Tiffany and Company: Data Privacy Framework Privacy Policy - Consumer Data

Last Updated: July 3, 2026

Tiffany and Company ("Tiffany") respects your concerns about privacy. Tiffany participates in the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework ("UK Extension") and the Swiss-U.S. Data Privacy Framework (collectively, the "DPF") administered by the U.S. Department of Commerce. Tiffany commits to comply with the

DPF Principles with respect to Consumer Personal Data the company receives from the EU, UK and Switzerland in reliance on the DPF. This Policy describes how Tiffany implements the DPF Principles for Consumer Personal Data. If there is any conflict between the terms in this Privacy Policy ("Policy") and the DPF Principles, the DPF Principles shall govern.

PURPOSES OF THIS POLICY

"Consumer" means any natural person who is located in the EU, UK and Switzerland, but excludes any individual acting in his or her capacity as an Employee.

"Controller" means a person or organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

"DPF Principles" means the Principles and Supplemental Principles of the DPF.

"Employee" means any current, former or prospective employee or contractor of Tiffany or any of its EU, UK or Swiss affiliates, or any related individual whose Personal Data Tiffany processes in connection with an employment relationship, who is located in the EU, UK or Switzerland. For purposes of this Policy, "Employee" includes any temporary worker, intern, or other non-permanent employee of Tiffany or any of its EU, UK or Swiss affiliates.

"EU" means the European Union and Iceland, Liechtenstein and Norway.

"Personal Data" means any information, including Sensitive Data, that is (i) about an identified or identifiable individual, (ii) received by Tiffany in the U.S. from the EU, UK or Switzerland, and (iii) recorded in any form.

"Processor" means any natural or legal person, public authority, agency or other body that processes Personal Data on behalf of a Controller.

"Sensitive Data" means Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership (including trade union-related views or activities), sex life (including personal sexuality), information on social security measures, the commission or alleged commission of any offense, any proceedings for any offense committed or alleged to have been committed by the individual or the disposal of such proceedings, or the sentence of any court in such proceedings (including administrative proceedings and criminal sanctions).

"UK" means the United Kingdom (and Gibraltar).

Tiffany's DPF certification, along with additional information about the DPF, can be found at https://www.dataprivacyframework.gov/s/. For more information about Tiffany's processing of Consumer Personal Data, please visit Tiffany's Global Privacy Notice.

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TYPES OF PERSONAL DATA TIFFANY COLLECTS

Tiffany collects Consumer Personal Data in various ways, such as in Tiffany's stores, on Tiffany's websites, through Tiffany's apps and social media channels, at Tiffany's events, through surveys, via text messages, on the telephone or through thirdparty sources such as marketing and social media providers. The types of Consumer Personal Data Tiffany collects include:

- contact information (such as name, postal address, email address, and mobile or other telephone number);
- username and password;
- payment information (such as payment card number, expiration date, authorization number or security code, delivery address, and billing address);
- purchase and transaction information;
- customer service information (such as customer service inquiries, comments, and repair history);
- photographs, comments and other content Consumers provide;
- information regarding personal or professional interests, date of birth, marital status, demographics, and experiences with Tiffany's products and contact preferences;
- images or live stream footage of your wrists, face or ears from your mobile device if you use our augmented reality simulation experience;
- contact information Consumers provide about friends or other people Consumers would like Tiffany to contact; and
- information Tiffany may obtain from its third-party service providers.

TIFFANY USES THIS INFORMATION TO

- provide products and services;
- process payments;
- create and manage Consumers' accounts;
- send promotional materials and other communications;
- communicate with Consumers about, and administer Consumers' participation in, special events, contests, sweepstakes, programs, offers, surveys and market research;
- respond to inquiries;
- operate, evaluate and improve Tiffany's business (including developing new products and services; enhancing and improving Tiffany's services; managing Tiffany's communications; analyzing Tiffany's products and customer base; performing data analytics; and performing accounting, auditing and other internal functions);
- reduce credit risk and manage collections;
- verify Consumers' identity;
- enable Consumers to virtually try on our products if a Consumer uses our augmented reality simulation experience;
- protect against, identify and prevent fraud and other unlawful activity, claims and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and Tiffany's policies.

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Tiffany also may use the information in other ways for which Tiffany provides specific notice at the time of collection.

Tiffany's privacy practices regarding the processing of Consumer Personal Data comply with the DPF Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability.

NOTICE

Tiffany provides information in this Policy and the company's Global Privacy Notice about its Consumer Personal Data practices, including the types of Personal Data Tiffany collects, the types of third parties to which Tiffany discloses the Personal Data and the purposes for doing so, the rights and choices Consumers have for limiting the use and disclosure of their Personal Data, and how to contact Tiffany about its practices concerning Personal Data. Privacy notices pertaining to specific data processing activities also may contain relevant information

CHOICE

Tiffany generally offers Consumers the opportunity to choose whether their Personal Data may be (i) disclosed to third- party Controllers or (ii) used for a purpose that is materially different from the purposes for which the information was originally collected or subsequently authorized by the relevant Consumer. To the extent required by the DPF Principles, Tiffany obtains opt-in consent for certain uses and disclosures of Sensitive Data. Consumers may contact Tiffany as indicated below regarding the company's use or disclosure of their Personal Data. Unless Tiffany offers Consumers an appropriate choice, the company uses Personal Data only for purposes that are materially the same as those indicated in this Policy or the company's Global Privacy Notice.

Tiffany shares Consumer Personal Data with its parent, affiliates and subsidiaries. Tiffany may disclose Consumer Personal Data without offering an opportunity to opt out, and may be required to disclose the Personal Data, (i) to third-party Processors the company has retained to perform services on its behalf and pursuant to its instructions, (ii) if it is required to do so by law or legal process, or (iii) in response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements. Tiffany also reserves the right to transfer Personal Data in the event of an audit or if the company sells or transfers all or a portion of its business or assets (including in the event of a merger, acquisition, joint venture, reorganization, dissolution or liquidation).

ACCOUNTABILITY FOR ONWARD TRANSFER OF PERSONAL DATA

This Policy and Tiffany's Global Privacy Notice describe Tiffany's sharing of Consumer Personal Data.

Except as permitted or required by applicable law, Tiffany provides Consumers with an opportunity to opt out of sharing their Personal Data with third-party Controllers. Tiffany requires third-party Controllers to whom it discloses Consumer Personal Data to contractually agree to (i) only process the Personal Data for limited and specified purposes consistent with the consent provided by the relevant Consumer, (ii) provide the same level of protection for Personal Data as is required by the DPF Principles, and (iii) notify Tiffany and cease processing Personal Data (or take other reasonable and appropriate remedial steps) if the third-party Controller determines that it cannot meet its obligation to provide the same level of protection for Personal Data as is required by the DPF Principles.

With respect to transfers of Consumer Personal Data to third-party Processors, Tiffany (i) enters into a contract with each relevant Processor, (ii) transfers Personal Data to each such Processor only for limited and specified purposes, (iii) ascertains that the Processor is obligated to provide the Personal Data with at least the same level of privacy protection as is required by the DPF Principles, (iv) takes reasonable and appropriate steps to ensure that the Processor effectively processes the Personal Data in a manner consistent with Tiffany's obligations under the DPF Principles, (v) requires the Processor to notify Tiffany if the Processor determines that it can no longer meet its obligation to provide the same level of protection as is required by the DPF Principles, (vi) upon notice, including under (v) above, takes reasonable and appropriate steps to stop and remediate unauthorized processing of the Personal Data by the Processor, and (vii) provides a summary or representative copy of the relevant privacy provisions of the Processor contract to the Department of Commerce, upon request. Tiffany remains liable under the DPF Principles if the company's third- party

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Processor onward transfer recipients process relevant Personal Data in a manner inconsistent with the DPF Principles, unless Tiffany proves that it is not responsible for the event giving rise to the damage.

SECURITY

Tiffany takes reasonable and appropriate measures to protect Consumer Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Personal Data.

DATA INTEGRITY AND PURPOSE LIMITATION

Tiffany limits the Consumer Personal Data it processes to that which is relevant for the purposes of the particular processing. Tiffany does not process Consumer Personal Data in ways that are incompatible with the purposes for which the information was collected or subsequently authorized by the relevant Consumer. In addition, to the extent necessary for these purposes, Tiffany takes reasonable steps to ensure that the Personal Data the company processes is (i) reliable for its intended use, and (ii) accurate, complete and current. In this regard, Tiffany relies on its Consumers to update and correct the relevant Personal Data to the extent necessary for the purposes for which the information was collected or subsequently authorized. Consumers may contact Tiffany as indicated below to request that Tiffany update or correct relevant Personal Data.

Subject to applicable law, Tiffany retains Consumer Personal Data in a form that identifies or renders identifiable the relevant Consumer only for as long as it serves a purpose that is compatible with the purposes for which the Personal Data was collected or subsequently authorized by the Consumer, as appropriate.

ACCESS

Consumers generally have the right to access their Personal Data. Accordingly, where appropriate, Tiffany provides Consumers with reasonable access to the Personal Data Tiffany maintains about them. Tiffany also provides a reasonable opportunity for those Consumers to correct, amend or delete the information where it is inaccurate or has been processed in violation of the DPF Principles, as appropriate. Tiffany may limit or deny access to Personal Data where the burden or expense of providing access would be disproportionate to the risks to the Consumer's privacy in the case in question, or where the rights of persons other than the Consumer would be violated. Consumers may request access to their Personal Data by contacting Tiffany as indicated below.

RECOURSE, ENFORCEMENT AND LIABILITY

Tiffany has mechanisms in place designed to help assure compliance with the DPF Principles. Tiffany conducts an annual self-assessment of its Consumer Personal Data practices to verify that the attestations and assertions the company makes about its DPF privacy practices are true and that the company's privacy practices have been implemented as represented and in accordance with the DPF Principles.

Consumers may file a complaint concerning Tiffany's processing of their Personal Data. Tiffany will take steps to remedy issues arising out of its alleged failure to comply with the DPF Principles. Consumers may contact Tiffany as specified below about complaints regarding the company's Consumer Personal Data practices.

If a Consumer's complaint cannot be resolved through Tiffany's internal processes, Tiffany will cooperate with JAMS pursuant to the JAMS DPF Program, which is described on the JAMS website at https://www.jamsadr.com/DPF-DisputeResolution. JAMS mediation may be commenced as provided for in the JAMS rules. Following the dispute resolution process, the mediator or the Consumer may refer the matter to the U.S. Federal Trade Commission, which has DPF investigatory and enforcement powers over Tiffany. Under certain circumstances, Consumers also may be able to invoke binding arbitration to address complaints about Tiffany's compliance with the DPF Principles.

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HOW TO CONTACT TIFFANY

To contact Tiffany with questions or concerns about this Policy or Tiffany's Consumer Personal Data practices:

Write to:
Tiffany and Company
Data Protection Officer
c/o Legal Department
200 Fifth Avenue
New York, NY 10010
USA

Email to: privacy@tiffany.com