



Data Privacy & Security Policy

Urban Outfitters, Inc.

URBN is committed to safeguarding the personal information of its customers and potential customers (“customers”) as well as its own sensitive data and information. In doing so, URBN intends to comply with applicable law in the jurisdictions in which it operates and to implement technical and organizational measures to protect the privacy and security of customer personal information and URBN sensitive data.

Governance

The Data Privacy & Security Working Group of URBN’s Sustainability Committee has primary responsibility for setting data security and privacy policies, overseeing those policies, and tracking and reporting on data security and privacy performance. The Working Group is comprised of URBN’s Global Data Privacy Officer, Global Director of IT Security, and General Counsel. The Working Group reports directly to the Audit Committee of the URBN Board of Directors at least annually.

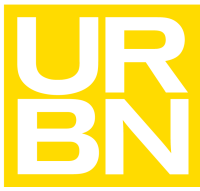
Data Security Procedures & Audits

URBN employs industry best practices to secure customer personal information and URBN sensitive data. In addition to an in-house team of leading data security personnel, URBN employs outside auditors to evaluate its security environment. For example, URBN complies with Payment Card Industry Standards and is audited annually by a third party to confirm compliance with those Standards. In addition, URBN employs third party penetration testers to identify potential security weaknesses for evaluation and remediation. URBN also partners with government organizations and industry associations to share intelligence and quickly respond to emergent threats. If you have a question or concern regarding how URBN protects your information, please email DataPrivacyOfficer@urbn.com.

Data Privacy & Minimization

URBN is subject to varying local, national, and international data privacy laws. URBN intends to comply with those applicable laws and has appointed a Global Data Privacy officer to oversee those efforts.

URBN policy is to minimize retention of personal information to the maximum extent possible consistent with the legitimate and reasonable needs of its business. To this end, URBN employs industry best practices, such as pseudonymization, anonymization, tokenization and encryption, to minimize the personal information in its possession. In addition, URBN employs technical and



Data Privacy & Security Policy

Urban Outfitters, Inc.

organizational measures to ensure that unencrypted personal information is accessible only by authorized personnel. If you have a question or concern regarding data privacy, please email DataPrivacyOfficer@urbn.com.

Data Breach Notification

URBN is governed by local, national, and international laws regarding data breach notifications. In the event of a URBN data breach, URBN is committed to notifying impacted customers and/or appropriate government entities in accordance with applicable law without unreasonable delay and in all events within the time period specified by applicable law. URBN plans to use reasonable, cost effective, and secure methods for notifications in the event of a URBN data breach.