

# J.CREW

## Our Privacy Policy

This Privacy Policy describes how J.Crew Group, LLC, 225 Liberty St., New York, NY 10281, USA, and our brands and subsidiaries (including J.Crew Inc., J.Crew, crewcuts, J.Crew Factory, and Madewell) (collectively, "J.Crew," "we" or "us") collect, use or disclose personal information and the choices that are available with respect to our handling of personal information.

This Privacy Policy applies to personal information we collect when you interact with us online [e.g., through our website or other online products and services or download one of our mobile applications (collectively, our "App")], offline (e.g., when you shop in our stores or interact with customer support), or otherwise interact with us as described below. Our online and offline services and interactions with you are collectively referred to as our "Services" in this Privacy Policy.

The "U.S. Privacy Rights" section [below](#) serves as our Notice at Collection for purposes of the California Consumer Privacy Act ("CCPA").

This Privacy Policy does not apply to personal information collected from or about current or former job applicants or our employees. If you are an employee or job applicant, please contact your human resources partner or contact [privacy@jcrew.com](mailto:privacy@jcrew.com).

[Changes to this Privacy Policy](#)

[Collection of Information](#)

[Use of Personal Information](#)

[Disclosure of Personal Information](#)

[Sweepstakes, Contests and Promotions](#)

[Cookies, Advertising and Analytics](#)

[Data Retention](#)

[Protecting Personal Information](#)

[Children's Privacy](#)

[Your Privacy Choices](#)

[International Data Transfers](#)

[Residents of EEA and U.K.](#)

[U.S. Privacy Rights](#)

[Your Consumer Rights and How to Exercise Them](#)

[Notice of Financial Incentives](#)

[Additional Notice for California Residents](#)

[Contact Us](#)

# Changes to this Privacy Policy

We may change this Privacy Policy from time to time to address changes in applicable laws or our business operations. If we make changes, we will notify you by revising the “Last Updated” date at the top of this Privacy Policy. We also will inform you in advance of significant changes that may be applicable to you (such as adding a statement to the homepages of our websites or sending you an email notification). If your prior consent is required by applicable laws, we will request your consent to such changes before the revised Privacy Policy becomes applicable to you. We encourage you to review the Privacy Policy whenever you interact with us to stay informed about our personal information practices and the choices available to you.

## Collection of Information

### **Personal information we collect directly from you**

We collect personal information you provide directly to us. For example, we collect personal information when you visit our websites; download an App; provide product reviews; shop in our stores; call us on the phone; create an online account; sign up to receive our emails; request a catalog; participate in a sweepstakes, contest, promotion or survey; communicate with us via third-party social media sites; request customer support; apply for and/or participate in our loyalty program; or otherwise communicate with us.

The types of personal information that we collect include your contact details (name, email address, zip or postal code, billing address, shipping address, telephone number), payment card information, product preferences, demographic information, and any other personal information that you choose to provide.

Personal information also includes personal information that you provide about others, such as when you purchase a gift card for someone and request that we deliver it electronically, create and share a “wish list” or decide to purchase and ship products to someone else. We will use this personal information to fulfill your requests and will not send marketing communications to your contacts unless they separately opt in to receive communications from us.

When you download and install an App, the information that we collect depends on your mobile device’s operating system and permissions. We may collect precise geolocation (GPS) when permitted through your mobile device’s operating system to help customize your experience of the App, to let you know when products, promotions or events are available near you or to send geographically-relevant advertising. To learn more about the specific information collected by our App, please check your device settings or review the permissions information available on the platform (e.g., Google Play and the App Store) from which you downloaded the App. The App also may allow you to check or change your status for certain data collection in the App’s settings. If you change your settings, certain features may not function properly.

## **Personal information we collect automatically**

We automatically collect certain personal information about you when you access or use our websites or App or shop in our stores:

- **Log and Usage Information:** We collect information about your use of our online Services, such as the type of browser you use, access times, pages viewed, items placed in your shopping bag, links clicked, browsing behavior, the referring URL (i.e., the webpage you visited before navigating to our websites) and similar traffic and usage measurements.
- **Device Information:** We collect information about the device you use to access our online Services, including the hardware model, IP address, unique device identifiers and operating system and version.
- **App Information:** Our App collects interactions, search history and similar in-App activity data, crash logs, diagnostics and other App performance data.
- **Transaction Information:** When you purchase or return a product, we collect information about the transaction, such as product details and the date and location of the purchase/return.
- **Security Camera Video Data:** We collect video data via security cameras that we deploy in some of our retail stores. We provide notice about our use of security cameras as required by law.
- **Information Collected by Cookies and Similar Tracking Technologies:** We (and our vendors) use cookies, web beacons (also known as "tracking pixels") and similar tracking technologies to collect information about you when you interact with our online Services, customer service chat or emails, such as information about your browsing and purchasing behavior, your device, and your geolocation. We may combine this information with other information we collect about you and use it for various purposes, such as improving our websites and your online experience, understanding which areas and features of our websites are popular, counting unique visits, understanding effectiveness of promotions and other marketing campaigns, personalizing our advertising and communications with you, determining whether J.Crew emails that you receive are opened and whether links within an email have been clicked, and for other similar business purposes. For more information about cookies and how to exercise your cookie preferences, please see the "Cookies, Advertising and Analytics" section below.

## **Personal information we collect from our partners and other sources**

We may receive personal information about you from other sources and combine it with information we collect about you. For example, we collect personal information from the local postal services' national change of address databases to verify and update mailing addresses. If you are a United States customer who applies for a J.Crew Credit Card, we receive personal information about you, such as your name and address, from the partners that manage our private label credit card program. If you interact with us on social media, we also collect personal information about you from those interactions, such as your username and any other information you choose to provide us as permitted by your social media account settings.

## **Personal information that we create**

We use personal information to draw inferences about you based on personal information that we collect from or about you. For example, we may infer your general location (city, state) based on your IP

address when you visit one of our websites, or that you are interested in purchasing a certain type of clothing based on your browsing behavior on our websites or App.

## Use of Personal Information

We use personal information about you for various purposes, including to:

- Provide, maintain and improve our Services, such as improving your in-store and online shopping experiences;
- Deliver the products and Services you request, or that are reasonably anticipated within the context of our ongoing business relationship, complete transactions you initiate, perform our contractual obligations and send you related information, such as purchase or delivery confirmations and email receipts or notifications about your order;
- Process your orders, payments and account adjustments and initiate, render, bill and collect payment for our products and Services;
- Conduct internal research and development and make business decisions about current and future product and service offerings;
- Respond to your comments, questions and requests and provide customer service;
- Communicate with you about products, offers, promotions, rewards and events, and provide news and other information that we think will interest you (for information about how to manage these communications, please see ["Your Privacy Choices" here](#));
- Manage your online account(s) and send you technical notices, updates, security alerts and support and administrative messages;
- Personalize your online experience and provide advertisements, content or features that match your profile and interests, including when inferred from your online activity;
- Monitor and analyze trends, usage and activities;
- Administer contests, sweepstakes and other promotions, such as processing entries and delivering rewards;
- Debug and repair errors in our Services and other activities to maintain and improve the quality and safety of our Services;
- Detect, protect against and prevent security incidents and suspicious activities that may be illegal or unauthorized, investigate complaints and claims and provide other security measures such as identity verification;
- Protect users of our Services from fraudulent, malicious, deceptive, abusive or unlawful activities of others;
- Protect the rights, interests, safety or property of J.Crew or our customers, service providers and other third parties;
- Comply with our legal and regulatory obligations, such as cooperating with law enforcement and responding to governmental requests;
- Enforce our policies, terms and conditions or other agreements;
- Defend against or pursue claims, disputes or litigation—in court or elsewhere;
- Create de-identified data, which is data that cannot reasonably be used to identify you or your browser or device, as permitted by law (once personal information is de-identified as required under applicable privacy laws, it is no longer subject to this Privacy Policy);

- Provide you the benefits of our loyalty program if you are a member of our loyalty program;
- Carry out any other purpose described to you at the time the personal information is collected based on the context of our interaction with you; and
- Carry out any other use as permitted by your consent.

## Disclosure of Personal Information

We disclose personal information about you as follows:

- With vendors, agents, consultants, contractors and other third parties requiring access to personal information to carry out work on our behalf and improve the products and services they provide to us, such as providers of web hosting, shipping and delivery, payment processing, fraud prevention, analytics, marketing, advertising and customer service;
- If you are a U.S. customer with a J.Crew Credit Card, with our banking partner Comenity Bank, the issuer of the J.Crew Credit Card. Comenity Bank is independent of J.Crew and has its own privacy and security policies. We encourage you to review those policies carefully;
- In response to a request or demand for personal information if we believe disclosure is required or otherwise in accordance with any applicable law, regulation or legal process;
- If we believe your actions are inconsistent, or if disclosure is necessary to enforce compliance, with our user agreements or policies or to protect the rights, property and safety of us or any third party;
- In connection with, or during negotiations of, any merger, sale of company assets, financing, or transfer of all or a portion of our business to another company;
- With our current and future parents, affiliates, subsidiaries and other companies under common control and ownership;
- With our lawyers and other professional advisors where necessary to obtain advice or otherwise protect and manage our business interests;
- By publicly posting, at our discretion, your product review or other user content if you provide one; and
- With your consent or at your direction.

We allow our e-commerce partner, U.S. Direct E-Commerce Limited (trading as "ESW") (based in County Dublin, Ireland), to directly collect personal information from you for the purposes of facilitating ordering and shipping internationally. The information collected by ESW is treated in accordance with ESW's privacy notice and practices, not this Privacy Policy. For more information about ESW's privacy practices, see eShopWorld's privacy policy.

We may use your personal information to send you marketing communications. Except as described in this Privacy Policy, we will not share your Personal Information with third parties for their own direct marketing purposes.

We may also share aggregated or de-identified information which cannot reasonably be used to identify you. Before we share de-identified information with any third party, we require that each recipient of such information agree not to reidentify or allow reidentification of the de-identified data.

# Sweepstakes, Contests and Promotions

We may offer sweepstakes, contests and other promotions, including promotions jointly sponsored or offered by third parties. If you voluntarily choose to enter a sweepstake, contest or other promotion, we collect your information and may disclose it to co-sponsors and other business partners, such as for posting a winners list. By participating in a promotion, you agree to the official rules or terms and conditions that govern that promotion (“Promotion Terms”). Promotion Terms may include personal information handling practices that are different from what is described in this Privacy Policy. If the practices described in Promotion Terms differ from the practices in this Privacy Policy, the Promotion Terms govern but solely to the extent of the differences between the Privacy Policy and Promotion Terms. Please review the relevant Promotion Terms carefully before you participate in any promotion. You can find our Notice of Financial Incentives [here](#).

# Cookies, Advertising and Analytics

We engage third parties to serve advertisements on our behalf across the Internet and to provide analytics services. These third parties may use cookies, web beacons and other technologies to collect personal information about your use of our websites, such as your IP address, web browser, pages viewed, time spent on pages, links clicked, conversion information, and use of our App. This personal information may be used by us and others to analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our websites and other websites and better understand your online activity and similar data analytics among other things. To exercise your choices regarding this personal information, please see “Your Privacy Choices” [here](#).

We may use Google Analytics, Adobe Analytics, or other vendors for analytics services. These vendors use cookies and other tracking technologies to help us analyze how the Services are used. Information generated by these vendors, such as IP address and usage information, is transmitted to and stored by these vendors in the U.S. or elsewhere. These vendors use this information to compile reports for us on use of the Services and related analytics. Please see “Your Privacy Choices” [here](#) for more information on your choices regarding these third-party services.

We also may work with third parties (such as Facebook and Instagram) to serve ads to you as part of a customized campaign on their platforms. If you prefer not to see customized ads from us, you can usually opt out by changing your account settings or preferences on those platforms.

# Data Retention

Our retention periods for personal information are based on business needs and legal requirements. We retain personal information for as long as is necessary for the purposes described above. We also

retain personal information as long as necessary to comply with legal obligations, resolve disputes and enforce our agreements. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired. Please also see the retention periods set forth in the "U.S. Privacy Rights" Section [here](#).

## Protecting Personal Information

J.Crew uses technical, physical and administrative safeguards intended to protect you and your personal information. J.Crew takes reasonable security measures appropriate to the level of information we maintain. You are responsible for maintaining the security of your account credentials.

## Children's Privacy

The Services are intended for a general audience and not directed to children under age 13. We do not, in providing the Services, knowingly collect personal information from children. We do not knowingly Sell or Share the Personal Information of Consumers under age 16.

If you think we may have unknowingly collected Personal Information of a customer under age 16 or if you have reason to believe that a child under age 13 has provided personal information to us via our Services, please contact us immediately at [privacy@jcrew.com](mailto:privacy@jcrew.com) and we will endeavor to delete the child's personal information as required by applicable law.

## Your Privacy Choices

### **Your online J.Crew account**

You may update, correct or delete certain information stored within your online J.Crew and/or Madewell accounts at any time by logging into your account and navigating to the "My Account" page. To delete your online account(s), please write to [privacy@jcrew.com](mailto:privacy@jcrew.com). If you request account deletion, we may retain certain personal information (such as transaction information) as permitted or required by law. We may also retain cached or archived copies of personal information about you for a certain period of time. If you have other questions about your account, please ["Contact Us."](#)

### **Opting out of promotional communications**

You can opt out of receiving promotional communications from us at any time.

- To opt out of direct mail (such as catalogs and postcards), please contact us at [help@jcrew.com](mailto:help@jcrew.com).
- To opt out of promotional emails and text messages, please follow the instructions provided in those communications or contact us at [help@jcrew.com](mailto:help@jcrew.com).

Please note that even if you opt out of receiving promotional communications, we may continue to send you non-promotional emails related to your account or an ongoing transaction you made with us.

## **Apps**

You can stop all collection of data generated by your use of our App by uninstalling it. Also, you may be able to exercise specific privacy choices, such as enabling or disabling certain features by adjusting the permissions in your mobile device and/or the App's settings. To learn more about how you can control permissions using your mobile device's operating system settings, please review the mobile device's support pages.

## **Cookies**

Most web browsers are set to accept cookies by default. If you prefer, you can usually set your browser settings to remove or reject cookies. (Each browser offers different options and settings, so you may need to set them separately if you use different browsers or devices to access our Services.) Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our websites. For more information, please see our [cookie policy](#).

You may exercise choices regarding the use of cookies from Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout> or downloading the Google Analytics Opt-out Browser Add-on. You may exercise choices regarding the use of cookies from Adobe Analytics by visiting <http://www.adobe.com/privacy/opt-out.html>.

You can learn about the data Microsoft Advertising Services collects and how your data is used by it and to opt-out of certain Microsoft browser interest-based advertising by visiting: <https://privacy.microsoft.com/en-us/privacystatement>.

Some of the advertisers and vendors that perform advertising-related services for J.Crew and third parties participate in the Digital Advertising Alliance's ("DAA") Self-Regulatory Program for Online Behavioral Advertising. Others are members of the Network Advertising Initiative ("NAI"). For more information about targeted advertising or to opt out of having your web browsing information used for behavioral advertising purposes, please visit <http://optout.networkadvertising.org>, <http://www.aboutads.info/choices>, and <http://www.aboutads.info/appchoices>. European users may opt of receiving targeted advertising by visiting <http://www.youronlinechoices.eu/>.

Please note that opting out through the mechanisms above means that those businesses agree not to deliver certain interest-based advertising to you. You may continue to receive non-targeted digital advertisements.

In addition, we may serve digital advertisements on other online services that are targeted to reach people on those services that are also identified on one of more of our databases ("Matched List Ads"). This is done by using tracking technologies or by matching common factors between our databases and the databases of the other online services. For example, we may use targeted advertising services offered by Facebook, Pinterest and other third-party services. You control these advertisements through your account on those services, not our Services.



# International Data Transfers

J.Crew is headquartered in the United States. We process and store the personal information that we handle in the U.S. We may transfer personal information across borders to any of the places where we and our vendors and partners do business. These other places may have data protection laws that are different from (and, in some cases, less protective) than the laws where you reside.

If you are based outside the U.S., we transfer your personal information to, and process your personal information on, servers located in the U.S., a jurisdiction that may not provide equivalent levels of data protection as your home jurisdiction. These transfers and processing of your personal information are necessary to provide our Services.

## Residents of the EEA and U.K.

### **Data controller (J.Crew entity responsible for your personal information)**

- If you are a resident of the United Kingdom, J.Crew U.K. Limited and J.Crew Group LLC provide our Services to you.
- If you reside in the European Economic Area (“EEA”), J.Crew Group LLC provides our Services to you and is the data controller of your personal information when you use our Services.

### **J.Crew’s legal bases for processing**

The legal bases for our processing of your personal information depend on the context in which the personal information is collected and processed. Generally, we only process personal information:

- As necessary to perform our contract with you (e.g., processing payments for and providing the products you have ordered);
- When the processing is in our legitimate interests and not overridden by the privacy or other fundamental rights and freedoms of users, including our interest in securing the Services and improving our Services and products. If we process personal information in reliance on our legitimate interests (or those of any third party), this interest is to provide our Services and communicate with you about our Services and for responding to queries, improving the Services, advising users about new features or products, maintenance, undertaking marketing activities and similar commercial interests to make the Services available for you. We may have other legitimate interests and if appropriate we will make clear our legitimate interests at the relevant time;
- When we have your consent, which you may revoke at any time.; or
- When we have a legal obligation to collect personal information from you. If we ask you to provide personal information to comply with a legal requirement, we will make this clear at the relevant time and advise you of the possible consequences if you do not provide your personal information.

Please contact us at [privacy@jcrew.com](mailto:privacy@jcrew.com) if you have questions about or need further information concerning the legal bases on which we collect and use your personal information or to request a copy of the Standard Contractual Clauses that we use to facilitate the lawful transfer of data outside the EEA or U.K.

### **How to exercise your data subject rights**

To the extent provided under EEA / U.K. law, you have the following rights with respect to personal information concerning you:

- Right of access to your personal information
- Right to rectification (i.e., correction, update)
- Right to erasure
- Right to restrict processing
- Right to data portability (i.e., receive an electronic copy of your personal information for purposes of transmitting it to another organization)
- Right to withdraw consent at any time
- Right to express your point of view and to contest a decision made based solely on automated processing that produces legal or similarly significant effects

If you would like to exercise any of these rights, please visit <https://jcrew.clarip.com/dsr/create> for our J.Crew brands, <https://jcrew.clarip.com/dsr/create?brand=Madewell> for our Madewell brand, and/or contact us at [privacy@jcrew.com](mailto:privacy@jcrew.com). In your request, please make clear the personal information that is subject to your request. For your protection, we verify your identity before fulfilling your request. We will comply with your request as soon as reasonably practicable and within the time periods required by applicable law.

As noted above, if you have a J.Crew and/or Madewell account, you also may review, update and delete certain personal information or adjust your marketing preferences by logging in to your account(s).

Please note that we often need to retain certain personal information for recordkeeping purposes and/or to complete any transaction that you began prior to submitting your request (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the personal information provided until after the completion of the purchase or promotion). We also may not delete certain personal information for legal reasons.

### **Questions or complaints**

If you have a concern about our processing of your personal information that we are not able to resolve, you have the right to lodge a complaint with the Data Protection Authority where you reside.

#### **EU Residents**

You have a right to lodge a complaint about how we process your personal information with the appropriate EU data protection authority. Please click [here](#) for more information.

#### **Residents of U.K.**

United Kingdom's Data Protection Regulator  
Information Commissioner's Office (ICO)  
Wycliffe House, Water Lane, Wilmslow Cheshire SK9 5AF  
Telephone: 0303 123 1113  
Fax: 01625 524510  
<https://ico.org.uk/global/contact-us/>

# U.S. Privacy Rights

This U.S. State Privacy Rights Notice (“U.S. State Notice”) applies to Consumers under the State Privacy Laws (defined below).

This U.S. State Notice serves as our Notice at Collection for purposes of CCPA.

In this U.S. State Notice:

- **“Consumer”** means individuals acting in an individual or household context. For California residents, a Consumer also includes individuals in a business-to-business context or employment context. This U.S. State Notice does not, however, apply to our current and former job applicants, employees, and independent contractors.
- **“Process”** means any operation or set of operations performed on Personal Information.
- **“State Privacy Laws”** means the California Consumer Privacy Act, including as amended by the California Privacy Rights Act (together, the “CCPA”), the Colorado Privacy Act, the Virginia Consumer Data Protection Act, the Utah Consumer Privacy Act (beginning December 31, 2023), Connecticut’s Act Concerning Personal Data Privacy and Online Monitoring, Chapter 603A of the Nevada Revised Statutes, and all laws implementing, supplementing or amending them.

Other capitalized terms used but not defined in this U.S. State Notice have the meanings given to them under State Privacy Laws applicable to you.

This U.S. State Notice covers the twelve (12) months prior to the Last Updated Date above and is updated at least once per year. This U.S. State Notice is designed to meet our obligations under State Privacy Laws and supplements the general privacy policies of J.Crew and our Privacy Policy. In the event of a conflict between any other J.Crew policy, notice, or statement and this U.S. State Notice, this U.S. State Notice will prevail as to Consumers unless stated otherwise.

We may Collect your Personal Information (also known as Personal Data under the State Privacy Laws) directly from you (such as when you register for an account); your devices; our affiliates; service providers; public sources of data; credit reporting agencies; or other businesses or individuals.

We process your Personal Information to provide you services and as otherwise related to the operation of our business, including for one or more of the following Business Purposes: Performing Services; Managing Interactions and Transactions; Security; Debugging; Advertising & Marketing; Quality Assurance; Processing Interactions and Transactions; and Research and Development. We may also use Personal Information for other Business Purposes in a context that is not a Sale or Share under State Privacy Laws, such as disclosing it: (i) to our Service Providers, Contractors, or Processors that perform services for us (“Vendors”); (ii) to the Consumer or to other parties at the Consumer’s direction or through the Consumer’s action; (iii) for the additional purposes explained at the time of collection (such as in the applicable privacy policy or notice); (iv) as required or permitted by applicable law; (v) to the government or private parties to comply with law or legal process or protect or enforce legal rights or obligations or prevent harm; and (vi) to assignees as part of an acquisition, merger, asset sale, or other transaction where another party assumes control over all or part of our business (“Corporate Transaction”) (collectively, (i) – (vi) are “Additional Business Purposes”). Subject to restrictions and obligations under State Privacy Laws, our Vendors also may use your Personal Information for

Business Purposes and Additional Business Purposes and may engage their own vendors to enable them to perform services for us.

We may also use and disclose your Personal Information under this U.S. State Notice for Commercial Purposes, which may be considered a Sale or Share under applicable State Privacy Laws, such as when Third-party Digital Businesses (defined below) Collect your Personal Information via third-party cookies, and when we process Personal Information for certain advertising purposes. We provide more detail on our data collection practices in the two charts that follow.

**Personal Information Collection, Disclosure, and Retention – By Category of Personal Information**

We Collect, disclose, and retain Personal Information as follows:

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
1. Identifiers	Real name, alias, postal address, unique personal identifiers, online identifier, Internet Protocol address, email address, and account name.	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>• Vendors (e.g., data analytics providers, payment processors, and marketing services providers) (“Our Vendors”);</li> <li>• The issuer of the J.Crew Credit Card;</li> <li>• Our corporate group (“Corporate Group”);</li> <li>• Governmental entities; and/or</li> <li>• Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Third-party Digital Businesses
2. Personal Records	Name, signature, description, address, telephone number, and financial information (e.g., payment card information). Some Personal Information included in this category may overlap with other categories.	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>• Our Vendors;</li> <li>• The issuer of the J.Crew Credit Card;</li> <li>• Corporate Group;</li> <li>• Governmental entities; and/or</li> <li>• Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Not Sold/Shared
3. Personal Characteristics or Traits	In some circumstances, we may Collect Personal Information that is considered protected under U.S. law, such as age or gender.	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>• Our Vendors;</li> <li>• The issuer of the J.Crew Credit Card;</li> <li>• Corporate Group;</li> <li>• Governmental entities; and/or</li> <li>• Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Not Sold/Shared
4. Customer Account Details/Commercial Information	Records of products or services purchased, obtained, or considered, or other purchasing or	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>• Our Vendors;</li> <li>• Corporate Group;</li> <li>• Governmental entities; and/or</li> </ul>

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
	consuming histories or tendencies.	<ul style="list-style-type: none"> <li>• Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Third-party Digital Businesses
5. Internet Usage Information	When you browse our sites or otherwise interact with us online, we may Collect browsing history, search history, and other information regarding your interaction with our sites, applications, or advertisements.	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>• Our Vendors;</li> <li>• Corporate Group;</li> <li>• Governmental entities; and/or</li> <li>• Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Third-party Digital Businesses
6. Geolocation Data	If you interact with us online we may gain access to the approximate location of the device or equipment you are using.	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>• Our Vendors;</li> <li>• Corporate Group;</li> <li>• Governmental entities; and/or</li> <li>• Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Not Sold/Shared
7. Sensory Data	We may Collect audio, electronic, or similar information when you visit our store or contact us through our customer service line.	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>• Our Vendors;</li> <li>• Corporate Group;</li> <li>• Governmental entities; and/or</li> <li>• Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Not Sold/Shared
8. Inferences from Personal Information Collected	Inferences drawn from Personal Information to create a profile about a Consumer reflecting preferences, characteristics, and behavior.	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>• Our Vendors;</li> <li>• Corporate Group;</li> <li>• Governmental entities; and/or</li> <li>• Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Not Sold/Shared
9. Sensitive Personal Information	Government Issued Identification Numbers (e.g., social security, driver's license, state identification card, or passport number)	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>• Our Vendors;</li> <li>• The issuer of the J.Crew Credit Card;</li> <li>• Corporate Group; and/or</li> <li>• Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Not Sold/Shared
	Account Log-in (e.g., user and password to	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>• Our Vendors;</li> <li>• Corporate Group; and/or</li> </ul>

Category of Personal Information	Examples of Personal Information Collected and Retained	Categories of Recipients
	online account with J.Crew)	<ul style="list-style-type: none"> <li>Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Not Sold/Shared
	Precise Geolocation Information	Disclosures for Business Purposes: <ul style="list-style-type: none"> <li>Our Vendors;</li> <li>Corporate Group; and/or</li> <li>Other parties to comply with our legal obligations.</li> </ul> Sale/Share: Not Sold/Shared

We may Collect other information that meets the definition of Personal Information under State Privacy Laws but is not reflected by a category above. When this occurs, we will treat the information as Personal Information as required by the State Privacy Laws.

As permitted by applicable law, we do not treat "de-identified information" and "publicly available information" as Personal Information. We reserve the right to convert (or permit others to convert) your Personal Information to de-identified information. We will not attempt to reidentify data that we maintain as de-identified data and if we share it with third parties will use technical and administrative controls to ensure that it is not reidentified.

**Retention Period:** Our Personal Information retention periods vary for each of the categories of Personal Information described above. The length of time for which we retain each category of Personal Information depends on the purposes for our Collection and use and requirements pursuant to applicable laws. We do not retain your Personal Information for any longer than reasonably necessary to achieve the purposes for which it was Collected or processed, or as required by applicable law.

### Use and Disclosure of Personal Information – By Processing Purpose

We use and disclose Personal Information for the processing purposes described below:

Processing Purpose(s)	Examples(s) of Processing Purpose
1. Performing Services	<p><u>Provide our Services/communicate about our Services:</u> to provide you with information or Services, to send you electronic newsletters and push notifications (if you have elected to receive such), to communicate with you about your use of the services, to provide you with special offers or promotions.</p> <p><u>Enable additional features of our sites:</u> to enable you to participate in a variety of our site's features, including reviewing products.</p> <p><u>Process orders:</u> to process or fulfill an order or transaction.</p> <p><u>Contact You:</u> to contact you about your use of our Services and, in our discretion, changes to our Services or our service's policies.</p> <p><u>Account management:</u> to process your registration with our Services, verify your information is active and valid, manage your account, and to administer our customer loyalty program.</p>

Processing Purpose(s)	Examples(s) of Processing Purpose
	<p><u>Customer Service</u>: to respond to any questions, comments, or requests you have for us or for other customer service purposes.</p> <p><u>Payment and other purchase-related purposes</u>: to facilitate a purchase made using our Services, including payment.</p>
2. Managing Interactions and Transactions	<p><u>Auditing</u>: related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with user interaction or transaction specifications and standards (e.g., ecommerce activities).</p>
3. Security	<p><u>Security/fraud prevention</u>: to protect the security of J.Crew, our Services, or its users and to prevent and address fraud.</p>
4. Debugging	<p><u>Repairs</u>: identify and repair errors that impair existing intended functionality of our Services.</p>
5. Advertising & Marketing (excluding Cross-context Behavioral Advertising and Targeted Advertising)	<p><u>Content and offers customization</u>: to customize your experience on our Services, or to serve you specific content and offers that are relevant to/customized for you (e.g., pricing and discounts based on your profile, location, or shopping history)</p> <p><u>Advertising, marketing, and promotions</u>: to assist us in determining relevant advertising and the success of our advertising campaigns; to help us determine where to place our ads, including on other websites; for promotional activities such as running sweepstakes, contests, and other promotions (including third-party and co-promotions).</p>
6. Quality Assurance	<p><u>Quality and Safety of Service</u>: undertaking activities to verify or maintain the quality or safety of our Services, and to improve, upgrade, or enhance our Services.</p>
7. Processing Interactions and Transactions	<p><u>Short-term, transient use</u>: including, but not limited to, non-personalized advertising shown as part of a Consumer's current interaction with J.Crew and use of our Services' features and functionality (e.g., e-commerce transactions).</p>
8. Research and Development	<p><u>Research and analytics</u>: to better understand how users access and use our Services, both on an aggregated and individualized basis, to improve our Services and respond to user preferences, and for other research and analytical purposes.</p> <p><u>Market research and customer satisfaction surveys</u>: to administer surveys and questionnaires, such as for market research or customer satisfaction purposes.</p>
9. Additional Business Purposes	<p><u>Compliance with legal obligations</u>: to comply with legal obligations, as part of our general business operations, and for other business administration purposes and in response to legal obligations or process.</p> <p><u>Prevention of illegal activities, fraud, injury to others, or violation of our terms and policies</u>: to investigate, prevent or act if someone may be using information for illegal activities, fraud, or in ways that may threaten someone's safety or violate of our terms or this U.S. State Notice.</p> <p><u>Purposes disclosed at Personal Information Collection</u>: We may provide additional disclosures at the time of Personal Information Collection, such as on a checkout page.</p> <p><u>Related or compatible purposes</u>: for purposes that are related to and/or compatible with any of the foregoing purposes</p>

Processing Purpose(s)	Examples(s) of Processing Purpose
10. Commercial Purposes	Cross-context Behavioral Advertising and Targeted Advertising (as explained below), which may be treated as a Sale and/or Share under State Privacy Laws. For the specific types of Personal Information Sold or Shared for this purpose and the recipients thereof, see the first chart above.

## Your Consumer Rights and How to Exercise them:

Subject to certain limitations permitted by applicable laws and meeting the requirements for a Verifiable Consumer Request (defined below), J.Crew provides California, Colorado, Connecticut, Nevada, Utah (beginning December 31, 2023), and Virginia Consumers the privacy rights as legally required described in this section. For residents of states without Consumer privacy rights, we will offer you a limited right to delete, but will apply our discretion with respect to if and how we process such requests.

You or an authorized agent may make these requests by calling 1-866-467-8688 and entering service code 358#, emailing [privacy@jcrew.com](mailto:privacy@jcrew.com), or visiting <https://jcrew.clarip.com/dsr/create> for our J.Crew brands, <https://jcrew.clarip.com/dsr/create?brand=Madewell> for our Madewell brand, and responding to any follow-up inquiries we make. Once we receive your request, we will verify it by asking you to provide certain information, such as identifiers like your email address and phone number.

### Right to Limit Sensitive Personal Information Processing

We only process Sensitive Personal Information for purposes that are exempt from Consumer choice under the State Privacy Laws.

### Right to Know/Access

Residents of California, Virginia, and Colorado are entitled to access Personal Information up to twice in a 12-month period. Residents of Connecticut and Utah (beginning December 31, 2023) are entitled once every 12-month period to access Personal Information maintained by J.Crew, with subsequent requests subject to a service fee. We apply the same limitation on the number of Verifiable Consumer Requests in Connecticut and Utah to all states other than California, Virginia, and Colorado.

- (1) Categories (available for California Residents Only). California Residents have a right to submit a request for any of the following for the period that is 12-months prior to the request date:
  - The categories of Personal Information we have Collected about you.
  - The categories of sources from which we Collected your Personal Information.
  - The Business Purposes or Commercial Purposes for our Collecting, Selling, or Sharing your Personal Information.
  - The categories of Third Parties to whom we have disclosed your Personal Information.



- A list of the categories of Personal Information disclosed for a Business Purpose and, for each, the categories of recipients, or that no disclosure occurred.
- A list of the categories of Personal Information Sold or Shared about you and, for each, the categories of recipients, or that no Sale or Share occurred.

## (2) Specific Pieces

You may request to confirm if we are processing your Personal Information and, if we are, to obtain a transportable copy, subject to applicable request limits, of your Personal Information that we have Collected and are maintaining. For your specific pieces of Personal Information, as required by applicable State Privacy Laws, the request must be a Verifiable Consumer Request as described below. We have no obligation to re-identify information or to keep Personal Information longer than we need it or are required to by applicable law to comply with access requests.

## Do Not Sell / Share / Target

Under the various State Privacy Laws there are broad and differing concepts of “Selling” Personal Information for which an opt-out is required. California also has an opt-out from “Sharing” for Cross-context Behavioral Advertising (use of Personal Information from different businesses or services to target advertisements). Other states have an opt-out of “Targeted Advertising.” We may Sell or Share your Personal Information and/or use your Personal Information for Targeted Advertising, as these terms are defined and apply under State Privacy Laws. However, we provide Consumers an opt-out of Sale/Sharing/Targeting that is intended to combine all these state opt-outs into a single opt-out. We do not believe we currently sell information as it is defined under Nevada law, but we offer Nevada consumers the opportunity to opt-out of targeted advertising, as described above.

Third-party digital businesses (“Third-party Digital Businesses”) may associate cookies and other tracking technologies that Collect Personal Information about you on our Services, or otherwise Collect and process Personal Information that we make available about you, including digital activity information. We understand that giving access to Personal Information on our Services, or otherwise, to Third-party Digital Businesses could be deemed a Sale and/or Share under some State Privacy Laws and we will treat such Personal Information (e.g., cookie ID, IP address, and other online IDs and internet or other electronic activity information) collected by Third-party Digital Businesses, where not limited to acting as our Service Provider (or Contractor or Processor), as a Sale and/or Share and subject to a Do Not Sell/Share/Target opt-out request. We will not Sell your Personal Information, Share your Personal Information for Cross-context Behavioral Advertising, or process your Personal Information for Targeted Advertising if you make a Do Not Sell/Share/Target opt-out request.

**Opt-out for Personal Information:** If you want to limit our processing of your Personal Information for Targeted Advertising, or opt-out of the Sale/Sharing, you need to exercise your opt-out request on our consent management tool by visiting <https://jcrew.clarip.com/dsr/create> for our J.Crew brands and/or <https://jcrew.clarip.com/dsr/create?brand=Madewell> for our Madewell brand. Our consent management tool enables you to exercise such an opt-out request on your device. You must exercise your preferences on each of our websites and Apps you visit, from each browser you use, and on each device that you use. Since your browser opt-out is designated by a cookie, if you clear or block cookies, your preferences will no longer be effective, and you will need to enable them again via our cookie management tool. Please also refer to our [cookie policy](#) for other ways to exercise preferences regarding Third-party Digital Businesses. If you use ad-

blocking software, our cookie banner may not appear when you visit our website, and you may have to use the link above to access the tool.

**Opt-out preference signals / or GPC):** Some of the State Privacy Laws require businesses to process global privacy control (“GPC”) signals or, in California, opt-out preference signals (“OOPS”), which are signals sent by a platform, technology or mechanism, enabled by individuals on their devices or browsers, that communicate the individual’s choice to opt-out of the Sale and Sharing of Personal Information. To use an OOPS/GPC, you can download an internet browser or a plugin to use on your current internet browser and follow the settings to enable the OOPS/GPC (for example, <https://globalprivacycontrol.org/>). We have configured the settings of our consent management platform to receive and process GPC signals on our website.

We may disclose your Personal Information for the following purposes, which are not a Sale or Share: (i) if you direct us to disclose Personal Information; (ii) to comply with a Consumer rights request you submit to us; (iii) disclosures amongst the entities that constitute J.Crew as defined above, or as part of a Corporate Transaction; and (iv) as otherwise required or permitted by applicable law.

### **Right to Delete**

If we have a basis for retention under applicable law, you may request that we delete your Personal Information. Our retention rights include, without limitation:

- to complete transactions and services you have requested;
- for security purposes;
- for legitimate internal Business Purposes (e.g., maintaining business records);
- to comply with the law and to cooperate with law enforcement; and
- to exercise or defend legal claims.

Please also be aware that making a deletion request does not ensure complete or comprehensive removal or deletion of Personal Information or content you may have posted.

### **Correct Your Personal Information**

Consumers may bring inaccuracies they find in their Personal Information that we maintain to our attention and we will act on a request as required by applicable law. You can also make changes to your online account(s) as explained in your online J.Crew and/or Madewell account. That will not, however, change your information that exists in other places.

### **How to Exercise Your Consumer Rights**

You may make these requests, or to submit a request as an authorized agent, by calling 1-866-467-8688 and entering service code 358#, emailing [privacy@jcrew.com](mailto:privacy@jcrew.com), or by visiting <https://jcrew.clarip.com/dsr/create> for our J.Crew brands and/or <https://jcrew.clarip.com/dsr/create?brand=Madewell> for our Madewell brand,, and responding to any follow-up inquiries we make.

#### **(1) Your Request Must be a Verifiable Consumer Request**

As permitted or required by applicable State Privacy Laws, any request you submit to us must be a Verifiable Consumer Request, meaning when you make a request, we may ask you to provide verifying information,

such as your name, email, phone number and/or account information. We do not verify opt-outs of Sell/Share/Target or Limitation of Sensitive Personal Information requests unless we suspect fraud. To protect Consumers, if we are unable to verify you sufficiently we will be unable to honor your request.

## (2) Agent Requests

You may use an authorized agent to make a request for you, subject to our verification of the agent, the agent's authority to submit requests on your behalf, and of you. An agent may submit a request by visiting <https://jcrew.clarip.com/dsr/create> for our J.Crew brands and/or <https://jcrew.clarip.com/dsr/create?brand=Madewell> for our Madewell brand, or by calling 1-866-467-8688 and entering service code 358#. Once your agent's authority is confirmed, they may exercise rights on your behalf subject to the agency requirements of applicable State Privacy Laws.

## (3) Appeals

Residents of California, Colorado, Connecticut, and Virginia may appeal J.Crew's decision regarding a request by submitting a new Consumer Rights Request and identifying your previous request number.

## Our Responses

Some Personal Information that we maintain is insufficiently specific for us to be able to associate it with a verified Consumer (e.g., clickstream data tied only to a pseudonymous browser ID). We do not include that Personal Information in response to those requests. If we deny a request, in whole or in part, we will explain the reasons in our response.

We will make commercially reasonable efforts to identify Personal Information that we process to respond to your request(s). We will typically not charge a fee to fully respond to your requests; provided, however, that we may charge a reasonable fee, or refuse to act upon a request, if your request is excessive, repetitive, unfounded, or overly burdensome. If we determine that the request warrants a fee, or that we may refuse it, we will give you notice explaining why we made that decision.

Consistent with applicable State Privacy Laws and our interest in the security of your Personal Information, we will not deliver to you your more Sensitive Personal Information in response to a Consumer privacy rights request; however, you may be able to access some of this information yourself through your account if you have an active account with us.

## Non-discrimination / Non-retaliation

We will not discriminate or retaliate against you in a manner prohibited by applicable State Privacy Laws for your exercise of your privacy rights. We may charge a different price or rate or offer a different level or quality of goods or service, if and when doing so is reasonably related to the value of the Personal Information.

# Notice of Financial Incentives

We offer various financial incentives, such as discounts, coupons, and other benefits for customers who sign up to receive our marketing emails or join our loyalty program. When you participate in a financial

incentive, we collect Personal Information from you, such as identifiers (like your name and email address) and commercial information (like your purchase history). You can opt in to a financial incentive by following the sign-up or participation instructions provided, and you have the ability to opt-out of the financial incentive, or our subsequent use of your Personal Information in connection with a financial incentive, at any time by contacting us at [help@jcrew.com](mailto:help@jcrew.com). In some cases, we may provide additional terms and conditions for a financial incentive, which we will present to you when you sign up. We value your Personal Information as the value of the offer or discount provided to you, and the value of your Personal Information is reasonably related to the value of the offer or discount presented to you.

### **Our Rights and the Rights of Others**

Notwithstanding anything to the contrary, we may process your Personal Information as required or permitted by applicable law and this processing may override your rights under State Privacy Laws. We are not required to honor your privacy requests if doing so infringes on our or another party's rights or conflicts with applicable law.

### **Additional Notice for California Residents**

In addition to the CCPA, certain Californians are entitled to certain other notices. This section provides information on our online practices and your California rights specific to our online Services. Californians that visit our online Services and seek to acquire goods, services, money or credit for personal, family or household purposes are entitled to the following notices of their rights:

#### **California Minors**

Any California resident under age eighteen (18) who has registered to use our Services and posted content on the Services can request removal by contacting us at [privacy@jcrew.com](mailto:privacy@jcrew.com) with information about where the content is posted and attesting to posting it. We will then make reasonably good faith efforts to remove the post from prospective public view or anonymize it, so the minor cannot be individually identified to the extent required by applicable law. This removal process cannot ensure complete or comprehensive removal; third parties may have republished or archived content by search engines we do not control.

#### **Shine the Light**

We do not share personal information as defined by California Civil Code Section 1798.83 ("Shine the Light law") with third parties for their direct marketing purposes absent your consent.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us at [privacy@jcrew.com](mailto:privacy@jcrew.com).