

PRIVACY POLICY

This statement, and the data processing policy described herein, applies in general to all situations in which **Trussardi S.p.A.** accesses, collects, stores, processes, uses, discloses or transfers your personal information, either electronically or on paper. It also applies to all situations in which other Trussardi Group companies may use your personal information on behalf of Trussardi S.p.A..

This information does not apply for other websites that may be consulted by the users via links that appear on www.trussardi.com ("**Website**"), except as further specified with reference to the E-shop from which it is possible to purchase Trussardi brand products.

Therefore, Trussardi S.p.A. may not be held liable in any way for any processing of your data carried out by third parties not contemplated in this information.

Our privacy policy does not extend to services provided by other companies that operate on their own behalf and independently from Trussardi S.p.A., such as franchisees and licensees, or when you share your personal information on social media (WeChat, WhatsApp, Facebook, Twitter, Instagram, etc.), or other online platforms owned and managed by other companies. We therefore invite you to carefully read the information on data protection and on specific cookies of any such third parties, because this information may be different from ours, and to contact the manager of the pertinent third party if you have any doubts on how your personal data are being used.

From the Website, you can access the e-commerce section of Trussardi S.p.A. ("**E-shop**"), where you can purchase Trussardi products online. This section of the Website is managed by TRS Evolution S.p.A. (Tax ID and VAT no. 01708280167), a Trussardi Group company that sells Trussardi brand products of various kinds through the E-shop.

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GENERAL INFORMATION REGARDING DATA PROTECTION

a) Definitions

"Personal data" are intended as having the meaning set forth in art. 4, first comma, number 1) of EU Regulation no. 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR"), and indicate any information regarding a natural person who may be directly or indirectly identified and that may be directly or indirectly used to identify him or her.

In this policy, the following terms: "*We*" and "*our*" refer to Trussardi S.p.A., a Trussardi Group company **incorporated in Italy**, with registered office in **Piazza della Scala no. 5, 20121 Milan, Italy**, Business Register enrolment no. 1239427 and Tax ID no. 01709450165, VAT no. 08766830155 ("**Trussardi**"), subject to the management and coordination of Levriero Holding S.p.A., an Italian company with registered office in Milan, in Via Fatebenefratelli 14, and, if pertinent, of its subsidiaries in Italy and abroad, including in countries outside of the European Union.

A list of the affiliates may be requested by contacting Trussardi S.p.A.

In order to be able to deliver our products to you and to allow you to take advantage of certain services offered by Trussardi, we need to share your personal information with authorised partners who work with us or with Trussardi Group, who are required to take appropriate security measures to protect the personal information they hold regarding you, and who are bound by a confidentiality agreement that provides all the necessary instructions on "how" and "when" these partners are authorised to use your personal information on our behalf.

The terms "You" and "Your" refer to all persons who provide their data to Trussardi, including users (registered and/or not registered) of the Website.

b) Data Controller

Unless otherwise specified in this Policy, the subject who controls the processing of the personal data described herein and is described as the data controller for the purposes established by European regulations governing data protection, is Trussardi.

c) Consent

With the exception of those processing purposes for which Trussardi must request your explicit consent pursuant to the regulations currently in force, by using the Website, uploading or providing personal data on it or notifying said data to Trussardi, for purposes other than professional purposes, you agree to and give your consent to be bound by the terms and conditions of this policy and the cookie policy (to which specific reference is made for further information on cookies), and therefore give your consent for Trussardi to disclose your personal details, with no exceptions, in compliance with the terms and conditions set forth in this information and in the cookie policy.

Pursuant to the regulations in force, you will be asked to give your consent for a number of specific types of data processing (for example, the possibility to analyse your habits regarding the purchase of Trussardi products, both online and in the brick-and-mortar stores), so we can offer you personalised services, and for marketing purposes. Please remember that your consent is, in any case, **freely** given and **unconditional** and that by selecting the dedicated box, you may agree to or refuse the specific types of data processing, which will in all cases be carried out as expressly contemplated in this information, in the Policy and in the cookie policy.

d) Sharing of personal data

Please note that Trussardi S.p.A. may:

1. use the services of affiliates or subsidiaries that are part of Trussardi Group, as well as third parties, to provide our services used by you. These subjects will process your personal data in their capacity as joint data controllers, i.e. subjects entrusted by us with data processing, based on specific contractual guarantees with which our institutions undertake to comply with regard to data protection. These third parties may include retailers, delivery service providers, logistics companies and business and banking partners; providers of marketing and advertising services, providers of communication services (e-mail and other messaging services, including text and instant messaging), providers of information technology services;
2. share your personal data with other Trussardi Group companies, so that they may store and retain said personal data centrally in their capacity as data controllers;
3. share your data within the framework of extraordinary corporate operations, such as mergers, business combination transactions, sale of assets or in the unlikely event of bankruptcy. Where necessary for compliance with the regulations in force, and provided you have previously provided your contact details, you will be sent notification when such transfer takes place;
4. disclose your data, including contact information, in the event that Trussardi is obliged to do so based on the regulations in force, including cases in which Trussardi must comply with court orders or in other circumstances contemplated by the law that require compliance on the part of Trussardi;

- disclose your data for the purpose of enforcing its own legal rights or interests, and/or the rights of companies in which it holds a stake, and/or belonging to Trussardi Group protected by the law, in order to safeguard the security of the Website and its users.

When we collect your personal data

In general, we collect your Personal Data directly from you and process it by automated means. When you interact with us, whether online or in person, your personal information may be collected in the following ways:

- through our sales staff (in stores) or our customer service (e.g. by phone, e-mail or chat) when you share your Personal Data with us;
- our Website, whether you are registered or not, when you complete surveys, procedures or registration forms;
- during each of your shopping experiences on our Website;
- from third-party sources such as social media, if you have given them the necessary consent.

More generally, we collect your Personal Data through any means you may use to interact with our sales representatives, whether in our stores or through our customer service department by phone, e-mail, chat or text message. Our sales or customer service representatives may use various means to collect your personal information during or after such interaction.

In addition, we may obtain personal information from services provided by other companies in order to update or supplement your personal information, for example when you link your social media profile with your Trussardi profile. These companies have their own privacy policies and cookies, so please bear in mind that any personal information you transmit to them will be subject to their rules and not ours.

Minimum

age

Trussardi does not accept registration or orders placed by subjects under the age of 18, or subjects who are not legally adults according to the regulations in force in their country, and it will not knowingly collect or use their personal data. Minors are invited not to register on the website or make online purchases, and to ask an adult to carry out the necessary procedures.

Applicability of other information on data protection

If you have registered for other Trussardi services that do not expressly refer to this Privacy Policy, additional privacy policies and statements may apply with regard to the protection of personal data; this Privacy Policy does not replace or modify any other privacy policy or statement that applies to personal data collected or used by Trussardi in the context of this specific relationship.

Security Measures

Trussardi is constantly committed to applying the most advanced security procedures and standards to protect your personal data from improper use, loss and/or unauthorised alterations. However, despite our efforts to guarantee our users the maximum protection of their personal data, we believe you should be aware there is no absolute guarantee against unauthorised access to your personal data on the part of third parties. Therefore, we would like you to be aware that when you send us your data, you accept the above, and will not hold us responsible for any breaches of security, except for cases in which this is due to negligence on our part.

International transfer of personal data

If you have chosen to register on the Trussardi customer database for marketing and profiling activities, we may collect your personal data in your country, for example data regarding your visits to our stores, and subsequently transfer and file them, in compliance with the regulations in force, in another country in which the servers of our Group companies or our suppliers are located, and which offer hosting services. The data will be transferred for the purposes described in this Policy (for example to provide the services you have requested, or to offer personalised services in all our stores worldwide, to share your data with other Trussardi Group companies, or simply because the servers your data are stored on are located in other countries). The privacy and data protection regulations in force in said countries may not be the same as those in force in your country of residence. Trussardi will adopt measures to ensure your data are processed in a secure manner and in compliance with this Policy, regardless of the country they may be transferred to. These measures include the use of standard contract clauses for the transfer of data approved by the European Commission (i.e. specific, mandatory contractual obligations that must be undersigned by the supplier) and/or, if applicable, certification that the subject receiving the data has joined the US Safe Harbor programme, or complies with other legitimisation criteria contemplated by the law, such as, for example the Binding Corporate Rules, if deemed appropriate in future.

Where permitted in your country, by using the Website/s or providing us with your data for the purposes set forth in this Policy, you declare that you fully understand and clearly agree to the processing of your personal data abroad in the context of the normal commercial operations of Trussardi, including the collection, storing and processing of said data in the USA.

Duration of storage and processing of personal data

Your data will be stored by Trussardi for the period of time necessary to guarantee the proper provision of the services requested from us, without prejudice to the need to store them for a longer period of time in observance of the applicable legislation.

Specifically, the storage terms for the various types of Data processed are as follows:

- *data collected to conclude and execute contracts for the purchase of products on the E-Shop*: until the conclusion of the administrative and accounting formalities. Invoicing data will be stored for 10 years from the invoice date;
- *data of registered users*: the data will be personal for seven years from your last interaction with us. Last interaction means your last contact with us that can be traced by the systems or by one of our sales assistants. Before deleting your Personal Data from your registered user profile, we will contact you to inform you of the deletion so that you can inform us if you wish to keep your Personal Data in our systems. If you do not reply, you consent to the deletion of your Personal Data that Trussardi is not legally obliged to retain for a longer period in compliance with the legal, tax and accounting provisions that may be in force at any given time;
- *payment data*: until the definitive certification of payment and the completion of the pertinent administrative and accounting formalities consequent to the expiry of the right to withdrawal and the terms applied for challenging payment;
- *data collected for the provision of services offered on the Website*: these data will be stored until the service ceases to become available, or until the user cancels their registration with the Website;
- *data related to requests made by users to Customer Service*: the data needed to assist you will be kept until your request has been fulfilled;
- *curriculum vitae*: for 24 months from receipt;
- *data provided for commercial communication activities, opinion surveys and market research, for profiling purposes, to customise the Website*: until your request to cease the activity.

We will cease processing and then definitively and irreversibly delete or anonymise the pertinent personal data within 30 days of the terms indicated above.

Your rights

You are entitled, at any time, to exercise your rights regarding the processing of your personal data on the part of Trussardi Group.

Specifically, you may:

Access and modify your data: by writing to customercare@trussardi.com, you may ask to view the personal data in our possession and request that they be corrected, rectified or supplemented. You may also request a copy of your data that are processed by us; *Withdraw consent:* You are entitled, in any case, and at any time, to withdraw your consent for the processing of data in relation to any activity carried out for marketing purposes (i.e. the sending of commercial and promotional communications, the carrying out of market research and surveys for gauging customer satisfaction and for customising the website and for providing you with commercial offers based on your interests). We will cease processing your personal data based on this consent in the shortest timeframe possible. Processing for other reasons will continue, in full compliance with the applicable regulations.

Object to the processing of your data: You may, at any time, raise an objection to the processing of your personal data based on our legitimate interest, indicating the reasons for said request. Trussardi will consider said reasons before accepting your request.

Request the deletion of data: In the cases provided for by the regulations in force, you may request the deletion of your data. If your request is deemed legitimate, we will cease processing and delete your personal data in the shortest timeframe possible.

Request a temporary limitation on the processing of your personal data: Trussardi will continue to store your data, without processing them in any way, unless you instruct us otherwise, and with the exceptions provided for by the regulations in force. This temporary limitation may be requested if you believe that your personal data are incorrect, or when they are no longer necessary for Trussardi Group but are of use to you in order to exercise your rights in court, or during the period of time in which Trussardi is considering the reasons for the objection you have raised to the processing of your data.

Exercise your data portability rights: You may ask Trussardi to transfer your data to a subject indicated by you. Where technically possible, Trussardi will meet your request.

Rights concerning deceased persons: In order to exercise the rights set out in Articles 15 to 22 of the GDPR, we may ask you to provide us with evidence that you are qualified to do so, for example that you are an heir of the deceased or his/her executor, or that you have an interest of your own, or are acting on behalf of the deceased, as his/her agent, or for family reasons deserving of protection. In any event, please note that we may not be able to process your request if applicable privacy legislation does not allow it, or if the deceased data subject has prohibited this in writing in a communication sent directly to the Data Controller.

To exercise your rights, you may contact the Data Controller directly at the following addresses:

mail:

Trussardi S.p.A.
Piazza della Scala n. 5
20121 Milan
FAO Data Protection Office

e-mail: privacy@trussardi.com

Furthermore, if you have requested that Trussardi send you commercial information and newsletters, you may, at any time, oppose this by requesting the deletion of your data from the mailing list, by following the “unsubscribe” link you will find in all the commercial communications sent to you by Trussardi.

Changes to this Policy

In time, Trussardi may make changes to this Policy, also in order to comply with new obligations imposed by the laws in force, or for technical reasons. The updated information will be published on the Website, and if there are any changes for which the applicable regulations require your express consent, we will ask you for said consent. We therefore invite you to consult this page periodically.

FURTHER INFORMATION

A – Browsing the website

Personal data acquired automatically.

Please note that while you are browsing the Website, there may be some personal data that Trussardi acquires automatically, the transmission of which is implicit in the use of internet communication protocols.

This information is not specifically collected by Trussardi in order to be associated with a specific identified subject, but given the nature of such data, they could be used to identify you if processed and combined with data held by third parties.

This data category includes the IP addresses or domain names of computers of users who visit the website, the URI (“Uniform Resource Identifier”) addresses of the requested resources, the time of the request, the method used to submit the request to the server, the size of the file received in reply, the numerical code indicating the status of the response from the server (successful, error, etc.) and other parameters relating to the operating system and the computer environment of the user.

These data are used only to obtain anonymous statistical information on the usage of the Website and to check its correct functioning, and are immediately deleted after processing. The data could be used to determine responsibility in the case of hypothetical computer crimes against the Website. Except for this eventuality, data on web contacts are not currently held for any longer than 15 days.

If you have given your specific consent, these data may also be cross-referenced with your personal data (for example, in the case of authentication on the E-shop) and processed in order to improve the services we provide you with.

Group employees entrusted with carrying out specific operations on the Website (including statistical analysis and Website development) may process the data collected while you are browsing the Website and/or data you have provided us with while using the Website.

Cookies

To guarantee the functioning of the Website and improve the service offered, the Website uses cookies.

Cookies are small text files positioned by the Website on your computer or mobile device, where they are memorised so they can be retransmitted to the Website upon your subsequent visit.

They are files that automatically collect some information you do not provide directly.

Trussardi uses cookies to (i) make the Website function, or to make it function more efficiently and make it simpler to use, and (ii) obtain data on the use of the Website for statistical purposes (for example to find out which pages are visited and how frequently).

When you use our Website, as a registered or non-registered user, Trussardi may also use Cookies to tailor the Website more closely to your requests and to simplify your browsing experience. For example, Cookies allow us to ensure that the information present on the Website is in line with your preferences during your subsequent visits.

For further information on the use of Cookies, pixel tags, flash cookies and similar technologies, please read our [Information on Cookies](#).

B – PURPOSES AND LEGAL BASIS OF PROCESSING

Your personal data will be processed only for specific purposes and under the conditions provided for by the regulations in force, and specifically:

i) to conclude and execute a contract you are party to

When we process your data to conclude a sales contract you are a party to, we will do so by using the minimum information necessary to execute said contract. This legitimates the processing of personal data for carrying out the following activities:

- conclusion and execution of contracts for the purchase of products sold in the E-shop;
- registration with the website and use of the services the website offers;
- managing of requests sent to our Customer Service by users.

In these cases, providing your personal data is a compulsory contractual requirement. You are free to choose whether to provide us with your data, but if you fail to provide them, we will be unable to execute the contract and meet your requests. This means that you will not be able to purchase products from the E-shop, or use the services of the Website; for our part, we will not be able to act upon your requests.

On the Website, you will find clear indications of the essential data you are asked for and without which we will not be able to provide you with the services requested. If you intend to purchase Trussardi products online, essential information includes all the information that regards you and is necessary to respond to your order, i.e. to carry out all the activities necessary to manage your order (including the administrative management of the contract, the shipping of the products, handling of payments, credit and any controversies and the prevention of fraud) and to comply with all the obligations established by the law and the regulations in force regarding the retail sale of products.

ii) to comply with a legal obligation

For contracts concluded for the purchase of products in the E-Shop, we will process your personal data in order to comply with the fiscal measures and legal obligations binding upon Trussardi Group. You are always free to choose whether to conclude a contract and to provide us with your data, but if you conclude a contract for the purchase of products on sale in the E-Shop, you will have to provide us with your details and it will be necessary for us to process them in order to comply with the legal obligations binding upon Trussardi Group.

Your Personal Data may also be used for the purpose of sending you security notices regarding your Personal Data, including but not limited to: sending emails to verify your identity when you sign up for our services; sending e-mails to reset passwords and user names; notify you that a specific service has been or will be suspended for maintenance or terminated; notify you of an update, correction or incident on our services that may involve your Personal Data; notify you of an update to our privacy policy or Terms of Use.

We will never contact you to ask for your password.

Please be careful if you receive requests for this type of personal information, and if necessary, inform us - using the contact details at the bottom of this email - of any suspicious communication you receive that may involve Trussardi.

iii) for a legitimate interest of Trussardi Group

Some personal data requested from you while purchasing products on sale in the E-Shop with a credit or debit card will also be processed for controls to combat fraud. In such cases, Trussardi Group has a specific, legitimate interest in carrying out said controls to prevent any fraudulent action, and to take the pertinent legal action.

We make every effort to offer you the same experience online and offline. Regardless of the means of communication used, and regardless of who initiates the communication between you and us, we always endeavour to offer you a customer service tailored to your needs and requirements. For this purpose, based on our legitimate interest in improving our services, we will collect, store, process, use, disclose and transfer your personal information in order to be able to identify you whenever we have contact with you, or based on our legitimate interest in improving our services.

iv) based on your legitimately expressed consent

Some types of processing of your personal data could be carried out only if you have given your specific consent in advance.

Such Personal Data may include, for example, your date of birth, your country of residence, your preferred means of contact, and - alone or in combination - certain behavioural patterns that we may observe when interacting with you (e.g. where you prefer to buy our products, what types of products you like, which pages of the Website are of most interest to you). With this information, we may develop communications addressed to you personally, in order to make your experience with Trussardi more relevant to your habits and interests.

We are referring in particular to processing for the purposes listed below:

- (i) for promotional offers, discounts, special conditions and other services;
- (ii) for sending commercial or promotional information, newsletters and invitations to take part in private sales events or other events;
- (iii) for carrying out market research and notifying users of special activities and events dedicated to Trussardi Group customers;
- (iv) for analysing your consumer choices (“profiling”), in compliance with the necessary guarantees and measures established by the regulations in force, by recording the type and frequency of the purchases you make online and/or at Group stores, so we can provide you with a better service when you make any future purchases in one of the Group stores and pursue the purposes listed at the point above.
- (v) for statistical purposes and records.

Please also note that by using some of the services provided on the Website, Trussardi may collect further information linked to the activities you carry out online on the Website (for example, the products entered on your wish list, the products in your shopping bag that you have not removed before leaving the Website), or your preferences regarding the use of the Website selected through the functions available on the Website.

When providing your data, please make sure they are correct, and if there are any changes to the personal data you have provided us with, please let us know as soon as possible by writing to: customercare@trussardi.com, or directly edit your data online in the “Profile”, area, if you have registered.

This will allow us to keep your personal data up to date.

Trussardi S.p.A. carries out its recruitment process through channels other than the website. However, if you freely decide to send us your CV via the website, please use only the following address recruitment@trussardi.com. If you send your CV to any other addresses found on the website, this could cause the immediate deletion of the same.

Please note that the processing of data contained in speculative applications is lawful and specifically authorised by the regulations in force, which do not require express consent in such cases.

C – MEANS OF DATA PROCESSING

Your personal data will be processed using appropriate electronic or otherwise automated, computerised and telematic tools, or manually, on paper; this processing will be carried out in observance of the principles of correctness, lawfulness and transparency, and in such a way as to protect your rights and your confidentiality, and will take place only for the purposes for which your data were collected.

Your personal data will be processed by the Trussardi Group personnel (employees and collaborators) authorised for this purpose and, if necessary, by external parties where necessary and/or instrumental to the performance of the above purposes (merely by way of example: shipping companies, computer technicians in charge of maintaining the Website and the Group's information systems, companies commissioned by Trussardi to manage promotional campaigns, events, marketing activities, etc.). These subjects have been selected from among those offering an adequate guarantee of compliance with data protection regulations. These subjects have been appointed as data managers, and their activity is subject to our control. Some of these subjects may be based outside the European Union, in countries that nonetheless offer an adequate level of data protection. If, in compliance with regulations also applicable at international level, or if necessary for the purchase of products on sale in the E-Shop, it should be necessary to transfer your personal data to countries that do not belong to the European Union and that do not guarantee adequate levels of protection, our Company will enter into a specific agreement in advance, containing clauses offering safeguards and adequate guarantees aimed at protecting your data as approved by the European Commission.

Expressly excluded from this is any use of data regarding your credit card for purposes other than verifying the existence of means of payment, anti-fraud purposes, charging for orders or managing payments relating to orders you have made, as well as for dealing with any complaints and controversies. Therefore, please note that your data will also be processed by the credit institute that provides the services connected with the management of online payments, as well as the institute that issued the credit card you indicate as the means of payment for your order.

Your data may also be transmitted to police forces and to legal and administrative authorities, for detection or prosecution of criminal offences, for the safeguarding against and the prevention of threats to public security, in order to allow Trussardi Group to identify, exercise or defend a right in court proceedings, and for other reasons connected with the safeguarding of the rights and liberties of others, all of which in compliance with the applicable regulatory measures.

Please note that if you agree to the processing of your personal data for the purposes set forth at letters (i) to (v) of the preceding paragraph, your data will be visible to and/or shared with all the retail outlets of Trussardi Group located within and outside of the European Union. In this regard, please note that we have taken all the appropriate safety and confidentiality measures required by the applicable regulations.

D – EXERCISING YOUR RIGHTS

For any questions, comments, complaints or requests regarding this Policy, you can send an e-mail to privacy@trussardi.com, or write to

Trussardi S.p.A., Ufficio Privacy, Piazza Della Scala no. 5, 20121 Milan, Italy

Trussardi will process your Data in compliance with the provisions of Regulation (EU) 2016/679 and Legislative Decree 196/2003 as amended. Therefore, your data will be processed in full observance of the principles of correctness, lawfulness and transparency, in order to protect the security and confidentiality of your data.

Should you wish to exercise one of these rights, or to receive the list of the companies belonging to Trussardi Group, you may contact:

- Ufficio Legale Corporate, Trussardi S.p.A., Piazza Della Scala n.5, 20121 Milan, Italy, or send an e-mail to privacy@trussardi.com.

COMPLAINTS

If you believe your data are being processed unlawfully, you may lodge a complaint with one of the supervisory authorities responsible for the protection of personal data.

In Italy, the competent authority for such complaints is the Personal Data Protection Authority (www.garanteprivacy.it). Information on how to lodge a complaint can be found on the website of the Authority.