

## Privacy Policy

*The purpose of this privacy policy is to provide all the information on the processing of personal data carried out by the Triboo Digitale S.r.l. when the User buys products on the Website (as better indicated below).*

### 1. INTRODUCTION – WHO ARE WE?

**Triboo Digitale S.r.l.**, with registered office in Viale Sarca 336, Edificio 10, 25124 Milan, VAT no. / Tax Code and Milan Business Register Enrolment No. IT02387250307 (hereinafter the “**Data Controller**”), who manages the sale of the products on the website [www.clivechristian.com](http://www.clivechristian.com) (hereinafter, the “**Website**”), in its capacity as **data controller** in relation to personal data of the users (hereinafter, the “**Users**”) hereby provides the privacy policy pursuant to Article 13 of the EU Regulation 2016/679 of 27 April 2016 (hereinafter, “**Regulation**” or “**Applicable Law**”).

### 2. HOW TO CONTACT US?

The Data Controller takes the utmost account of User’s right to privacy and the protection personal data. For any information in relation to this privacy policy, Users may **contact the Data Controller** at any time, using the following methods:

- By sending a registered letter with advice of receipt to the registered office of the Data Controller (viale Sarca 336, Edificio 16, 20126 Milan)
- By sending an e-mail to the address [triboospa@legalmail.it](mailto:triboospa@legalmail.it)
- By sending a fax to no. 02/64741491

Users can also **contact the Data Protection Officer (DPO)** designated by **the Data Controller**, at the address provided below: [lapo.curinigalletti@triboo.it](mailto:lapo.curinigalletti@triboo.it)

### 3. WHAT DO WE DO? - PURPOSE OF PROCESSING

- By browsing the Website, the User has the possibility to buy the products of **Clive Christian Perfume Limited** (company number 03538453) of Limited 76 Brook Street, London, W1K 5EE, London, United Kingdom (hereinafter, the “**Brand**”) with whom the Data Controller has an online retailer agreement (hereinafter, “**Service**”).

In connection with the activities that can be carried out through the Website, the Data Controller collects personal data of the Users.

This Website and the services eventually offered through the Website are reserved to subjects over the age of 18 years old. Hereby, the Data Controller does not collect personal data pertaining to subjects under the age of 18 years old. At request of the Users, the Data Controller will promptly delete all the personal data, involuntarily collected, pertaining to subjects under the age of 18 years old.

Users’ personal data will be lawfully processed by the Controller for the following purposes:

- a) **Contractual obligations and provision of the Service**, to execute the Service offered through the Website, the related **Terms and Conditions** and fulfil specific User requests. The User data collected by the Data Controller for the purposes of provision of the Service include: first name, last name, *e-mail*, shipping address and any personal information of the User that may be

voluntarily published. The User's personal data will be used by the Data Controller for the sole purpose of providing the Service, ascertaining the User's identity, thus avoiding possible fraud or abuse, and contacting the User for service purposes only (e.g., sending notifications regarding the shipping). Without prejudice to what is provided for elsewhere in this privacy policy, under no circumstances will the Data Controller make Users' personal data accessible to other Users and/or third parties;

- b) **Administrative-accounting purposes**. i.e., to carry out activities of an organizational, administrative, financial, and accounting nature, such as internal organizational activities and activities functional to the fulfilment of contractual and pre-contractual obligations;
- c) **Legal obligations**. i.e., to fulfil obligations laid down by law, by an authority, by a regulation or by European legislation.

The provision of personal data for the processing above-mentioned purposes is optional but necessary, since failure to provide such data will make it impossible for the User to use the Service offered through the Website.

#### **4. LEGAL BASIS FOR PROCESSING**

**Contractual obligations and provision of the Service** (as described in para. 3(a) and (b) above, the legal basis is Art. 6(1)(b) of the Regulation, i.e., the processing is necessary for the performance of a contract to which the User is party or for the performance of pre-contractual measures taken at the User's request.

**Legal obligations** (as described in para. 3, lett. c) above): the legal basis is Art. 6(1)(c) of the Regulation, as the processing is necessary to fulfil a legal obligation to which the Data Controller is subject.

#### **5. PROCESSING METHODS AND DATA RETENTION PERIODS**

The Data Controller will process the personal data of Users by means of manual and computerized tools, with logics strictly related to the purposes themselves and, in any case, in such a way as to guarantee the security and confidentiality of the data.

The personal data of Users will be retained for the time strictly necessary to carry out the primary purposes set out in paragraph 3 above, or in any case, as necessary for the protection in civil law of the interests of both the Users and the Data Controller.

In any case, any retention periods provided for by law or the Regulation shall remain unaffected.

#### **6. TRANSMISSION AND DISSEMINATION OF DATA**

The User's personal data may be transferred outside the European Union, and, in this case, the Data Controller will ensure that the transfer takes place in accordance with the Applicable Law and, in particular, in accordance with Articles 45 (Transfer on the basis of an adequacy decision) and 46 (Transfer subject to adequate guarantees) of the Regulation.

The personal data of the Users may be disclosed to the employees and/or collaborators of the Data Controller in charge of managing the Website and the Users' requests. These subjects, who have been instructed to do so by the Data Controller pursuant to art. 29 of the Regulation, will process Users' data

exclusively for the purposes indicated in this policy and in compliance with the provisions of the Applicable Law.

The personal data of the Users may also be disclosed to third parties who may process personal data on behalf of the Data Controller in their capacity as “**Data Processors**” pursuant to Article 28 of the Regulation, such as, by way of example, IT and logistical service providers, functional to the functioning of the Website; suppliers of *outsourcing* or *cloud computing* services; professionals and consultants.

Users have the right to obtain a list of any data processors appointed by the Data Controller, by making a request to the Data Controller in the manner indicated in paragraph 7 below.

## 7. RIGHTS OF THE DATA SUBJECTS

Users may exercise their rights granted by the Applicable Law by contacting the Data Controller as following ways:

- By sending a registered letter with advice of receipt to the registered office of the Data Controller (viale Sarca 336, Edificio 16, 20126 Milan)
- By sending an e-mail to the address [triboospa@legalmail.it](mailto:triboospa@legalmail.it)
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Pursuant to Applicable Law, the Data Controller informs that Users have the right to obtain indication of (i) the origin of personal data; (ii) the purposes and methods of the processing; (iii) the logic applied in the event of processing carried out with the aid of electronic instruments; (iv) of the identification details of the data controller and data processors; (v) the subjects or categories of subjects to whom the personal data may be communicated or who may come to aware of them as data processors or agents.

Furthermore, Users have the right to obtain:

- a) **Access, updating, rectification**, or, when interested, **integration** of data;
- b) **Cancellation, transformation into anonymous form** or the **restriction** of data processed in breach of the law, including data that do not need to be stored in relation to the purposes for which the data was collected or subsequently processed;
- c) Certification that the operations referred to in points a) and b) have been brought to the attention, also as regards their content, of those to whom the data have been communicated or disclosed, except where this proves impossible or involves a manifestly disproportionate effort compared with the right protected.

Moreover, the Users have:

- a) The right to **withdraw consent** at any time, if the processing is based on their consent;
- b) The right to **data portability** (the right to receive all personal data concerning them in a structured format, commonly used and readable by automatic device);
- c) The **right to oppose to**:
  - i) in whole or part, for legitimate reasons, the processing of personal data concerning them for legitimate reasons even pertinent to the purpose of collection;

- ii) in whole or in part, the handling of personal data concerning them for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication;
  - iii) if personal data are processed for direct marketing purposes, at any time, to the processing of data for this purpose, including profiling in so far as it is related to such direct *marketing*.
- d) If it is deemed that the processing concerning their personal data violates the Regulation, the right to **lodge a complaint with a Supervisory authority** (in the Member State in which they usually reside, in the one in which they work or in the one in which the alleged violation has occurred).