

**SYNTHETIC PRIVACY NOTICE *Clients In Store***  
**Art. 13 of the Regulation (EU) 2016/679 *General Data Protection Regulation***

The data you will provide us by filling in the present form (e.g. title, name, surname, e-mail address, phone number, date of birth, age range, address, country of residence, nationality) will be processed, in their capacity as independent Data Controllers, by the FENDI RETAIL company where you made the purchase (the relevant data can be found in the full Notice) to manage your purchases and connected services (also for post-sale assistance) as well as by FENDI S.r.l. in order to allow you to join our loyalty program and access the services and facilities reserved to the registered members.

Furthermore, if you wish to provide your consent, FENDI S.r.l. may use your data, including those related to your purchases (e.g., boutique where the sale took place, number, type and price of purchased products), those eventually communicated to FENDI by third parties authorized resellers and/or provided by you when visiting Fendi stores (e.g. age, favourite products, colours and materials, style, hobbies, most visited countries, size), in order to:

- **learn more about your purchase habits and your preferences, so as to customize our offer of products and services** in the Fendi world and offer you a tailored treatment at each Fendi store;
- **contact you**, also by sending customized communications (e.g. Newsletter, mail, e-mail, calls via operator, text messages, instant messaging, such as WhatsApp, WeChat and Social networks in general, posts, messages or communication on initiative on social networks, etc.) and keep you updated on Fendi brand products, services (e.g. new purchasing methods, home delivery, etc.), initiatives and events, or to have you participate in market surveys. **Should you not wish to provide your consent you can still purchase Fendi brand products** and take advantage of the related services offered by us. **Your consent can be freely withdrawn.**

In general, personal data will be retained for no longer than is necessary for the purposes for which the data were collected. Your data necessary for managing your purchases and the related services will be processed for the time necessary to reach such purposes and, subsequently, to comply with the related legal requirements (e.g. taxation and accounting requirements), after which the data will be cancelled or anonymized.

For customer loyalty, your data will be processed for the entire duration of your registration to our loyalty program.

Processing of data collected for the purposes of contacting you, also by sending customized communications on our products, services and events and to participate in market surveys and to know your preferences will be based on the consents you will provide us with, which can be in any case withdrawn at any given time. With limited reference to data collected for purposes of learning your habits and preferences, data will be retained for a maximum period of 7 years.

**At the time when consent will be revoked or, as the case may be, when the term above mentioned expires, data will be deleted or anonymized.**

**Please note that by sending an e-mail to [customerprivacy@fendi.com](mailto:customerprivacy@fendi.com) you will always be able to withdraw from your registration to our loyalty program, access your personal data, update and delete them, withdraw or modify the consent you provided us with, and receive or ask for the transmission of your data to another data controller. Furthermore you will always be able to object at any time to the processing of your personal data for marketing purposes and/or for analysis of your preference purposes; you will have the right to lodge a complaint with the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)) or, if different, with the supervisory authority of the Member State of your habitual residence, place of work or place of the alleged infringement.**

Should you need any further information, please read the complete text of the Full Privacy Notice *Clients in Store* available in store or on [www.fendi.com](http://www.fendi.com).

## **Article 13 of the Regulation (EU) 2016/679 General Data Protection Regulation**

### **a) Who processes your personal data:**

- Fendi Retail Spain S.L.U., with registered office at Madrid, calle Eratostenes, 14-16, Getafe, Fiscal registration number B-88023957, telephone number: +39 0633450130, e-mail address: customercare@fendi.eu (hereinafter "**FENDI RETAIL**"), is the company in charge of the sale of Fendi brand products within your Country, and, in its quality of Data Controller, collects and processes your personal data, pursuant to Regulation (EU) 2016/679 *General Data Protection Regulation* (the "**Regulation**") for the purposes no. 1), 2) and 3) as set forth in paragraph b) below.
- FENDI S.r.l., with registered office in Palazzo della Civiltà, Quadrato della Concordia n.3, 00144, Rome (RM), Italy, Fiscal Code, VAT Number and Register of Companies of Rome no. 00900541004, telephone number + 39 06 334501, e-mail address: customerprivacy@fendi.com (hereinafter "**FENDI**"), in its quality of Data Controller, collects and processes your personal data, pursuant to the Regulation for the purposes no. 4), 5), 6) and 7) as set forth in paragraph b) below.

### **b) How we collect and why we process your data:**

The data you are providing to us:

- by filling in the present form and possibly your fiscal details (e.g. your fiscal code/VAT number, if necessary for tax free or invoicing) and the data necessary for the delivery of the products you will purchase (delivery address),
- the data relating to your purchases or data provided by you when visiting Fendi stores (e.g. favorite products, colors and materials, style, hobbies, most visited countries, size), and
- those eventually communicated to FENDI by third parties authorized resellers

will be processed, as the case, in order:

1. to manage the sale of Fendi brand products and fulfill our obligations and exercise our rights – even in court - arising from the sale contract;
2. to fulfill our legal obligations deriving from laws, regulations and EU laws and relevant obligations set forth by internal regulations (e.g. as regards taxation, accounting, money laundering and fraud, internal audit);
3. to manage the services related to your purchase, also after-sales assistance (e.g. Customer Care service, returns management, etc.).
4. to allow you to access to all the services and facilities reserved by FENDI to the registered members of its loyalty program, such as: to manage your purchases faster; to take advantage, depending on the initiatives/campaigns undertaken from time to time by FENDI, of benefits and free services (e.g. personal shopping, tailoring, home delivery, gadget and/or discounts on your birthday and/or based on your purchase threshold); and view on your online profile– if you wish – also your purchase history at Fendi stores and the Wish Lists created for you at the stores;
5. to analyze your interests, preferences and purchase habits, also on the basis of the data provided by you when visiting and purchasing at Fendi stores in Italy and abroad and on Fendi web site, in order to allow FENDI to customize its offer of products and services and allow you to receive a tailored treatment at each Fendi store;
6. to keep you updated by sending you promotional material, also customized (e.g. by mail, e-mail, calls via operators, text message, instant messaging, (e.g. via WhatsApp, WeChat and Social networks in general), posts, messages or communications on initiative on social networks, etc.) on Fendi brand products (e.g. clothing, leather goods, accessories, home, etc.), services of Fendi world (e.g. purchasing methods, home delivery, etc.), initiatives and events organized by FENDI or to which FENDI adheres (e.g. new opening of Fendi stores), as well as to have you participate in market surveys (in order to learn more about your interests and to improve our offer);
7. to send you our Newsletter on Fendi brand products.

The legal basis of the processing of your personal data will be, as the case, (i) the performance of the contract and the fulfillment of the obligations provided for by the law and regulations for purposes no. 1, 2, 3 and 4,

pursuant to art. 6, para. 1, lett. b) and c) of the Regulation, and (ii) the consent you may provide us with, for the purposes no. 5, 6 and 7, pursuant to art. 6, para. 1, lett. a) of the Regulation.

At any rate, the processing will take place in compliance with the relevant Italian Data Protection Authority's decisions (the "**Authority**") - and following updating and/or amendments - (among which the Decision on *Loyalty Cards and Safeguards for consumers: Guidelines applying to loyalty programs – 24 February 2005*; and *Guidelines on Marketing and against Spam – 4 July 2013*) as well as in compliance with the guarantees and measures prescribed in the Authority's authorization to FENDI dated 22 December 2015.

#### **c) Your consent:**

In order to learn more about your interests and purchase preferences (so as to improve our offer of services and products), keep you updated on our products, services, initiatives and events, send you promotional material, even customized, or have you participate in market surveys (purposes no. 5, 6 and 7 paragraph b) we need your explicit consent. **Should you not wish to provide your consent you can still purchase Fendi brand products** and take advantage of the facilities offered to the registered members (purposes no. 3 e 4 paragraph b). **Your consent can be freely withdrawn** (as set forth in lett. j) of this Privacy Notice) at any time even by sending an e-mail to [customerprivacy@fendi.com](mailto:customerprivacy@fendi.com); the withdrawal of your consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Please note that, in case of withdrawal of your consent for sending updates, promotional communications or market surveys (purposes no. 6 and 7 paragraph b), you will no longer be the recipient of any type of communication. If you wish, you may withdraw your consent only to the receipt of communications via electronic means (e.g., newsletter, e-mail, sms, instant messaging), continuing to receive commercial communications only by mail or calls via operators, if provided and vice versa.

#### **d) Which data are processed and which ones are mandatory**

For the purposes indicated above, FENDI and FENDI RETAIL shall process the following categories of personal data:

- **Personal details** (title, name, surname, date of birth and nationality);
- **Contact details** (Country of residence, e-mail address, mobile telephone number);
- **Data related to the delivery of goods** (address, telephone number, gift box)
- **Data related to the purchases you made** (boutique where you made the purchase, number, type and price of the purchased products);
- **Additional personal data useful to carry out marketing and analysis activities** (age, favourite product categories, favourite colour, style, other brands purchased, hobbies, most visited countries, as the client knows Fendi, size, measures, marital status, number of children, anniversary, notes related to purchase preferences or special needs expressed by the client – e.g. favourites materials -), if you have a Personal Sales Assistant, Fendi events to which you participated.

We ask you to provide all the data requested as "*mandatory*" (e.g. name, surname, contact details, date of birth) as needed for your registration to our loyalty program, and for the fulfillment of our fiscal/accounting obligations should your request an invoice for your purchase. In case of missing or incomplete compilation of such data, your registration will not be completed. Failure to provide the data marked as "*optional*" (that are, the additional personal data useful to carry out the marketing and analysis activities listed above), will simply not allow us to use your data for the purposes no. 5 and 6 set forth in par. b) for which you have provided your consent; any refusal will have no consequences on your possibility of proceeding with the purchase of our products, but it will not be possible for us to inform you about our products and services, our initiatives and events or analyze your preference and interests.

If you provide personal data of third parties (e.g. your family members, other customers or potential customers) you must ensure that such third parties are informed and have consented (if necessary) for their data processing according with the hereby privacy notice.

#### **e) How do we process your data:**

Your data will be processed with and without the aid of electronic tools and stored on servers located in Italy. In particular, if you provide us with your consent to use your data for the purposes no. 5 and 6 above, your data will be organized and processed using automated methods based on your preferences, enabling us to

know your interests and propensities to purchase (e.g. by checking which products you purchased), adjust our product and services offer and update you on our products (e.g. new collections), services (e.g. purchase methods, home delivery, etc.), initiatives and events (e.g. invitations to events organized by FENDI or to which FENDI adheres), send promotional material that can also meet your tastes and interests (e.g. if you have purchased women's footwear in the past, we could send you our new women's catalogue, or send you promotions related to matching products or the same style), or contact you to participate in market surveys (e.g. through interviews, telephone contact, e-mail, etc.).

We specify that none of our analysis activities of your data and preferences will be based solely on automated processing, but will always involve the intervention and evaluation of our persons in charge of the processing. The data will always be processed in compliance with the current legislation and, in any case, in order to guarantee their security and confidentiality and prevent their disclosure or unauthorized use, alteration or destruction.

**f) Data entry into our CRM (Customer Relationship Management) system:**

**The insertion of your data into FENDI CRM system – for the purposes no. 5) and 6) of paragraph b) above - is optional and will only take place if you provide us with your consent to the processing of your data. The insertion of your data into our CRM system, will entail the possibility of reading, inserting and amending them by employees and staff (at the offices and stores) of FENDI, FENDI RETAIL and other retail companies of Fendi brand products in Italy and abroad (each for its respective field of competence) specifically authorized to data processing, pursuant to art. 29 of the Regulation.**

**g) How long do we store your data:**

In general, personal data will be retained for no longer than is necessary for the purposes for which the data were collected. For the purposes No. 1, 2 and 3 paragraph b) your data will be processed for the time necessary to manage your purchase and the related services, and to comply with obligations provided by the laws and regulations (e.g. as regards taxation, accounting, money laundering and fraud, internal audit); afterwards the data will be deleted or anonymized.

For the purposes no. 4, 5 and 6 paragraph b) your data will be processed, as the case may be, for the entire duration of your registration to our loyalty program and on the basis of the consents you will provide us with, which can be withdrawn at any given time (as set forth in lett. j) of this Privacy Notice). With limited reference to data collected for purposes No. 5 paragraph b) data will be processed for a maximum period of 7 years (pursuant to the Data Protection Authority's decision dated 22 December 2015). At the time when consent will be revoked or, as the case may be, when the term above mentioned expires, data will be deleted or anonymized.

Your data necessary to send the Newsletter on Fendi brand products (purpose No. 7 paragraph b) will be processed until your request for cancellation from our Newsletter; after which they will be deleted or anonymized.

**h) By whom your data are processed:**

Your data will not be disseminated and will come to knowledge of the persons in charge of the processing at Fendi stores, the Retail Department and other Departments in charge of managing your purchases and the connected services, as well as the FENDI CRM Department.

Your data will also be processed by companies appointed as external Data Processors and upon proper authorization and instructions that provide us with services to manage purchases or carry out on our behalf and/or in our interest activities (e.g. internal audit) or services <sup>[1]</sup>.

**i) Your data are transferred to Extra EU Country:**

To allow us to provide you with a tailored service also in the event of purchases made at Fendi stores abroad, your personal data may be transferred to the extra-EU countries where Fendi stores are located; the list of Fendi stores is available on [www.fendi.com](http://www.fendi.com)

Pursuant to the applicable legislation, we do not need your specific consent to transfer your data to third countries since the transfer is made on the basis of appropriate safeguards pursuant to articles 46 and 47 of

the Regulation, such as the adoption of the standard data protection contractual clauses adopted by the EU Commission as it happens in the relationships with the retail companies that manage Fendi stores in the world.

The transfer of your data to any additional third countries, if necessary, will take place in full compliance with the safeguards, measures and rights as provided for by the Regulations. By simple request to be made to the contacts indicated in paragraph j), you will receive more information on the transfer of your data and on the safeguards provided for their protection as well as on the means by which to obtain a copy of the data or the place where they have been made available.

**j) Which are your rights:**

By sending an email to FENDI CRM Department, e-mail [customerprivacy@fendi.com](mailto:customerprivacy@fendi.com), FENDI, Palazzo della Civiltà, Quadrato della Concordia n.3, 00144 - Roma (RM), Italy, you will be able to exercise at any time the rights provided for by articles from 15 to 22 of the Regulation, such as:

- *obtaining confirmation as to whether or not personal data concerning you is being processed;*
- *obtaining access to your personal data and to the information set out in Article 15 of the Regulation;*
- *obtaining the rectification of the inaccurate personal data that concern you without undue delay or the supplementing of incomplete personal data;*
- *obtaining the erasure of the personal data that concern you without undue delay;*
- *obtaining the restriction of processing the personal data that concern you;*
- *being informed of any rectifications or erasures or restrictions of processing in relation to the personal data that concern you;*
- *receiving in a structured, commonly used and machine-readable format the personal data that concern you;*
- *objecting at any time, on grounds associated with your specific situation, to the processing of the personal data that concern you.*

**In particular, you have the right to withdraw at any time the consents provided to the processing and to object to the processing of your personal data especially for marketing purposes and/or for the analysis of your preference.**

We remind you that, by sending an e-mail to [customerprivacy@fendi.com](mailto:customerprivacy@fendi.com) you will be able to withdraw your registration to our fidelity program at any given time.

**k) Who you can contact to lodge a complaint:**

We remind you that, should you consider the processing of your data infringes the Regulation, you may in any event lodge a complaint with the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)), or, if different, the Data Protection Authority of the Member State of your habitual residence, place of work or place of the alleged infringement.

**l) Data Protection Officer (DPO):**

You can contact the Data Protection Officer appointed by FENDI at the e-mail address [dpo@fendi.com](mailto:dpo@fendi.com).

## Footnotes

<sup>1</sup> Your data may become to knowledge, as external Data Processors and upon proper authorization and instructions, of the following recipients:

- (i) retail companies which manage our stores in Italy and abroad (if you have made purchases in our stores);
- (ii) companies which on our behalf carry out the analysis of your purchases;
- (iii) companies on our behalf responsible for managing Fendi "Customer Service";
- (iv) companies in charge of processing, managing and sending newsletters and promotional material;
- (v) companies that organize and manage market research and surveys on our behalf;
- (vi) companies entrusted with the management of our website and the related databases;
- (vii) companies that deal with the management and technical maintenance of the CRM system;
- (viii) the company LVMH that can carry out, also in our interest, internal audit activities in relation to the compliance with obligations provided by the laws and/or regulation, including internal.

The names of all the external Data Processors can be requested via email to [customerprivacy@fendi.com](mailto:customerprivacy@fendi.com).