

Policy information relating to the processing of personal data pursuant to artt. 13 and 14 GDPR and the communications pursuant to artt. 15-22 GDPR

In compliance with the provisions of EU Regulation 2016/679 – GDPR - and the Italian legislation, Legislative Decree 196/03 as amended by Italian Legislative Decree 101/2018 hereinafter referred to only as the Data Protection Code, we hereby inform you that your personal data will be processed by A.N.C.I. Servizi s.r.l. with a sole shareholder (hereinafter also referred to simply as Anci) and Assocalzaturifici Italiani (hereinafter also referred to simply as Assocalzaturifici), Joint Data Controllers pursuant to art. 26 GDPR, hereinafter for the sake of brevity referred to simply as “the Data Controller”, with registered offices in Milan, via Alberto Riva Villasanta 3. You may contact the Data Controller by going to the offices at this address, subject to prior appointment, or using the following telephone numbers: Tel. 02-438291 | Fax. 02.48005833. The Contact Person pursuant to art. 26 GDPR and DPO (pursuant to artt. 37 -39 GDPR) is Mrs Laura Marretta, who may be contacted at A.N.C.I. Servizi s.r.l. a socio unico’s phone number 02.438291 and at the e-mail address privacy@assocalzaturifici.it.

The Data Controller hereby informs you that the personal data in its possession, is processed in compliance with the provisions of the GDPR. Processing is carried out on the basis of the principles expressed in art. 5 GDPR and on the basis of the conditions for the lawfulness of processing set forth in art. 6 GDPR, for the purposes relating to the relationship existing with the Data Controller, which enables you to be informed and decide whether or not to participate in our events and remain up to date with our news. Your data is in our possession based on the direct supply of this by you over the years, whereby you will have been informed about our data processing through the policy information that was drafted on the basis of the previous law (legislative decree 196/03 prior to the above mentioned change in the law) and the Data Controller hereby provides you with information on the processing of your data through the policy information pursuant to art. 13 GDPR, which extends and supplements the policy information that had been previously rendered pursuant to legislative decree 196/03.

The legal basis authorising the processing of your data by the Data Controller, as requested by art. 13 lett. c of the GDPR, is currently justified by the legitimate interest of the Data Controller pursuant to art. 6 paragraph 1 letter f and consists in the performance of activities by A.N.C.I. Servizi s.r.l. with a sole shareholder and Assocalzaturifici to keep you informed through soft marketing and possibly through newsletter and by email on its initiatives on the footwear and, more broadly, the fashion sector, and regarding all its physical and digital trade fairs related to footwear that will be held in EU and extra-EU countries, which data subjects may benefit from (legal basis: legitimate interest). You can object to receiving this correspondence at all times by following the instructions in the footers of the emails. To see the specific policy information for our newsletter and verify whether or not you wish to object to the processing of your data, please use the link for the data protection policy information regarding registration to the Assocalzaturifici newsletter: <https://www.assocalzaturifici.it/ancimain/resources/static/newsletter-policy.pdf>.

In the context of said purposes, the processing of the data in the Data Controller's possession includes, inter alia, the management, organisation, use both within and outside the EU (countries which satisfy the conditions in artt. 45 and 46 GDPR) the retention, registration, organisation, creation, insertion, and maintenance in a database and CRM system, the consultation, comparison,

extraction, elaboration, amendment, realisation of anonymous statistics, the use, destruction and amendment of processed data following a request by a data subject and, as mentioned above, the communication of our future initiatives including by newsletter and soft spam, the communication to the members of the organisational structure of the Data Controller, commercial partners (e.g. Confindustria Moda) or consultants of the Data Controller in the context of the management of business activities who, depending on specific cases, will be appointed as processors pursuant to art. 28 GDPR. For more information on the processing of personal data by the Data Controller, please read the privacy policy on the institutional website of Assocalzaturifici, under the heading "Privacy policy".

Data will be processed in paper form and/or electronically by parties specially authorised to do so.

The Data Controller does not process data on the basis of automated decision-making processes or for profiling purposes.

The Data Controller will keep your data in its database (including, where applicable, data you supplied on behalf of your employees, consultants, co-workers and invitees) and will use the data in compliance with the original collection purposes, without prejudice to its prevailing legitimate interest pursuant to art. 6.1(f) GDPR, which you may object to at any time by sending a written notification to privacy@assocalzaturifici.it, stating in the subject line "Objection to legitimate interest".

Your data will be retained for no longer than the period of time required to satisfy the purpose the data was collected for.

The Data Controller also hereby informs you that you have the rights of access listed under art. 15 of EU Reg. and that you are also entitled to:

- 1) ask the Data Controller to permit you to access your personal data and correct or delete the data, or request limitation of data processing;
- 2) object to data processing;
- 3) data portability;
- 4) revoke your consent at any time without affecting the lawfulness of data processing on the basis of consent given prior to revocation, if processing is based on article 6, paragraph 1, letter a), or article 9, paragraph 2, letter a);
- 5) present a complaint to a supervisory authority (on this point please refer to the website of the Italian Data protection authority);
- 6) to have your rights recognised under art. 21 of the GDPR, including, therefore, the right to object at any time, for reasons connected with your particular situation, to the processing of data for the fulfilment of the legitimate interest of the Data Controller or third parties, and the right to object at any time to the processing of data for direct marketing purposes.

You may exercise the rights listed above (with the exception of n. 5, with regard to which we refer you to the website of the Italian supervisory authority) or receive additional information by sending an email to the DPO at the following email address privacy@assocalzaturifici.it stating in the subject line "exercising of rights pursuant to the GDPR" and inserting in the body of the email the right you wish to exercise as well as your name, surname and the email address you would like to receive the response at. Once your request has been processed, the Data Controller will send its feedback in the terms set forth in article 12(3), of the GDPR. The Data Controller informs you that the rights listed in and guaranteed by artt. 15-22 of the GDPR may not be exercised by submitting a request to the Data Controller or by lodging a complaint under art. 77 of the GDPR if exercising same could cause real, concrete injury to certain data

categories and/or to certain activities listed in art. 2-*undecies* of Leg. Decree 196/03, as amended by Leg. Decree 101/2018; this does not prejudice the provisions, specified in paragraphs 2 and 3 of the aforementioned article.

The Data Controller also notifies you that if they should intend to further process your personal data for a purpose other than that for which the data was collected, the data subject will be provided in advance with information on this different purpose and all other pertinent information, as stated in point 2, requesting your specific consent.