



PRIVACY POLICY

Last Updated: 02/07/2018

We want you to be familiar with how we collect, use and disclose Personal Information (as defined below). This Privacy Policy describes our practices in connection with Personal Information that we collect through websites from which you are accessing this Privacy Policy (the “**Websites**”), through the software applications made available by us for use on or through computers and mobile devices (the “**Apps**”), through our social media pages and apps, through HTML-formatted email messages that we send to you that link to this Privacy Policy, as well as through your offline interactions with us where notice is legally required (collectively, including the Websites, Apps, Social Media Pages and offline interactions, the “**Services**”).

PERSONAL INFORMATION

“**Personal Information**” is information that identifies you as an individual or relates to an identifiable individual, such as:

- Name
- Gender
- Birthday
- Postal address (including billing and shipping addresses)
- Telephone number
- Email address
- IP address
- Credit and debit card number
- Profile picture
- Social media account ID
- Travel information, including trip flight information

Collection of Personal Information

We and our service providers collect Personal Information in a variety of ways, including:

- **Through the Services.**
 - We collect Personal Information through the Services, for example, when you sign up for a newsletter or make a purchase.
- **Offline interactions.**
 - As part of our Services, we collect Personal Information from you via offline interactions, for example, when you visit our stores, attend one of our trade shows, place an order over the phone or contact customer service.
- **From Other Sources.**
 - We receive your Personal Information from other sources, for example, our affiliates, public databases, joint marketing partners, social media platforms (including from people with whom you are friends or otherwise connected) and from other third parties. In addition, if you elect to connect your social media account to your Website account, certain Personal Information from your social media account will be shared with us, which may include Personal Information that is part of your profile or your friends' profiles.

We need to collect Personal Information in order to provide the requested Services to you. If you do not provide the information requested, we may not be able to provide the Services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

SENSITIVE INFORMATION

We don't collect and ask that you not send us, and you not disclose, any sensitive Personal Information (for example, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometrics or genetic characteristics, criminal background, data concerning health or data concerning a person's sex life or sexual orientation, or social security numbers, health) on or through the Services or otherwise to us.

Use of Personal Information

We and our service providers use Personal Information for legitimate business purposes including:

- **Providing the functionality of the Services and fulfilling your requests.**
 - To provide the Services' functionality to you, such as arranging access to your registered account, and providing you with related customer service.
 - To respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise, for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for or other information about our Services.
 - To complete your transactions, and provide you with related customer service.
 - To send administrative information to you, such as changes to our terms, conditions and policies.
 - To allow you to send messages to another person if you choose to do so.

We will engage in these activities to manage our contractual relationship with you and/or to comply with a legal obligation.
- **Providing you with our newsletter and/or other marketing materials and facilitating social sharing.**
 - To send you marketing related emails, with information about our services, new products and other news about our company.
 - To facilitate social sharing functionality that you choose to use.

We will engage in this activity with your consent or where we have a legitimate interest.
- **Analysis of Personal Information for business reporting and providing personalized services.**
 - To analyze or predict our users' preferences in order to prepare aggregated trend reports on how our digital content is used, so we can improve our Services.
 - To better understand you, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests.
 - To better understand your preferences so that we can deliver content via our Services that we believe will be relevant and interesting to you.

We will provide personalized services either with your consent or because we have a legitimate interest.
- **Allowing you to participate in sweepstakes, contests or other promotions.**
 - To allow you to participate in sweepstakes, contests and similar promotions and to administer these activities. Some of these activities have additional rules containing additional information about how we use and disclose your Personal Information.

We use this information to manage our contractual relationship with you.

- **Aggregating and/or anonymizing Personal Information.**
 - We aggregate Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we use and disclose for any purpose.
- **Accomplishing our business purposes.**
 - For data analysis, for example, to improve the efficiency of our Services.
 - For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements.
 - For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.
 - For developing new products and services.
 - For enhancing, improving, or modifying our current products and services.
 - For identifying usage trends, for example, understanding which parts of our Services are of most interest to users.
 - For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users.
 - For operating and expanding our business activities, for example, understanding which parts of our Services are of most interest to our users so we can focus our energies on meeting our users' interests.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

Disclosure of Personal Information

We disclose Personal Information:

- **To our affiliates for the purposes described in this Privacy Policy.**
 - You can consult the list and location of our affiliates at www.aboutbags.com. Affiliates as used in this document means the entities controlled by, under common control with or controlling us.
- **To our third party service providers, to facilitate services they provide to us.**
 - These can include providers of services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services.
- **To third parties, to permit them to send you marketing communications, consistent with your choices.**
- **To third-party sponsors of sweepstakes, contests, and similar promotions.**
- **By using the Services, you may elect to disclose Personal Information.**
 - On message boards, chat, profile pages, blogs and other services to which you are able to post information and content (including, without limitation, our Social Media Pages). Please note that any information you post or disclose through these services will become public and may be available to other users and the general public.
 - Through your social sharing activity. When you connect your Services account with your social media account, you will share information with your friends associated with your social media account, with other users, and with your social media account provider. By doing so, you authorize us to facilitate this sharing of information, and you understand that the use of shared information will be governed by the social media provider's privacy policy.

Other Uses and Disclosures

We also use and disclose your Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so

- **To comply with applicable law.**
 - This can include laws outside your country of residence.
- **To respond to requests from public and government authorities.**
 - These can include authorities outside your country of residence.
- **To cooperate with law enforcement.**
 - For example, when we respond to law enforcement requests and orders.
- **For other legal reasons.**
 - To enforce our terms and conditions; and
 - To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- **In connection with a sale or business transaction.**
 - We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

OTHER INFORMATION

“**Other Information**” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual, such as:

- Browser and device information
- App usage data
- Information collected through cookies, pixel tags and other technologies provided by you that does not reveal your specific identity
- Demographic information and other information provided by you that does not reveal your specific identity
- Information that has been aggregated in a manner such that it no longer reveals your specific identity

If we are required to treat Other Information as Personal Information under applicable law (e.g. under GDPR), then we use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Policy.

Collection of Other Information

We and our service providers collect Other Information in a variety of ways, including:

- **Through your browser or device.**
 - Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services (such as the App) you are using. We use this information to ensure that the Services function properly.
 - When you download and use the App, we and our service providers track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.
- **Using cookies.**
 - Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other anonymous traffic data. We and our service providers use the

information for security purposes, to facilitate navigation, to display information more effectively, and to personalize your experience. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services. We also use cookies or other technologies in online advertising to track responses to our ads. We do not respond to browser do-not-track signals at this time.

- If you do not want information collected through the use of cookies, most browsers allow you to automatically decline cookies or be given the choice of declining or accepting a particular cookie (or cookies) from a particular website. You may also wish to refer to our [cookie policy](#) and to <http://www.allaboutcookies.org/manage-cookies/index.html>. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

Comment [CG1]: Should be clickable hyperlink to the applicable local cookie policy

- **Using pixel tags and other similar technologies.**

- Pixel tags (also known as web beacons and clear GIFs) may be used to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Services and response rates.

- **Analytics.**

- We use Google Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Google’s practices by going to www.google.com/policies/privacy/partners/, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

- **Using Adobe Flash technology (including Flash Local Shared Objects (“Flash LSOs”)) and other similar technologies.**

- We use Flash LSOs and other technologies to, among other things, collect and store information about your use of the Services. If you do not want Flash LSOs stored on your computer, you can adjust the settings of your Flash player to block Flash LSO storage using the tools contained in the [Website Storage Settings Panel](#). You can also go to the [Global Storage Settings Panel](#) and follow the instructions (which may explain, for example, how to delete existing Flash LSOs (referred to as “information” on the Macromedia site), how to prevent Flash LSOs from being placed on your computer without your being asked, and (for Flash Player 8 and later) how to block Flash LSOs that are not being delivered by the operator of the page you are on at the time). Please note that setting the Flash Player to restrict or limit acceptance of Flash LSOs may reduce or impede the functionality of some Flash applications.

- **Physical Location.**

- We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device’s physical location to provide you with personalized location-based services and content. We also sometimes share your device’s physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device’s location, but if you do, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content.

Uses and Disclosures of Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

THIRD PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media Pages.

THIRD PARTY ADVERTISING

We use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites or online services.

You may receive advertisements based on information relating to your access to and use of the Services and other websites or online services on any of your devices, as well as on information received from third parties. These companies place or recognize a unique cookie on your browser (including through the use of pixel tags). They also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. If you would like more information about this practice, and to learn how to opt out of it in desktop and mobile browsers on the particular device on which you are accessing this Privacy Policy, please visit <http://optout.aboutads.info/#/> and <http://optout.networkadvertising.org/#/>. You may download the AppChoices app at <http://www.aboutads.info/appchoices> to opt out in mobile apps.

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “*Contacting Us*” section below.

CHOICES AND ACCESS

Your choices regarding our use and disclosure of your Personal Information

We give you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt-out from:

- **Receiving electronic communications from us:** If you no longer want to receive marketing-related emails from us on a going-forward basis, you may opt-out by following the unsubscribe link in any marketing communication and by contacting us via www.aboutbags.com.
- **Our sharing of your Personal Information with affiliates for their direct marketing purposes:** If you would prefer that we not share your Personal Information on a going-forward basis with our affiliates for their direct marketing purposes, you may opt-out of this sharing by contacting us via www.aboutbags.com.
- **Our sharing of your Personal Information with unaffiliated third parties for their direct marketing purposes:** If you would prefer that we not share your Personal Information on a going-

forward basis with unaffiliated third parties for their direct marketing purposes, you may opt-out of this sharing by contacting us via www.aboutbags.com.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages, from which you cannot opt-out.

How you can access, change or delete your Personal Information

If you would like to request to review, correct, update, suppress, restrict or delete Personal Information that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us via www.aboutbags.com or by writing us at the address mentioned in the 'Contacting Us' section. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (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 such purchase or promotion). There may also be residual information that will remain within our databases and other records, which will not be removed.

RETENTION PERIOD

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

USE OF SERVICES BY MINORS

The Services are not directed to individuals under the age of sixteen (16), and we do not knowingly collect Personal Information from individuals under 16, except in those countries where the minimum age is lower.

JURISDICTION AND CROSS-BORDER TRANSFER

Your Personal Information can be stored and processed in any country where we have facilities or in which we engage service providers, and by using the Services you understand that your information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information.

If you are located in the European Economic Area (comprised of the EU Member States, Iceland, Liechtenstein, and Norway, together "EEA"): Some of the non-EEA countries are recognized by the European Commission as

providing an adequate level of data protection according to EEA standards (the full list of these countries is available at: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your Personal Information.

THIRD PARTY PAYMENT SERVICE

We will use a third-party payment service to process payments made through the Services. If you wish to make a payment through the Services, your Personal Information will be collected by such third party and not by us, and will be subject to the third party's privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, this third party's collection, use and disclosure of your Personal Information.

UPDATES TO THIS PRIVACY POLICY

The "*Last Updated*" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services. Your use of the Services following these changes means that you accept the revised Privacy Policy.

CONTACTING US

Samsonite Limited, 1 The Square, Stockley Park, Uxbridge, Middlesex, UB11 1TD, United Kingdom, is the company responsible for collection, use and disclosure of your Personal Information under this Privacy Policy.

Because email communications are not always secure, please do not include credit card or other sensitive information in your communication with us.

ADDITIONAL INFORMATION FOR INDIVIDUALS IN THE EEA

If you are located in the EEA, you also may:

- Contact us via www.aboutbags.com.
- Lodge a complaint with a data protection authority for your country or region, or where an alleged infringement of applicable data protection law occurs. http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm