

QURATE RETAIL GROUP STATEMENT OF PRIVACY PRACTICES

Qurate Retail Group (“QRG”) is a group of companies engaged in multi-platform retail operations including through television, e-commerce, and physical platforms. QRG is committed to protecting personal data in compliance with applicable privacy and data protection laws and regulations. In addition, QRG issues privacy statements and notices that provide tailored information about privacy practices relevant to its brands including QVC, HSN, Zulily, 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

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

Responsibilities and accountabilities

QRG’s privacy and cybersecurity teams work collaboratively to manage data protection across QRG brands. QRG 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 QRG personal data. QRG also has a data privacy lead and team focused on compliance with privacy and data protection requirements. QRG has adopted processes to assess uses of personal data both internally by QRG team members and externally by vendors.

Employee Awareness

QRG 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

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

Transparency

As set forth in QRG privacy statements, QRG provides customers with notice regarding QRG’s privacy practices. For QVC US, HSN, QVC UK, and QVC EEA companies, customers are also provided with the ability to obtain copies of personal data and delete personal data to the extent permitted by applicable law. Zulily and CBI entities extend these rights to certain customers depending on a customer’s residence.

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

QRG 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 QRG systems. The cybersecurity and data privacy teams monitor the operation of these programs across QRG brands, and QRG engages third parties to conduct external audits of the security safeguards in place for QRG systems. Our Service Providers are required by contract to maintain confidentiality and may not use personal information for any unauthorized purpose.

Incident Response

QRG has implemented incident response tools to identify possible incidents and organizational processes to

coordinate appropriate responses across QRG. QRG'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:

- Qurate Retail, Inc.: <http://www.libertyinteractive.com/privacy.html>
- 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/generic-pages/footer/diritti-e-privacy/privacy.html>
- QVC Japan: <https://qvc.jp/information/policy/policy1>
- HSN: <https://www.hsn.com/content/PrivacyPolicy/743>
- Zulily: <https://www.zulily.com/privacy-practices>
- 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>