



## **PRIVACY NOTICE**

(updated in July 2023)

### **1. Who is the 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") which can be contacted at the following email address [privacy@loropiana.com](mailto:privacy@loropiana.com), informs you, according to the EU Regulation No. 679/2016 on the processing of personal data ("GDPR") that it processes the personal data provided by you ("Data") when you purchase or enjoy Loro Piana's products or services, you contact Loro Piana or register and create a personal account on the website [www.loropiana.com](http://www.loropiana.com) ("Loro Piana Website") with the modalities set out in this privacy information notice (the "Privacy Notice").

When you visit and purchase a product at Loro Piana's physical stores, your Data may also be processed by the Loro Piana's local entity that operates the relevant store and manages the sales in order to provide you with products and services you request instore, acting as independent data controller. For further information on the countries where Loro Piana has its stores and the relevant Loro Piana's legal entity that manages each store, please visit the Loro Piana Website or contact Loro Piana as per the modalities indicated in Section 9 of this Privacy Notice. You can also consult the privacy information notice of the Loro Piana's local legal entity managing your preferred Loro Piana's store that is available instore.

### **2. What Data are processed?**

Loro Piana collects and processes the following Data:

- your identifying Data, such as the name and surname, the date of birth, the identity card, the number of family members and any images shared with Loro Piana;
- your contact information, including the postal and/or shipping address, telephone number, and e-mail;
- the details of your purchases and the services used by you, including the spending volume and items purchased, as well as your status as a customer;
- the information relating to payments done for online and instore purchases;
- the activities performed on Loro Piana Website or the Loro Piana Web Application that is available at <https://productinfo.loropiana.com> ("Loro Piana Web Application"), including the details of your personal account and wallet if you intend to redeem any Non-Fungible Tokens ("NFTs") that may be associated with certain products you purchase. In particular, Loro Piana uses some cookies and other tracking technologies to automatically collect certain information relating to the way in which you use the Loro Piana Website such as the IP address or the URL origin. For further information on the cookies and tracking systems that Loro Piana uses on its Website, please consult the Loro Piana's Cookie Policy; and
- any other information that you provide in relation to a request of assistance or that can be necessary to benefit from Loro Piana's services in order to allow Loro Piana to better meet your needs.

If you provide us any personal data relating to a third-party (for example, your family members or any person to whom you would like to make a Loro Piana's gift), please be sure that they agree on any processing of their personal data by Loro Piana. In any case, you should communicate to such third-party individuals that you provided their personal data to Loro Piana, also informing them on the purposes and modalities of the processing as well as on their privacy rights by providing them with a copy of this Privacy Notice.

### **3. How and when Data are collected and processed?**

Loro Piana collects your Data when you visit one of Loro Piana's stores, browse the Loro Piana Website, including by registering and accessing Loro Piana's services through your personal account, make your purchases both online



and instore, use Loro Piana Web Application to trace the production chain of a Loro Piana item you have purchased, claim or transfer its ownership, and redeem any NFT associated with that item.

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

#### 4. Why Data are processed?

Loro Piana processes Data collected from you for the following purposes:

- **Contractual Purposes** and, in particular (i) to manage the sale of its products and provide sale and after-sale services (including, for example, fraud prevention, returns, guarantee and customer support); (ii) in relation to Loro Piana's online activities, to maintain your personal account and offer the services you request through the Loro Piana Website, including the *clienteling* (that allows you to receive a personalized service from your trusted Loro Piana Advisor when you have applied for it), *virtual showroom* and *e-concierge* if requested, as well as the Loro Piana's *newsletter* service, if you have subscribed to it; (iii) to allow you to use the Loro Piana Web Application, including the possibility to consult the production chain of some of your purchased products, claim or transfer their ownership, as well as redeem – and subsequently sell to third-parties – any NFT eventually associated to these products, and (iv) to provide feedbacks to your information requests that you can submit either in person at Loro Piana's stores, via e-mail or telephone through our Customer Service, or online through the chat that is available on Loro Piana Website.
- **Law Purpose**, including to comply with legal and regulatory obligations to which Loro Piana may be subject and to conduct any "Know Your Customer" activity.
- **Marketing Purposes**, thus, with your prior consent, to send marketing communications on Loro Piana's exclusive products, services and activities through electronic means (including, for example, email, SMS, MMS, mobile, social network and instant messages) or paper means (including, for instance, traditional mail) to promote its trademarks, services and/or products, as well as to conduct market analysis and statistics, except for communications relating to Loro Piana's *newsletter* as referred to in letter (ii) above for which you need to subscribe.
- **Profiling Purposes** and therefore, with your prior consent, to analyse your habits, interests and preferences in order to offer personalised services and send targeted marketing communications on the basis of your needs.
- **Marketing Related Legitimate Interest Purposes**, to use your Data related to spending volume, product category, store of purchasing, date of birth, status and number of family members on the basis of Loro Piana's legitimate interest to provide a service in line with your needs and send you marketing communications that may be of interest for you. In any case, such marketing communications are sent upon your consent to the Marketing Purposes only. This means that, if you do not agree to Marketing Purposes, Loro Piana does not send you any marketing communications. In addition, Data may be processed to test and enhance Loro Piana's services in order to always offer you services with a high level of exclusivity, provided that such activities need to be carried out through personal data to ensure their reliability. The Marketing Related Legitimate Interest Purposes also include any customer satisfaction surveys that Loro Piana may send you after a purchase is done in order to allow you to evaluate your customer experience at Loro Piana. Such communications indeed help Loro Piana to understand your level of satisfaction in order to identify any issue and improve the services provided, if needed, also maintaining the highest standards of customer experience. In any case, please note that this processing is not intrusive since it takes into consideration only few categories of segmentation, it enhances your



experience with Loro Piana and it is always adequately balanced with your legitimate interests in order to protect your rights.

- **Business Legitimate Interest Purposes** and, in particular, (i) to exercise or defend legal claims in court proceedings or in an administrative or out-of-court procedures relating to the rights of Loro Piana, its group companies and/or their representatives, shareholders, officers and directors; (ii) to enable the technical management of the Loro Piana Website and Web Application, their operational functions, including solving any technical problems, to perform tests, updates and upgrades that cannot be performed through non-personal data, as well as to prevent or identify fraudulent activities or misuses of the Loro Piana Website or Web Application, or against the LVMH group and/or the other users of the Loro Piana Website or Web Application; (iii) to complete a potential merger, sale of assets, transfer of all or a material part of Loro Piana's business, or financing transaction by disclosing and transferring the Data to the third party or parties involved as part of the transaction; (iv) to anonymize the Data in order to perform statistical analysis.

## 5. Which is the legal basis to process your Data?

Processing of Data for Contractual Purposes is **mandatory** since it is necessary to purchase products, register and create a personal account on the Loro Piana Website and Web Application, as well as use the functionalities available on the Loro Piana Website and Web Application and specific services offered by Loro Piana (including but not limited to, the *clienteling*, *virtual showroom* and *e-concierge* services, the subscription to Loro Piana *newsletter*, the online chat, etc.).

Processing of Data for Law Purposes is **mandatory** since it is required by the applicable laws. If you do not provide your Data, 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 withdrawn at any time.

Processing of Data for Marketing Related Legitimate Interest and Business Legitimate Interest Purposes is **functional** to the pursuit of a legitimate interest of Loro Piana, properly balanced with your interests and, considering the limitation to this processing as explained in paragraph 4 above. This processing is not mandatory and you can object to it at any time as indicated below. In such case no data processing will be carried out by Loro Piana for the Marketing Related Legitimate Interest and Business Legitimate Interest Purposes, except in case where Loro Piana demonstrates the existence of legitimate compelling reasons or it needs to exercise a Loro Piana's right.

## 6. How long is Data retained?

Your Data are processed for no longer that is necessary to fulfil the above mentioned purposes and, particularly,

- For the Contractual and Business Legitimate Interest Purposes, Data are retained for **the duration of the contract and/or of the service requested** (in case of an account created on the Loro Piana Website or the Loro Piana Web Application, or in relation to services provided by Loro Piana), as well as for the **following next 10 years**. In any case, as for the *newsletter* service as referred to in letter (ii) of paragraph 4 above, your Data will be processed until you unsubscribe from the service and/or you exercise your right to oppose to such communications by clicking on the link available in the end notes of each communication received.



- For the Law Purposes, your Data are stored in accordance with the **specific limitation periods** defined by law.
- For Marketing and Profiling Purposes, your Data are stored for a period of **7 years from the last purchase done and/or from the last contact with you** (e.g. participation to an event, access to a specific service and opening of a newsletter).
- For Marketing Related Legitimate Interest Purposes, Data are retained for a period of **7 years from the last purchase done** too, notwithstanding your right to object to the processing at any time.

Upon expiry of the above mentioned retention periods, your Data will be automatically deleted, aggregated or made anonymous in a permanent and non-reversible way.

#### **7. Can Data be communicated or transferred abroad?**

Loro Piana may communicate your Data that are strictly necessary to fulfil each purpose of the processing as explained in paragraph 4 above, 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 belonging to the LVMH group of companies, including other LVMH *maisons*, companies controlled by Loro Piana and operating Loro Piana's local stores, Loro Piana's companies in joint venture arrangements and Loro Piana's franchisees; (iv) public entities, banks, third parties involved in corporate transactions and extraordinary operations and legitimate recipients.

These subjects may also be located in countries outside the Economic European Area (EEA) as indicated on the Loro Piana Website. In particular, Data may be transferred to countries where the Loro Piana group has a business (e.g., a store). For information on the countries where the Loro Piana group has a business, please refer to Loro Piana Website or contact Loro Piana as per the modalities indicated in paragraph 9 below. In any case, any transfer of Data outside the EEA will be carried out in compliance with articles 45 and 46 of the GDPR, as well as any other measures required by the applicable data protection laws.

You have the right to receive information on the place where your Data are kept, as well as on the measures adopted for the transfer, by asking directly to Loro Piana, through the contact details provided in paragraph 9 of this Privacy Notice.

In any case, your Data are not divulged.

#### **8. Which are your rights as data subject?**

You may always enforce your privacy rights, for example you may access your Data, verify your Data content, origin, accuracy, ask for your Data to be integrated, updated, amended, deleted, or blocked for breach of law, as well as 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, your Data portability and lodge a claim before the competent Data Protection Authority, if the premises subsist.

You can exercise your privacy rights at any time as follows:

- By contacting Loro Piana through the modalities indicated in paragraph 9 below;
- If you created a personal account on the Loro Piana Website, by changing your privacy preferences and setting in the dedicated section of your personal account; or



- By submitting a request to the Loro Piana's store where you provided the Data or to your trusted Loro Piana Advisor.

## **9. How to contact Loro Piana?**

If you have doubts, questions or complaints with regard to the collection and processing of your Data, or your wish to exercise one of your privacy rights above, please contact Loro Piana by sending an e-mail to the following address [privacy@loropiana.com](mailto:privacy@loropiana.com).

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

## **10. Change, Update and Contacts**

This Privacy Notice will be effective from the date of update indicated in the heading. Loro Piana might change and/or integrate this Privacy Notice, also as a consequence of further law modifications and/or integration. Updates and modifications will be notified in advance, and you will be able to consult the constantly updated Privacy Notice on the Loro Piana Website.