

# PRIVACY POLICY - MACAU

When you are shopping at Foot Locker in Macau or when using our Sites (as defined herein), you will be sharing certain personal data ("**Personal Data**") with us. With this Customers Privacy Statement ("**Statement**") we inform you of how we process your Personal Data.

This Statement has the following chapters:

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## 1. Introduction

Consent and transparency are the key principles of data protection legislation. With this in mind, we inform you on how your Personal Data is being processed and we promote the objective of strengthening your rights as an individual, our accountability and the lawful and fair processing of Personal Data.

This Statement contains information on how we process your Personal Data when you visit our websites and stores ("**Sites**" and "**Stores**"), sign up for our newsletters ("**Newsletter**"), use our mobile applications ("**Apps**"), register through the creation of a personal account ("**Personal Account**"), respond to a survey ("**Customer Satisfaction**")

**Program**") and when you contact us (collectively the "**Services**"). This Statement applies to all Personal Data of Customers collected by Foot Locker Macau, Ltd. or any of its affiliates or brands ("**Foot Locker Macau**").

By using the Services, you agree to the processing of your Personal Data as described in this Privacy Statement except where your express consent is required by law. Please do not use the Services if you do not agree.

## **2. Who are we?**

Foot Locker Macau, Ltd. (Company Registration Number: 83219 (SO)) is the Data Controller responsible for Personal Data in respect of Customers that are subject to the Personal Data Protection Law ("PDPL").

Foot Locker Macau, Ltd. has its principal address at Avenida Comercial de Macau, 251A – 301

AIA Tower, 11th Floor, Office 1103, Macau.

## **3. What Personal Data do we collect from you?**

### **3.1 Personal Data you share with us directly**

We collect the following categories of Personal Data when you use our Services (depending on which of the Services you are using):

1. Customer personal details: full name, title/salutation, contact details, gender, preferred language, address;
2. Interests and preferences: historical product purchases (including returns or orders cancelled), shoe and/or apparel size, interests, feedback and survey data;

3. Customer account details: customer ID, account information, choice and opt-in of Foot Locker communications (Newsletters);
4. Order information: order (tracking) number, order status and history, sales order information, invoice and shipping address, bank account information, purchase history; and
5. Communications with Customer Service.

### 3.2 Special categories of Personal Data

Foot Locker does not collect Personal Data belonging to the so-called special categories, being such data regarding ethnic origin, religious or philosophical beliefs, sex life or sexual orientation, health data, political opinions or trade union memberships during your use of our Services.

### 3.3 Personal Data we collect from you indirectly

We collect the following categories of Personal Data when you use our Services:

1. Online activity: your online interaction with us through the use of cookies, web beacons, pixel tags, log files or other similar technologies when you use our Services or interact with our emails or advertisements on our Site, our App, or other sites.
  0. Customer personal details: for example, name, email address, profile image, gender, date of birth, place of residence, list of friends, interests and likes. The only information you have consented to be used is shared with us; and
  1. Your image(s) from you when you visit our Stores to record you on video through the use of Closed-Circuit Television ("**CCTV**").

### 3.4 Personal Data we receive from other sources

We receive the following Personal Data when you use our Services:

1. Customer personal details: for example, name, username, demographic information, address, contact information, interests and online activity. We obtain such Personal Data from other sources that you use to connect with us. For example, from social networks. To disable this, please adjust your privacy and advertising settings through the applicable (browser) service provider used; and
2. Online activity: your online interaction with us if you have provided your consent for the use of third-party (tracking) cookies.

#### **4. Why do we use your Personal Data?**

We use your processed Personal Data for the following specific purposes and categories of use:

##### **4.1 To process and execute your order**

This includes processing and delivering your order, contacting you concerning the status of your order or any other information related to your order which we have to communicate with you.

Ground for processing: the processing of your Personal Data is necessary for the performance of a contract with you. The failure to provide us with the required Personal Data means that we cannot execute such contract and deliver you the purchased or requested product or service.

##### **4.2 To provide you with customer service**

We wish to answer any of your questions or requests, and we communicate with you with regard to a purchase, the use of our Services and to solve any of your possible issues in relation to the Services.

Ground for processing: the processing of your Personal Data is necessary for the performance of a contract with you. The failure to provide us with the required Personal

Data means that we cannot execute such contract and deliver you the purchased or requested product or service.

#### **4.3** To comply with applicable laws and regulations

When you purchase products or take services from us, we are required by law to keep certain Personal Data. We may also need to process your Personal Data to comply with court orders or governmental requests.

Ground for processing: the processing of your Personal Data for legal and regulatory purposes is necessary for compliance with legal obligations that we are subject to.

#### **4.4** Personal Account

When you shop at Foot Locker, you can register your Personal Data and create your own profile. Even though the registration is not required, it provides you with a quick and simple checkout experience.

Ground for processing: the processing of your Personal Data is based on your consent. Please note that you can always withdraw your consent by deleting your Personal Account.

#### **4.5** Newsletter

You can subscribe for our Newsletter in order to receive future e-mails about sneaker releases, news, surveys, initiatives and events, to remind you to complete a purchase or a transaction and to send you specific content based of your preferences and interests.

Ground for processing: the processing of your Personal Data is based on your consent. Please note that you can always withdraw your consent by using the unsubscribe link at the bottom of our emails or change your communication preferences settings in your Personal Account.

#### **4.6** Customer Satisfaction Program

When you shop you have the possibility to participate in our survey for our research program and opinion polling to develop and improve our Services obtaining your feedback. The data processed in this context is not used by us for advertising purposes. Your answers are neither passed on to third parties nor are published.

Ground for processing: the processing of your Personal Data is based on your consent.

#### **4.7** For marketing purposes to provide you with customized content, targeted offers and advertising on our Services

We provide you with customized content, targeted offers, and advertising in order to improve your shopping experience, to provide you with more relevant content and to know more about you. This may include generating tailored adds on social media like Facebook.

Ground for processing: the processing of your Personal Data is for analyzing you as (potential) customers, how you purchase and use our Services and to maintain or establish the relationship with you. We will only process this Personal Data based on your consent. Please note that you can always withdraw your consent.

#### **4.8** To operate our business and analyze, develop and improve our Services

We maintain the security of our Services. We also enable your use of our Services to administer accounts, diagnose and resolve technical and Service-related problems and other internal functions. This includes analyzing trends and Site traffic and administer and optimize our Services. This is partially done via the use of internet Cookies.

Ground for processing: the processing of your Personal Data is for enhancing the operation of our business and to develop and improve our Services in an efficient and appropriate manner and in enhancing the effectiveness, user experience, functioning and security of our systems, networks and services. We will only process this Personal Data based on your consent. Please note that you can always withdraw your consent.

#### **4.9** For litigation case management and evidentiary purposes

We may store your Personal Data if relevant for the administration of justice, including but not limited to any possible future court case, legal advice and/or any other litigation and disputes.

Ground for processing: the processing of your Personal Data is for us to manage litigation cases and to defend Foot Locker against any possible (third party) claims.

#### **4.10** To prevent and detect offences and to protect you, our employees and your and our property

We record how you use our Services to prevent and/or detect fraud, abuse, illegal use or violations of our policies and procedures or our general terms and conditions.

Ground for processing: the processing of your Personal Data is for us to prevent and detect offences which may affect you, our employees and your and our property.

#### **4.11** Or otherwise as described to you at the point of processing Personal Data.

### **5. How long do we retain your Personal Data?**

We retain your Personal Data for as long as is necessary to fulfil the relevant purposes we processed it for, as described in this Statement, unless a longer retention period is required by the applicable law.

If reasonably necessary or required to meet legal or regulatory requirements, resolve disputes, prevent and combat fraud and abuse, or enforce our terms and conditions, we will also keep hold of some of your Personal Data, even if it is no longer needed to provide our Services to you.

## **6. What automated decisions, including profiling, do we make about you?**

For our mutual security, each credit/debit card and PayPal payment is processed through an automatic payment verification system. The order details you entered are then compared to those registered to the payment card. In case the system cannot verify these details, it will automatically cancel your order.

We combine the information (including Personal Data) we receive from and about you, including the information you provide to us on one of the Services, information we receive from third parties, information we automatically process (as explained above), and information provided or processed offline when you shop in our Stores. We carry out some profiling of you for the purposes of improving and developing our products and Services and to help us to tailor our marketing to you. We use information that we learn about you such as Personal Data processed online, through your online behavior patterns, online interaction with us, online activities, tracking of visits, your preferences, hobbies, interests and your historical purchase data, including your return or order cancelled, to make sure the marketing you receive from us and the way our websites are displayed to you are appropriate and tailored to you. The impact of any automated decision is to ensure you experience the best service possible from Foot Locker.

## **7. Who do we disclose your Personal Data to?**

We may disclose your Personal Data in the following ways:

### **7.1 With other Foot Locker entities that are part of the Foot Locker Group**

We may share your Personal Data with entities that are part of our group organization, to the extent required for internal and administrative management or for the fulfillment of our Services and related actions and requirements.



## 7.2 With third party vendors

We use third party vendors for business, professional and technical support as Processors. These companies only use your Personal Data on behalf of us and under our written instructions. Specifically, we use such third party vendors and their servers and services for our web platforms, storage and business related data processing. In limited circumstances, these vendors might have access to your Personal Data when this is required for maintenance or problem solving.

## 7.3 With a competent public authority

In order to comply with a subpoena or other legal process or obligations, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to legitimate government requests, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes.

## 7.4 With cardholder and credit card issuing companies and investigative, criminal or judicial authorities

In case of fraud, confirmed by the cardholder and or credit card issuing company, we will share your Personal Data with investigative, criminal or judicial authorities for fraud prevention, investigation and prosecution purposes. In case of governmental inquiries or requests, we share the requested Personal Data to comply with the law.

## 8. Do we transfer your Personal Data outside of Macau?

Some of your Personal Data that we processed may be transferred and stored in countries outside of Macau. By using our Services, you agree to the transfer of your personal data (as may be necessary) to be transferred and stored in countries outside of Macau. The laws in those countries may not provide the same level of data protection compared to the country in which you initially provided your data. When we

transfer your Personal Data to recipients in other countries, we will protect that Personal Data as described in this Statement and in compliance with applicable laws.

We use various measures to ensure that your Personal Data transferred outside of Macau receives adequate protection in accordance with data protection legislation. This include verifying if the recipient adheres to and adopts a standard of personal data protection which is at least comparable to that required by Macau law.

## **9. Children's data privacy**

Our Services do not target children under the age of eighteen, and we do not knowingly process their Personal Data. We will only knowingly collect and process Personal Data of children under the age of eighteen if explicit parental consent is provided. If you are concerned about your child's data privacy, we encourage you to use web-filtering technology to supervise your child's access to our Services.

## **10. How do we protect your Personal Data?**

Foot Locker has implemented appropriate physical, organizational, administrative and technical security measures to protect your Personal Data against unlawful access, loss, misuse or alteration. Foot Locker uses a variety of secure techniques to protect your Personal Data, including secured servers, firewalls, and encryption of application data and of your communications via the Internet. To safeguard your transactions, we encrypt your Personal Data using encryption technology Secure Socket Layer (SSL) coding. Our systems will only be accessed by authorized staff involved in the performance in their tasks. Personal Data is only made available internally on a need to know basis and per department or even per associate if so applicable. We also have an ongoing Foot Locker privacy training program to raise awareness on privacy compliance.

## **11. Links to other sites**

Our Services contain links to other sites and applications. We are not responsible for the privacy practices or content of such other sites or applications that are not affiliated with or maintained by Foot Locker. We recommend that you review the privacy statement posted on any external site or app that you access through our Services.

## **12. What are my rights?**

You have the right:

**12.1** To rectify misleading, outdated, inaccurate or incomplete Personal Data;

**12.2** Of erasure of your Personal Data; and

**12.3** To revoke your consent for further processing of your Personal Data when such processing is based on your consent.

To exercise any of these rights, please contact [service@footlocker.mo](mailto:service@footlocker.mo). We will provide you with information on the action taken within a reasonable time after the successful submission of your request.

We are required to verify your identity including, but not limited to, the verification of your email address. If you do not allow us to verify your identity, we cannot proceed to process your request.

Please note that the above-mentioned rights are not absolute, subject to provisions provided under the PDPL. Under certain conditions and in line with applicable data protection legislation, we may refuse a request. When such a restriction (partially) applies to your request, we will inform you on the reason of our refusal to comply to your request.

## **13. How can I file a complaint?**

If you are unsatisfied with the way we have handled your Personal Data, please contact us at [privacy@footlocker.com](mailto:privacy@footlocker.com).

Please note that you also have the right to lodge a complaint with the competent Data Protection Authority.

#### **14. Updates to this Privacy Statement**

We amend this Statement from time to time to keep the information provided up to date. We encourage you to review this Statement periodically.

Last Updated: May 2022

#### **15. Contacts**

If you have any questions, concerns or complaints regarding this Statement or the processing of your Personal Data, please contact us at [privacy@footlocker.com](mailto:privacy@footlocker.com).

In case you desire to exercise any of your rights, please contact [service@footlocker.mo](mailto:service@footlocker.mo).