

EXTENDED PRIVACY POLICY

Valentino is aware of the importance of your personal data and, therefore, will provide you with full disclosure concerning its processing and requires your permission before any use thereof.

1. Data Controllers and Data Protection Officer

The Data Controllers are:

- Valentino USA (the “**Subsidiary**”) with registered offices in 11 W 42nd Street, 26th Floor, New York, NY 10036 for the processing of personal Data for the sale and related services as indicated in Section 2(i), and
- Valentino S.p.A. (hereinafter “**VALENTINO**”), with registered office at Via Turati No. 16/18, 20121 MILAN, ITALY for marketing and habit analysis, as indicated by Section (ii) and (iii). With reference to such activities, VALENTINO has appointed the Subsidiary as data processor for the collection, management and update of Data,

VALENTINO appointed a Data Protection Officer, who may be contacted at the following email address privacy@valentino.com for any information regarding the processing of personal data and the exercise of the rights described below.

2. Purposes and processing methods

As permitted by applicable law, your personal data (hereinafter also “**Data**”) shall be processed:

(i) by the Subsidiary for purposes strictly connected to the sales activities (bank details for payments, identification and address data for orders and deliveries), including pre and post sales services provided (identification and sizes/tailoring data for tailoring, shipments, repairs), even indirectly, and for any other legal purpose arising from the sales agreement (i.e. Identification and fiscal data for accounting, tax and legal obligations including statutory guarantees);

and, after you provide your permission,

(ii) by VALENTINO for commercial and marketing purposes, such as identification data to send promotional offers, marketing initiatives and advertising material for products and services offered by VALENTINO or by the companies of the same Group; through communications using automated methods (including SMS, instant messaging, e-mail, etc.) as well as traditional methods (including paper mail, phone calls);

(iii) by VALENTINO to study and analyse your habits, preferences and consumption choices, to propose products, services and events that respond more to the tastes and personal needs of customers as well as their necessities.

The Data will be processed using mainly automated and traditional means; in fact, some processing may use hard copies. Specific security measures will be followed to prevent the loss of Data, illicit or incorrect use and unauthorised access.

3. Study of customer habits and consumption choices

As indicated in paragraph 2 (iii) above, with your express permission, VALENTINO may process your Data (related to your purchases, hobby, lifestyle and preferences) for the purposes of studying your habits and consumption choices, to make products and initiatives more responsive to your tastes and needs.

With the help of automated tools, VALENTINO may process Data relating to the value and frequency of purchases (even if these were made during the sales period) as well as the type of products purchased (such as accessories, garments from the haute couture and pret-à-porter collections) over a fixed period of time.

VALENTINO will also be able to acquire additional Data directly from you regarding your consumption preferences (brands and products), hobbies, habits, lifestyle and favourite sports. This information could also be acquired through some social platforms or from the use of cookies on the website. These Data will complete and enrich your profile and your customer information sheet allowing VALENTINO to know you better. In any event, this will only occur if you had previously accepted communicating some of your Data through the social platform when logging on to register and/or authorised the use of analytical and marketing cookies, through website procedures. This study has the sole objective of offering customers products, services and initiatives in line with their tastes and needs and will be carried out using non-invasive methods. Furthermore, at any time, you may request to analyse your profile and update or modify it as you wish.

4. Legal basis of processing and Data storage period

With reference to the processing carried out for the purposes referred to under the previous Clause 2:

- paragraph 2 (i), the legal basis lies in the fulfilment of the agreement and the pre and post contractual obligations, as well as to fulfil specific legal obligations arising from the agreement (such as, for example, fiscal and accounting obligations, and statutory guarantee) or for defence in court;

– paragraph 2 (ii), (iii) and (iv) (*marketing purposes and profiling*), the legal basis of the processing lies in the respective consents you have provided.

Data collected for sales purposes - paragraph 2 (i) - are stored for a period not exceeding what is required by law for civil and tax purposes. These Data may also be kept for a further period of time, to comply with the terms of the contractual guarantee granted to the customer.

The Data provided for marketing purposes and to study consumption habits and choices (paragraphs 2 (ii) and 2 (iii)) are stored for the period necessary for the specific processing, also in consideration of the particular sector of business (luxury goods) and in consideration of the interest shown by the customer to receive updates on products, events and fashion shows organised by VALENTINO, always in compliance with the privacy legislation and the permission you provided and for a period not exceeding 7 years, unless you provide further confirmation of your interest to receive communications from VALENTINO.

5. Mandatory or optional nature of the Data

The provision of Data is not mandatory, however with regard to the purpose referred to in paragraph 2 (i), failure to provide certain Data may make it impossible to execute the sales agreement and/or related services; with regard to the purposes set out in paragraphs (ii) and (iii), failure to provide your Data may make it impossible to receive invitations, information and commercial proposals, even more responsive to your needs, but will not affect the sales agreement and its related services.

6. Categories of recipients of personal Data

The Data may be known and processed by:

- other companies of the Valentino Group,
- suppliers of technical, technological, mailing and essential core service for sales,
- employees and consultants, and
- third parties such as banks, public authorities, payment service management companies (with reference to the processing referred to in paragraph 2(i))

acting as data processors appointed or as authorised parties to the processing of Data by the relevant Data Controller and for these purposes instructed, or as independent data controllers.

7. Transfer to third countries outside of the EU and Canada

The Data will not be diffused and will be transferred abroad only by guaranteeing adequate levels of protection and safekeeping of the aforesaid Data, in compliance with applicable regulations. In order to allow the processing of Data for contractual and marketing purposes by the companies of the Group, the Data will be processed in the relevant countries (even outside the EU or Canada). In addition, VALENTINO has drawn up Standard Contractual Clauses with the companies of the group established in countries outside the European Union, in compliance with national and international legislation regarding the protection of personal data. You may always contact the Data Protection Officer to know the location of the Data and to obtain a copy. You acknowledge that Data may be processed and stored in foreign jurisdictions with different (and perhaps weaker) privacy laws, and that the governments, courts or law enforcement or regulatory agencies in those jurisdictions may be able to obtain disclosure of that personal information through the laws of the foreign jurisdiction.

8. Your rights

We remind you that Articles 15, 16, 17, 18, 20 and 21 of the General Data Protection Regulation No. 2016/679 of the European Parliament and Council, and other applicable privacy laws, grant several rights, including the right to: (a) access your personal data; (b) obtain the correction and updating of your data, request the limitation of the processing performed on your personal data (including, where possible, the right to be forgotten and cancellation); (c) object to the processing of your data for legitimate purposes and to exercise your right to data portability; (d) submit a complaint to the competent Supervisory Authority; (e) ask to know the logic applied to the studies and to request the modification of the results of the study activities on your consumption habits and choices. We remind you that, if you have freely provided your permission to the activities referred to in paragraphs 2 (ii), (iii) and (iv) (marketing, profiling and communication to other Group companies), you may withdraw your permission at any time, even limited to specific methods of contact. It should be noted that the right to object to the processing of personal Data for direct marketing purposes, exercised by means of automated methods, also extends to traditional means, without prejudice to your power to exercise this right only partially. The rights listed above may be exercised by sending a request at the following address: privacy@valentino.com.