

PRIVACY POLICY

May 2017

1. Introduction

Tory Burch LLC (together with its affiliates, “Tory Burch”) values its customers and respects its customers’ privacy. This Privacy Policy (the “Privacy Policy”) applies to personal information that we collect about you in the United States, including but not limited to data collected through our websites and mobile applications (collectively, the “Website”) and in our stores. The information we collect is used to improve your shopping experience and to communicate with you about our products, services and promotions. Neither your name nor any of your personal information is sold to any non-affiliated company or agency. However, as described in greater detail below, we may share your information under certain circumstances with business partners that help the Website function or assist us in fulfilling or servicing your order, as well as otherwise detailed below. Personal information that we collect about you outside of the United States is governed by separate privacy policies.

This Privacy Policy describes the personal information we collect about you, why we collect it, how we use it, and when we share it with third parties. Our Privacy Policy also describes the choices you can make about how we collect and use certain information. If our information practices change, we will post an updated Privacy Policy on our Website. You can tell if the Privacy Policy has changed by checking the revision date that appears on this Privacy Policy. We will not apply changes in our Privacy Policy retroactively to information collected from you under a prior policy if, in the reasonable exercise of our discretion, we determine that the changes substantively affect your rights, unless we have given you notice of the changes of the Privacy Policy and an opportunity to opt out.

2. Information We Collect & How We Use It

From time to time, we may ask you to provide certainly personally identifying information in order to allow us to better provide to you the services we offer. By providing your personal information as set forth herein, you are authorizing Tory Burch to store and use such information accordingly:

Shopping: We may ask for information such as your name, billing and shipping address, telephone number, email address and payment card information in order to process your purchase, confirm your order, and ship merchandise to you. Tory Burch does not store your payment card information unless you choose to include it in your “My Account” (see below).

My Account: You have the opportunity to create a personal shopping account with Tory Burch, which allows you to shop faster and easier. By creating a user name and a password of your choice, you may access your account online at any time to add, delete, or change information. In creating this account, you authorize Tory Burch to store your user name, password, and email address. Should you elect to do so, you may also include in your account your telephone number, payment card information, and shipping and billing addresses. If you choose to include such additional information then you are also authorizing Tory Burch to store such information accordingly. Each

of these options is for your convenience only. Through the “My Account” feature, you may also create a Wish List of products that you want, and you can make this Wish List public. You are responsible for maintaining the confidentiality of your access information and for controlling access to your account. You agree to accept responsibility for all activities that occur under your account. Tory Burch may terminate your account at any time, for any reason or no reason, and without prior notice to you. If you ever use a public computer to visit your account, we strongly encourage you to log out at the conclusion of your session.

Email/Marketing List: You may sign up on the Website to receive promotional emails from Tory Burch. In doing so, we may ask for information such as your name, email address, mailing address, telephone number, gender, age, birthday and preferences. If you elect to be added to the Tory Burch marketing list, we may use your contact information to communicate with you about topics such as our products, services, surveys and promotions. **Removal from Email/Marketing List:** To be removed from our marketing list, please email us at inquiries@toryburch.com, or simply click the unsubscribe button found at the bottom of any of the marketing emails that we send you. Please allow us at least ten (10) business days from when the request was received to complete the removal, as some of our promotions may already have been in process before you submitted your request.

Customer Care: If you call, email or chat with our Customer Care center, we may ask for information such as your name, email address, mailing address, telephone number, and – if you choose to make a purchase – your payment card information. We use this information to assist you and to process and/or review your transaction. When you place an order through Customer Care, you will be asked to provide your payment card information. Tory Burch does not store your payment card information unless you choose to include it in your “My Account” (see above).

Surveys, Sweepstakes & Promotions: On this Website, you may be able to participate in surveys, sweepstakes and promotions. If you choose to participate in these promotions, we may request information such as your name, age, email address, mailing address, telephone number, and interests or product preferences. We may use this information to communicate with you about our products, services and promotions, but only if you have given us your consent to do so. We may invite you to participate in promotions that are co-marketed with an unaffiliated business partner. If you participate in this type of promotion, we may also share the information you provide with our business partner, who may use it if you have indicated your interest in receiving communications directly from that company. If you elect to receive communications from our business partner, your information will be used by that company in accordance with its policies, and this Privacy Policy will not apply to that company’s use of your information. Sometimes the rules, terms and conditions or disclaimers that apply to a particular promotion include information on how we may use the information that you provide to us through your participation in the promotion. If there is a conflict between the rules, terms and conditions that apply to a particular promotion and this Privacy Policy, those applying to the particular promotion will govern. Please review all of the information about a promotion before you provide us (or our business partners) with any personally identifiable information.

Email to a Friend: You may be able to share certain content from this Website with your friends. In order to do so, we may ask for information such as your name, email address, zip code and

telephone number, as well as your friend's contact details, in order for Tory Burch to fulfill your request, on your behalf and under your sole responsibility with respect to their consent to receive a message from you via this service.

Public Forum: On this Website, you may be able to participate in an online customer forum or other public forum where you can post comments or other content. In order to participate in such a forum, we may ask for information such as your name, email address, and social media user names, and we will request that you create a username. We will use the username to identify you publicly on the Website. We may also use the information you provide to us in order to communicate with you about our products, services and promotions, but only if you have given us your consent to do so. You should be aware that if you voluntarily disclose information, personal or otherwise, online in any community area (whether through the Website or any other service available online), that information can be collected and used by others. Accordingly, you should use caution when sharing any personally identifiable information with others in any community area (whether through the Website or any other service available online). If you have a concern about any content posted on the Website, please contact us at inquiries@toryburch.com.

3. Information We Collect By Automated Means

Cookies: Cookies are files that contain information about your general Internet usage, and are stored on the hard drive of your device. From these cookies, we may collect information about your browser, including, where available, your IP address, operating system and browser type, for system administration. Cookies help us to improve our Website and to deliver a better and more customized service. They enable us to:

- estimate usage numbers and patterns;
- store information about your preferences;
- customize our Website according to your individual interests;
- speed up your searches; and
- recognize you when you return to our Website.

You may refuse to accept cookies by activating the setting on your browser that allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the Website or unable to avail yourself of some of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system may issue cookies when you log on to our Website. Additionally, if a browser is set to issue a "do not track" signal, we do not place tracking cookies on that browser.

Pixel Tags: We also use "pixel tags" (sometimes called "Internet tags", "web beacons" or "clear GIFS"), which are tiny graphic images, on our Website. Pixel tags help us analyze our customers' online behavior and measure the effectiveness of our Website and our advertising. We work with service providers that help us track, collect, and analyze this information. Pixel tags on our Website may be used to collect information about your visit, including the pages you view, the features you use, the links you click, and other actions you take in connection with the Website. This information may include your device's IP address, your browser type, your operating

system, date and time information, and other technical information about your device. We may also track certain information about the identity of the website you visited immediately before coming to our site. We do not otherwise track any information about your use of other websites.

Mobile Location Analytics Data: We may use tracking technology to collect certain information about your Wi-Fi enabled mobile device, including the presence of the device in our stores, its signal strength, its manufacturer, and a unique identifier known as its Media Access Control (“MAC”) address (collectively, “Customer Mobile Device Data”). This Customer Mobile Device Data may be collected for the purpose of determining the amount, location and frequency of customer traffic into our stores. A mobile device’s MAC address identifies a specific device to the surrounding Wi-Fi networks. The MAC address does not disclose the identity or any other personal data of the mobile device user. You may opt-out of having your MAC address recorded by visiting the following link and entering your mobile device’s MAC address: <https://optout.smart-places.org/>. To learn more about the use of Customer Mobile Device Data and your choices, please visit: www.smartstoreprivacy.com

Other Tracking Technology: Pixel tags and cookies in our emails may be used to track your interactions with those messages, such as when you receive, open, or click a link in an email message from us. We also work with business partners that use tracking technologies to deliver advertisements on our behalf across the Internet. These companies may collect information about your visits to our Website, and your interaction with our advertising and other communications. We may combine the information we collect through cookies and pixel tags with other information we have collected from you. This information may be used to improve our Website, to personalize your online experience, to help us deliver information to you, to determine the effectiveness of our advertising, and for other internal business purposes.

4. Use of Your Personal Information

We use the information we collect from our customers for various purposes, including to:

- Process transactions upon their request;
- Improve our stores, Website, customers shopping experience and quality of service.
- Determine the amount, location and frequency of customer traffic into our stores;
- Send communications to you about our products, services, surveys and promotions, as well as information about the Tory Burch Foundation;
- Prevent and detect fraud and abuse;
- Process information or claims in connection with incidents at our stores;
- Enable our service providers to perform certain activities on our behalf;
- Comply with our legal obligations, policies and procedures and for internal administrative and analytics purposes; and
- Combine information obtained in store and online for the purposes identified above.

5. Others with Whom We May Share Your Information

We may disclose information to outside companies that help us bring you the products and services we offer. For example, we may work with an outside company to: (a) manage a database of customer information; (b) assist us in distributing emails; (c) assist us with direct marketing and data collection; (d) provide us data storage and analysis; (e) provide fraud prevention; (f) provide customer service by phone; and (g) provide other services designed to assist us in maximizing our business potential. We require that these outside companies agree to keep confidential all information we share with them and to use the information only to perform their obligations in the agreements and in a manner consistent with this Privacy Policy. We also may share your information with the Tory Burch Foundation so that you can receive information regarding this organization, which Tory Burch supports.

6. Miscellaneous

Compliance with Law: We may provide access to information when legally required to do so, to cooperate with legal proceedings, to protect against misuse or unauthorized use of our Website, to limit our legal liability and protect our rights or to protect the rights, property or safety of visitors of this Website or the public.

Links to other sites: While visiting our Website, you may link to sites operated by our business partners or other third parties. This does not mean that we endorse these sites. We do not make any representations or warranties about any website you may access through the Tory Burch Website. They are independent from us, and we have no control over, or responsibility for, their information or activities. In addition, our privacy practices may differ from those of these other sites. If you provide personal information at one of those sites, you are subject to the privacy policy of the operator of that site, not the Tory Burch Privacy Policy. Please make sure you understand the other site's privacy policy before providing personal information.

Security: Tory Burch uses commercially reasonable measures to keep your financial and personal information private and safe. We take appropriate physical, electronic and administrative steps to maintain the security and accuracy of personally identifiable information we collect, including limiting the number of people who have physical access to our database servers, as well as employing electronic security systems and password protections that guard against unauthorized access. In addition, it is our policy to never send your payment card number via email. Our customer service center and stores also operate over a private, secure network. Please note, however, that email is not encrypted and is not considered to be a secure means of transmitting payment card information.

We use what we consider to be industry standard security technology in transferring information to process your orders. All payment card transactions should take place in a protected area of our Website, which is designed to reduce the risk of any loss, misuse or alteration of the information collected. When you have finished shopping and begin the checkout process, you should move into the protected area of our Website. Once you've entered, the page address (URL) should change from http to https. Also, a key or a closed lock should appear in the lower right hand corner of your screen to notify you of this change. You should remain in this secure zone for the entire checkout

process. Please check that you are still in this protected area when you type in your payment card details.

Despite our best efforts, the transmission of data over the Internet cannot be guaranteed to be 100% secure. While we will use commercially reasonable means to ensure the security of information you transmit to us, we cannot guarantee that such information will not be intercepted by third parties. We may, however, prosecute any unauthorized or fraudulent transactions to the fullest extent permitted by law.

Spoofing and Phishing: Spoofing and phishing are common Internet scams. These may occur when you receive an email from what appears to be a legitimate source requesting personal information from you. Please be aware that Tory Burch will never send you an email requesting you to verify payment card or bank information. If you ever receive an email that appears to be from us requesting such information from you, do not respond to it, and do not click on any links appearing in the email. Instead, please forward the email to us at inquiries@toryburch.com, as we will endeavor to investigate all instances of possible Internet fraud.

Children's Privacy: Our Website is not meant for children. We do not intentionally collect any personal information from children under the age of thirteen, and will dispose of any such information if we become aware that it has been provided to us. Our online contests or sweepstakes or commenting features are restricted to entrants who are at least 18 years old or the age of majority in the jurisdiction where they are located, whichever is greater.

California Privacy Rights: Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice describing what categories of personal information we share with third parties or corporate affiliates for those third parties' or corporate affiliates' direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with which it was shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit a written request to the following address: Tory Burch LLC, 11 West 19th Street, 7th Floor, New York, NY 10011, Attn: Customer Care or by email to inquiries@toryburch.com. Please allow 30 days for a response.

Your Consent: You acknowledge and agree that: (1) this Privacy Policy is part of Tory Burch's Terms of Use (see below); (2) using our Website signifies your assent to this Privacy Policy; (3) this Privacy Policy is subject to all applicable laws; and (4) your use of the Website is undertaken at your own risk. Tory Burch reserves the right to change this Privacy Policy at any time, without advance notice. As described above, if we decide to change our Privacy Policy, we will post those changes on this page so that you are aware of what information we collect, how we use it and under what circumstances we disclose it. In the event of a corporate reorganization or asset transfer, your personal information may also be transferred. However, use of your personal information will remain subject to this Privacy Policy. By giving us your personal information you consent to those transfers occurring.

For European Citizens: Tory Burch complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce

regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. To learn more about the Safe Harbor program, and to view Tory Burch's certification, please visit <http://www.export.gov/safeharbor/>.

Your data may be stored and processed in and transferred to the United States and other non-European countries. Data may also be processed by people around the world who work for us or for one of our suppliers or vendors. These people may be engaged in, among other things, the fulfillment of your information requests, meeting your orders and the provision of support services. By consenting to this Privacy Policy, you confirm to be aware of and to accept the fact that these countries are deemed by the EU and other European authorities to not have data privacy laws that provide equivalent protection as the EU. However, Tory Burch takes what it considers to be appropriate technical and organizational measures to guard against unauthorized or unlawful processing of your data and against accidental loss or destruction of, or damage to, your data. Tory Burch has security measures in place designed to protect its customer database.

How To Contact Us: If you have any questions about your privacy or security on our Website, please contact us at inquiries@toryburch.com.