**POLLINI RETAIL S.p.A.**

**INFORMATION ON THE PROCESSING OF PERSONAL DATA**

**PURSUANT TO ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679**

**Data Subjects: Customers**

Dear Customer,

Pollini Retail S.p.A., acting as Data Controller of your personal data, pursuant to and for the purposes of Regulation (EU) 2016/679 (hereinafter referred to as the "GDPR"), hereby informs you that the aforementioned legislation provides for the protection of data subjects with regard to the processing of personal data and that such processing shall be carried out in accordance with the principles of fairness, lawfulness, transparency and the protection of your privacy and rights.

In order to fulfil the tax and accounting obligations arising from a purchase, the Data Controller needs to collect personal data such as, by way of example, your first name, surname, address, VAT number, tax identification number and, where applicable, passport number for the purpose of applying Tax Free benefits.

Alternatively, your data may be collected during your visit to one of our stores by completing a paper form or by scanning a QR code with your smartphone. The information requested may include, in addition to the data required for tax and accounting purposes, your telephone or mobile phone number, email address and, optionally, your date of birth.

Such information may also be used for the optional marketing and profiling purposes described in Sections 1 and 2 of this Privacy Notice.

By scanning the QR code, we may also collect anonymous data for statistical purposes, such as the location of the store or place where the scan takes place, the date of scanning, and the type and characteristics of the mobile device used.

Your personal data will be processed in accordance with the provisions of the aforementioned legislation and the confidentiality obligations established therein.

Any updates to this Privacy Notice will be made available on our website at www.pollini.com.

**Purposes and legal basis of processing**

In particular, your personal data will be processed for the following purposes:

- **Compliance with tax and accounting obligations**, including the application of Tax Free benefits. Legal basis: legal obligation and pre-contractual measures aimed at facilitating customers in fulfilling Tax Free requirements.

- **Management of any electronic payments** through the payment system selected by you. Legal basis: legal obligation and contractual obligation.
- **Compliance with obligations established by applicable laws and regulations.**

**Consequences of failure to provide data:**

The processing of personal data is necessary in order to fulfil the customer's request for the purposes indicated above. Failure to provide, or the incorrect provision of, any mandatory information may prevent the Data Controller from providing the requested services.

**Optional purposes**

The purposes described below in Sections 1 and 2 are optional and not mandatory. Their fulfilment is based exclusively on your consent.

In particular, two separate consents are requested:

1. Consent to receive promotional communications from Pollini Retail S.p.A., acting as Data Controller.
2. Consent to profiling (creating your profile and analysing your habits or purchasing preferences in order to suggest offers based on your preferences through different communication channels).

You may withdraw your consent at any time, either through the automatic unsubscribe mechanisms provided in the emails you receive or by submitting a request using the contact details of the Data Controller.

**1) Direct Marketing by Pollini Retail S.p.A. and Use of Tracking Pixels**

Subject to your freely given consent, Pollini Retail S.p.A., acting as Data Controller, may process your personal data for market research, customer satisfaction surveys, statistical purposes, event invitations and promotional activities, including the sending of advertising and promotional material by email, post, SMS and/or telephone calls, other than communications necessary to provide services relating to the sale of products.

Such communications may also be sent through WhatsApp, where expressly requested by the customer in the data collection form.

With regard to promotional material sent to your email address, the processing may also include your interactions with the communications sent (e.g. email open rates and any clicks on links, banners and/or buttons).

For this purpose, our promotional communications and newsletters use tracking technologies (tracking pixels) that allow us to detect email openings and collect technical information, such as the date and time of opening, IP address and details of the device used, in order to monitor the effectiveness of promotional campaigns and improve our communications.

You may withdraw your consent to tracking at any time by clicking on the relevant link provided at the bottom of each newsletter, without having to unsubscribe from promotional communications. Following such withdrawal, promotional communications will continue to be sent to you, but will no longer be monitored using these tools.

Tracking pixels may nevertheless be used in specific service-related communications or communications relating to the contractual relationship, for example those concerning contractual changes, deadlines or security notices, exclusively where the conditions established by applicable legislation allowing their use without consent are met.

**2) Profiling**

In order to improve the search for products that may meet your needs, we would like to use your data to create your profile and analyse your habits and purchasing preferences, so that we can suggest offers tailored to your preferences through different channels, including emails, newsletters and personalised messages.

Your data may also be used to personalize online advertisements, for example while browsing search engines or social media platforms (e.g. Google, Pinterest, etc.).

The legal basis for processing for the optional purposes described in Sections 1 and 2 is the consent of the data subject.

**Consequences of refusing consent for optional purposes:**

Providing your data for the purposes indicated above is entirely optional. Any refusal to consent to such processing will not affect the continuation of the relationship or the lawfulness of the processing itself.

**How to withdraw your consent:**

You may withdraw your consent at any time, including consent relating to the use of WhatsApp, either through the automatic mechanisms provided at the bottom of each email received or by submitting a request using the contact details of the Data Controller.

To stop receiving promotional communications via WhatsApp, you may send a message containing the words “STOP WHATSAPP”.

Methods of processing

Personal data are processed using manual and/or electronic and IT tools, in such a way as to ensure the security, integrity and confidentiality of the data, in compliance with the organisational, physical and logical security measures required by applicable legislation.

These measures are intended to minimise the risks of destruction or loss, unauthorised access, alteration and unauthorised disclosure, in accordance with Articles 5 and 32 of the GDPR.

**Recipens of personal data**

In order to carry out certain activities or provide support for the operation and organisation of our business, some personal data may be disclosed or made available to recipients.

Such recipients are divided into the following categories:

**Third parties:** (disclosure to natural or legal persons, public authorities, services or other bodies other than the data subject, the Data Controller, the Data Processor and persons authorised to process personal data), including:

- Companies belonging to the Aeffe Group, within the scope of legitimate intra-group communications for internal administrative purposes;
- Banking institutions for the management of collections and payments;
- Companies responsible for managing tax and accounting compliance obligations relating to purchases (e.g. Tax Free procedures);
- Companies providing traditional or electronic postal services, where necessary for the purposes indicated;
- Consultants and independent professionals, including legal professionals and associated professional firms, acting as independent Data Controllers;
- Persons or entities entitled to access your data pursuant to legal obligations;
- Any other parties to whom the disclosure of data is necessary to achieve the purposes indicated above.

**Data Processors:** (natural or legal persons, public authorities, services or other bodies processing personal data on behalf of the Data Controller), including:

- Companies and other entities, consultants and independent professionals appointed to manage mandatory tax, administrative and accounting obligations, legal consultancy and related activities;
- Any IT, web service providers or other service providers necessary to achieve the purposes required for the management of the relationship.

**Within the company:**

Your personal data will be processed exclusively by personnel expressly authorised by the respective Data Controllers, who are subject to confidentiality obligations.

**Disclosure:**

Your personal data will not be disclosed to the public in any way.

**Transfers of data to third countries**

Considering the use of IT platforms for the processing and storage of data, including Cloud services, some service providers may be located in countries outside the European Union.

Appropriate safeguards are adopted for transfers to recipients, which, depending on the circumstances, may include:

- Verification of the existence of an adequacy decision adopted by the European Commission in respect of the recipient country (for example, for providers located in

the United States, verification of the provider's participation in the Data Privacy Framework, pursuant to the adequacy decision of 10 July 2023 under Article 45 of the GDPR, known as the “EU-US Data Privacy Framework”);

- Execution of Standard Contractual Clauses;
- Verification of the adoption of any supplementary measures in accordance with EDPB Recommendation 01/2020.

By way of derogation from these safeguards, for data processing activities falling within the scope of Article 49 of the GDPR, where applicable, the existence of a contract or pre-contractual measures in favour of the data subject, or the data subject's consent to the transfer, will be verified.

**Data retention period**

Please be informed that, in compliance with the principles of lawfulness, purpose limitation and data minimisation set out in Article 5 of the GDPR, your personal data necessary to provide the requested services will be retained for no longer than is necessary to achieve the purposes for which they were collected and processed.

- **Data relating to optional purposes (1. Direct Marketing by Pollini Retail S.p.A. – 2. Profiling):** such data will be retained until consent is withdrawn. Consent may be withdrawn through the automatic mechanisms provided in emails or by sending a communication using the contact details of the Data Controller. Two years after consent has been obtained, a communication will be sent to the contact channels provided by you, allowing you to withdraw your consent or confirm its continuation.
- **Purchase-related data:** where you have made a purchase, your data may be retained, subject to the same data protection measures and safeguards, for the period required to comply with applicable legal obligations, including, by way of example, tax legislation, which requires data to be retained for at least 10 years.

**Data controller**

The Data Controller, pursuant to applicable legislation, is **Pollini Retail S.p.A.**, with registered office at Strada Erbosa Uno, 92 – 47043 Gatteo (FC), Italy, VAT No. 03527510154, represented by its legal representative pro tempore.

You may request further information regarding the personal data you have provided by sending an email to:

**privacy@pollini.com**

Further information regarding the privacy policies adopted by our Company is available on our website:

**www.pollini.com**

The Data Protection Officer (“DPO”) for Pollini Retail S.p.A. is **Studio Paci & C. Srl** (Contact person: Luca Di Leo), who may be contacted at:

**Email:** dpo.pollini@studiopaciecsrl.it

**Telephone:** +39 0541 1795431

**Right of the data subject**

**Regulation (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21 and 22 – Rights of the Data Subject**

1. The data subject has the right to obtain confirmation as to whether or not personal data concerning them are being processed and, where that is the case, to obtain access to their personal data and the following information (**Right of access**):

a) the purposes of the processing;

b) the categories of personal data concerned;

c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;

d) where possible, the envisaged period for which the personal data will be stored or, if this is not possible, the criteria used to determine that period;

e) the existence of the right to request from the Data Controller the rectification or erasure of personal data or the restriction of processing of personal data concerning the data subject, or to object to such processing;

f) the right to lodge a complaint with a supervisory authority;

g) where the personal data are not collected directly from the data subject, any available information as to their source;

h) the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in such cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for the data subject.

2. The data subject has the right to:

a) obtain the rectification of inaccurate personal data concerning them without undue delay (**Right to rectification**);

b) obtain the erasure of personal data concerning them without undue delay, where one of the grounds set out in Article 17 of the GDPR applies (**Right to erasure**);

c) obtain restriction of processing where one of the circumstances set out in Article 18 of the GDPR applies (**Right to restriction of processing**);

d) receive their personal data in a structured, commonly used and machine-readable format, where the conditions set out in Article 20 of the GDPR are met (**Right to data portability**);

e) object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them pursuant to Article 6(1)(e) or (f), including profiling based on those provisions (**Right to object**);

f) not be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them, subject to the exceptions provided for in Article 22 of the GDPR (**Automated individual decision-making, including profiling**).

**Right to lodge a complaint**

Where the relevant conditions are met, data subjects also have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), as the competent supervisory authority, in accordance with the procedures established by law.

For any further information, or to exercise the rights granted to you, you may contact the Data Controller using the contact details provided above.