

# Privacy Notice

(California)

Effective Date: October 21, 2020

Last Reviewed: October 12, 2020

On January 1, 2020, the California Consumer Privacy Act (CCPA) came into effect. For the most part, the CCPA aligns with the policies and practices set forth in our Privacy Policy. However, the CCPA directs businesses to disclose certain practices in particular ways. This Privacy Notice aims to present our practices in the format required by the CCPA. It also summarizes your rights under the CCPA and tells you about our interactions with third parties. Because this Notice is intended to complement and not replace our general privacy practices, please be sure to read our entire [Privacy Policy](#) for more information.

## CATEGORIES OF PERSONAL INFORMATION

We have set out below in table format a list of the categories of personal information, as grouped under the CCPA, we may collect and the business or commercial purposes for which it may be collected. Note that some types of personal information overlap categories, and we may use the same personal information for more than one purpose.

Category	Examples	Purposes
Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	<ul style="list-style-type: none"> <li>• To register you as a new customer</li> <li>• To identify you as a user in our system</li> <li>• To create and manage your user account, including verifying your information is active and valid</li> <li>• To verify your identity</li> <li>• To process and deliver your order, including manage payments, fees, and charges, reduce credit risk, collect and recover money owed to us</li> </ul>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number,	<ul style="list-style-type: none"> <li>• To send administrative notifications, such as order confirmations, order status updates, security, or support and maintenance services</li> <li>• To bill you for products or services</li> <li>• To form a view on what may be of interest to you or that you may want or need</li> <li>• To provide product and service offerings to you</li> </ul>

Category	Examples	Purposes
	or any other financial information, medical information, or health insurance information.	<ul style="list-style-type: none"> <li>• To determine warranty coverage and provide customer services, including responding to your inquiries</li> <li>• To respond to complaints of injuries and/or administer product recalls</li> <li>• To enable you to partake in a prize draw, competition, or sweepstakes or to complete a survey or submit a review</li> <li>• To operate, evaluate, improve, administer and protect our business, this website, and our apps and other services (including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data)</li> <li>• To deliver relevant website, app, social media, and other digital content and advertisements to you and to measure or understand the effectiveness of the advertising we serve to you</li> <li>• To present our Sites and their content in a suitable and effective manner for you and your computer</li> <li>• To customize and tailor your experience on the Sites, for example, by displaying content we think you might be interested in, or delivering content in your preferred language</li> <li>• To use data analytics to improve our website, apps, products/services, marketing, customer relationships, and experiences</li> <li>• To market and advertise our products and services, including sending newsletters, surveys, offers, and other promotional materials and recommending products or services that might be of interest to you</li> <li>• To notify you of changes to our Sites, service, terms and conditions, Privacy Policy, or otherwise</li> <li>• To respond to a data security breach or attempted breach</li> <li>• To perform compliance and fraud prevention and safety functions, including enforcing our terms of</li> </ul>
Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	
Geolocation data	Physical location or movements.	
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	

Category	Examples	Purposes
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<p>service and our Privacy Policy, protecting our rights, safety, or property, and protecting against, investigating, or deterring fraudulent, harmful, unauthorized, unethical, or illegal activity</p> <ul style="list-style-type: none"> <li>• To investigate, protect and enforce intellectual property rights</li> <li>• To perform accounting, auditing, and other internal functions</li> <li>• To comply with and enforce public company reporting and other legal requirements, relevant industry standards, contractual obligations, and our policies</li> <li>• To comply with lawful requests and legal process, such as to respond to subpoenas or requests from government authorities</li> <li>• To respond to your inquiries related to employment opportunities</li> <li>• To identify you as a job applicant in our system</li> <li>• To evaluate and process your job application</li> <li>• To perform other functions as stated in our Privacy Policy or with your consent</li> </ul>
Professional or employment-related data	Current or past job history or performance evaluations.	<ul style="list-style-type: none"> <li>• To respond to your inquires related to employment opportunities</li> <li>• To evaluate and process your job application</li> <li>• To perform other functions as stated in our employee policies</li> </ul>

**PERSONAL INFORMATION WE HAVE COLLECTED**

Within the last twelve (12) months, Movado Group has collected from direct interactions, automated technologies or interactions, community features, third parties, publicly available sources, and other persons the following categories of personal information about California consumers: Identifiers; personal information categories listed in the California Customer Records statute, Cal. Civ. Code § 1798.80(e); protected classification characteristics under California or federal law; commercial information; biometric information; internet or other similar network activity; geolocation data; inferences drawn from other personal information.

## PERSONAL INFORMATION WE HAVE SHARED

In the preceding twelve (12) months, Movado Group has disclosed the following categories of consumer personal information for a business purpose: Identifiers; personal information categories listed in the California Customer Records statute, Cal. Civ. Code § 1798.80(e); protected classification characteristics under California or federal law; commercial information; biometric information; internet or other similar network activity; geolocation data; inferences drawn from other personal information.

We disclose personal information to service providers, data aggregators, parent or subsidiary organizations and affiliates, social media companies, internet cookie information recipients, and other third parties as described in this Notice and our Privacy Policy.

We do not sell your personal information in exchange for monetary compensation. Moreover, few of the third parties with whom we share personal information are permitted to use that personal information for any purpose other than to provide services for us.

In those instances where a third party is permitted to use information for their own commercial purpose, we may be relying on a consumer's intentional direction to share their personal information with that third party. We do not believe this is a "sale" under the CCPA. For example, a consumer may wish to finance a purchase through a service like Affirm. To do so, the consumer must select that offering, choose to engage with the third party, and share their Identity, Contact, Payment, Transaction or other information to enable the financing. To the extent Movado Group facilitates such information sharing, we rely on the consumer's choice to engage with that third party. Consumers should always keep in mind that the third party's terms and conditions and privacy policies and practices will apply to that third party's services and offerings, and we urge you to make sure you understand them before you proceed.

## INTEREST-BASED ADVERTISING; THIRD PARTY ANALYTICS PROVIDERS & AD SERVERS; ONLINE TRACKING

When you go to our websites, open our emails, use our apps or "smart" wearable devices, interact with Movado Group-related social media sites or tools, widgets, or plug-ins, or when you visit one of our physical stores (all digital and physical sources, our "Sites"), we may collect information about you, your online activities, or your geolocation information for use in providing you with advertising about products and services that is tailored to your individual interests. When using our Sites, you also may be presented with an opportunity to receive information and/or marketing offers from our curated third parties or in connection with referral programs. If you agree to such uses, including to receive such communications, your personal information will be disclosed to that third party or those third parties.

Movado Group also works with certain third parties (including network advertisers, ad agencies, and data analytics companies) to provide us with information regarding traffic on our Sites, to serve advertisements both on our Sites and elsewhere online, and to provide us with information regarding the use of the Sites and the effectiveness of our advertisements. Through these sources, we can target our messaging to users through demographic, interest-based, and contextual means. We can also track your online activities over time and use this information to

show you advertisements that may be tailored to your individual interests. In addition, we can collect data about your visits to other websites that serve Movado Group advertisements, such as the pages or advertisements you view, where you viewed them, and whether you clicked through. This process helps us track the effectiveness of our marketing efforts.

When performing services for us, these third parties may set and access their own tracking technologies and may otherwise collect or have access to information about you. These technologies may be used, among other things, to more effectively target advertisements, to prevent you from seeing the same advertisements too many times, to conduct research regarding the usefulness of certain advertisements to you, and to assist in providing analytics. These third parties may transfer information that they have collected to other third parties. The ability of these third parties to use and share information among their networks is restricted by their respective terms of use and privacy policies, and we encourage you to read those privacy policies.

## THE RIGHT TO OPT-OUT

You have the right to opt-out of our sale of your personal information. To inform us of your desire to exercise this right, you may click [here](#). This link will take you to the same webform that is available through the “Do Not Sell My Personal Information” link enabled on our websites. Please understand that we will still share your information in ways that are not a “sale,” such as with our service providers for our own business purposes, including online advertising. Accordingly, opting-out of the sale of your information for interest-based advertising purposes does not necessarily mean that you will stop seeing ads for our own products and services, including interest-based ads.

Moreover, as explained in the Do Not Sell My Personal Information tool, submitting the webform will not block the sale of personal information that may occur through Cookies placed on our Sites. If you wish to prevent such sales, please click [here](#). This link will take you to the Manage My Cookies tool for California residents, where you may choose to block Cookies associated with the sale of your personal information. Please remember that you may need to repeat this step on each separate device you use to access our Sites and for each individual Site you visit. Blocking these Cookies will not prevent our own ads, including ads served to you based upon your prior browsing history, from appearing.

If you submit the webform but choose not to change your Cookies settings, then we will treat this as your direction to stop all future sales of personal information that are not conducted through Cookies while allowing us to continue to sell any information (including personal information) collected through the dropped Cookies.

Requests to opt-out of the sale of personal information also may be made by mail or by calling our Customer Service team at 1-800-810-2311.

Consumers may request to opt back in at any time by using the Manage My Cookies tool or by calling our Customer Service team at 1-800-810-2311.

## OTHER RIGHTS AND CHOICES

The CCPA provides California consumers with other rights regarding their personal information. This section describes those rights and explains how California consumers may exercise them.

### *The Right to Know*

California consumers have the right to request that Movado Group disclose to them some or all of the following information about our collection and use of their personal information over the past 12 months:

- The categories of personal information we collected about them;
- The categories or sources for the personal information we collected about them;
- Our business or commercial purpose for collecting that personal information;
- The categories of third parties with whom we share that personal information;
- The specific pieces of personal information we collected about them;
- If we sold or disclosed your personal information for a business purpose, two separate lists (one for sales and one for disclosures), identifying the personal information categories that each category of recipient purchased or received.

We will provide the information requested after receiving and confirming a verifiable consumer request.

### *The Right to Delete*

Subject to certain exceptions, California consumers have the right to request that Movado Group delete any of their personal information that we collected from that consumer and have retained. Once we receive and confirm a verifiable consumer request, we will delete (and direct our service providers to delete) the consumer's personal information from our records, unless an exception applies.

We may deny a deletion request if retaining the information is necessary for us to:

- Complete the transaction for which we collected the personal information, provide a good or service that the consumer requested, take actions reasonably anticipated within the context of our ongoing business relationship with the consumer, or otherwise perform our contract with the consumer;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
- Debug products to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.);
- Enable solely internal uses that are reasonably aligned with consumer expectations based on the consumer's relationship with us;
- Comply with a legal obligation; and/or
- Make other internal and lawful uses of that information that are compatible with the context in which the consumer provided it.

### *How to Exercise Your Rights*

California consumers and their authorized agents may submit a request to know or request to delete by:

- [Webform](#);
- Mail; or
- Calling us at 1-800-810-2311.

Only the data subject, or a person registered with the California Secretary of State authorized to act on a data subject's behalf, may make a verifiable consumer request. A California consumer also may make a verifiable consumer request on behalf of their minor child. Requests can only be made twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us.

### *Response Timing and Format*

We endeavor to respond to requests within forty-five (45) days of verification. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

We will deliver our written response electronically, unless you instruct us to deliver it by mail.

Any disclosures we provide will cover the 12-month period preceding our receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For requests to know particular information and that necessitate a voluminous response, we will select a format to provide your personal information that is readily useable.

We generally do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### *Statistics on Consumer Privacy Requests*

Every year Movado Group receives requests from people around the globe to exercise their privacy rights. We anticipate reporting on or before July 1, 2021 data about requests we have received.

## **NON-DISCRIMINATION & FINANCIAL INCENTIVES**

The CCPA prohibits businesses from discriminating against a consumer for exercising their rights under the law. Such discrimination may include denying a good or service, providing a different level or quality of service, or charging different prices. However, the CCPA permits businesses to provide differing levels or quality or different prices where the difference is reasonably related to the value of the consumer's personal information to the business.

Consistent with the CCPA we may offer certain programs or financial incentives that can result in different prices, rates, or quality levels, provided that such programs or incentives are reasonably related to the value of your personal information to us. For example, we may offer a coupon to consumers who sign up for our mailing list, or we may offer a loyalty program that provides consumers with certain benefits associated with repeat purchases. In such instances, we have determined that the amount of the coupon or the benefits provided is reasonably related to the value we receive from the consumer's participation in the program or incentive.

When Movado Group offers these programs or incentives, your participation is optional. If you choose to participate, your participation will be subject to any applicable terms, and you may withdraw at any time.

#### OTHER CALIFORNIA PRIVACY RIGHTS

California's "Shine the Light" law (Civil Code Section 1798.83) permits users of our Websites who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes during the immediately preceding calendar year. To make this request, California residents may contact us by mail or email ([privacy@movadogroup](mailto:privacy@movadogroup)). You must put the statement "Your California Privacy Rights" in the subject field of your email or include it in your writing if you choose to write to us at the designated mailing list. You also must include sufficient detail that allows us to properly understand, evaluate, and respond to your request. We are not responsible for notices that are not labelled or sent properly or do not have complete information.

#### OUR MAILING ADDRESS

Movado Group, Inc.  
650 From Road  
Ste. 375  
Paramus, NJ 07652  
Attn: Legal Department