



Additional Privacy Information for California Residents

Last Updated: July, 2023.

In this section, we provide information for California residents, as required under California privacy laws, including the California Consumer Privacy Act as amended by the California Privacy Rights Act (“**CCPA**”). The CCPA 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, share, and disclose to others for a business purpose (and have collected, sold, shared or disclosed in the previous 12 months). Our collection, use, sale, sharing 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 or share?
Name, Contact Information and other Identifiers: such as a real name, alias, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, or other similar identifiers.	YES	YES	NO
Customer Records: such as paper and electronic customer records containing personal information, such as name, signature, physical characteristics or description, address, telephone number, credit card number, debit card number, or any other financial or payment information.	YES	YES	NO
Protected Classifications: Characteristics of protected classifications under California or federal law such as race, color, sex, age, religion, national origin, disability, citizenship status, and genetic information.	YES	YES	NO
Purchase History and Tendencies: 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
Biometric Information: 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
Usage Data: 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 other activity information related to your use of any Loro Piana’s websites, applications or other online services.	YES	YES	YES
Geolocation Data: Precise geographic location information about a particular individual or device.	YES	YES	NO
Audio, Video and other Electronic Data: Audio, electronic, visual, or similar information such as CCTV footage, photographs, and call recordings and other audio recording (e.g., recorded meetings and webinars).	YES	YES	NO



Professional or employment-related information: Employment history, qualifications, licensing, disciplinary record.	NO	NO	NO
Education Information: 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).	NO	NO	NO
Sensitive Personal Information: Account login and password.	YES	YES	NO
Profiles and Inferences: 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.	YES	YES	NO

Sources of Personal Information

We generally collect personal information from the following categories of sources:

- Directly or indirectly from you;
- Our affiliates and subsidiaries;
- Our service providers;
- Our business partners;
- Social networks.

Purposes for Collecting and Disclosing Personal Information

As described in the **Purposes of Data Processing** in our main privacy notice, we collect and process personal information, including sensitive personal information (account creation and management only), for the following business or commercial purposes:

- Manage product sales;
- Provide after-sale services;
- Offer services through our websites;
- Create and manage your account;
- Analytics and improvement (including to offer personalized services);
- Communicate with you (e.g., for support services, responding to information requests and to provide our newsletter);
- Marketing and promotions;
- Research and surveys;
- Planning and managing events;
- Security and protection of rights;
- Compliance and legal process;
- Auditing, reporting, and other internal operations; and
- General business and operational support.

Retention of Personal Information

We retain your personal information for as long as needed or permitted, based on the reason we obtained it (consistent with applicable law). When deciding how long to keep your personal information, we consider whether we are subject to any legal obligations (e.g., any laws that require us to keep records for a certain period before we can delete them) or whether we have taken any legal positions (e.g., issued any legal holds or otherwise need to preserve the information). Rather than delete your data, we may also deidentify it by removing identifying details. Where we have committed to maintaining and using personal information in a deidentified form, we agree not to reidentify deidentified data except as permitted by applicable law.

Disclosure of Personal Information

In the past 12 months we have disclosed *identifiers (IP addresses)*, and *internet or other electronic network activity* information to advertising networks and data analytics providers to assist us with personalized advertising and understanding how users interact with our site.

Sales and Sharing of Personal Information

The CCPA defines "sale" as disclosing or making available personal information to a third-party in exchange for monetary or other valuable consideration, and "sharing" includes disclosing or making available personal information to a third-



party for purposes of cross-contextual behavioral advertising. While we do not disclose personal information to third parties in exchange for monetary compensation, by using third-party advertising and tracking tools on our website we may be “selling” or “sharing” the following categories of personal information: *identifiers (IP addresses)*, and *internet or other electronic network activity information*. We disclose these categories to third-party advertising networks, analytics providers, and social networks for purposes of marketing and advertising. We do not sell or share personal information about individuals we know are under age sixteen (16).

California Privacy Rights

California law grants California residents certain rights, subject to exceptions, to make requests relating to their personal information as set forth below.

- **Right to Opt-out of Sale and Sharing of Personal Information.** California residents have the right to opt-out of our sale or sharing of their personal information. As stated above, our use of third-party advertising and tracking cookies may count as a “sale” or “sharing” of personal information under the CCPA. To exercise your right to opt-out of the “sale” or “sharing” of personal information, please use our cookie preferences tool available by clicking on Cookie Settings on [this page](#). You also have the right to opt-out of “sales” and “sharing” of your personal information using an opt-out preference signal. If our site detects that your browser or device is transmitting an opt-out preference signal, such as the “global privacy control”—or GPC— signal, we will opt that browser or device out of cookies on our site that result in a “sale” or “sharing” of your personal information. If you come to our site from a different device or from a different browser on the same device, you will need to opt-out, or use an opt-out preference signal, for that browser and/or device as well.
- **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. California residents may make Requests to Know up to twice every 12 months
- **Requests to Delete.** Subject to certain exceptions, California residents have the right to request deletion of their personal information that we have collected from them and to have such personal information deleted, except where an exemption applies.
- **Request to Limit.** California residents have the right to opt-out of the disclosure of sensitive personal information to a third party if we use that information for any purpose other than the purpose to which you agreed, or another purpose allowed under the CCPA. However, we do not use or disclose sensitive personal information in a manner that would trigger this right.
- **Right to Non-Discrimination.** We will not discriminate against you in terms of price or service level for exercising any of the rights described above.

Submitting Requests. If you are a California resident you may exercise the above rights by contacting us at (855) 481-9100 (toll free), or by emailing us at privacy@loropiana.com. We will respond to verifiable requests received from California consumers as required by law.

Verification. Before responding to your request, we must first verify your identity using the personal information you have already provided to us. When you exercise your privacy rights, please provide us with your full name, the email you used to contact us, and your address. We will take steps to verify your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

Authorized Agent.

You may designate someone as an authorized agent to submit requests and act on your behalf. Authorized agents will be required to provide proof of their authorization in their first communication with us, and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

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.

Changes to this Notice

We may change, update, or modify this notice from time to time, so please be sure to check back periodically. We will post any updates to this notice here. If we make any changes to this notice that materially affect our practices regarding our use of the personal information, we have previously collected from you, we will endeavor to provide you with notice, such as by posting notice on our site.

Contact Us

If you have any questions or concerns regarding this Policy or our privacy practices, you may contact us at privacy@loropiana.com.