

## **PRIVACY NOTICE**

### **(June 8, 2020 version)**

#### 1. Data Controller

Loro Piana S.p.A. with registered offices in Corso Rolandi 10, Quarona (VC) – 13017, Italy, in its quality as data controller ("**Loro Piana**", "**we**" our "**our**") which can be contacted at the following email address [privacy@loropiana.com](mailto:privacy@loropiana.com), informs you, according to European Regulation No. 679/2016 on the processing of personal data ("**European Privacy Regulation**") that it processes the personal data collected from you, even online through its websites ("**Data**") with the following modalities.

#### 2. Ways of Data Processing

Data is processed in paper and electronic form in line with organizational and security requirements defined by applicable laws.

#### 3. Purposes of Data Processing

Notwithstanding what provided for in the Cookie Policy published at the following link <https://it.loropiana.com/it/privacy-cookies>, Loro Piana processes Data (such as, for example, name, surname, address, details of your purchases, status and number of family members, image, and – if you agree that we may install on your device cookies from Loro Piana's website – browsing data on Loro Piana's website, included the pages consulted and products viewed, etc.) for the following purposes (i) to manage the sale of our products and provide sales and after-sales services (including, for example, fraud prevention, returns, warranty and customer support) and, in relation to online activities, to manage the services offered by our websites, including the management of your information requests ("**Contractual Purposes**"); (ii) to comply with legal and regulatory obligations ("**Legal Purposes**"); and, with your prior consent where required by applicable law, (iii) to send marketing communications through electronic means (including, for example, email, SMS, MMS, mobile, social network and instant messages) or paper means (including, for example, traditional mail) to promote our trademarks, services and/or products and to conduct market analysis and statistics ("**Marketing Purposes**") and (iv) to analyse your habits, interests and preferences, including – where you consented to install the cookies – browsing data with specific reference to pages consulted and products viewed on Loro Piana's website, in order to offer services and send marketing communications on this basis ("**Profiling Purposes**").

Moreover, Data related to spending volume, product category, store of purchasing, date of birth, status and number of family members may be processed on the basis of Loro Piana's legitimate interest to provide a service in line with your needs, adequately balanced with the necessity of your rights protection ("**Marketing Related Legitimate Interest Purposes**").

#### 4. Legal Basis

Processing of Data for Contractual Purposes is mandatory since it is necessary to register, purchase products and use specific services offered by Loro Piana. Processing of Data for Legal Purposes is mandatory since it is required by the applicable laws. If you do not provide Data when it is mandatory, it would not be possible for Loro Piana to provide the products or services that you request. Processing of Data for Marketing and Profiling Purposes is not mandatory and subject to your prior consent which, in any case, may be revoked. Processing of Data for Marketing Related Legitimate Interest is functional to the pursuit of a legitimate interest of Loro Piana, properly balanced with your interests and as explained in paragraph 3.

## 5. Data Retention Period

Data are processed for no longer that is necessary to fulfil the above mentioned purposes and, particularly, for Contractual Purposes Data are retained for the duration of the contract (in case of an account created on the website or in relation to services provided by Loro Piana) and for 10 years after the requested service. For Legal Purposes, Data are retained in accordance with the specific limitation periods defined by law. For Marketing and Profiling Purposes Data are retained for a period of 7 years from the last purchase, as per the authorization of the Italian Data Protection Authority obtained by Loro Piana S.p.A. on March 9, 2017, and/or from the last contact with you (e.g. participation to an event, opening of a newsletter). For Marketing Related Legitimate Interest Data are retained for a period of 7 years from the last purchase, notwithstanding the right to object to the processing at any time. Upon expiry of the above mentioned retention periods, Data will be automatically deleted or made anonymous in a permanent and non-reversible way.

## 6. Data Communication and Transfer Abroad

For the Purposes explained in paragraph 3, Loro Piana might communicate Data, strictly necessary to each purpose of processing, to the following categories of subjects: (i) employees in charge of the processing (such as the personnel of the CRM, IT, Retail offices); (ii) consultants and professional and technical service providers (such as IT service providers, postal offices and couriers, legal consultants, etc.), (iii) companies controlled by Loro Piana, Loro Piana's companies in joint venture arrangements and Loro Piana's franchisees which may also be located in countries outside the Economic European Area (EEA) as indicated on [www.loropiana.com](http://www.loropiana.com); (iv) public entities, banks, third parties involved in corporate transactions and extraordinary operations, and legitimate transferee. Data may be transferred outside the EEA according to articles 45 and 46 of the European Privacy Regulation. Your Data are not disseminated.

You have the right to obtain a copy of Data held abroad outside the EEA and to receive information on the place where Data are kept, by asking directly to Loro Piana, through the contact details provided in paragraph 8 of this Privacy Notice.

## 7. Data Subject's Rights

You may always enforce your privacy rights, for example you may access the Data, verify Data content, origin and accuracy, ask that Data be integrated, updated, amended, deleted, blocked for breach of law and object to the processing of your Data for legitimate purposes. In addition to the rights above, you may ask for a restriction of the processing, ask for Data portability and bring a claim before the Data Protection Authority, if the premises subsist.

## 8. Additional Privacy Information for California Residents

In this section, we provide information for California residents, as required under California privacy laws, including the California Consumer Privacy Act ("**CCPA**"), which requires that we provide California residents certain specific information about how we handle their personal information, whether collected online or offline. Under the CCPA, and as used in this section, "personal information" means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. It does not include publicly available data as defined by the CCPA. This section does not address or apply to our handling of personal information that is subject to an exemption under the CCPA.

### Notice at Collection

The table below sets out generally the categories of personal information (as defined by the CCPA) about California residents that we collect, sell, and disclose to others for a business purpose. We collect these categories of personal information from you for the purposes described in section 3. Purposes of Data Processing above. Our collection, use and disclosure of personal information about a California resident will vary depending upon the circumstances and nature of our interactions or relationship with such resident.

Categories of personal information	Do we collect?	Do we disclose for business purpose(s)?	Do we sell?
<b>Name, Contact Information and other Identifiers:</b> Identifiers such as a real name, alias, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.	YES	YES	NO
<b>Customer Records:</b> Paper and electronic customer records containing personal information, such as name, signature, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, bank account number, credit card number, debit card number, or any other financial or payment information.	YES	YES	NO
<b>Protected Classifications:</b> Characteristics of protected classifications under California or federal law such as race, color, sex, age, religion, national origin, disability, citizenship status, and genetic information.	NO	NO	NO
<b>Purchase History and Tendencies:</b> Commercial information including records of personal property, products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.	YES	YES	NO
<b>Biometric Information:</b> Physiological, biological or behavioral characteristics that can be used alone or in combination with each other to establish individual identity, including DNA, imagery of the iris, retina, fingerprint, faceprint, hand, palm, vein patterns, and voice recordings, keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	NO	NO	NO
<b>Usage Data:</b> Internet or other electronic network activity information, including, but not limited to, browsing history, clickstream data, search history, and information regarding a resident’s interaction with an internet website, application, or advertisement[, including access logs and	YES	YES	NO

other activity information related to your use of any Loro Piana’s websites, applications or other online services.]			
<b>Geolocation Data:</b> Precise geographic location information about a particular individual or device.	<i>NO</i>	<i>NO</i>	<i>NO</i>
<b>Audio, Video and other Electronic Data:</b> Audio, electronic, visual, thermal, olfactory, or similar information[ such as CCTV footage, photographs, and call recordings and other audio recording (e.g., recorded meetings and webinars)].	<i>YES</i>	<i>NO</i>	<i>NO</i>
<b>Professional or employment-related information:</b> Employment history, qualifications, licensing, disciplinary record.	<i>NO</i>	<i>NO</i>	<i>NO</i>
<b>Education Information:</b> Information about education history or background that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	<i>NO</i>	<i>NO</i>	<i>NO</i>
<b>Profiles and Inferences:</b> Inferences drawn from any of the information identified above to create a profile reflecting a resident’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.	<i>YES</i>	<i>YES</i>	<i>NO</i>

**California Resident Rights.** California law grants California residents certain rights and imposes restrictions on particular business practices as set forth below.

**Right to Opt-out of Sale of Personal Information.** California residents have the right to opt-out of our sale of their personal information. We do not and will not sell your personal information. Furthermore, we do not sell personal information about residents who we know are younger than 16 years old, without opt-in consent.

**Notice at Collection.** At or before the point of collection of personal information, notice must be provided to California residents of the categories of personal information collected and the purposes for which such information is used.

**Verifiable Requests to Delete and Requests to Know.** Subject to certain exceptions, California residents have the right to make the following requests, at no charge:

**Request to Delete.** California residents have the right to request deletion of their personal information that we have collected about them and to have such personal information deleted, except where an exemption applies.

**Request to Know.** California residents have the right to request and, subject to certain exemptions, receive a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the resident to transmit this information to another entity without hindrance. California residents also have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months, including the following:

- categories of personal information collected;
- categories of sources of personal information;
- business and/or commercial purposes for collecting and selling their personal information;
- categories of third parties/with whom we have disclosed or shared their personal information;
- categories of personal information that we have disclosed or shared with a third party for a business purpose;
- categories of personal information collected; and
- categories of third parties to whom the residents' personal information has been sold and the specific categories of personal information sold to each category of third party.

California residents may make Requests to Know up to twice every 12 months.

**Submitting Requests.** Requests to Opt-out of Sale of Personal Information, Requests to Know, and Requests to Delete may be submitted by contacting us at (855) 481-9100 (toll free), or by emailing us at [privacy@loropiana.com](mailto:privacy@loropiana.com). We will respond to verifiable requests received from California consumers as required by law.

**Right to Non-Discrimination.** The CCPA prohibits discrimination against California residents for exercising their rights under the CCPA. Discrimination may exist where a business denies or provides a different level or quality of goods or services, or charges (or suggests that it will charge) different prices, rates, or penalties on residents who exercise their CCPA rights, unless doing so is reasonably related to the value provided to the business by the residents' data.

**Financial Incentives.** A business may offer financial incentives for the collection, sale or deletion of California residents' personal information, provided the incentive is not unjust, unreasonable, coercive or usurious, and is made available in compliance with applicable transparency, informed consent, and opt-out requirements. California residents have the right to be notified of any financial incentive offers and their material terms, and the right to opt-out of such incentives at any time; residents may not be included in such incentives without their prior informed opt-in consent. We do not offer any incentives at this time.

## 9. Change, Update and Contacts

This document will be effective from the date indicated in the heading. Loro Piana might change and/or integrate the Privacy Notice, also as a consequence of further modifications and/or integration of the European Privacy Regulation. Updates and modifications will be notified in advance and you will be able to view the update Privacy Notice at the [www.loropiana.com](http://www.loropiana.com).

If you have doubts, questions or complaints with regard to the collection and processing of your Data, you may contact Loro Piana by sending an email to the following address [privacy@loropiana.com](mailto:privacy@loropiana.com).

The Data Protection Officer (DPO) designated by Loro Piana is reachable to the following address [privacy@loropiana.com](mailto:privacy@loropiana.com).