contact the publishers of these web sites should you have any questions about the way in which they use your personal data. CELINE hereby disclaims liability for any failure by a third party to use your personal data in accordance with their confidentiality policy or in accordance with any contractual or legal obligation that is binding upon them.

3.8 Security

CELINE has implemented the appropriate technical and organisational measures to guarantee the confidentiality and the security of your personal data against any loss, destruction, alteration, unauthorised access or disclosure. For instance:

- CELINE's computer systems are equipped with hardware and software protections that comply with the highest standards of the profession. Physical and electronic procedures for backing up the data gathered on the site are implemented, in accordance with the prevailing French laws and European regulations governing data protection.
- CELINE's employees who, on account of their duties, have access to your personal data, are subject to strict confidentiality obligations.
- CELINE's service providers and subcontractors are bound by written undertakings to implement adequate security measures to ensure the protection of your personal data in keeping with the applicable laws.
- All the payment data that you provide on the Site is stored on the secure web site of the payment services provider chosen by CELINE. The transactions performed on the Site are protected by SSL encryption.

3.9 Modifications and updates of the Confidentiality Policy

This Confidentiality Policy is in keeping with the prevailing practices at CELINE. It may be modified and updated to reflect the changes in CELINE's practices, to provide more information or to ensure compliance with the applicable regulations.

In case of a modification or update, the revised Confidentiality Policy shall be put online on the Site, with a statement indicating the date of the latest update. You will also be informed by a message on the Site urging you to read the updated Confidentiality Policy. If you have a client account with CELINE, CELINE will warn you about the update by sending an e-mail or a notification to your account beforehand.

3.10 Your rights and options

Access and rectification

You have the right to access your personal data and to request the rectification or the destruction of any data that should turn out to be inaccurate. Should you have a client account with CELINE, you may directly access the data contained in your online account and rectify/eliminate it where applicable, as well as access the chronology/log of your transactions and your choices in terms of marketing.

Where applicable, you must ensure that you disclose to CELINE any updates or changes to your personal data, including your postal and/or e-mail address, in order to enable us to dispatch your orders to the right address and to contact you about your orders in case of need.

Other rights

Erasure. You may also request the erasure of your personal data provided that it is no longer necessary for CELINE to keep it.

Opposition. You can also oppose the processing of your personal data or request the imposition of limitations on such processing, unless the processing is necessary for the management of the Services that you request.

Withdrawal of consent. Where the processing of your data is based on your consent, you may withdraw this consent at any point in time.

Portability. You may moreover exercise your right to portability, i.e. obtain, in a structured, machine-readable form, the personal data that you provided to us directly on the basis of your consent or of a contract drawn up and signed with you and that that is undergoing automated processing.

Directives. You may also let us know your instructions regarding the preservation, erasure and disclosure of your personal data after your death, and modify these directives at any point in time.

These rights may be exercised directly with CELINE in accordance with the terms of the section 4 entitled Contact US . You may be asked for proof of your identity.

3.11 Unsubscribing from our newsletters, requesting an end to targeted advertising

You may withdraw your consent at any point in time and request to no longer receive correspondence from us regarding our offers, news and events, by using the hypertext link that is included for this purpose in each e-mail that we send you. You may also contact us by telephone, at the phone number indicated on the website's contact page (calls are charged at the standard, local rate), Monday to Saturday from 10am to 7pm, or by e-mail sent to the following address: clientservice.eu@celine.com.

You may also oppose CELINE's use of your personal data for purposes of marketing or drawing up your client profile; in that case, however, you will no longer benefit from customised offers or services.

4 Contact us

Should you have any questions about this Confidentiality Policy and CELINE's data protection practices, please do not hesitate to contact our Customer Service unit via the "Contact us" section on the Site or directly, by sending an e-mail to clientservice.eu@celine.com by calling the phone number indicated on the website's contact page, Monday to Saturday from 10am to 7pm, or by sending us a letter addressed to CELINE, Service Clients, 16 rue Vivienne, 75002 Paris, France.

Should you have any problem or for more information about our data protection policies, please contact our data protection officer by e-mail at the following address : dataprotection@celine.fr or by post to Data Protection Officer (DPO) CELINE 16 rue Vivienne 75 002 Paris.

Should you be unhappy about the way in which CELINE gathers and processes your personal data, you may file a complaint with France's CNIL [data protection watchdog] by visiting <https://www.cnil.fr/fr/plaintes/> or by writing to the following address: 3 Place de Fontenoy, TSA 80715, 75334 PARIS CEDEX 07, France, or if you are a resident of another European Union country, you may file a complaint with the data protection regulating body with jurisdiction over the place where your main residence is located, or the place where you have been dealing with CELINE.