USER REGISTRATION NOTICE EU Regulation 679/2016 General Data Protection Regulation (GDPR)

The registration on the Website is prohibited for individuals under the age of 18

a) Who we are:

Coin S.p.A., with registered and administrative headquarters in 30174 - Venezia Mestre (VE), via Maderna n.11, tax code. and VAT number 04391480276 ("**COIN**"), is the company that - as Data Controller - collects and processes your personal data and, pursuant to art. 13 of EU Regulation 2016/679 "General Data Protection Regulation" ("**Regulation**"), provides you with the following information.

b) How to contact us and the Data Protection Officer:

For any questions, need for information or to exercise of your rights, you can contact us by sending an email to ecommerce@coin.it or by writing to Coin S.p.A., via Maderna n.11, 30174 – Venezia Mestre (VE), Italy. The Data Protection Officer can be contacted at the email address <u>dpo@coin.it</u>.

c) What data we collect:

The personal data we collect and how we collect it, depend on the services and features you use by registering on the www.coin.it website (the '**Site**'), the purchases you make, and how you interact with Coin. In particular, the data that may be collected, depending on the services used, are:

Data collected during registration on the site and in case of purchases:

- first and last name;
- email;
- date of birth (optional);
- postal code (optional);
- Coincard number (optional) and related spending thresholds reached, use of dedicated discounts (or rewards), participation in contests and initiatives

Data collected in case of purchases:

- residence and/or shipping address;
- mobile phone number;
- purchases made (e.g., products purchased, amount, date and time of purchase, etc.);
- billing information

Browsing data and website usage:

- data related to the connection and navigation within the Site for more information, please refer to our privacy policy [https://www.coin.it/en-it/privacy-2/privacy-2.html];
- (if you provide your consent) data collected through "cookies" or other tracking tools, both technical (i.e., to facilitate navigation and use of the Site) and profiling (i.e., to analyze users and their behaviors and preferences, and deliver personalized advertising) – for more information, please refer to our cookie policy [https://www.coin.it/en-it/cookie-policy/cookie-policy.html].

d) Why we process your data:

Your data will be used for the purpose of:

- (1) Managing your account: In particular, registering on the website www.coin.it will allow you to:
 - Create personalized area for you and access to reserved services and benefits (e.g., viewing your past purchases, managing returns, checking and updating your privacy consents, etc.);
 - make your purchases more quickly, check your purchase history, etc. (more information is available during your purchase);
 - receive service communications strictly related to your account and any purchases made (these service communications will not contain promotional content).

The processing of data is necessary for the execution of the contractual relationship related to registration, as well as for our legitimate interest in verifying the correct use and functioning of the Site (Art. 6, letters b) and f) of the Regulation).

In addition, if you provide your consent, your data, including those we will obtain from the analysis of your navigation within the Site and your purchases, will be used for:

- (2) Analysis of your preferences and purchasing habits: improve our commercial offering, our products and the Site thanks to a better knowledge of our customers, their purchasing preferences and their interests and tastes (e.g. allowing us to understand which products they prefer, to improve our assortments and possibly send personalised commercial communications);
- (3) Marketing: contact you (by telephone, post, newsletter, e-mail, instant messages, posts, messages or communications about initiatives on social networks, etc.) for advertising or promotional communications including personalised ones if you have given us your consent to know your preferences and purchasing habits and your tastes (purpose sub 2) (e.g. by sending you information on the brands or collections that interest you most) relating to exclusive advantages reserved for those registered on the Site, as well as to have you participate in market research).

The sending of advertising or commercial communications may also concern the various brands owned by Coin and which can be consulted, in their updated list, on the website www.coin.it.

The processing of your data will be based on your possible consent (art. 6, letter a) of the Regulation). If you do not intend to provide your consent, you can still register on the Site and take advantage of the benefits reserved for registered users. Your consent will always be freely <u>revocable</u> by writing to ecommerce@coin.it.

e) Mandatory data and optional data:

COIN requires some "mandatory" data (*) because they are necessary for registration, which in the event of failure to fill in or incomplete completion will not be possible. Failure to fill in the data indicated as "optional" will simply not allow us to use that data for the purposes for which you have given your consent or to access certain services (e.g. if you do not provide your Coincard number, we will not be able to associate the purchases made on the Site with your card).

f) How we process your data:

Your data will be processed mainly electronically, in compliance with current legislation and, in any case, in a way that guarantees its security and confidentiality and prevents its unauthorized disclosure or use, alteration or destruction.

If you give us your consent, we may analyze your data (e.g. your purchases), to try and understand your tastes and preferences so that we can improve ourselves (e.g. allowing us to understand which products our customers prefer and what their spending habits are) and also send you personalized offers on our products (e.g. if you purchase woman or household products, we may send you advantages or discounts on similar or matching products), initiatives (e.g. competitions) or contact you to participate in market research (e.g. through interviews, telephone contact, e-mail, etc.).

We may also use the data relating to your connection and navigation within the Site in order to verify your browsing preferences and improve the services offered by the Site or display advertisements of interest to you; your data – collected via cookies or other tracking tools – will be collected and processed (subject to your consent) in compliance with the <u>cookie policy</u> accessible at the bottom of each page of the Site.

We specify that all our analysis activities of your data and preferences will not take place exclusively with automated methods, but will always involve the intervention and evaluation of our representatives.

g) How long we retain data:

Your data will be processed for the entire duration of your registration on the Site.

The data relating to the details of your purchases will, instead, be processed for analysis or promotional purposes for a maximum period of 12 months from the registration of the same and will be deleted in the following 30 days.

h) Who processes your data:

The data will not be disclosed or transferred to third parties and may be disclosed to persons authorised to process the data in the Marketing and Digital Transformation and Administration Departments/Offices of COIN.

Your data may also be processed – as external Data Processors – by: (i) OVS S.p.A., with registered office in Mestre (VE), via Terraglio n.17, the company responsible for managing our information systems; (ii) companies that take care of the maintenance of the Site on our behalf; (iii) suppliers of technical-IT services and systems functional to the management of our information systems, databases (e.g. optical archiving, storage and processing of IT archives); (iv) suppliers of services functional to the performance of our customer data analysis, communication and marketing activities (e.g. companies that take care of sending promotions and promotional communications or carrying out market research; (iv) companies responsible for

managing our customer service. The names of all data processors can be requested by sending a communication to <u>ecommerce@coin.it</u>.

i) If your data is tranmitted outside the European Union:

For the management of the Site and the purposes described above, your personal data will not be transferred to countries outside the European Union, given that COIN uses servers and suppliers located within the European Union.

I) What your rights are:

By sending a communication to the COIN headquarters or to the email: ecommerce@coin.it, or by using the "contact us" form on the Site, you may at any time exercise the <u>rights</u> set out in Articles 15 to 22 of the Regulation, including obtaining access to your personal data, the rectification of inaccurate personal data or the erasure of the same or the limitation of processing, requesting to receive or transmit to another owner your data in a structured, commonly used and machine-readable format (a detailed list of rights is provided below).

You may also always revoke at any time any consent to processing provided and object to the processing of your data carried out, in particular, for marketing purposes or analysis of your preferences. You can find the complete list of your rights on www.garanteprivacy.it.

m) Who can you contact to file a complaint:

We remind you that, if you believe that the processing concerning you violates the provisions of the Regulation, you can always lodge a complaint with the Data Protection Authority (www.garanteprivacy.it), or with the Data Protection Authority of the country in which you habitually reside, work or where the alleged violation occurred.

Coin S.p.A

Privacy rights:

Articles 15 to 22 of the Regulation recognize the following rights:

- **Right of access**: the interested party may request which data concerning him or her are processed, the purposes of the processing, the categories of data processed, the recipients to whom personal data has been or will be communicated, any transfer of data outside the European Union, the period of data retention, the existence of an automated decision-making process (including profiling), as well as the origin of the data if not collected from the interested party (Article 15 of the Regulation).

- **Right of rectification**: the interested party may request the correction or updating of inaccurate data or, taking into account the purpose of the processing, the integration of incomplete personal data (Article 16 of the Regulation).

- **Right to erasure (right to be forgotten):** (where applicable) the interested party has the right to obtain the erasure of personal data concerning him or her, for example when the personal data is no longer necessary for the purpose for which it was collected. However, it will not be possible to request the deletion of data if this is necessary to fulfill a legal obligation (e.g. keeping accounting records, security, etc.) or for the ascertainment, exercise or defense of a right in court (art. 17 of the Regulation).

- **Right to limitation**: the interested party may request that the processing of data be limited, for example when the accuracy of the personal data is contested, for the period necessary to verify the accuracy of such data (art. 18 of the Regulation).

- **Right to notification**: the data subject has the right to be informed of any rectification or erasure or limitation of processing carried out in relation to personal data concerning him or her, and of the recipients to whom they have been communicated (art. 19 of the Regulation).

- **Right to portability**: (where applicable) the data subject has the right to receive the data concerning him or her in a structured, commonly used and machine-readable format (e.g. in .excel, .csv format). However, this right is limited only to data processed by automated means and on the basis of a contract with the data subject, or his or her consent. If technically feasible, it will be possible to request the transmission of data directly to another data controller (art. 20 of the Regulation).

- **Right to object**: (where applicable) the data subject has the right to object at any time, for reasons relating to his or her particular situation, to the processing of personal data concerning him or her carried out, for example, for the pursuit of a legitimate interest of the data controller or third parties (including profiling). He or she can also always object to the processing of data carried out for direct marketing purposes, including profiling related to such direct marketing (art. 21 of the Regulation). (art. 21 del Regolamento).

- Right not to be subject to automated decisions, including profiling: (where applicable) the data subject has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or significantly affects him or her,

except where the automated decision is necessary (i) for the conclusion or performance of a contract between the data subject and a data controller, (ii) is provided for by law, subject to appropriate measures and safeguards, (iii) is based on the explicit consent of the data subject (art. 22 of the Regulation).