

## ROMWE PRIVACY POLICY

Effective Date: 16 December, 2021

### Introduction and Overview-

This Privacy Policy ("Policy") explains how your personal information is collected, used, shared and processed when accessing this website or using other services provided by its operator, including any written or electronic communications and purchases performed (collectively, the "Services") as well as the rights and choices you have associated with that information.

The Services include any services provided via this website, located at ROMWE.com (the "Site"), our mobile applications (the "Apps"), our accounts and fan pages on social media platforms (the "Social Media Accounts"), and any other websites, pages, features, or content owned and operated by the Company that hyperlink to this Policy.

The company responsible for selling the products via the Site and Apps and providing the Services (and therefore, the payment collection entity) is Fashion Choice Pte. Ltd, 22 Sin Ming Lane, #06-76, Midview City, Singapore 573969, acting as a licensee of Roadget Business Pte. Ltd., 7 Temasek Boulevard, #12 07 Suntec Tower One, Singapore (038987). Therefore, the terms "Company," "we," "us," and "our" refer to different entities.

Please read our [Terms and Conditions](#) and this Policy before accessing or using our Services. If you cannot agree with this Policy or the Terms and Conditions, please do not access or use our Services. By using our Services, you accept the Terms and Conditions and Privacy Policy on the site you are using.

**Right to modify this Policy:** We may change this Policy from time to time, to reflect how we are processing your data, and if we make changes, we will notify you by revising the effective date or last modified date at the top of this Policy. If we make significant changes that materially affect your privacy rights, we will provide advanced notice and make that clear on the ROMWE website or other ROMWE services, or by some other means of contact such as email, so that you are able to review the changes before you continue to use the Services. If you do not agree with the modified Policy, please discontinue use of the Services immediately.

**Instant information:** In addition, we may provide you with real time disclosures or additional information about the personal information handling practices of specific parts of our Services. Such notices may supplement this Policy or provide you with additional choices about how we process your personal information.

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## 1. How We Collect and Use Your Personal Information

We respect the privacy of the visitors to our digital properties and the users of our products and Services, and we are committed to protecting it through our compliance with this Policy. We collect personal information when you use our Services.

Personal information is any information that identifies or makes an individual identifiable. The definition of personal information (used interchangeably in this Privacy Policy with the term “personal data”) depends on where you are a resident. Only the definition that applies to your country of residence will apply to you under this Privacy Policy.

Personal Information does not include data that has been effectively irreversibly anonymized or aggregated so that it can no longer enable us or others, whether in combination with other information or otherwise, to identify you.

Your personal data is collected and used by us to support a range of different activities or business purposes. The purposes and types of information we collect are listed in the chart below, and should be understood to include uses of your personal data that are compatible with the purposes listed or uses that may be reasonably expected given the original purpose of collection.

Purpose	The Personal Data We Collect
To create an account with us and to manage your account, to provide you our Services;	<ul style="list-style-type: none"> <li>· Contact information, including email address and password, to register with our website or app;</li> <li>· Profile data, including your style preference, if you voluntarily choose to provide it for personalization purposes.</li> </ul>
To fulfill or process orders;	<ul style="list-style-type: none"> <li>· Identity and contact information such as name, phone number and shipping address, as well as financial information or payment account information, for delivery, returns, refund, sales tax determinations, and payment operations;</li> <li>· Transaction details, such as return and refund details, gift card number, and order history, in our Services, in order to fulfill basic functions, including processing your payment and return requests,</li> </ul>

	<p>and keeping you informed of the order status and shipping logistics;</p> <ul style="list-style-type: none"> <li>· Location data at an IP address-based level, to tailor your experience in terms of displaying the appropriate local website, language, or user experience.</li> </ul>
To provide customer service and support, or to provide you with service-related communications;	<ul style="list-style-type: none"> <li>· Your communication history with us via various channels, such as email, phone, social media, mail, instant chat, and our customer service platform, to respond to your requests, as well as to keep you updated about your account and the Services;</li> <li>· Photographs you upload to our Services in accordance with our Terms and Conditions, to provide product advice and to allow you to voluntarily show other potential customers what items may look like when purchased or worn.</li> </ul>
To undertake marketing, advertising or other promotional activities;	<ul style="list-style-type: none"> <li>· Contact information, such as phone number and email address, for telemarketing and email marketing purposes;</li> <li>· Non-directly identifiable device identifiers, operating system information, and cookie information, to direct and measure the effectiveness of the advertising we offer;</li> <li>· Data about how you engage with our Services, such as browsing, adding to your shopping cart, saving items, placing an order,, and returns) for market research, statistical analysis and the display of personalized advertising based on your activity on our site and inferred interests;</li> <li>· Contact and identity information, such as name, email address and phone number, when you voluntarily enter into a competition, market survey, event or other marketing campaigns organized by us;</li> <li>· To share your personal data with third party advertisers.</li> <li>· Name, email address and/or phone number if you enter into a promotion or program, such as the ROMWE VIP program via the Services or through a third-party platform ("Promotion"). As permitted by applicable law, your information may also be used by ROMWE or the Promotion sponsor for marketing purposes. Your entry into the Promotion may result in the addition of your information to our mailing list as well as to the mailing list of our promotional partners, both as permitted by applicable law. Acceptance of a prize may require you (unless prohibited by law) to allow us to post publicly some of your information via the Site or App, such as on a winners' page.</li> </ul>
To improve our product or service, or for	<ul style="list-style-type: none"> <li>· Collect your device information, and usage data in our website or app for fault analysis, troubleshooting, and system maintenance, as well as setting default options for you, such as language and</li> </ul>

personalization;	<p>currency;</p> <ul style="list-style-type: none"> <li>· When you optionally provide such information, we may collect general personal data that cannot identify you, such as body shape, personal height, chest/waist/hip circumference, and weight. For example, this information may be used by us to recommend clothing sizes or styles, personalization, or to provide fit prediction services for you;</li> <li>· To share your personal data within and across our corporate organization for our business needs and personalization;</li> <li>· Collection of your “like” records and votes when prompted as to your preference between two items, to provide preference setting options;</li> <li>· The display of information you choose to post on public areas of the Services, for example a customer review.</li> </ul>
To prevent and investigate fraud and other illegal activities;	<ul style="list-style-type: none"> <li>· Information automatically collected through the Services, such as browser type, device information, operating system and account setting information for fraud prevention and detection and credit risk reduction;</li> <li>· Log-in data for risk control and fraud reporting;</li> <li>· Billing address to verify payment information.</li> </ul>
To comply with legal or compliance requirements;	<ul style="list-style-type: none"> <li>· Identity information, such as ID- or passport-related information, for customs clearance purposes;</li> <li>· Transaction history and certain identity information to handle and resolve legal disputes, for regulatory investigations purpose, and to comply with lawful requests from a competent law enforcement agency or court.</li> </ul>
Other Purposes.	<p>We may use your information for any other purpose disclosed to you prior to you providing us your personal information or which is reasonably necessary to provide the Services or other related products and/or services requested, with your permission or upon your direction.</p>

Please note: When communicating with us by email or through forms on our Services, or when you publicly share content through our Services, we ask that you please do not send us any sensitive information pertaining to yourself or to others. We do not collect or store sensitive information or special categories of information.

## 2. Sharing Your Personal Information

We may disclose and share your personal information with the parties as described below.

- A. Within Our Corporate Organization. The Company is a part of a corporate organization that has several legal entities, business processes, management structures and technical systems. We may share your personal information with our related group companies and, in some cases, other affiliates of our corporate group for business maintenance and personalization continuity purposes, for instance so that you may enjoy a personalized user experience across our digital properties, to provide you with the Services, or to take actions based on your requests or preferences.
- B. Service Providers. We may share your personal information with the following types of third-party service providers as set out in the table below:

Supplier/Service Provider/Processor	Services Offered
IT system and software service provider	Website hosting services (including cloud storage), mobile app or software optimization services, customer relationship management software, email service providers, or system maintenance services.
Payment service provider	Third-party payment processing services.
Marketing and advertising services	Assistance in reaching potential new customers across multiple communications channels, or sharing with affiliated companies that promote our products on their websites.
Order fulfillment service provider	Provision of logistics, warehousing and distribution services, return and exchange services, and order status notification services for your purchased items.
Customer service provider	Assistance with customer services and support.
Fraud prevention and information security service provider	Identity verification, fraud prevention, or credit risk reduction services to protect our website/app and our business.
Other Service providers selected by you	Other third parties, such as size recommendations and fit prediction services providers, if you have chosen to help us provide you with product recommendations.

We strive to ensure that our third party service providers can only use your data for the purposes for which it was provided to them and to the extent necessary for such purposes, in accordance with our written instructions.

- C. To Maintain Legal and Regulatory Compliance. We have the right to disclose your personal information or as required by law, or when we believe that disclosure is

necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator or any other legal process served on us. We also may disclose your information where we reasonably believe that the disclosure is necessary to enforce our agreements or policies, or if we believe that disclosure will help us protect the rights, property or safety of the Company or our customers.

- D. Co-Branded Services and Features. Portions of our Services may be offered as part of co-branded services and features. We will share your personal information with our co-branded partners based on your voluntary use of or participation in a co-branded service or feature. Use of your personal information by a co-branded partner will be subject to a co-branded partner's privacy policy. If you wish to opt-out of a co-branded partner's future use of your personal information, you will need to contact the co-branded partner directly.
- E. Consent. We may disclose your personal information for any purpose with your consent.
- F. Corporate Transactions. We may disclose personal information—including account information, Wallet balance or points information—to a buyer, prospective buyer, corporate affiliate, or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding in which personal information held by us about our Services users is among the assets transferred. You acknowledge and agree to our assignment or transfer of rights to your personal information.

Please note that we may disclose, without restriction, aggregated or anonymized information about the users of our Services, which is information that does not identify any specific individual.

### 3. Cookies and Other Tracking Technologies

We may use cookies, tags, web pixels, and similar technologies to automatically collect information on our Services. Cookies or tags are bits of code that allow our technology partners to collect information that usually does not directly identify you. If required by law, we will request your consent before using cookies or other tracking technologies.

Information within this section describes our use of cookies and your ability to control the use of cookies for advertising-related purposes.

- A. Cookies. Cookies are small web files that a site or its provider transfers to your device's hard drive through your web browser that enables the site's or provider's system to recognize your browser and remember certain information.

Generally, we use first-party and third-party cookies for the following purposes: to make our Services function properly; to provide a secure browsing experience during your use of our Services; to collect passive information about your use of our Services; to measure how you interact with our marketing campaigns; to help us improve our Services; and to remember your preferences for your convenience.

We use the following types of cookies on our Services:

- **Strictly Necessary Cookies.** These cookies are essential because they enable you to use our Services.
- **Functional Cookies.** We use functional cookies to remember your choices so we can tailor our Services to provide you with enhanced features and personalized content.
- **Performance or Analytic Cookies.** These cookies collect passive information about how you use our Services, including webpages you visit and links you click. We use the information collected by such cookies to improve and optimize our Services.
- **Advertising or Targeting Cookies.** These cookies are used to make advertising messages more relevant to you. They perform functions like preventing the same ad from continuously reappearing, ensuring that ads are properly displayed for advertisers, and in some cases selecting advertisements that are based on your interests. Our third-party advertising partners may use these cookies to build a profile of your interests and deliver relevant advertising on other sites. You may disable the use of these cookies as set forth below.
- **B. Your Choices.** Your browser may provide you with the option to refuse some or all browser cookies. You may also be able to remove cookies from your browser. You can exercise your preferences in relation to cookies served on our Services by taking the steps outlined below.
  - **First-Party Cookies.** You can use the browser with which you are viewing this Site to enable, disable or delete cookies. To do this, follow the instructions provided by your browser (usually located within the “Help”, “Tools” or “Edit” settings). Please note, if you set your browser to disable cookies, you may not be able to access secure areas of the Site. Also, if you disable cookies other parts of the Services may not work properly. You can find more information about how to change your browser cookie settings at <http://www.allaboutcookies.org>.
  - **Third-Party Cookies.** Many advertising companies that collect information for interest-based advertising are members of the Digital Advertising Alliance (DAA) or the Network Advertising Initiative (NAI), both of which maintain websites where people can opt out of interest-based advertising from their members. To opt-out of website interest-based advertising provided by each organization’s respective participating companies, visit the DAA’s opt-out portal available at <http://optout.aboutads.info/>, or visit the NAI’s opt-out portal available at <http://optout.networkadvertising.org/?c=1>. Residents of the European Union may opt-out of online behavioral advertising served by the European Interactive Digital Advertising Alliance’s participating member organizations by visiting <https://www.youronlinechoices.eu/>. For more information about third-party advertising networks and similar entities that use these technologies, please see <http://www.aboutads.info/consumers>.

We do not control third parties’ collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. In addition,



most web browsers provide help pages relating to setting cookie preferences. More information may be found for the following browsers here: [Google Chrome](#), [Internet Explorer](#), [Mozilla Firefox](#), [Safari \(Desktop\)](#), [Safari \(Mobile\)](#), [Android Browser](#), [Opera Mobile](#)).

- C. Web Pixels. To see how successfully our marketing campaigns or other goals of the Services are performing we sometimes use conversion pixels, which fire a short line of code to tell us when you have clicked on a particular button or reached a particular page (e.g. a thank you page once you have completed the procedure for subscribing to one of our services or have completed one of our forms). We also use web pixels to analyze usage patterns on our Services. The use of a pixel allows us to record that a particular device, browser, or application has visited a particular webpage.
- D. Analytics. We may use third-party service providers to monitor and analyze the use of our Services. Presently, we use Google Analytics. Google Analytics is a web analytics service that tracks and reports Site traffic. For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics, available at: <https://tools.google.com/dlpage/gaoptout>.
- E. Behavioral Remarketing. We also use remarketing services to advertise on third-party websites to you after you visited our Services. For this purpose, visitors are grouped by certain actions on our Services, e.g., by duration of a visit. This enables us to understand your preferences and to show you personalized advertising even if you are currently surfing on another website that also participates in the same advertising network. We utilize Google Ads, Bing Ads, and similar ad networks.
- F. Other Tracking Technologies. Pages of our Site may also use Java scripts, which are code snippets embedded in various parts of websites and applications that facilitate a variety of operations including accelerating the refresh speed of certain functionality or monitoring usage of various online components; entity tags, which are HTTP code mechanisms that allow portions of websites to be stored or “cached” within your browser to accelerate website performance; and HTML5 local storage, which allows data from websites to be stored or “cached” within your browser to store and retrieve data in HTML5 pages when the website is revisited.
- G. Do Not Track. Some Internet browsers, such as Internet Explorer, Firefox, and Safari, include the ability to transmit “Do Not Track” or “DNT” signals. Since uniform standards for “DNT” signals have not been adopted, our Site does not currently process or respond to “DNT” signals.

#### 4. Security Precautions

We maintain physical, electronic, and procedural safeguards designed to guard and prevent misuse of your personal information. Our security measures include industry-standard physical, technical and administrative measures to prevent unauthorized access to or disclosure of your information



The Internet is not an absolutely secure environment. We strongly recommend that you use a secure method and use a complex password to help us ensure the security of your account. We also strongly advise that you neither share your password with others nor re-use passwords on our Services that you use on other sites or apps, as doing so increases the likelihood of your being the victim of a credential stuffing attack or other malicious cyber behavior. If you feel that the security of your account or personal data has been compromised, please immediately contact us at our dedicated [Privacy Center](#) or as otherwise described in the “Contact Us” section below.

## 5. Your Rights

We attach great importance to your attention to personal information, so that you have the full ability to protect your privacy and security. To exercise your rights, you may contact us at our dedicated [Privacy Center](#) (see section 11).

### 5.1 Access, Rectification and Deletion of your Personal Information

You have the right to access, rectify, or delete the personal information that we collect. To protect the privacy and the security of your personal information, we may request data from you to enable us to confirm your identity and right to access such data, as well as to search for and provide you with the personal data we maintain. There are instances where applicable laws or regulatory requirements allow or require us to refuse to provide or delete some or all of the personal information that we maintain. To exercise your rights, you may make updates within your customer account on the Site or App, or you may contact us our dedicated [Privacy Center](#). We may not accommodate a request to delete or change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

### 5.2 Unsubscribe from Our Marketing Communications

If you no longer wish for us to use your email account to send you marketing emails or non-transactional promotional materials, please directly click on the unsubscribe link at the bottom of any of our email messages to you or contact us at our dedicated [Privacy Center](#).

## 6. Retention

We will retain your personal information for the purposes set out in this Policy, and for backup, archival, fraud prevention or detection, or audit purposes. We also will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes and enforce our legal agreements and policies.

If you no longer wish to be our customer, or cease using or accessing our Services, you can request us to close your account and delete all personal information we hold about you via [Privacy Center](#) (See [section 11](#)), subject to certain legal requirements.

If you send us correspondence, including emails, we retain such information electronically in the records of your account. We will also electronically retain customer service correspondence and other correspondence from us to you. We retain these records to

measure and improve our customer service and to investigate potential fraud and violations. We may, over time, delete these records as permitted by law.

We will also retain Services usage data for internal analysis purposes. Usage data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Site, or we are legally obligated to retain this data for longer periods.

## 7. Third-Party Websites

Our Apps or Site may contain links to third-party sites. This Policy does not apply to those third-party sites. We recommend that you read the privacy statements of any other sites that you visit as we are not responsible for the privacy practices of those sites.

## 8. Children

Our Services are not directed to, and we do not knowingly collect personal information from, children under the age of 16 or minors (as defined by applicable national laws). If you are a minor, please do not attempt to fill out our forms or send any personal information about yourself to us. If a minor has provided us with personal information without parental or guardian consent, the parent or guardian should contact us (See Section 11) immediately to remove the relevant personal information and unsubscribe the minor.

If we become aware that a minor has provided us with personal information, we will take steps to promptly delete such information from our files. As described further in our Terms and Conditions, please do not upload photographs showing other people, in particular if they are minors.

## 9. Social Media Accounts

We operate accounts and fan pages on different social media platforms (the “Social Media Accounts”), such as on [Facebook](#), [Instagram](#), [Twitter](#), [YouTube](#), [Pinterest](#), [Snapchat](#), and [TikTok](#). If you visit one of our Social Media Accounts you initiate a variety of data processing operations. If you do not provide us with your personal data, certain functionalities of the social networking platforms requiring such data will not be available to you or only to a limited extent.

As the owner of a Social Media Account, we can usually only see information stored in your public profile on such social media platform, and only insofar as you are logged in to your profile while visiting our Social Media Account. In addition, we may process data that you provide to us when you contact us through one of our Social Media Accounts (for example: if you create a post, or send us a private message via Facebook). If you visit one of our Social Media Accounts, the operator of the respective social network also processes your data, regardless of whether you yourself have a profile in the respective social network. The individual data processing operations and their scope differ depending on the operator. In addition, the respective operator of the social network provides us with anonymous usage statistics, which we use to improve the user experience.

## 10. Storage and Transfer of Your Personal Data.

When you access or use our Services, your personal data may be processed or transferred outside of the country in which you reside. Such countries or jurisdictions may have data protection laws that are different in some respects or less protective than the laws of the jurisdiction in which you reside. If you do not want your information transferred to, processed, or maintained outside of the country or jurisdiction where you reside, you should immediately stop accessing or using the Services. For further details about these transfers and the safeguards that we use to facilitate such transfers, please contact us at our dedicated [Privacy Center](#).

## 11. Contact Us

If you have questions or concerns regarding your personal information or any information in this Privacy Policy, please contact us at our dedicated [Privacy Center](#). You can also contact us via our [customer service Platform](#) on our Site.

Our Privacy Office can be contacted via email at [legal@romwe.com](mailto:legal@romwe.com) or at our postal address below in writing:

ROMWE Privacy Office  
7 Temasek Boulevard  
#12-07 Suntec Tower One  
Singapore (038987)