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INFORMATION ABOUT DATA PROCESSING ARTICLES 13 AND 14 OF REGULATION (EU) 2016/679

Data Subjects: Retail Events Customers

Dear Customer,

"AEFFE S.P.A.", in its capacity as Data Controller of your personal data, pursuant to and for the purposes of Regulation (EU) 2016/679 (GDPR), as well as the legislation on the protection of personal data applicable in the country where the shop is located, hereby informs you that the aforementioned legislation provides for the protection of data subjects with respect to the processing of personal data and that such processing will be based on the principles of correctness, lawfulness, transparency and protection of your confidentiality and your rights.

During your visit to the shop, you will be given the option to fill out a data collection form using electronic devices (e.g., tablets) available in the shop. The information, such as your name, surname, and e-mail address, will be used for the optional marketing and profiling purposes described in points 1 and 2 of this notice.

Your personal data will be processed in accordance with the legal provisions of the above-mentioned legislation and the confidentiality obligations therein.

Updates to this policy are made available on the website www.aeffe.com

Optional purposes: the purposes described in points 1 and 2 below are optional and not compulsory, and their implementation is based solely on your consent. Specifically, two different consents are required: the first (1) for the sending of promotional communications by AEFFE S.p.A. as the data controller - the second (2) for profiling (defining your profile, analysing habits or consumption choices, in order to suggest offers to you, through various means, based on your preferences).

1) Direct marketing by Aeffe S.p.A.: Subject to your voluntary consent, the Controller Aeffe S.p.A. may process your data for market surveys, customer satisfaction surveys, statistics, invitations to events, and promotional activities, including the sending of advertising and promotional material – via e-mail, post, and/or SMS and/or telephone calls – beyond that necessary to ensure the implementation of the relationship. In relation to the promotional material sent to your e-mail inbox, the processing may also include interactions with the messages sent (for example, the e-mail opening rate, clicks on links and/or banners and/or buttons).

<u>Data Controller</u>: AEFFE S.p.A.

2) Profiling: In order to improve the search for products that could meet your needs, we would like to use your data to define your profile, analyse habits or consumption choices, in order to suggest offers to you, through various means, based on your preferences, either through e-mails, newsletters or personalised messages. If your consent is obtained, upon reaching a particular threshold, you may be offered the opportunity to join the VIP Card scheme, which gives you access to special promotions and additional services, for which specific details will be provided to you. The legal basis for the processing is the consent of the data subject.

Data Controller: AEFFE S.p.A.

Consequences of refusal for optional purposes: The provision of the data for the above-mentioned purposes is optional, and your refusal to permit the processing of the data will not affect the continuation of the relationship or the appropriateness of the processing.

How to withdraw consent: You may withdraw your consent at any time, either through the automatic means provided in the e-mails or by sending a message to the Data Controller using the contact details provided.

Methods of processing: The processing is carried out using manual and/or computerised and electronic tools, in order to guarantee the security, integrity and confidentiality of the data in compliance with the

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physical and logical organisational measures required by the applicable provisions, in order to minimise the risks of destruction or loss, unauthorised access, modification and unauthorised disclosure in compliance with the procedures set out in Articles 5 and 32 of the GDPR.

Recipients: In order to carry out certain activities, or to provide support for the operation and organisation of the activities, some data may be made known or communicated to recipients. These parties are identified as:

<u>Third parties</u>: (disclosure to: natural or legal persons, public authorities, agencies or other bodies that are not the data subject, the data controller, the data processor, and the authorised individuals responsible for processing) including:

- Aeffe Group companies in the context of legitimate intra-group communications for internal administrative purposes;
- Banking institutions for the management of receipts and payments;
- Companies operating traditional or electronic postal services (where necessary for the purposes indicated);
- Consultants and freelancers, also in associated form in legal matters, etc. as autonomous data controllers;
- Parties/Institutions whose right to access your data is dictated by legal requirements;
- Any other parties to whom your data may need to be disclosed for the achievement of the purposes set out above.

<u>Data processors:</u> (natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller)

- Companies and other parties, consultants and freelancers to whom mandates have been given for the handling of compulsory tax, administrative, accounting and legal advisory requirements, etc.;
- Suppliers of IT, web, or other services necessary for the achievement of the purposes necessary for the management of the relationship.

<u>Within the company</u>: Your data will only be processed by personnel expressly authorised by the Data Controller, with guarantee of the adoption of a confidentiality agreement.

Dissemination: Your personal data will not be disseminated in any way.

Transfer of data to third countries: Due to the use of IT platforms for data processing and storage, including cloud-based instruments, some providers are located in non-EU countries. Appropriate safeguards are adopted for transfers to recipients, which depending on the case, may include: verification of the existence of adequacy decisions from the European Commission for the recipient country (for example, for suppliers located in the USA, verification of the supplier's adherence to the Data Privacy Framework agreement with reference to the adequacy decision of 10/07/2023, pursuant to Article 45 of the GDPR, "EU-US Data Privacy Framework"), signing of standard contractual clauses, and verification of the adoption of any additional measures in implementation of the EDPB Recommendations 01/2020. In exception to these guarantees, for the data processing (as per Article 49 of the GDPR), where applicable the existence of a contract or pre-contractual measures in favour of the data subject or consent to the transfer is verified.

Retention period: Data for optional purposes (*I. Direct marketing of Aeffe S.p.A.:* - 2. *Profiling*) are retained until consent is withdrawn, which can be requested either through the automatic means provided in the e-mails or by sending a message to the Data Controller using the contact details provided. Two years after consent has been obtained, a notification will be sent to the contact channels provided to enable withdrawal or continuation of the consent.

Data Controller: The Data Controller, pursuant to the regulations, is "AEFFE S.P.A.", Via delle Querce 51 - 47842 San Giovanni in Marignano (RN), Italy, VAT No. 01928480407. You can request further information on the data provided by sending an e-mail to the following address <u>privacy@aeffe.com</u>. The

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website https://aeffe.com/it/ provides further information on the privacy policies adopted by our Company.

The **Data Protection Officer ("DPO") for AEFFE S.P.A.** is Studio Paci & C. Srl (Contact Person Gloriamaria Paci) who can be contacted at the following e-mail address: dpo.aeffe@studiopaciecsrl.it and Telephone No. 0541 - 1795314.

Reg. (EU) 2016/679: Articles 15, 16, 17, 18, 19, 20, 21, 22, and 23 - Rights of the Data Subject

- 1. The data subject has the right to obtain confirmation as to whether or not data relating to him or her are being processed, even if not yet recorded, and their communication in an intelligible form.
- 2. The data subject has the right to be informed of the:
 - a. source of the personal data;
 - b. purposes and methods of the processing;
 - c. logic involved in any processing carried out with the aid of electronic means;
 - d. identification details of the data controller, data processors and the appointed representative pursuant to Article 5(2);
 - e. the parties or categories of parties to whom or which the personal data may be communicated or who or which may become aware of them in their capacity as appointed representative in the territory of the country, data processor or person authorised to process data.
- 3. The data subject has the right to obtain the:
 - a. update, rectification or, if desired, the supplementation of the data;
 - b. erasure, transformation into anonymous form or restriction of data processed in breach of the law, including data whose storage is not necessary in relation to the purposes for which the data were collected or subsequently processed;
 - c. certification that the operations referred to in points a) and b) have been notified, also in relation to their content, to the parties to whom or which the data were communicated or disseminated, unless this proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected;
 - d. portability of the data.
- 4. The data subject has the right to object, in whole or in part:
 - a. for legitimate reasons to the processing of personal data concerning him or her, even if pertinent to the purpose of the collection;
 - b. the processing of personal data concerning him or her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communications.

<u>Complaint:</u> The data subjects, where conditions apply, also have the right to lodge a complaint with the Italian Data Privacy Authority as the supervisory authority in accordance with the procedures established. For any further information, and to exercise your rights, you can contact the data controller using the contact details provided above.

Rev. 1/2024 - Retail Events