

Customer Privacy Statement

Hong Kong

When you are shopping at Foot Locker in Hong Kong or when using our Sites, you will be sharing certain personal data (“Personal Data”) with us. With this Customers Privacy Statement (“Statement”) we inform you on how we process your Personal Data.

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1. Introduction

Transparency is one of 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 Hong Kong Ltd. (“**Foot Locker**”).

2. Who are we?

Foot Locker Hong Kong Ltd. is the Data User responsible for Personal Data in compliance with the Hong Kong Personal Data (Privacy) Ordinance (“**Ordinance**”).

Foot Locker Hong Kong Ltd. is incorporated under Hong Kong law and has its principal address at Unit 1001, 10/F., Infinitus Plaza, 199 Des Voeux Road Central. Foot Locker Hong Kong Ltd. is registered with the Hong Kong Companies Registry under the registration number 2673009.

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.

The provision of certain Personal Data is obligatory. The failure to provide us with the required Personal Data means that we may not be able to deliver you the purchased or requested product or service.

3.2 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. For more information, please read our Cookies Statement;
2. Customer personal details: for example, name, email address, profile image, gender, place of residence, list of friends, interests and likes. Only information you have consented to be used is shared with us. For more information, please read our Cookies Statement; and

3. Your image(s) from you when you visit our Stores to record you on video through the use of Closed-Circuit Television (“**CCTV**”). For more information, please read our CCTV Statement.

3.3 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. For more information, please read our Cookies Statement.

4. Why do we use your Personal Data?

We use your collected 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.

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.

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 and process certain Personal Data for compliance with legal obligations that we are subject to. We may also need to process your Personal Data to comply with court orders or governmental requests.

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.

4.5 Newsletter

We intend to use your name and contact details for direct marketing purposes, and we require your consent in order to do so. The classes of marketing subjects are: footwear and apparel related goods and services. We also intend to provide your name and contact details to [other Foot Locker entities that are part of the Foot Locker Group] in order to enable them to market the same classes of marketing subjects to you, and your written consent is required in order for us to do so.

In particular, 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. 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 research program and opinion polling to develop and improve our Services obtaining your feedback. The data collected in this context is not used by us for advertising purposes. Your answers are not published and are only accessible by our third party service providers who assist us to manage such surveys.

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 more relevant content and to know more about you. This may include generating tailored ads on social media like Facebook.

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

We maintain 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. For more information, please read our Cookies Statement.

We process your Personal Data 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.

4.9 For litigation case management and evidentiary purposes

We may store your Personal Data if relevant for any possible future court case, legal advice and/or any other litigation and disputes, and we may process your Personal Data 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. This includes the use of CCTV. For more information, please read our CCTV Statement.

4.11 Or otherwise as described to you at the point of Personal Data collection

5. Who do we disclose your Personal Data to?

We may disclose your Personal Data in the following ways:

5.1 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.

5.2 With third-party vendors

We use third-party vendors for business, professional and technical support as Data Processors (as meant in the Ordinance). 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.

5.3 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.

5.4 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.

6. 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.

7. 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.

8. What are my rights?

You have the right:

8.1 Of access to your Personal Data that we process on you; and

8.2 To rectification of inaccurate or incomplete Personal Data.

To exercise any of these rights, please contact Service at service@footlocker.hk or alternatively, use the following webpage [www.footlocker-emea.com/privacy].

Please note that the above-mentioned rights are not absolute. Under certain conditions and in line with the Ordinance, we may refuse a request.

9. 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.

10. Updates to this Privacy Statement

We amend this Statement from time to time to keep the information provided up to date, and we will take any further action as required by applicable law. We encourage you to review this Statement periodically.

Last Updated: 8 October 2021

11. 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.

In case you desire to exercise any of your rights, please use the following webpage www.footlocker-emea.com/privacy.

