



## PRIVACY POLICY COINCARD

### **a) About Us**

Coin S.p.A., with its registered and administrative office located in Mestre (VE), via Maderna No. 11, 30174, tax code and VAT number: 04391480276 ("Coin"), is the company that – as the Data Controller – collects and processes your personal data and, pursuant to EU Regulation 2016/679 ("General Data Protection Regulation" or "GDPR"), provides you with the following information

### **b) How to Contact Us and the Data Protection Officer**

You can contact us by sending an email to [servizioclienti@coin.it](mailto:servizioclienti@coin.it) or by writing to:  
Coin S.p.A., Customer Service,  
Via Maderna No. 11,  
30174 Venezia Mestre (VE), Italy. The Data Protection Officer (DPO) appointed by Coin S.p.A., pursuant to Article 37 of the GDPR, can be reached at the email address [dpo@coin.it](mailto:dpo@coin.it)

### **c) What Data We Collect**

The personal data we collect depends on how you use your Card and your personal account on coin.it, as well as any consents you may have provided, where required. Specifically, we may collect the following data:

- First and last name;
- Date of birth;
- Gender;
- Province of residence;
- Postal code;
- Mobile phone number;
- Email address;
- Issuing entity (store or online) of the Card;
- Data related to the use of the Card, such as Card code, total purchase amount, discount thresholds reached, use of discounts (or rewards) granted, participation in contests and promotions;
- Data related to purchase details for the purpose of analyzing your preferences and buying habits (e.g., date, item code, product description, price, and quantity).

During the Coincard activation process, we may ask you to present an identity document to verify your age.

For the processing of data related to connection and navigation on the coin.it website, please refer to the respective privacy policy and cookie policy.

### **d) Why We Process Your Data**

Your data will be used for the purpose of:

**(1) To issue and manage your Card**, allowing you to access the MY COINCARD program and/or promotional campaigns (e.g., receiving discounts, promotions, and initiatives reserved for cardholders, as specified in the loyalty program terms), and to send you service communications related to this (e.g., your status or the expiration of spending thresholds).





The Card activation will take place through the sales assistant if you request the Card at one of the Coin, Coincasa, or Coin Excelsior stores, who will provide you with the necessary instructions at that time.

**2) To create your personal Coin account**, allowing you to access the services and benefits reserved for registered users on coin.it (e.g., using your Card online, making faster purchases by saving your information, checking your purchase history and Status, viewing your wishlist, reviewing and updating your personal data or privacy consents, and receiving service communications strictly related to your account).

The legal basis for processing your data for purposes 1 and 2 is the necessity to execute the loyalty relationship established through the issuance of the Coincard and to provide you with services connected to the activation of your personal account on coin.it (Article 6(1)(b) of the GDPR).

**(3) Exercise of Coin's Rights Against Unlawful or Fraudulent Conduct**

The legal basis for processing is Coin's legitimate interest in verifying the proper use of the account and the Card, and consequently exercising its rights, including through legal action, against unlawful or fraudulent behavior (Article 6(f) of the GDPR).

This interest is considered legitimate and balanced against the rights and freedoms of the data subjects, as the processing is solely aimed at protecting Coin's rights against fraudulent or unlawful conduct, in compliance with applicable laws, as well as the company's internal procedures and regulations governing the proper processing of personal data.

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**If you give your consent**, some of the data provided during the activation of your Coincard and personal account on coin.it, as well as data derived from the analysis of your preferences and purchasing habits, will be used for the following purposes:

**(4) Analysis of your preferences and purchasing habits** in order to improve our commercial offering, products, and services through a better understanding of our customers, their purchasing preferences, and tastes (e.g., helping us identify the products you prefer, improve our product selection, etc.);

**(5) Marketing purposes**, to contact you—via phone, mail, newsletter, email, SMS, messaging apps, or social media campaigns—for advertising and promotional communications about our products, services, or initiatives, including personalized content if you have given us consent to process your preferences and tastes (as described under purpose 4, e.g., by sending you information about the brands or collections you're most interested in), or to invite you to take part in market research.

Promotional or commercial communications may also concern the various Coin format, which can be found on coin.it. The legal basis for processing your data for the purposes outlined under points 4 and 5 is your consent (Article 6(1)(a) of the GDPR).

**If you choose not to give your consent, you will still be able to obtain the Card**, benefit from the advantages reserved for members, and **register on coin.it by creating your personal account**.

**You may update your consent at any time** by selecting the relevant option within your personal account on coin.it, or by writing to [servizioclienti@coin.it](mailto:servizioclienti@coin.it). If you no longer wish to receive commercial emails, you can also unsubscribe by clicking the link provided in each message.

Additionally, in your personal area on coin.it, you can manage your preferences and choose the channels through which you wish to receive our marketing communications.

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**e) Consequences of Incomplete Data**

Coin requires certain data at the time of registration (marked as “mandatory” \*\*\*) as they are necessary for registering on the coin.it website and/or for issuing the Card.





Failure to provide the data marked as “optional,” or to give consent for specific purposes, will simply result in those personal data not being used for those purposes.

You can update your data at any time directly through your personal account on coin.it or by writing to [servizioclienti@coin.it](mailto:servizioclienti@coin.it).

#### **f) How We Process Your Data**

Your data will be processed by electronic means to allow you to access discounts and promotions based on your spending levels, benefit from other advantages described in the Card terms and informational materials, and register on coin.it.

If you provide your consent, we may also analyze your data (e.g., purchase history) to better understand your tastes and preferences and send you offers—including personalized ones—about our products (e.g., if you buy women's products or home items, we may send you promotions on similar or complementary products), services (e.g., home delivery), or initiatives (e.g., sweepstakes), or invite you to take part in market research (e.g., interviews, phone calls, emails, etc.).

Please note that any analysis of your data and preferences will not be carried out exclusively through automated means, but will always involve evaluation and oversight by our staff.

Coin may also carry out specific, non-continuous or non-systematic checks to verify the proper use of your account and Card, and to protect itself against fraudulent or unlawful behavior, in compliance with applicable regulations and internal procedures.

#### **g) Data Retention Period**

The data necessary to fulfill the purposes under points 1 and 2 of paragraph d) will be processed for the entire duration of your Card membership and registration on the coin.it.

Data required for the exercise of our rights, including judicial enforcement against unlawful or fraudulent conduct (purpose under point 3 of paragraph d), will be retained until the resolution of any related dispute.

Data relating to the details of your purchases, processed for the purposes of preference analysis (purpose under point 4 of paragraph d) and/or marketing (purpose under point 5 of paragraph d), will be retained for a period of 24 months from the date of purchase registration.

#### **h) Who processes your data**

Your data will not be disclosed or transferred to third parties. However, to enable Coin to manage your account, ensure the operation of the Coincard, and pursue the purposes for which you have given consent (purposes no. 4 and 5 in paragraph d), your data may be accessed—within the limits of their respective responsibilities—by the following recipients:

- (i) our affiliated companies managing Coincasa-branded stores;
- (ii) service providers and IT system operators supporting the management of our IT systems, website, and databases (e.g., optical archiving, data storage, and processing);
- (iii) providers of software and services necessary for customer data analysis, communication, and marketing activities;
- (iv) companies organizing and managing market research;
- (v) public and judicial authorities in case of disputes, fraud, or unlawful activities;
- (vi) external legal and tax professionals.

Details of the entities acting as Data Processors under Article 28 of the GDPR will be provided upon request, by contacting the addresses indicated in paragraph l).

Additionally, data may be accessed by authorized personnel within Coin's Marketing & Digital Transformation Department, as well as the Retail, IT, and Legal Departments.

#### **i) International (Extra-EU) Data Transfers**





**Your data is not transferred outside the European Union**, as all processing is carried out either directly by Coin or through service providers that use servers and systems located within the European Union or the European Economic Area (EEA).

#### **l) What Are Your Rights**

**By contacting the store directly and/or by sending a communication to Coin S.p.A., Via Maderna no.11, 30174 – Venice Mestre (VE), Italy, or by email at [servizioclienti@coin.it](mailto:servizioclienti@coin.it)**, you may exercise at any time the rights set out in Articles 15 to 22 of the GDPR. These include the right to access your personal data, request the rectification of inaccurate data, the erasure or restriction of your data, as well as the right to receive your data—or have it transmitted to another controller—in a structured, commonly used, and machine-readable format.

You may withdraw at any time any consent you may have given for your data processing and object to the processing of your data, particularly for marketing purposes or the analysis of your preferences. If you wish, you may limit your withdrawal of consent to communications sent via electronic means (e.g., email, SMS), while continuing to receive commercial communications by postal mail or telephone with an operator, where applicable. Please note that you can independently update your personal data and manage your consent preferences at any time through your personal account on **coin.it**. You can find a full list of your rights at [www.garanteprivacy.it](http://www.garanteprivacy.it).

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#### **Articles 15 to 22 of the GDPR grant the following rights to data subjects:**

- **Right of Access:** The data subject may request information about whether personal data concerning them is being processed, the purposes of the processing, the categories of data processed, the recipients to whom the personal data has been or will be disclosed, any transfers of data outside the European Union, the storage period, the existence of automated decision-making (including profiling), and the source of the data if it was not collected directly from the data subject (Art. 15 GDPR).
- **Right to Rectification:** The data subject may request the correction or updating of inaccurate personal data or, considering the purpose of the processing, the completion of incomplete personal data (Art. 16 GDPR).
- **Right to Erasure ("Right to be Forgotten"):** (where applicable) The data subject has the right to obtain the deletion of personal data concerning them, for example, when the data are no longer necessary for the purposes for which they were collected. However, deletion cannot be requested if the data are necessary to comply with a legal obligation (e.g., accounting, security), or for the establishment, exercise, or defense of legal claims (Art. 17 GDPR).
- **Right to Restriction of Processing:** The data subject may request that the processing of their data be restricted, for example, when the accuracy of the data is contested, for the period necessary to verify the accuracy of the data (Art. 18 GDPR).
- **Right to Notification:** The data subject has the right to be informed about any rectification, erasure, or restriction of processing carried out on their personal data, as well as the recipients to whom the data have been disclosed (Art. 19 GDPR).
- **Right to Data Portability:** (where applicable) The data subject has the right to receive personal data concerning them in a structured, commonly used, and machine-readable format (e.g., .xls, .csv). This right applies only to data processed by automated means and based on a contract with the data subject or their consent. Where technically feasible, the data subject may request the direct transmission of data to another controller (Art. 20 GDPR).
- **Right to Object:** (where applicable) The data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of personal data concerning them carried out for the legitimate interests of the controller or third parties (including profiling). They may also always object to the processing of data for direct marketing purposes, including profiling related to such marketing (Art. 21 GDPR).





- **Right Not to be Subject to Automated Decision-Making, 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 them or similarly significantly affects them, except when the automated decision is necessary (i) for entering into or performance of a contract between the data subject and the controller, (ii) is authorized by law with appropriate safeguards, or (iii) is based on the data subject's explicit consent (Art. 22 GDPR).
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**m) Who you can contact to lodge a complaint about the processing of personal data**

Please note that if you believe the processing of your personal data violates the provisions of the GDPR, you may lodge a complaint with the Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)), or with the supervisory authority of the country where you habitually reside, work, or where the alleged violation occurred.

COIN S.p.A.

