

## PRIVACY POLICY

This platform ("**Platform**") is an interactive platform dedicated to the transmission of live/recorded digital content related to the ISM and Strike Events organized by Kering Eyewear S.p.A., a company established under the laws of Italy, with registered office in Padua, Via Altichiero, n. 180, registered with the Companies' Register of Padua under n.04846890285 ("**Kering Eyewear**"), belonging to the group of companies of Kering S.A. The Platform allows also a dynamic involvement of all authorized users of the Platform during its operation ("**Services**").

In order to make the Platform more secure, Kering Eyewear adopted this policy regarding the processing of personal data (the "**Privacy Policy**"). In this Privacy Policy, all references to the words "**User**" and/or "**Users**" shall be referred to any authorized visitors of the Platform.

PLEASE CAREFULLY READ THROUGH THIS PRIVACY POLICY AND THE TERMS AND CONDITIONS OF USE AVAILABLE ON THE PLATFORM. SHOULD YOU NOT AGREE TO ANY OF THE TERMS OF THIS PRIVACY POLICY OR THE TERMS AND CONDITIONS OF USE, YOU SHOULD NOT CONTINUE TO NAVIGATE ON THE PLATFORM. BY USING THE PLATFORM, YOU AGREE TO BE BOUND BY, AND ACCEPT, THIS PRIVACY POLICY AS WELL AS THE TERMS AND CONDITIONS OF USE CONTAINED THERETO.

## PRIVACY NOTICE

In accordance with the European Regulation n. 2016/679 ("**GDPR**") as well as the Italian Legislative Decree n. 196 of June 30<sup>th</sup>, 2003 and subsequent modifications and integrations ("**Italian Personal Data Protection Code**", together with the GDPR the "**Privacy Laws**"), with this privacy policy concerning the processing of personal data ("**Privacy Policy**"), Kering Eyewear provides the Users with a general description of the purposes and the methods of the processing of the Personal Data which should be in any way provided by the User during the access of the Platform, the use of the Platform and/or of the Services. Any capitalized term in this Privacy Policy which is not defined herein or in the Terms of Use of the Platform shall have the meaning ascribed to that term in the Privacy Laws in the version as of the date this Privacy Policy was last modified on.

### 1. DATA CONTROLLER

The Data Controller is Kering Eyewear S.p.A., with registered office in Padua, Via Altichiero, n. 180, registered with the Companies Register of Padua under n. 04846890285, belonging to the group of companies of Kering S.A. (the "**Kering Group**"). The Data Controller autonomously determines the purposes and methods of the personal data processing, as well as the security measures to be adopted in order to ensure the confidentiality, the integrity and the availability of the personal data of the User.

The personal data of the User will be collected, processed and stored by the Data Controller and/or data processors (if appointed), as well as by the persons authorized by the Data Controller and/or by the data processor to carry out processing operations (any of them, the "**Person in charge**") in accordance with the terms of this Privacy Notice and in compliance with the Privacy Laws.

The User may, at any time, contact Kering Eyewear (or its Data Protection Officer) on any query or request relating to this Privacy Policy or the User's personal data, by writing an e-mail to the following e-mail address:

- [keringeyewear.HR.privacy@kering.com](mailto:keringeyewear.HR.privacy@kering.com)

or by sending a registered mail to:

- Kering Eyewear S.p.A.

Via Altichiero n. 180,

35135 - Padua (Italy)

## **2. OPTIONAL NATURE OF THE DATA PROVISION**

The User is free to provide Kering Eyewear with its personal data.

## **3. TYPE OF PROCESSED DATA**

Kering Eyewear, the Person in Charge and the data processor, if any, are entitled to collect, process and store, in compliance with the Privacy Laws, the following types of personal data:

### **- Data collected during the Platform surfing**

During their normal execution, the information systems and the software procedures used for the Platform may lead to the collection of some information. Such information is collected not for the purpose for it to be associated to the Users but such information, as per their nature, may allow the identification of the Users where elaborated or associated with data owned by third parties.

By way of example, the domain name IP addresses of the devices used by the User for visiting/accessing the Platform, the web-pages of the Platform visited by the User, the domain name and the website addresses from which the User accessed the Platform, the Uniform Resource Identifier (URL) address of the requested sources, the time of the request, the method used for submitting the request to the web server, the size of the file obtained in reply, the numeric code indicating the status of the reply given by the web server and the other parameters relating to the browser and/or to the operating system and/or to the informatics environment used by the User are included in this category of data.

The abovementioned data are used in order to obtain statistical anonymous information about the use of the Platform and to verify the correct functioning of the Platform during the surfing.

The aforementioned data could (also) be used in order to (i) prevent any misuse in using the Platform and/or (ii) ascertain liability in the event of cybercrimes occurred to prejudice the Platform.

### **- Data collected during the registration process**

By providing its personal data in the Platform registration process, the User agrees that Kering Eyewear, the Person in Charge and/or the data processor, if any, may also collect, process, disclose (including transfer overseas, where required) and store some information and/or personal data provided by the Users during the Platform registration process: (i) name and surname; and (ii) e-mail address. Additional personal data may be contained in communications sent by the User to Kering Eyewear, for example to report a problem or to submit queries, concerns or comments regarding the Platform or its content. Such information and/or personal data will be processed in compliance with the Privacy Laws, for the purposes listed below.

### **- Data collected during the interaction with the Platform' services**

By interacting with the contents of the Platforms (e.g. videos, chats, etc.), the User's activity will be recorded in order to analyse the contents' liking. In some cases the name and surname of the User will be disclosed in a leaderboard showing the most engaged Users for each content of the Platform.

## **4. PURPOSES AND LEGAL BASIS OF THE PROCESSING**

The personal data provided by the User during the registration process will be processed, depending on their type, for all or some of the following purposes:

- a) To identify the visitor to the Platform.
- b) To provide the User with the Services and information offered through the Platform.
- c) To contact the User, at the addresses provided during the registration, in order to ask for the confirmation and/or the updating of the information and/or the data already collected by Kering Eyewear or to correspond with Users to resolve their queries or complaints.
- d) To maintain and provide the technical assistance which is necessary for providing the Services connected with the use of the Platform.

- e) To improve the quality and the structure of the Platform.
- f) To provide the Users with the information regarding the Users most engaged with the contents of the Platform.

For the purposes under letters from a) to c), the legal basis for the processing is the necessity to perform the contract with the User. For the purposes under letters from d) to f), the legal basis for the processing is the legitimate interest pursued by the Controller in order to ensure the security of the Platform, improve the quality of the services and analyse the engagement of the Users with the contents published in the Platform.

## **5. PROCESSING METHODS AND SECURITY SYSTEMS**

All personal data are processed and stored with mechanized tools, for no longer than is strictly necessary for the purposes for which the data have been collected and, in any case, in compliance with the applicable law.

In compliance with the applicable law, specific security measures have been adopted in order to prevent the loss, the destruction and the crushing of the collected data, as well as any unlawful and/or non-correct uses of the data and any not authorized access.

The personal data may be collected in the Users' country and subsequently transferred and/or stored to another country where Kering Eyewear or other companies of Kering Group or its vendors have their servers. This transfer is done in accordance with applicable law for the purposes set out in this Privacy Policy. The local privacy and data protection laws in those countries may not be equivalent to the privacy and data protection laws in the Users' country of residence. Kering Eyewear will take specific measures to ensure the Users' personal data is treated securely and in accordance with this Privacy Policy wherever in the world it may be transferred.

## **6. ENTITIES TO WHICH THE DATA MAY BE COMMUNICATED**

For the purposes set forth herein, and in order to ensure the correct and regular performance of the Services, the personal data of the User may be communicated to third parties other than Kering Eyewear, including the following:

- a) other companies of Kering Group;
- b) data processors, if appointed by Data Controller;
- c) individuals, even outside Kering Eyewear's organization, should they be self-employees, employees, of counsels or anyway authorized person, appointed by Data Controller or by the data processor, if any, to collect, elaborate and use the personal data of the User;
- d) professional firms and/or companies providing assistance and consulting activities also for the company organization control (administrative, legal, accounting and financial matters);
- e) companies contractually linked to Kering Eyewear or third parties suppliers to which the communication of the personal data of the User is necessary for the services provided by Kering Eyewear through the Platform;
- f) public administration or entities in order to verify the compliance with civil and/or tax duties;
- g) banks and credit and/or insurance institutions to carry out economics or insurance activities;
- h) any competent law enforcement body, regulatory, government agency, court or other third party where the disclosure is necessary (i) as a matter of applicable law or regulation; (ii) to exercise, establish or defend our legal rights; or (iii) to protect the User's interests or those of any other person.

It is understood that the collected personal data may be communicated also in case of mergers and acquisitions transaction or in the event of sale of the company and/or the relative assets, as well as in the circumstance of winding up, failure, bankruptcy or any other similar circumstance in which case the personal data will be transferred as part of the assets of Kering Eyewear. Should any of the above circumstances

occur, the User will be properly informed as described in "Changes to this Privacy Policy" section.

## **7. RIGHTS OF THE USER**

The Privacy Laws provides the User with certain rights in relation to the processing of your personal data, including the right to:

- a) Request access to personal data (commonly known as a "data subject access request"). This enables the User to receive a copy of the personal data Kering Eyewear hold about it, and to check that Kering Eyewear is lawfully processing it.
- b) Request rectification, correction, or updating to any of the personal data that Kering Eyewear holds about it. This enables the User to have any incomplete or inaccurate information corrected.
- c) Request personal data provided by the User to be transferred in machine-readable format ("data portability").
- d) Request erasure of personal data. This enables the User to ask Kering Eyewear to delete or remove personal data where there is no good reason for Kering Eyewear continuing to process it, except for the data which have been published on website or social media which cancellation (or correction) may be impossible due to the diffusion of such data. The User also has the right to ask Kering Eyewear to delete or remove personal data where the right to object to processing has been exercised (see below).
- e) Request the restriction of processing of personal data. This enables the User to ask Kering Eyewear to suspend its processing of its personal data.

The User also has the right to lodge a complaint with the data protection Supervisory Authority, if it is not happy with how Kering Eyewear processes its personal data and the former could not provide the latter with a satisfactory resolution to its request.

These rights are not absolute and are subject to various conditions under:

- applicable data protection and privacy legislation; and
- the laws and regulations to which Kering Eyewear is subject.

To exercise the rights accorded by the Privacy Laws, the User could contact Kering Eyewear at the addresses provided under paragraph 1 of this Privacy Policy.

## **8. LINKS TO OTHER WEBSITES**

The Platform may contain links to websites of third parties, also not related to Kering Eyewear.

Kering Eyewear does not control, nor carry out any monitoring operation on such websites and on their contents and, accordingly, it cannot be considered liable for the contents of such websites nor for the policy that such website adopted with reference to the privacy of the users. Therefore, the User is invited to read carefully the terms and conditions of use of the websites of third parties it may access by clicking to the links contained in the Platform as well as their privacy policy.

In no event the activation of the links shall be intended as a Kering Eyewear suggestion and/or recommendation to the User to access or navigate on such websites, and Kering Eyewear does not release any warranty with reference to their contents, the services and/or the goods offered and/or sold through them.

## **9. CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy may be occasionally changed, for example, to comply with new requirements imposed by the applicable laws or technical requirements. The updated Privacy Policy will be published on the Platform. Kering Eyewear may also notify the Users in case of material changes and seek their consent to those changes, where required by data protection applicable laws. Users are thus encouraged to periodically review this page.