



Statement of Privacy Practices

QVC Group ("QVC") is a group of companies engaged in multi-platform retail operations including through television, e-commerce, and physical platforms. QVC is committed to protecting personal data in compliance with applicable privacy and data protection laws and regulations. In addition, QVC issues privacy statements and notices that provide tailored information about privacy practices relevant to its brands including QVC, HSN, Ballard Designs, Frontgate, Garnet Hill, and Grandin Road. In those separate privacy statements and notices for our brands, we provide information about the personal data collected, how we use personal data, and options customers or employees have with respect to the use and disclosure of their personal data.

Privacy Governance

QVC has implemented internal policies and guidelines to govern the processing of personal data across QVC brands. QVC monitors compliance with these policies and guidelines and enforces them as appropriate, including through disciplinary measures for violations, when appropriate and permitted under QVC policies.

Responsibilities and Accountabilities

QVC's privacy and cybersecurity teams work collaboratively to manage data protection across QVC brands. QVC has devoted departments and resources to this effort, including by appointing a chief information security officer who leads a cybersecurity team focused on the technical protection of QVC personal data. QVC also has a data privacy lead and team focused on compliance with privacy and data protection requirements. QVC has adopted processes to assess uses of personal data both internally by QVC team members and externally by vendors.

Employee Awareness

QVC provides communications to employees about the use of personal data and conducts targeted training to employee groups who have more significant access or access to sensitive personal data.

Vendor Management

QVC generally conducts risk-appropriate privacy and security due diligence when engaging vendors that may process QVC personal data, to verify that such vendors comply with applicable legal requirements and meet QVC's internal standards. QVC takes measures to include in certain vendor contracts QVC's expectations related to the processing of personal data by vendors and to provide QVC with remedies including contract termination- for failures by vendors to meet their contractual obligations.



Transparency

As set forth in QVC privacy statements, QVC provides customers with notice regarding QVC's privacy practices. Customers are also provided with the ability to obtain copies of personal data and delete personal data to the extent permitted by applicable law.

Retention

Information is retained in relation to its purpose(s) and is accordingly disposed of consistent with applicable law, each brand's privacy statements and according to internal retention policies. In addition, retention limitations relevant to the services are described and agreed to within the applicable vendor contracts.

Security Safeguards

QVC has implemented technical, organizational, and administrative safeguards to ensure a level of security appropriate to the types of personal data being processed and to support the ongoing confidentiality, integrity, and availability of personal data and the resilience of QVC systems. The cybersecurity and data privacy teams monitor the operation of these programs across QVC brands, and QVC engages third parties to conduct external audits of the security safeguards in place for QVC systems. Our Service Providers are required by contract to maintain confidentiality and may not use personal information for any unauthorized purpose.

Incident Response

QVC has implemented incident response tools to identify possible incidents and organizational processes to coordinate appropriate responses across QVC. QVC's incident response protocols also address the timely restoration of system availability and access to personal data in the event of an incident. Individuals affected by an incident will be contacted, through communication channels such as email, phone, mail, or other media, as defined by the organizational processes, the associated risk to the individuals and legal requirements.

Related external privacy policies:

- QVC Group, Inc.: <https://investors.qvcgrp.com/privacy-policy>
- QVC US: <https://www.qvc.com/content/information/privacy-statement.html>
- QVC UK: <https://www.qvcuk.com/content/legal-information/privacy-statement.html>
- QVC DE: <https://www.qvc.de/content/datenschutz/datenschutzbestimmungen.html>
- QVC IT: <https://www.qvc.it/co/content/legal-information/privacy.html>
- QVC Japan: <https://qvc.jp/information/policy/policy>
- HSN: <https://www.hsn.com/content/PrivacyPolicy/743>
- Ballard Designs: <https://www.ballarddesigns.com/privacy-full/content>
- Frontgate: <https://www.frontgate.com/full-privacy/content>
- Garnet Hill: <https://www.garnethill.com/full-privacy/content>
- Grandin Road: <https://www.grandinroad.com/full-privacy/content>