

# RINASCENTE

## **PRIVACY POLICY according to articles 13 and 14 of EU Reg. 2016/679, the “Regulation”**

la Rinascente S.p.A. (hereinafter, “Rinascente”) with offices in Milan, Via Washington, 70, is the Data Controller in charge of the processing of your personal data collected through its website [www.rinascente.it](http://www.rinascente.it) (“Website”) and will process them in compliance with the regulations in force and pursuant to what is reported hereinafter.

### **1) Categories of personal data**

Rinascente collects and processes the following data from those accessing and visiting the website:

#### **1.1. Automatically-collected personal data**

- Browsing data: In the course of their normal operations, the IT systems and software procedures designated to the website’s operations acquire some personal data whose transmission is implicit in the use of Internet communication protocols. This information is not collected in order to associate it with identified interested parties, but, due to its nature, could allow users to be identified, through processing and association with data held by third parties. This data category includes IP addresses or the domain names of computers used by users connecting to the site, the URIs (Uniform Resource Identifiers) of the resources requested, the time of the request, the method used to submit the request to the server, the size of the response file obtained, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters related to the operating system and the user’s IT environment.
- Aggregate information regarding user behaviour on the website, collected through cookie use - for further information on Rinascente cookie use, please read our Cookie Policy.

#### **1.2. Personal data provided directly by you**

- Personal data, contact details and other personal data that you provide when completing forms on our website (for example, to request our Fidelity card, respond to a job offer, or when you access and use the area reserved to Rinascentecard/International Visitors Card holders - to this end, please read the related information that Rinascente posts from time to time at the bottom of forms which contain further information on the personal data processing performed in each context);
- any contact with Rinascente through our Customer Service or optional and unprompted messages, emails or letters, to Rinascente contacts indicated on our website entail the subsequent acquisition of the sender’s address, or email address, or their telephone number, which is needed to answer queries, as well as any other personal data included in the related correspondence;

### **2) Purposes and legal bases of personal data processing**

The above-indicated personal data is collected and processed with automated means, and with the aid of electronic and IT means, according to principles of necessity, lawfulness, correctness, proportionality and transparency, for the purposes and according to the conditions of lawfulness (so-called legal basis) indicated hereinafter:

#### **a. To consent you to browse our website and use the services offered on it**

- to provide you with assistance when requested through our Customer Service and answer your queries via email or telephone;
- to issue you the Rinascentecard and allow you to access all the advantages reserved to card holders (discounts, promotions, entering prize draws, event invitations and admission, etc.). For further information on personal data use to said ends, please read our Information for Rinascentecard holders [HERE](#).
- to issue you the International Visitors Card and allow you to access all the advantages reserved to card holders (discounts, promotions, entering prize draws, event invitations and admission, etc.). For further information on personal data use to said ends, please read our Information for International Visitors Card holders [HERE](#).
- when looking for and selecting staff, if you send your CV on request or without prompting. For further information on personal data use to said ends, please read our Information for candidates available on the website’s Careers section [HERE](#).
- To contribute to the website archives, providing historic material on Rinascente. For further information on personal data use to said ends, please read our Information available on the website’s Archives section [HERE](#).
- To use the wedding gift list service. For further information on personal data use to said ends, please read our Information available on the wedding gift list website.

In all of the above-indicated cases, the legal basis of the processing is the performance of a contract and pre-contractual measures.

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## **PRIVACY POLICY ai sensi degli artt. 13 e 14 del Reg. UE 2016/679, “Regolamento”**

### **b. Analyses of consumption habits**

To analyse your consumption habits and perform market analyses and research to the ends of improving our commercial offer and to send you promotions and invitations which are suited to you and your preferences. The legal basis of the processing is your consent (obtained when you request the our Fidelity Card and said consent may be withdrawn at any time).

### **c. Marketing**

To send you advertising and promotional materials, via mail, telephone or electronically, for example via e-mail, sms, mms and other digital channels which you have authorised. The legal basis of the processing is your consent (obtained when you request our Fidelity Card and said consent may be withdrawn at any time).

### **d. Safeguard rights and comply with the terms of use of the Website, verify compliance with the provisions of our Fidelity Card Regulations and safeguard said rights**

To ascertain liability in the event of potential IT crimes to the detriment of the website and manage any behaviour which violates the rules established in our Fidelity Card Regulations and safeguard our rights before courts of law. The legal basis of the processing is the need to pursue our legitimate interests (safeguarding our rights before courts of law and verifying compliance with our Fidelity Card Regulations).

### **e. Fulfilment of legal obligations**

To comply with the obligations established by the law, regulations or orders from the competent Authorities. The legal basis of the processing is the need to fulfil a legal obligation.

Browsing data is then used to obtain anonymous statistical information on website use and to check that the website works correctly.

## **3) Nature of personal data provided**

In the forms available on our website, data marked with an asterisk is mandatory to the provision of the requested services (for example, on issuing the Rinascentecard/International Visitors Card or when forwarding a CV). Missing, incomplete or untrue communications will lead to the Service not being provided. Conferring personal data other than those indicated is optional and refusing to provide such data will lead to the above-indicated ends not being pursued, possibly only in part.

## **4) Personal data recipients**

In order to pursue the above-indicated purposes, your personal data will be processed by authorised Rinascente staff (including the Director of the point of sale where it was collected, the sales staff, the authorised staff of the Marketing, Human resources and Information System departments), as well as authorised staff of third parties acting as data processors (IT service and customer service suppliers, companies providing services such as data entry and mailing, brands and, in the event of entering prize draws or attending events, companies that take care of the organisation and management of competitions and events on our behalf).

Where strictly necessary to the ends of pursuing the purposes indicated above, your personal data may also be disclosed to independent third-party data controllers, such as the competent Authorities (for example, in the event of card theft being reported or dispute management), a notary and the chamber of commerce (in the event of entering prize draws) or PR companies (event attendance).

Further information on recipient categories is available in the respective information on personal data processing according to point 2.

### **Personal data storage period and location**

Rinascente stores your personal data through servers located in the EEA for the time period strictly necessary to pursue the purposes indicated above in compliance with civil and tax obligations on data storage and the limits provided for by the law.

The data processed to fulfil any contractual obligation with you may be stored for the whole duration of the contract, plus another 10 years afterwards, in order to deal with any tax-related audits and/or disputes.

In the event of disputes: in the event that we must defend ourselves or act or make claims against you or third parties, we may store personal data whose processing we consider reasonably necessary to these ends, for the time in which the claim may be pursued.

Further information on the storage times of the data processed is available in the respective information on personal data processing according to point 2.a

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## PRIVACY POLICY ai sensi degli artt. 13 e 14 del Reg. UE 2016/679, “Regolamento”

### 5) Your rights

In quanto interessato, ai sensi degli artt.15-21 del Regolamento Lei ha il diritto di:

- get confirmation of the existence of your personal data, access their content and get a copy (**right of access**);
- update, amend and/or correct your personal data (**right to rectification**);
- request the cancellation or restriction of data processing in the cases provided for by the Regulation, including where data have been processed in violation of the law or storage is not necessary for the purposes for which the data were collected or otherwise processed (**right to erasure and right to restriction**);
- withdraw consent, where given, at any time, without prejudice to the lawfulness of the processing based on consent given before withdrawal (**right to withdraw consent**);
- within the limits of what is provided for by the Regulation, get a copy of the data you provided in a structured, commonly used, machine-readable format and request this data to be transmitted to another data controller where technically feasible (**right to data portability**);
- you also have the right to object to the processing of your data, at any time, for the purpose of direct marketing, including profiling connected to direct marketing and in the event that the processing is founded on legitimate interest - p. 2 lett. d (**right to object**).

You may exercise your right at any time by writing to the following email address: [dpo@rinascente.it](mailto:dpo@rinascente.it) or by sending a registered letter to the following address: Via Washington, 70, Milan (FAO Rinascente DPO).

Please, remember that to manage consent where given (including withdrawal) and amend or update your personal data and your profile, you may access your reserved area at any time and use the functions available in the “edit profile” section.

You also have a right to lodge a complaint with a Supervisory Authority for Data Protection.

### 6) Data controller and data protection officer contact info

The Data controller is: la Rinascente S.p.A., with offices in Milan, Via Washington, 70, VAT No. 05034580968, Telephone No. +39 0246771.

The data protection officer or DPO is available at the following email address: [dpo@rinascente.it](mailto:dpo@rinascente.it) or by sending a registered letter to the following address: Via Washington, 70, Milan (FAO Rinascente DPO).

### 7) Updates

This information may be updated over time and, in that event, we will inform you.

Last update: May 2018.