# California Consumer Privacy Act Disclosures

These disclosures are provided by mytheresa.com GmbH and its corporate affiliates ("Company") and apply solely to residents of the State of California ("consumers" or "you") with respect to personal information Company processes as a business. Any terms defined in the California Consumer Privacy Act of 2018, as amended from time to time, including by the California Privacy Rights Act of 2020 and its implementing regulations ("CCPA") have the same meaning when used in these disclosures. These disclosures do not reflect our collection, use, or disclosure of California residents' personal information, or data subject rights, where an exception or exemption under the CCPA applies.

### 1. Notices at Collection

We have set out below categories of personal information about California resident website visitors, customers, prospective customers, corporate representatives of our vendors and other partners, job applicants and other potential employees. The California Consumer Privacy Act Privacy Policy is in section 2 of these disclosures.

### **Website Visitors**

We do not monetize personal information about California residents in the sense of exchanging personal information for money. However, we disclose personal information collected about website visitors to advertising partners to provide website visitors with more interesting and customized information, promotions, and advertising, which is considered "selling" and "sharing" under the CCPA. Please see our notice of right to opt out of selling sharing here: Your Privacy Choices Do Not Sell or Share My Personal Information // Your Opt-Out Rights.

### What Categories of Personal Information Do We Collect?

#### **Non-Sensitive Personal Information:**

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited
  to, his or her name, address, telephone number, credit card number, debit card number, or any other financial information, but excluding
  publicly available information that is lawfully made available to the general public from federal, state, or local government records.
- Characteristics of protected classifications under California or federal law.

- Commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.
- Geolocation data.
- Audio, electronic, or similar information.
- Inferences drawn from any personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, and behavior.

### **Sensitive Personal Information:**

• A consumer's account log-in in combination with any required security or access code, password, or credentials allowing access to an account.

## For What Purposes Do We Collect and Use Personal Information?

We use personal information about our website visitors as reasonably necessary and proportionate to:

- To perform the services or provide the goods reasonably expected by our website visitors;
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information, including in or via our premises, computers, software, networks, communications devices, and other similar system;
- To resist malicious, deceptive, fraudulent or illegal actions directed at us and to prosecute those responsible for those actions;
- To ensure the physical safety of natural persons;
- For short-term, transient use;
- To verify or maintain the quality or safety of our services and products;
- To improve, upgrade, or enhance our services and products;

- To market to you; and
- To collect or process it where such collection or processing is not for the purpose of inferring characteristics about a consumer such as to
  perform functions that are required under laws that apply to us and to support any claim or defense that we could face before any jurisdictional
  and/or administrative authority, arbitration, or mediation panel, and cooperating with or informing law enforcement or regulatory
  authorities to the extent required by law.
- We use automated devices and applications, such as Google Analytics, to evaluate usage of our websites. We also may use other analytic
  means to evaluate our website. We use these tools to help us improve our sites' performance and user experiences. Entities providing such
  devices and applications may use cookies and other tracking technologies, such as web beacons, to perform their services.

To learn more about Google's privacy practices, please review the Google Privacy Policy at https://www.google.com/policies/privacy/partners/. You can also download the Google Analytics Opt-out Browser Add-on to prevent their data from being used by Google Analytics at <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.

### What Criteria Do We Consider When Retaining Personal Information?

In general, with respect to each category of personal and sensitive personal information about website visitors, we retain each category for the longer of: as long as needed or permitted in light of the purpose(s) for which it was obtained and any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up and deletion processes.

## Job applicants or other potential employees

We do not "sell" or "share" personal information about California resident job applicants.

### What Categories of Personal Information Do We Collect?

### **Non-Sensitive Personal Information:**

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers.
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited
  to, his or her name, signature, physical characteristics or description, address, telephone number, education, employment, employment
  history, medical information, but excluding publicly available information that is lawfully made available to the general public from federal,
  state, or local government records.
- Characteristics of protected classifications under California or federal law.
- Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.
- Geolocation data.

- Audio, electronic, visual, or similar information.
- Professional or employment-related information
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).
- Inferences drawn from any personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

### **Sensitive Personal Information:**

- A consumer's account log-in in combination with any required security or access code, password, or credentials allowing access to an account.
- A consumer's citizenship or immigration status.

## For What Purposes Do We Collect and Use Personal Information?

We use personal and sensitive personal information about you as a job applicant or other potential worker for the following purposes as reasonably necessary and proportionate to:

- To perform the services or provide the goods reasonably expected by applicants and other potential workers including employees in their
  role, including those services and goods that are reasonably necessary for us to administer the application process and for our workers to
  perform their duties, to manage our relationship with applicants and other potential workers from recruitment and as applicable through post
  the working relationship;
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information, including in or via our premises, computers, software, networks, communications devices, and other similar system;
- To resist malicious, deceptive, fraudulent or illegal actions directed at us and to prosecute those responsible for those actions;
- To ensure the physical safety of natural persons;

- For short-term, transient use;
- To perform services on behalf of us;
- To verify or maintain the quality or safety of our services and products;
- To improve, upgrade, or enhance our services and products; and
- To collect or process it where such collection or processing is not for the purpose of inferring characteristics about a consumer such as to
  perform functions that are required under laws that apply to us and to support any claim or defense that we could face before any jurisdictional
  and/or administrative authority, arbitration, or mediation panel, and cooperating with or informing law enforcement or regulatory
  authorities to the extent required by law.

# What Criteria Do We Consider When Retaining Personal Information?

In general, with respect to categories of personal and sensitive personal information about job applicants and other potential workers of the Company, we retain each category for the longer of: until the withdrawal or rejection of your application, or if you are engaged by the Company, until the end of your working relationship with us, plus 4 years and any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up and deletion processes.

# Customers, prospective customers, corporate representatives of our vendors and other partners (including those who attend our events)

We do not "sell" or "share" personal information about California resident customers, prospective customers, corporate representatives of our vendors and other partners.

### What Categories of Personal Information Do We Collect?

### **Non-Sensitive Personal Information:**

- Identifiers such as a real name, alias, postal address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited
  to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number,
  driver's license or state identification card number, employment, bank account number, credit card number, debit card number, or any other
  financial information, but excluding publicly available information that is lawfully made available to the general public from federal, state,
  or local government records.

- Characteristics of protected classifications under California or federal law.
- Commercial information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Geolocation data.
- Audio, electronic, visual, or similar information.
- Professional or employment-related information.
- Inferences drawn from any personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, attitudes, intelligence, and abilities.

### **Sensitive Personal Information:**

- A consumer's social security, driver's license, state identification card, or passport number.
- A consumer's account log-in in combination with any required security or access code, password, or credentials allowing access to an account.

# For What Purposes Do We Collect and Use Personal Information?

We use personal information about you as a customer, prospective customer, corporate representative of our vendors and other partners as reasonably necessary and proportionate for the purposes of:

- To perform the services or provide the goods reasonably expected by you in your role, including those services and goods that are reasonably necessary for us to administer our customer relationships and for our employees to perform their duties;
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information, including in or via our premises, computers, software, networks, communications devices, and other similar system;
- To resist malicious, deceptive, fraudulent or illegal actions directed at us and to prosecute those responsible for those actions;
- To ensure the physical safety of natural persons;
- For short-term, transient use;

- To perform services on behalf of us;
- To verify or maintain the quality or safety of our services and products;
- To improve, upgrade, or enhance our services and products;
- To market to you; and
- To collect or process it where such collection or processing is not for the purpose of inferring characteristics about a consumer such as to perform functions that are required under laws that apply to us and to support any claim or defense that we could face before any jurisdictional and/or administrative authority, arbitration, or mediation panel, and cooperating with or informing law enforcement or regulatory authorities to the extent required by law.

# What Criteria Do We Consider When Retaining Personal Information?

In general, with respect to categories of personal information about customers, prospective customers, corporate representatives of our vendors and other partners, we retain each category for the longer of: until we determine that the Company will not be engaged by or engage the customer, vendor, or partner, or if a customer, vendor or partner engages or is engaged by the Company, until the end of such engagement, plus any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up and deletion processes.

# 2. California Consumer Privacy Act Privacy Policy

**Last Updated: 12/15/2025** 

# **Our Personal Information Handling Practices in 2025**

We have set out below categories of personal information about California residents we have collected, and as applicable disclosed, for a business purpose in the preceding 12 months. The table is followed by a description of the purposes for which we collected personal information. If we process de-identified information, we will maintain the information in a deidentified form and not attempt to reidentify the information, except that we may attempt to reidentify the information solely for the purpose of determining whether deidentification processes used satisfy legal requirements.

Category of personal information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?		
Personal Information						

Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.

- Directly from you (e.g., through your use of the site)
- Indirectly (e.g., from recruiting agencies)

Yes, we may have "sold" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.

Yes, we may have "shared" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.

To various service providers, such as:

- Recruiting agencies for recruiting-related purposes
- Payroll providers, benefits providers, banks and payment processing service providers, documents processing and storage services providers, travel agencies, expense reimbursement service providers for HR purposes
- Benefits and insurance providers for HR and insurance purposes
- IT security companies, network monitoring companies, for security, investigation, and enforcement purposes
- Business analysts for analytics purposes
- To corporate partners,

Category of personal information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?
				for corporate transaction purposes  • To government agencies for HR,
				insurance, and regulatory purposes
Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, but excluding publicly	<ul> <li>Directly from you (e.g., through your use of the site)</li> <li>Indirectly (e.g., from recruiting agencies)</li> </ul>	Yes, we may have "sold" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	Yes, we may have "shared" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	<ul> <li>To various service providers, such as:</li> <li>Recruiting agencies for recruiting-related purposes</li> <li>Payroll providers, benefits providers, banks and payment processing service providers, documents processing and storage services providers, travel agencies, expense reimbursement service providers for HR</li> </ul>
available information that is lawfully made available to the general public from federal, state, or local government records.				<ul> <li>purposes</li> <li>Benefits and insurance providers for HR and insurance purposes</li> </ul>
(The categories of personal information described in the California Customer Records Act (Cal. Civ. Code § 1798.80(e))				<ul> <li>Business analysts for analytics purposes</li> <li>To corporate partners, for corporate</li> </ul>

Category of personal information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?
				transaction purposes  • To government
				agencies for HR, insurance, and regulatory purposes
Characteristics of protected classifications under California or	Directly from you	No.	No.	To various service providers, such as:
federal law.				<ul> <li>Benefits and insurance providers for HR and insurance purposes</li> </ul>
				• To corporate partners, for corporate transaction purposes
				<ul> <li>To government agencies for HR, insurance, and regulatory purposes</li> </ul>
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Directly from you	Yes, we may have "sold" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	Yes, we may have "shared" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	<ul> <li>To payment processing and delivery services providers for purposes of using our websites</li> </ul>
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information	Indirectly from consumers and job applicants (through the website), and indirectly	Yes, we may have "sold" this category of personal information to advertising business	Yes, we may have "shared" this category of personal information to	<ul> <li>To various service providers (such as IT security companies, network</li> </ul>

Category of personal information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?
regarding a consumer's interaction with an internet website application, or advertisement.	from employees (through their activity on the company network or usage of company devices)	partners for the purposes of supporting our advertising efforts.	advertising business partners for the purposes of supporting our advertising efforts.	<ul> <li>monitoring companies, etc.) for security purposes</li> <li>Regarding the activity of consumers to certain marketing service providers for consumer marketing purposes</li> <li>To corporate partners, for corporate transaction purposes</li> <li>To government agencies for HR, insurance, and regulatory purposes</li> </ul>
Geolocation data.	Indirectly from consumers (through the website), and indirectly from employees (through their access card and/or badge number)	Yes, we may have "sold" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	Yes, we may have "shared" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	To various service providers, such as:  • Regarding the activity of consumers, to certain marketing service providers for consumer marketing purposes
Audio, electronic, visual, thermal, olfactory, or similar information.	Directly from employees at work	No.	No.	To various service providers, such as:

Category of personal information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?
				<ul> <li>Marketing services providers for client marketing purposes</li> </ul>
				• To corporate partners, for corporate transaction purposes
Professional or Employment-related information.	• Directly from you (e.g., through your use	No.	No.	To various service providers, such as:
	of the site)  • Indirectly (e.g., from recruiting agencies)			• Payroll providers, benefits providers, banks and payment processing service providers, documents processing and storage services providers, travel agencies, expense reimbursement service providers for HR purposes
				<ul> <li>Benefits and insurance providers for HR and insurance purposes</li> </ul>
				<ul> <li>Business analysts for analytics purposes</li> </ul>
				<ul> <li>Marketing services providers for clients marketing purposes</li> </ul>
				• To corporate partners, for corporate

Category of personal information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?
				<ul> <li>To government agencies for HR, insurance, and regulatory purposes</li> </ul>
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).	• Directly from you (e.g., through your use	No.	No.	To various service providers, such as:
	of the site)  • Indirectly (e.g., from recruiting agencies)			<ul> <li>Document processors and storing services companies for HR purposes</li> </ul>
				<ul> <li>Professional profile service providers for HR and client marketing purposes</li> </ul>
				• To corporate partners, for corporate transaction purposes
Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<ul> <li>Directly from you (e.g., through your use of the site)</li> <li>Indirectly (e.g., from recruiting agencies)</li> </ul>	Yes, we may have "sold" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	Yes, we may have "shared" this category of personal information to advertising business partners for the purposes of supporting our advertising efforts.	<ul> <li>To various service providers, such as:</li> <li>Document processors and storing services companies for HR purposes</li> </ul>
	Sensitive I	Personal Information		

Category of personal information	Did we collect? If so, from what source?	Did we sell? If so, to whom and for what purpose?	Did we share? If so, to whom and for what purpose?	Did we disclose? If so, to whom and for what purpose?
A consumer's social security, driver's license, state identification card, or passport number	Directly from you	No.	No.	To government agencies for regulatory purposes
A consumer's account log-in, in combination with any required security or access code, password, or credentials allowing access to an account	Directly from you	No.	No.	To various service providers (such as IT security companies, network monitoring companies, etc.) for security purposes
A consumer's citizenship or immigration status.	Directly from you	No.	No.	To various service providers to comply with applicable employment laws during the job applicant process.

# **Business or Commercial Purpose for Collecting Personal Information**

- To perform the services or provide the goods reasonably expected by consumers in their role, including recruiting services, including those services and goods that are reasonably necessary for us to administer our customer and worker relationships and for our workers to perform their duties;
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information, including in or via our premises, computers, software, networks, communications devices, and other similar system;
- To resist malicious, deceptive, fraudulent or illegal actions directed at us and to prosecute those responsible for those actions;

- For short-term, transient use;
- To perform services on behalf of us;
- To verify or maintain the quality or safety of our services and products;
- To improve, upgrade, or enhance our services and products;
- To perform functions that are required under laws that apply to us;
- To market to consumers such as website visitors, customers, prospective customers, corporate representatives of our vendors and other partners;
- To collect or process it where such collection or processing is not for the purpose of inferring characteristics about a consumer such as to perform functions that are required under laws that apply to us and to support any claim or defense that we could face before any jurisdictional and/or administrative authority, arbitration, or mediation panel, and cooperating with or informing law enforcement or regulatory authorities to the extent required by law; and
- We use automated devices and applications, such as Google Analytics, to evaluate usage of our websites. We also may use other analytic
  means to evaluate our website. We use these tools to help us improve our sites' performance and user experiences. Entities providing such
  devices and applications may use cookies and other tracking technologies, such as web beacons, to perform their services.

We do not have actual knowledge that we sell or share for cross context behavioural advertising, the personal information of California residents under 16 years of age.

## **CCPA Rights**

As a California resident, you have the following rights under the CCPA:

- The **right to know** what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you. You may only exercise your right to know twice within a 12-month period.
- The **right to delete** personal information that we have collected from you, subject to certain exceptions.
- The **right to correct** inaccurate personal information that we maintain about you.
- The right to opt out of the sale or sharing of your personal information by us. We disclose California residents' personal information to advertising business partners for the purposes of supporting our advertising efforts and, as such, we "sell" and "share" personal information as these terms are defined under the CCPA. Please note that we do not monetize personal information in the sense of disclosing your personal information in exchange for money. Please also note that, if you exercise your right to opt-out of the "sale" and

"sharing" of your personal information, we may still disclose your personal information to third parties for purposes other than cross-contextual behavioral advertising, as described in our privacy disclosures.

- The **right to limit** our use and disclosure of sensitive personal information to purposes specified in Cal. Civil Code 1798.121(a). We do not use or disclose sensitive personal information for purposes other than those specified in Cal. Civil Code 1798.121(a).
- The **right not to be retaliated against** for exercising privacy rights conferred by the CCPA, in violation of California Civil Code § 1798.125, including when a consumer is an employee, applicant, or independent contractor.

### **How to Exercise CCPA Rights**

**Methods of Submission and Instructions:** To submit a request to exercise your **rights to know**, **delete or correct**, please email privacy@mytheresa.com

**Verification:** Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may designate an authorized agent by taking the steps outlined under "Authorized Agent" further below. In your request or in response to us seeking additional information, you, or your authorized agent, must provide sufficient information to allow us to reasonably verify that you are, in fact, the person whose personal information was collected which will depend on your prior interactions with us and the sensitivity of the personal information being requested. We may ask you for information to verify your identity and, if you do not provide enough information for us to reasonably verify your identity, we will not be able to fulfil your request. We will only use the personal information you provide to us in a request for the purposes of verifying your identity and to fulfill your request.

**Opt-Out Preference Signals**: We respond to opt-out preference signals communicated via the Global Privacy Control and will process such signals with respect to the browser or device communicating the signals, or with respect to you specifically if you have signed onto your Company account while communicating Global Privacy opt-out preference signals. To use Global Privacy Control opt-out preference signals, please follow the instructions here: https://globalprivacycontrol.org/.

Authorized Agents: You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity and the agent provides proof that you gave the agent signed permission to submit the request; and
- For verifiable consumer requests, you directly confirm with Company that you provided the authorized agent with permission to submit the request.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4121 to 4130, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

### **Contact Us**

If you have any questions or comments about these disclosures or our practices, please contact us at:

Attorney-Client Privileged Confidential DRAFT

Email address: privacy@mytheresa.com

Postal address: Einsteinring 9, 85609 Aschheim/Munich, Germany