

# PRIVACY POLICY

## 1. GENERAL INFORMATION

Pursuant to art. 13 of Regulation (EU) 2016/679 (hereinafter the “Regulation”), Salvatore Ferragamo S.p.A. (hereinafter “Salvatore Ferragamo” or the “Company”) hereby provides, information about how your personal data may be processed when you visit the websites [www.ferragamo.com](http://www.ferragamo.com), [csr.ferragamo.com](http://csr.ferragamo.com) and [group.ferragamo.com](http://group.ferragamo.com), hereinafter referred to as the “Website”) (paragraphs A and B) or when you use the e-commerce platform of Salvatore Ferragamo (paragraph C) on the website [www.ferragamo.com](http://www.ferragamo.com) or the newsletter service (paragraph D).

## 2. DEFINITIONS

The term “personal data” has the meaning provided by the data protection legislation and refers to any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier.

“Data protection law” means the EU Regulation n. 2016/679 as amended, including the Recitals and Guidelines of the article 29 working party, the applicable national law, including the decisions issued by the Data Protection Authority, and codes of conduct, if applicable.

The terms “processing”, “data controller”, “data processor”, “joint data controllers”, “personal data” (including “special categories of personal data”), “data subjects”, “third parties”, “recipients”, “third countries”, “breach of personal data” and “supervisory authorities” are used according to the definition and meaning provided by the data protection legislation, to which reference is made.

## 3. COLLECTION AND PROCESSING OF PERSONAL DATA

### A) NAVIGATION DATA

*The following section describes the data that Salvatore Ferragamo collects from users who surf the Website, without logging in as a registered user.*

During the normal course of operation, the IT systems and software procedures used to run the Website collect certain personal data whose transmission is implicit in the Internet communication protocols. This information is not collected for the purpose of associating the same with identified data subjects, but may make it possible to identify the user when processed and associated with the data held by third parties.

This category of data includes IP addresses or domain names or specification of the type of devices

used by users who connect to the Website, the URI - Uniform Resource Identifier - addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response to the same, the numerical code indicating the status of the response provided by the server (successfully completed, error, etc.) and other parameters relevant to the operating system and the user's IT environment.

Salvatore Ferragamo will process your personal data for the technical administration of the Website, to obtain anonymous statistical information on the use of the Website and to ascertain the correct functioning thereof, and will be deleted immediately after processing for such purposes.

Your personal data may be used to ascertain responsibility in case of computer crimes against the Website discovered before the above-mentioned deletion. For this purpose, your personal data will be retained for the period set forth by Italian law in order to protect our interests (article 2946 and ff. of the Italian Civil Code).

## **B) COOKIES**

*This section describes how data are processed through the so-called cookie technology and invites you to visit the relevant section.*

This website uses so-called first and third-party cookies. Cookies are short text strings that are transmitted to the browser and may be stored on the computer, smartphone or any other device used to access the Internet, whenever a website is visited.

For more information on the use of cookies, why and how they are used, and how to change your settings, please read our [Cookie Policy](#) .

## **C) PERSONAL DATA RELATING TO THE PURCHASE OF SALVATORE FERRAGAMO PRODUCTS ON THE E-COMMERCE PLATFORM**

*This section describes the purposes for which the data collected by Salvatore Ferragamo are processed when the user uses the e-commerce platform of the website [www.ferragamo.com](http://www.ferragamo.com).*

You may use the Salvatore Ferragamo e-commerce platform either as a registered user or as a guest user.

When you purchase Salvatore Ferragamo products on the e-commerce platform of the website, the personal data you provide in the context of the process relating to the transaction and, in case, the personal data you provide as a registered user of the Website (jointly referred to as the “Purchasing Data”), will be processed by Salvatore Ferragamo, as data controller, in order to:

- a) process the purchase order and deliver the products you have purchased;
- b) verify that the information provided for the purposes of the transaction are complete, valid, correct and non-fraudulent.
- c) manage the contractual relationship with customers and provide after-sales services, as well as to provide technical assistance to users and clients in order to register to the Website and/or to make a purchase order and/or after a purchase order is made;
- d) comply with the legal obligations set forth by tax and accounting legislation, or any other legislation that Salvatore Ferragamo is required to comply with as seller.

For the purposes indicated under points a) and c), the processing of data is necessary to perform the contract, to which you are a party, with the Company (pursuant to article 6 paragraph 1 (b) of the Regulation). The purpose indicated under point d) is necessary to fulfil any legal obligations of the data controller (as set forth by article 6 paragraph 1 (c) of the Regulation); As regards the purpose set forth by point b), pursuant to recital 47 of the Regulation, your data will be processed in the legitimate interest of Salvatore Ferragamo to ascertain the security of the payments received.

You are required to provide your Purchasing Data in order to execute the purchase contract between you and Salvatore Ferragamo. Should you refuse to provide your Purchasing Data, you will be unable to finalise the purchase of the products on the e-commerce platform of the Website.

Please ensure that your personal data are correct; in the case of changes to the personal data you have provided, please contact the Company at your earliest convenience, or if you are a registered user, please change your personal data online.

Your Purchasing Data will be retained by Salvatore Ferragamo only as long as necessary to deliver the products you have purchased, comply with any requests made by you pursuant to the Consumer Code, to comply with tax and civil law obligations and for the period set forth by Italian law in order to protect our interests (article 2946 of the Italian Civil Code).

After identifying yourself, you have the right to ask Salvatore Ferragamo to access your Purchasing Data, and to amend or delete the same, provided that the relevant conditions are met. You also have the right to ask Salvatore Ferragamo for a copy of your Purchasing Data and to limit the processing of your Purchasing Data, provided that the relevant conditions are met.

In order to exercise the above rights or request further information about how we process your Purchasing Data, you may contact the Data Protection Officer ('DPO') at [privacy-it@ferragamo.com](mailto:privacy-it@ferragamo.com).

You may, in any case, file a claim with the competent supervisory authority, or the Authority for the Protection of Personal Data, if you believe your personal data have been processed illegally.

***Disclosure of Purchasing Data by Salvatore Ferragamo to Riskified Ltd. and processing of Purchasing Data by Riskified Ltd.***

When you purchase Salvatore Ferragamo products on the e-commerce platform of the website, Salvatore Ferragamo will disclose your Purchasing Data with Riskified Ltd., a company with registered offices at 30 Kalisher St., Tel Aviv 6525724 Israel (hereinafter referred to as "Riskified"), that will carry out security and anti-fraud checks on the transactions carried out.

Riskified is a company that specialises in anti-fraud services, software and platforms in the field of e-commerce. Riskified will process your Purchasing Data as data controller to ascertain the security of your payments.

Salvatore Ferragamo discloses your Purchasing Data to Riskified, who processes the same, in the interest of Salvatore Ferragamo, in order to guarantee the legality of payments made using the e-commerce platform of the Website. The data processing by Riskified will be carried out through automated means and will consist of aggregating your Purchasing Data with other data relevant to transactions concluded on e-commerce platforms, in order to assess the regularity of the payment, according to pre-determined criteria.

For a description of the commitments and measures provided by Riskified to guarantee the protection of your data, please read Riskified's [Privacy Policy](#), which includes the email address of the Riskified Data Protection Officer and information on how long the Purchasing Data processed by Riskified will be retained by the same. You may also contact the Salvatore Ferragamo DPO on [privacy-it@ferragamo.com](mailto:privacy-it@ferragamo.com) for more information about how Riskified protects your Purchasing Data.

Please be aware that the disclosure of your Purchasing Data to Riskified entails the transfer of your Purchasing Data outside the European Economic Area.

Your Purchasing Data will be transferred to the United States of America, where they will be retained in the Riskified servers in that country. This transfer is subject to Riskified's undertaking to provide

adequate guarantees relevant to your Purchasing Data, by accepting the standard “Controller to Controller” contract clauses adopted by the Commission pursuant to art. 26 (2) of Directive 95/46/EC and art. 46 (2) (d) of the Regulation. To obtain a copy of the standard contractual clauses please write \_\_\_\_\_ to [privacy-it@ferragamo.com](mailto:privacy-it@ferragamo.com).

A backup copy of your Purchasing Data will also be retained by Riskified on servers in the State of Israel. Your personal data are transferred according to the [adequacy decision of the European Commission adopted on 31 January 2011](#), which recognised that the legal system of the State of Israel ensures that your right to the protection of your personal data, is substantially guaranteed, and equivalent to that in force in the European Union.

### ***Data Relevant to Incomplete Purchase Orders***

If a purchase on the Website is not completed, Salvatore Ferragamo will use the e-mail address, your personal details, the content of the cart and the purchase details you provided, to send you reminder e-mails of the order.

The data collected for this purpose will not be used for any other purpose. The service may be disabled at any time through the link at the bottom of the *reminder* emails you receive.

In order to provide you with this service, Salvatore Ferragamo uses SaleCycle Ltd. (having registered office in rue Notre-Dame des Victoires 75002 Paris), an external supplier appointed as data processor for this purpose. The above Data Processor will process your personal data (e-mail address, general details, cart content and purchasing details) for the sole purpose of providing this service.

In this case, your personal data will be retained on databases in the European Union, that are subject to the applicable ISO safety standard, and may be accessed only by authorized personnel. In order to provide the service in question, the data processor may in turn use external parties, who will be appointed as sub data processors. The above will be required to comply with the same obligations as the Data Processor who appoints the same.

Your personal data (e-mail address, general details, cart content and purchasing details) will be retained only as long as it is necessary to provide the service in question.

Neither Salvatore Ferragamo, nor the data processor, nor any sub-data processor will disclose your personal data to third parties, without your prior consent, unless so required by law.

### **D) NEWSLETTER AND DATA SUPPLIED VOLUNTARILY BY THE USER**

*This section refers to the information provided from time to time for additional processing carried out by Salvatore Ferragamo on the website [www.ferragamo.com](http://www.ferragamo.com).*

Among the services available on the Website, Salvatore Ferragamo offers a newsletter service to which users may subscribe. Users who subscribe to the newsletter will receive e-mails with information and commercial content.

The legal basis for processing such data is art. 6 (1) (b) of the Regulation.

The personal data processed for this purpose include your e-mail address, that will be retained only as long as it is strictly necessary to provide the newsletter service requested.

You may *unsubscribe* from the newsletter at any time using the link at the bottom of the e-mails you receive.

In some sections of the Website, you may be asked to provide personal data. In this case, a specific privacy policy statement pursuant to article 13 of the Regulations will be provided and, if necessary, you will be asked to give your consent to specific processing purposes.

#### **4. DISCLOSURE OF DATA**

Your personal data will be processed by the duly authorised and appointed employees and collaborators of Salvatore Ferragamo.

Your personal data may be processed by companies appointed by Salvatore Ferragamo, who carry out technical and organisational tasks on behalf of the same. These companies are direct collaborators of Salvatore Ferragamo and are appointed as data processors, in accordance with art. 28 of the Regulations, and guarantee to implement appropriate measures to ensure that the processing of your personal data complies with the Regulations and protects the rights of the data subject.

As part of the data processing procedure carried out through the Website, Salvatore Ferragamo has specifically appointed the companies providing managing and technical maintenance service for the Website and the Company's servers as data processor.

As part of the data processing carried out through the e-commerce platform, the personal data collected may also be shared with the following categories of recipients:

- companies belonging to the Ferragamo Group in Italy and/or in the world that manage the sales channels in order to attain the purposes described by paragraph C), (c) and (d) on behalf of Salvatore Ferragamo;
- companies that provide shipping/delivery services for the products;
- companies that provide customer care services;
- companies that carry out market analyses and surveys;

- companies that offer IT maintenance services, hosting and maintenance services.

The data collected may also be processed by third parties, as independent data controllers, such as:

- persons, companies, associations or professional firms that provide assistance and advisory services (lawyers, accountants, auditors).
- companies that provide payment processing services by credit card and through banks;

The complete list of recipients is constantly updated and may be requested by sending an e-mail to [privacy-it@ferragamo.com](mailto:privacy-it@ferragamo.com).

Your personal data will not be disseminated for any reason whatsoever.

## **5. SHARING CONTENT VIA THE SOCIAL NETWORK**

Should you decide to share content on the social networks (e.g. Facebook, Twitter, LinkedIn, Instagram), the Website will neither collect personal data from nor provide the personal data to the social networks. For more information and to view the privacy policy of each social network, please visit the website of the social network in question.

In case you decide to share some content of the Website via social networks, your data might be visible by other users and may be transferred outside the European Economic Area by the relevant social network. With regard to this transfer and any other processing, it should be stressed that the social network acts as autonomous data controller, with Salvatore Ferragamo not having any control whatsoever on such processing.

## **6. YOUR RIGHTS**

You may exercise the rights set forth by the data protection law at any time. In particular, if applicable, you may:

- request and receive confirmation that we hold your personal data and access the content thereof (right of access);
- update, amend and/or correct your personal data (right of rectification);
- request that your personal data be deleted, anonymised, or a block of any data processed in breach of the law or limit the processing thereof;
- object to the processing of your data, for legitimate reasons, if such objections are based on art. 6 (1) (f) of the Regulations;
- object to the processing of your personal data for advertising and marketing purposes, or for market surveys or to forward promotional messages;

- withdraw your consent -when given- at any time, without prejudice to the legality of any processing based on your consent prior to such withdrawal;
- receive a copy of the personal data you provided and request that such personal data be transmitted to another data controller.

In order to exercise your rights, please send an e-mail to [privacy-it@ferragamo.com](mailto:privacy-it@ferragamo.com).

You in any case have the right to file a claim with the competent supervisory authority, or the Data Protection Authority, if you believe your personal data have been processed illegally.

## **7. DATA CONTROLLER AND DATA PROCESSOR**

The Data Controller is Salvatore Ferragamo S.p.A., having registered offices in Via dei Tornabuoni, no. 2 - 50123 - Florence.

The Data Protection Officer ('DPO'), appointed by Salvatore Ferragamo, may be contacted on [privacy-it@ferragamo.com](mailto:privacy-it@ferragamo.com).

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