

**INFORMATION ON DATA PROCESSING  
ARTS. 13 AND 14 OF EU REGULATION 2016/679**

**Data Subjects: Customers**

**Dear Customer,**

**Roles and responsibilities:** this section describes the roles of the Companies that process your personal data following a purchase in the store or after filling out the paper forms or scanning a QR code with your smartphone and having released your data, including through our partners.

– **Pollini Suisse SAGL**

Pollini Suisse SAGL is the Data Controller of your personal data for tax and accounting purposes deriving from purchases made in the store, including any electronic payments through the available payment system you have chosen.

In order to achieve its purposes related to the management of tax and accounting obligations related to the purchase, the Data Controller needs to acquire personal data such as, by way of example, your VAT number, and possibly your passport number to apply the TaxFree benefits.

– **Pollini Retail S.p.A.**

During your purchase or visit to the store, you will be asked to fill out a data collection form. The information from this form, such as your name and surname, telephone or mobile number, address, email address or date of birth, will also be used for the optional marketing and profiling purposes described in points 1 and 2 of this policy.

Pollini Retail S.p.A. is the Data Controller of your personal data for the optional marketing and profiling purposes described in points 1 and 2 of this policy, following the filling out of the paper forms or by scanning a QR code with your smartphone and having released your data, subject to your free consent.

By scanning the QR code, we will be able to acquire anonymous data for statistical purposes such as: the location of the store or the location of scanning, the date of scanning, and the type and characteristics of the mobile device.

The Companies, in their capacity as Data Controllers of your personal data, each for their own processing purposes, pursuant to and for the purposes of EU Regulation 2016/679 (hereinafter "GDPR"), hereby inform you that the aforementioned legislation provides for the protection of the Data Subjects with respect to the processing of personal data and that such processing will be based on the principles of honesty, lawfulness, transparency, and the protection of your privacy and your rights.

Your personal data will be processed in accordance with the legal provisions in the aforementioned regulations and in accordance with the privacy obligations set forth therein.

Any updates to this policy shall be made available on the website [www.pollini.com](http://www.pollini.com).

**Purpose and legal basis of the processing:** in particular, your data will be processed for the following purposes:

- Tax and accounting obligations, including the application of TaxFree benefits; legal basis: legal obligation, pre-contractual measures aimed at facilitating customers in the application of TaxFree obligations.  
Data Controller: **Pollini Suisse SAGL.**
- Management of any electronic payments through the available payment system you have chosen; legal basis: legal obligation and contractual obligation.  
Data Controller: **Pollini Suisse SAGL.**
- Dispute management; legal basis: legal obligation and contractual obligation.  
Data Controller: **Pollini Suisse SAGL.**
- Obligations under applicable laws; legal basis: legal obligation.  
Data Controller: **Pollini Suisse SAGL.**

**Consequences of non-communication:** the processing of data is necessary as a result of the customer's request for the purposes indicated above; any non-communication, or incorrect communication, of any of the mandatory information may make it impossible for the Data Controller to guarantee the requested services.

**Optional purposes:** the purposes described below in points 1 and 2 are optional and not mandatory, and their implementation is based exclusively on your consent. In particular, two different forms of consent are required: the first (1) for the sending of promotional communications by Pollini Retail S.p.A. as data controller – the second (2) for profiling (defining your profile, analyzing habits or consumption choices, in order to suggest, in various ways, offers based on your preferences). You can revoke the consent given at any time, either through the automatic methods present in the emails received or by sending a request to the contact details of the Data Controller.

**1) Direct marketing by Pollini Retail S.p.A.:** Subject to your free consent, the Data Controller Pollini Retail S.p.A. may process your data, if necessary, to conduct market surveys, customer satisfaction surveys, statistics, invitations to events, and for promotional activities related to the sending of advertising and promotional material – by email, mail and/or text message and/or telephone calls – other than those necessary to ensure the sale of the products. These communications will also be transmitted via the WhatsApp channel if expressly indicated by the customer in the data collection form. Regarding the sending of promotional material to your email inbox, interactions with the transmitted messages may also be subject to processing (e.g., email opening rate, any clicks on links and/or banners and/or buttons).

Data Controller: Pollini Retail S.p.A.

**2) Profiling:** in order to improve the search for products that can satisfy you, we would like to use your data to define your profile and analyze consumption habits or choices, in order to suggest, in various ways, offers based on your preferences, whether through emails, newsletters or messages dedicated to you. Your data will also be used to personalize online ads, for example, when browsing search engines or social media platforms (e.g. Google, Pinterest, etc.).

Data Controller: Pollini Retail S.p.A.

The legal basis of the processing for the optional purposes 1 and 2 is the consent of the Data Subject.

**Consequences of refusing the optional purposes:** Your provision of data with regard to these purposes is optional, and your refusal to allow processing shall not compromise the continuation of the relationship and the adequacy of the processing.

**How to revoke consent:** You can revoke the consent given, including regarding the use of WhatsApp, at any time, either through the automatic methods shown at the bottom of each email received or by sending a request to the contact details of the Data Controller. To stop receiving promotional communications via WhatsApp, you can send a message with the text "STOP WHATSAPP".

**Processing methods:** The processing is carried out with manual and/or IT and online tools, in order to guarantee the security, integrity, and confidentiality of the data in compliance with the physical and digital organizational measures set forth by the regulations in force, in order to minimize the risks of destruction or loss, unauthorized access and unauthorized modification and disclosure in compliance with the procedures set out in Articles 5 and 32 of the GDPR.

**Recipients:** To carry out certain activities, or to provide support for the business' operation and organization, some data may be disclosed or communicated to recipients. These parties are divided into:

Third parties: (communication to: natural or legal persons, public authorities, service, or another body that is not the Data Subject, the Data Controller, the Data Processor, or the authorized persons 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 for the management of regulatory obligations in the tax and accounting field related to the purchase (e.g. TaxFree obligations, etc.);
- Companies that manage traditional or computerized postal services (if necessary for the purposes indicated);
- Consultants and freelancers, including associations of legal professionals, etc. as independent data controllers;
- Parties/Bodies, in accordance with legal requirements, whose right to access your data, where applicable, is recognized by legal obligations;
- Any other parties to whom the communication of data is necessary to achieve the aforementioned purposes.

Data processors: (the natural or legal person, public authority, service, or other body that processes personal data on behalf of the Data Controller)

- Companies and other subjects, consultants and freelancers who have been given the mandates for the management of mandatory tax, administrative, accounting, legal advice, etc.;
- Any providers of IT, web, or other services necessary to achieve the purposes required to manage the relationship.

Within the corporate structure: Your data will only be processed by personnel expressly authorized by the Data Controller, with the assurance that they will adhere to a confidentiality agreement.

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

**Transfer of data to third countries:** Given the use of IT platforms for data processing and storage, including Cloud-based tools, some providers are located in non-EU countries. Adequate safeguards are adopted for the transfer to the recipients, which, depending on the circumstances, may be: verification of the existence of adequacy decisions for the recipient country by the European Commission (by way of example, for providers located in the USA, verification of the provider's adherence to the Data Privacy Framework agreement with reference to the adequacy decision of July 10, 2023, pursuant to Art. 45 of the GDPR, "EU-US Data Privacy Framework"), signing of standard contractual clauses, verification of the adoption of any additional measures in the implementation of the EDPB recommendation 01/2020. Notwithstanding these safeguards, for data processing (in reference to Art. 49 of the GDPR), where applicable, the existence of a contract or pre-contractual measures in favor of the Data Subject or consent to the transfer is verified.

**Retention period:** We inform you that, in accordance with the principles of lawfulness, limitation of purposes, and data minimization, the retention period of your personal data necessary to perform the requested services is established for a period of time not exceeding the fulfillment of the purposes for which they are collected and processed.

- Data related to opt-in purposes (*1. Direct marketing by Pollini Retail S.p.A.: - 2. Profiling*) are kept until consent is revoked, to be requested either through the automatic methods present in the emails or by sending a message to the Data Controller's contact details. At the end of 2 years from the acquisition of consent, a notice will be sent to the contact channels you provided to allow you to withdraw or continue consent.

- With the same methods and guarantees of data protection, if you have made a purchase, the data may be stored for a period of time in compliance with the obligations set out by the laws in force, by way of example on the basis of tax legislation for at least 10 years.

**Data Controller:** In accordance with regulations, the Data Controller is "**Pollini Retail S.p.A.**", with registered office in Strada Erbosa Uno, 92 - 47043 Gatteo (FC), Italy; VAT number: 03527510154; in the person of its legal representative pro tempore. By sending an email to the following address [privacy@pollini.com](mailto:privacy@pollini.com) you can request more information regarding the data provided. The website [www.pollini.com](http://www.pollini.com) contains further information regarding the privacy policies adopted by our Company.

The **Data Protection Officer ("DPO") for Pollini Retail S.p.A.** is Studio Paci & C. Srl (Contact person: Luca Di Leo) who can be contacted at the following address: [dpo.pollini@studiopacicsrl.it](mailto:dpo.pollini@studiopacicsrl.it) and telephone: 0541-1795431.

**Data Controller** for the sole purposes related to compliance with regulatory obligations in tax and accounting matters deriving from purchases made in the store, the Data Controller of personal data is "**Pollini Suisse SAGL**" with registered office in ARIFIDA, via Motta, 18 6830 P.O. box 1564 Chiasso – Switzerland (CH).

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

1. The Data Subject has the right to obtain confirmation as to the existence or non-existence of their personal information, even if it has not yet been recorded, and to its communication in an intelligible format.
2. The Data Subject has the right to obtain information on:
  - a. the origin of the personal data;
  - b. the purposes and methods of data processing;
  - c. the software applied in case of processing carried out with the aid of electronic devices;
  - d. the identity of the Data Controller, Data Processors and designated representative pursuant to Article 5, paragraph 2;
  - e. parties or categories of parties to whom the personal data may be communicated, or who can learn about them in their capacity as appointed representatives of the State, Data Processors, or Data Managers.
3. The Data Subject has the right to obtain:
  - a. the updating, rectification or, when of interest, integration of said data;
  - b. the cancellation, transformation into anonymous form, or limitation of data processed in breach of the law, including data whose retention is no longer required for the purposes for which they were collected or subsequently processed;

- c. confirmation that those to whom the data are communicated or disclosed are notified of the actions referred to under points a) and b), including their content, unless the fulfillment thereof proves impossible or involves using methods that are clearly disproportionate to the right being protected;
  - d. the portability of the data.
4. The Data Subject has the right to oppose, in whole or in part:
- a. the processing of personal data concerning them for legitimate reasons, even if pertinent to the purpose of collection;
  - b. the processing of their personal data for the purpose of sending advertising or direct sales material, or for carrying out market research or commercial communications.

Complaint: The Data Subjects, having met the conditions, also have the right to lodge a complaint with the Guarantor as the supervisory authority according to the established procedures. For any further information, and to assert the rights granted to you, you may contact the Data Controller at the details given above.