

VITRA, INC.

SUPPLEMENTAL PRIVACY POLICY AND NOTICE AT COLLECTION FOR CALIFORNIA

Updated: 31st August, 2023

This Supplemental U.S. State-Specific Privacy Notice (hereinafter referred to as the “**State-Specific Notice**”) supplements the information in our Privacy Policy, available at <https://www.vitra.com/en-us/privacy> (the “**Privacy Policy**”), and contains disclosures that the California Consumer Privacy Act of 2018 (“**CCPA**”) as amended by the California Privacy Rights Act of 2020 (“**CPRA**”) and such other data protections laws in California (collectively, the “**California Law**”) may require from Vitra, Inc. (“**we**” or “**us**”) with respect to personal information collected from residents of the State of California.

For general information on our privacy practices, please refer to the Privacy Policy. This State-Specific Notice is incorporated in the Privacy Policy hereby by reference. Capitalized terms not defined in this State-Specific Notice shall have the meaning assigned to them in the Privacy Policy.

PERSONAL INFORMATION

We note that California Law uses the term “personal information”. Any references to “personal data” below and in the Privacy Policy shall have the meaning assigned to the term “personal information” under California Law. Personal information does not include:

- Publicly available information from government records;
- Deidentified or aggregated consumer information;
- Information excluded from the California Law’s scope.

1. COLLECTED PERSONAL INFORMATION

Below is a chart containing categories of personal information under the California Law that we have collected within the last twelve (12) months and may continue to collect. All of the categories of personal information set forth in the chart below are collected and used for all the purposes mentioned above under “Use of personal information”. Such personal information was disclosed/may be disclosed for a business purpose to the following categories of third parties: service providers, marketing partners, other companies in the Vitra group. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

Category	Examples	Collected
A. Identifiers.	A real name, postal address, online identifier, Internet Protocol address, email address, account name	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, address, telephone number, employment, employment history, bank account number, credit card number, debit card number, or any other financial information.	YES

D. Commercial information.	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	N/A.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	N/A.	NO
H. Sensory data.	N/A.	NO
I. Professional or employment-related information.	Current or past job history.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act)	N/A.	NO
K. Inferences drawn from other personal information.	N/A.	NO

Payments on our Site are processed by one or multiple third-party service provider(s) who do not disclose your financial information to us. Before conducting payments through our Site, please refer to the terms and conditions and privacy policy of the third-party service provider processing your payment. We entered into agreements with such service providers which require them, among others, to only use your personal information for the business purposes for which we engaged them.

Please refer to Section 2 of the Privacy Policy information on the sources from which we collect your Personal information.

1.1. COLLECTED SENSITIVE PERSONAL INFORMATION

In the preceding twelve (12) months, we have not collected sensitive personal information as defined in the California Law (“**sensitive personal information**”) and do not intend to collect such information on and after the date of this State-Specific Notice.

1.2. SALE AND SHARING OF PERSONAL INFORMATION

We have not sold personal information or sensitive personal information in the preceding twelve (12) months for monetary consideration and do not intend to do so.

2. YOUR RIGHTS AND CHOICES

California Law provides the below specific rights to California residents regarding their personal information. This section describes your rights under California Law and explains how to exercise those rights.

2.1. RIGHT TO KNOW AND RIGHT TO ACCESS

You have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we receive your request and confirm your identity (see **Section 3** of this State-Specific Notice), we will disclose to you:

- The categories of personal information that we collected about you;
- The categories of sources from which we collected personal information about you;
- Our business or commercial purpose for collecting, disclosing, “selling” or “sharing” such personal information about you;
- The categories of personal information about you that we disclosed for a business purpose and the categories of third parties to whom such personal information was disclosed for a business purpose; and
- The categories of personal information about you that we “sold” or “shared” and the categories of third parties to whom your personal information was “sold” or “shared”, by category or categories of personal information for each category of third parties to whom the personal information was “sold” or “shared”;
- The specific pieces of personal information that we collected about you.

2.2. RIGHT TO DELETE

You have the right to request that we delete any of your personal information that we have collected and retained, subject to certain exceptions. Once we receive your request and confirm your identity (see **Section 3** of this State-Specific Notice), we will review your request to see if an exception allowing us to retain the personal information applies.

We may deny your deletion request if retaining the personal information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service that you requested or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
- Help to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for those purposes;
- Debug to identify and repair errors that impair existing intended functionality;
- Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law;

- Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 of Title 12 of Part 2 of the Penal Code (Cal. Penal Code § 1546 et. seq.);
- Engage in public or peer-reviewed scientific, historical, or statistical research that adheres to all other applicable ethics and privacy laws, when our deletion of the personal information is likely to render impossible or seriously impair the ability to complete such research, if you previously provided informed consent;
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information; and/or
- Comply with a legal obligation.

We will then delete or de-identify personal information not subject to one of these exceptions from our records and will direct our service providers, contractors and third parties to whom we have sold or shared your personal information to take similar action, unless this proves impossible or involves disproportionate effort. However, we may maintain a confidential record of your deletion request solely for the purpose of preventing your personal information from being sold, for compliance with laws of for other purposes permissible under California Law.

2.3. RIGHT TO CORRECT

You have the right to request that we correct your personal information if you think they are inaccurate, taking into account the nature of the personal information and the purposes of the processing of the personal information. Once we receive your request and confirm your identity (see Section 3 of this State-Specific Notice), we will use commercially reasonable efforts to correct your inaccurate personal information and will direct our service providers to do the same.

2.4. RIGHT TO OPT-OUT OF SALE OR SHARING

You have the right to direct us to stop “selling” (i.e., disclosing your personal information to third parties for monetary or other valuable consideration or “sharing” your personal information (i.e., disclosing your personal information to third parties for cross-contextual behavioral advertising).

We do not “sell” or “share” personal information that would trigger these opt-out requirements.

At any time, you can also use our cookie preference tools to manage what kinds of cookies and other tracking technologies you’re comfortable with. You can also disable cookies altogether by adjusting the settings on your browser. However, if you choose to disable some or all cookies, many parts of our services may no longer work. Please refer to our Cookie Settings for more information.

2.5. RIGHT TO LIMIT USE AND DISCLOSURE OF SENSITIVE PERSONAL INFORMATION

California Law provides its residents with a right to limit the use and disclosure of sensitive personal information. However, we do not currently collect, use or disclose sensitive personal information triggering California Law’s opt-out requirements.

2.6. OTHER CALIFORNIA PRIVACY RIGHTS

California's “Shine the Light” law (Civil Code Section § 1798.83) permits users of our Site that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to

privacy@vitra.com or call us at: +1-855-651-5846. Except for our affiliates, our policy is not to disclose any personal information to a third party for their direct marketing purposes without your approval.

3. EXERCISING YOUR RIGHTS UNDER CALIFORNIA LAW

You may exercise your rights mentioned above as follows:

- To exercise your rights to know, access, delete or correct described above, please submit a request by either:
 - o Calling us at +1-855-651-5846 (toll-free);
 - o Emailing us at privacy@vitra.com; or
 - o Completing the online form on the Site.
- To exercise your rights pursuant to California's "Shine the Light" law, please submit a request by either
 - o Emailing us at privacy@vitra.com; or
 - o Calling us at +1-855-651-5846.

Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may also make a request on behalf of your minor child.

You may only submit a request to know twice within a 12-month period and a request pursuant to California's "Shine the Light" law once during the course of a calendar year.

Your request related to personal information must:

- Provide sufficient information or documentation that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. Such information or documentation may include:
 - o Certain personal information about you that we have on file (*e.g.*, postal address) or information related to the purchases you made on the Site.
 - o Certain information or certification showing your authority or relationship to the person on whose behalf you are submitting the request.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request related to personal information 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 or the person on whose behalf you are submitting the request.

You do not need to create an account with us to submit a request related to personal information. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

4. RESPONSE TIMING AND FORMAT

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact us at privacy@vitra.com.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing. For requests under the California's Shine the Light Law, we will respond within thirty (30) days of receipt of your request.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. Upon your request, unless impossible or involving disproportionately effort, we will also provide you with disclosures beyond the 12-months period for personal information¹. The response we provide will also explain the reasons we cannot comply with a request, if applicable. We will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is manifestly unfounded or excessive, in particular because of its repetitive character. 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.

5. NON-DISCRIMINATION

We will not discriminate against you for exercising any of your rights pursuant to Section 2 of this State-Specific Notice. Unless permitted by the California Law, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

6. MINORS

We do not sell the personal information of consumers we know to be less than 18 years of age, unless we receive affirmative authorization from the parent or guardian of a minor less than 18 years of age.

If you are under the age of 18 and you want to remove your name or comments from the Site or publicly displayed content, please contact us directly at privacy@vitra.com. We may not be able to modify or delete your information in all circumstances.

If you wish to submit a privacy request on behalf of your minor child in accordance with applicable jurisdictional laws, you must provide sufficient information to allow us to reasonably verify your child is the person about whom we collected personal information and you are authorized to submit the request on your child's behalf (*i.e.*, you are the child's legal guardian or authorized representative).

7. RETENTION OF PERSONAL INFORMATION

Unless otherwise stated in this Privacy Policy as a general rule, Vitra retains your personal information for as long as reasonably necessary and proportionate to the original purpose for collecting and processing it. Your personal information will be removed and/or de-identified when your personal information is no longer necessary for such purpose. We may also need to delete sooner or retain your personal information for a longer period if we have a reason of doing so pursuant to applicable law, rule, regulation, or an order from a government entity.

8. CHANGES TO OUR PRIVACY POLICY

We reserve the right to amend this State-Specific Notice at our discretion and at any time. When we make changes to this State-Specific Notice, we will post the updated notice on the Site and update the notice's effective date. **Your continued use of our Site following the posting of changes constitutes your acceptance of such changes.**

9. CONTACT INFORMATION

If you have any questions or comments about this notice, the ways in which we collect and use your personal information described here and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under the state laws set forth in this State-Specific Notice, please contact us at:

Phone: 1-855-651-5846 (toll-free)

Email: privacy@vitra.com

If you need to access this State-Specific Notice in an alternative format due to a disability, please contact us via email or by phone at the above address/number.