

SUMMARY PRIVACY NOTICE - CANADA

In-Store Clients

Art. 13 of the Regulation (EU) 2016/679 General Data Protection Regulation and applicable Canadian privacy laws.

Note to Canadian clients: Although the following notices apply equally to Canadian clients, and comply with applicable Canadian privacy laws, the notices contain a number of terms derived from Europe's General Data Protection Regulation, to which FENDI S.r.l., as businesses based in Italy, is subject. Please consult the glossary at the end of this document, as necessary, to better understand these terms.

The Personal 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** (collectively, "FENDI", "we" and "us").

Furthermore, **if you wish to provide your consent**, FENDI S.r.l. may use your Personal Data, including transactional data arising from your purchases and those provided by you when visiting FENDI stores (e.g. personal and contact details, boutique where the sale took place, number, type and price of purchased products), as well as those eventually communicated or collected by third parties (e.g. FENDI authorized retailers and/or business partners), in order to:

- **learn more about your purchase habits and your interests, 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 according to your preferences, (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 are collected. Your Personal Data necessary for managing your purchases and the related services will be processed for the time necessary to fulfil 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 Personal Data will be processed for the entire duration of your registration to our loyalty program.

Processing of Personal 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 reference to data collected for the purposes of learning your habits and preferences, Personal Data will be retained for a maximum period of 7 years, unless you revoke your consent prior to that time. Upon withdrawal of your consent or the expiry of the retention period, as the case may be, your Personal Data will be deleted or anonymized.

Please note that by sending an e-mail to customerprivacy@fendi.com or by postal mail to FENDI, Palazzo della Civiltà, Quadrato della Concordia n.3, 00144 - Roma (RM), Italy, you will always be able to withdraw

from your registration to our loyalty program, access your Personal Data, update and delete such data, withdraw or modify the consent you provided us with, and where applicable, receive or ask for the transmission of your Personal 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 preferences and interests. You also have the right to lodge a complaint with the Italian Data Protection Authority (www.garanteprivacy.it) or, for Canadian residents, with the privacy commissioner with jurisdiction over the province in which you reside.

Should you need any further information, please read the complete text of the Full Privacy Notice for In-Store *Clients* below. This Notice is also available at any time in FENDI stores or online at www.fendi.com.

FULL PRIVACY NOTICE – CANADA

In-Store *Clients*

Article 13 of the Regulation (EU) 2016/679 *General Data Protection Regulation* and applicable Canadian privacy laws

a) Who processes your Personal Data:

- FENDI Canada Inc., with registered office in 199 Bay Street - Suite 5300 - Commerce Court West, Toronto, postal code M5L 1B9, telephone number +1 647 494 3707, 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 role as 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), and in compliance with Privacy Law, 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), and in compliance with Privacy Law, as set forth in paragraph b) below.

b) How we collect and why we process your Personal Data:

Your data are collected in the following ways:

- directly from you, such as when you fill out this form
- on the occasion of your purchases and/or visits to FENDI stores (e.g. identity document, tax details (e.g. your tax code/VAT/HST number, if necessary for tax free or invoicing), data necessary for the delivery of the products you will purchase (delivery address), preferences and interests (e.g. favourite products, colours and materials, style, hobbies, most visited countries, size), and
- possible communication or collection by third parties (e.g. FENDI authorized retailers or other business partners)

We will Process your Personal Data, as applicable, for the following purposes:

1. to manage the sale of FENDI brand products and fulfill our legal obligations and exercise our legal rights arising from the sale contract, including before the courts;
2. to fulfill our legal obligations deriving from laws, regulations, 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 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. with your consent, to analyze your interests, preferences and purchase habits, also on the basis of the Personal Data provided by you when visiting and purchasing at FENDI stores in Italy and abroad and on the 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. with your consent, 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.

With respect to EU residents and our European stores and authorized third-party retailers, 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. For Canadian residents, our processing of your Personal Data will be based on your consent, or as otherwise required or permitted by law.

At any rate, the processing will take place in compliance with the relevant Canadian or Italian Data Protection Authority's decisions (the "**Authority**") – and, for EU residents, 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. For Canadian residents the Processing will take place in compliance with Privacy Law and Canada's Anti-Spam Legislation (CASL).

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 request 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 paragraph j) of this Privacy Notice) at any time even by sending an e-mail to customerprivacy@fendi.com. You may also unsubscribe from the receipt of electronic marketing and promotional messages from us through the unsubscribe link contained in such messages. 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) What types of Personal Data do we process and what Personal Data are you required to provide

For the purposes indicated above, FENDI and FENDI RETAIL shall process the following categories of Personal Data, as required:

- **Personal details** (e.g. title, name, surname, date of birth, age range, nationality identity document);
- **Contact details** (e.g. country of residence, e-mail address, mobile telephone number);
- **Data related to the delivery of goods** (e.g. address, telephone number, gift box)
- **Data related to the purchases you made** (e.g. 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 require you to provide certain Personal Data (e.g. name, surname, contact details, age range) 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. If your registration does not contain all data fields required as “mandatory” your registration will not be accepted. 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 Personal Data for the purposes no. 5 and 6 set forth in par. b) for which you have provided your consent; declining to provide any “optional” data will otherwise have no consequences on your ability to purchase our products, but it will prevent us from informing you about our products and services, our initiatives and events or analyze your preference and interests.

If you provide us with the 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 this privacy notice.

e) How do we process your Personal Data:

Your Personal Data may be processed, with and without the aid of electronic tools and stored on servers located in the European Union, where it will be subject to the domestic laws of that country, which may differ from the laws of Canada.

In particular, if you provide us with your consent to use your Personal Data for the purposes no. 5 and 6 above, your data will be organized and processed by using automated methods that allow to define profiles for targeting campaigns, activities and / or marketing actions, based on your preferences and purchases, also using information from third-party business partners of FENDI, 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.).

The Personal 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 processing of your Personal 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 Personal Data into our CRM system, will entail the possibility of reading, inserting and amending them by employees (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, and in compliance with

Privacy Law. In all cases, employees are bound to handle personal data only for the purposes of maintaining our CRM.

g) How long do we store your Personal 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 Personal Data will be processed for the time necessary to manage your purchase and the related services, and as required or permitted by law (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 Personal 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 section j) of this Privacy Notice). With reference to Personal Data collected for purposes No. 5 paragraph b), data will be processed for a maximum period of 7 years (pursuant to the Italian Data Protection Authority's decision dated 22 December 2015), and in compliance with Privacy Law, as applicable. At the time when consent will be revoked or, as the case may be, when the term above mentioned expires, Personal Data will be deleted or anonymized.

Your Personal 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 Personal Data are processed:

Your Personal Data will be treated confidentially and may be handled by 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 Personal Data will also be processed by trusted 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 ^[1].

i) Your Personal 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

For European residents, pursuant to the applicable legislation, we do not need your specific consent to transfer your Personal 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. For residents of Canada, you consent to such transfers by registering for our loyalty program and agreeing with terms of this Notice.

The transfer of your Personal 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 and Canadian Privacy Law. By simple request to be made to the contacts indicated in section j), you will receive more information on the transfer of your Personal 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, 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, or by Canadian Privacy Law, as applicable, 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, or as required by Canadian Privacy Law, as applicable;*

- *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. You may also unsubscribe at any time from the receipt of electronic marketing and promotional messages from us through the unsubscribe link contained in such messages.

We remind you that, by sending an e-mail to customerprivacy@fendi.com you will be able to withdraw your registration to our loyalty 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 Personal Data infringes the Regulation, you may in any event lodge a complaint with the Italian Data Protection Authority (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. Residents of Canada may lodge a complaint with the appropriate privacy commissioner for their province or residence.

l) Data Protection Officer (DPO):

You can contact the Data Protection Officer appointed by FENDI S.r.l. at the e-mail address dpo@fendi.com.

Footnotes

¹ Your Personal Data may be handled by the following types of external Data Processors that we have engaged to provide services on our behalf:

- (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.

CANADA – GLOSSARY OF TERMS

Of relevance to Canadian residents and customers of FENDI stores located in Canada, for the purpose of the above Notice and Summary, the terms have the following meaning:

“Data Controller” means the organization which controls Personal Data at law, i.e. determines the purposes and means of the Processing of such data. In most cases in the Notice and Summary, one or both of the FENDI Companies will be the relevant Data Controller(s);

“Data Protection Authority” or **“Authority”** – means the government authority that oversees and enforces the privacy law or data protection law in a particular jurisdiction. In Canada, these are usually referred to as “privacy commissioners”;

“FENDI Companies”, **“we”**, **“us”** and **“our”** refer, collectively, to FENDI Canada Inc. (“FENDI RETAIL”) and FENDI S.r.l. (“FENDI”).

“Personal Data” means any information about an identifiable individual, or as may otherwise be defined in Privacy Law; but does not include an information excluded from the application of such Privacy Law.

“Privacy Law” means the Canadian privacy statute that is applicable in the province in which you reside or in which a relevant FENDI store is located.

“Processing” means any collection, use or disclosure of Personal Data, whether or not by automated means.