

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

In accordance with the provisions of REGULATION (EU) 2016/679 (hereinafter referred to simply as GDPR) OF THE EUROPEAN PARLIAMENT AND COUNCIL of 27 April 2016 relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of this personal data and Italian law (Legislative Decree 196/2003 as amended by Legislative Decree 101/2018), we hereby inform you that your data will be processed by A.N.C.I. Servizi s.r.l. with a sole shareholder and by Assocalzaturifici Italiani, both of which have registered offices in Milan Via Alberto Riva Villasanta 3.

Pursuant to art. 26 GDPR the above legal persons are Joint Data Controllers and will be referred to hereinafter simply with the term Data Controller.

You may contact the Data Controller by booking an appointment at its offices or by using the following telephone number: +39 02 438241.

Our Data Protection Officer (hereinafter DPO) is Mrs Laura Marretta, whom you can contact by writing to the email address privacy@assocalzaturifici.it. She is also the Contact person for data subjects pursuant to art. 26 GDPR.

Pursuant to art. 14 GDPR the Data Controller hereby informs the data subject that the Personal data came into its possession following a communication from institutional, commercial or press office partners. This data does not belong to the special categories of personal data listed in article 9 of the GDPR and relates to the data subject (including if the latter operates as an individual undertaking, small business owner or professional) or its employees, agents, representatives or co-workers (the "Data") and shall be processed in accordance with the provisions of the GDPR.

The processing is conducted on the basis of the applicable personal data processing principles described in art. 5 GDPR (i.e. principles of integrity/lawfulness, relevance, transparency, suitability, protection of confidentiality and rights, etc.) and on the basis of the conditions of lawfulness set forth in art. 6 GDPR. The legal basis for the processing, as requested by art. 13 lett. c of the GDPR, is justified by the legitimate interest of the Data Controller pursuant to art. 6 paragraph 1 letter f and consists in retaining your data for the performance of activities by the Data Controller to keep you informed, through soft marketing sent by email, about its initiatives relating to footwear, and more broadly to fashion, including all its physical and digital trade fairs related to footwear that will be held in EU and extra-EU countries, which the data subject may benefit from (legal basis: legitimate interest). You may object to receiving this correspondence at any time by following the instructions in the footer of the email. 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, creation of a database and/or inclusion in a CRM system, the consultation, and, as mentioned above, the communication of our future initiatives including marketing by soft spam, the elaboration, amendment, compiling of anonymous statistics, the use, destruction and amendment of processed data following a request by data subjects, communication to the members of the organisational structure of the Data Controller, or to commercial/institutional partners and consultants of the Data Controller in the context of the

management of business activities, who 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 website privacy policy (www.assocalzaturifici.it).

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 and will use the data in compliance with the purposes of the collection that has already been made, 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 informs you that you have the rights of access listed under art. 15 of EU Reg. and 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 Data protection authority);
- 6) 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 point 5) or obtain more information by sending an email to the DPO at the address privacy@assocalzaturifici.it, stating the following "Exercising of rights under the GDPR" in the subject line and specifying the right that you wish to exercise in the body of the email, along with your name, surname and the email address where you wish to receive the reply from the Data Controller. 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 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.