**DRAFT - Revision of Diesel Japan Privacy Policy (Personal Data Protection Policy)**

Diesel Japan Co., Ltd. and group companies\*1 complies with “Act on the Protection of Personal Information” (hereinafter, the “Protection Act”) and observes all applicable laws and regulations related to the Protection Act, and appropriately handles personal information obtained from customers with various methods (hereinafter collectively, “Personal Data”), in accordance with the general policies described as follows.

\*1) Group companies mean OTB S.p.A. and our parent company Diesel S.p.A which are located in Italy.

OTB S.p.a. and Diesel S.p.a. also comply with EU Regulation 679/2016 (“GDPR”) and carry out some activities as joint controllers according to GDPR, taking jointly the decisions regarding the purposes and means of personal data processing. Hereafter, the term “**Joint Controllers**” means Diesel S.p.a. and OTB S.p.a. jointly considered when they process data as joint controllers.

1. **Collecting Personal Data**

We specify purposes of use of the Personal Data, and collect the Personal Data from customers in an appropriate and fair manner.

The term “Personal Data” described in this Privacy Policy represents personal information which has been defined in the Protection Act.

Persons under the age of 15 should provide their personal information with the consent of such person's parent or guardian.

1. **How to handle the Personal Data**
2. We have established a proper control in the company to execute the terms described in the Privacy Policy, and we handle the Personal Data by appropriate and deliberate means.
3. When required to outsource handling of Personal Data to any third party, we will conduct necessary and appropriate supervision to the party to ensure the security of Personal Data outsourced to the party.
4. **Why we collect the Personal Data**

Except where stipulated in the Protection Act, the Personal Data we collect will be used by Diesel Japan Co., Ltd. only for the purposes of the following items from (1) to (7) and the purposes of providing to third party as described in the following paragraph. We will not use the Personal Data beyond the extent necessary to accomplish such purposes.

(1) Providing services regarding our merchandise

(2) Providing privilege of membership and related services

(3) For sales promotion, and marketing purposes

(4) For profiling purposes, that is analysis of your consumer choices consistent in automated processing of the Personal Data included data relating to purchases details in stores and websites. This processing is finalized to predict your purchase preferences and to create customers profiles.

(5) Collecting opinions for development of product and improvement of services

(6) Responding to customer’s inquiries, consultation and requests

(7) Other businesses associated with the abovementioned items

The purpose indicated in point 4 will be carried out also by the Joint Controllers, while the purpose indicated in point 3 will also be carried out by Diesel S.p.a.

1. **Disclosure and provision of the Personal Data to third party**

We will not disclose or provide the Personal Data to any third party, except where stipulated in the Protection Act and where one of the following cases applies.

1. We obtain a consent to provision of the Personal Data from customers
2. Within the scope necessary for our business, we disclose or provide the information concerning customers to commercial facilities where our store is located at. Such information includes date of birth, address of residence, gender, first name and surname, phone number and email address, to be provided through electronic media such as the systems managed by us, e-mail and CD-ROM and through analog media such as paper.

(Please contact our Customer Support if you wish to stop disclosing and providing your Personal Data based on the items described in this paragraph.)

1. For the purpose described in the preceding Article, we jointly use information concerning customers are processed also among the group companies that could autonomously process such information including date of birth, gender, user ID, DIESEL CLUB CARD usage history (purchased product, purchase date, purchase price, number of purchased products, store of purchase, store of joining the membership, points earned, point usage records). In this case, your Personal Data is controlled by Diesel Japan.
2. **Disclosure, correction, deletion and suspension of use of the Personal Data**

We adequately process disclosure, correction, deletion and suspension of use regarding the Personal Data, upon a request from customer himself/herself.

Pursuant to Chapter III of the GDPR, you also have the right to ask Diesel S.p.a. or OTB S.p.a. or Joint Controller:

* to access to your Personal Data;
* to receive the copy of the Personal Data you provided us (so-called “data portability”) and to have data transmitted to another controller, if technically possible;
* the rectification of the Personal Data in our possession;
* the erasure of any Personal Data in relation to which we no longer have any legal basis for processing;
* the limitation of the way in which we process your Personal Data, within the limits set by the applicable law data protection law.

Right to object: in addition to the rights listed above, you always have the right to object at any time to the processing of your Personal Data carried out by the data controller or Joint Controller for the pursuit of its legitimate interest. You have the right to object to direct marketing, which includes profiling.

If you believe that the processing of your Personal Data is carried out in breach of the provisions of the GDPR, you have the right to lodge a complaint with the Supervisory Authority or to start the appropriate legal actions before the competent courts.

To exercise your rights, you can send a request to the Data Controllers or Joint Controllers by writing to OTB S.p.A., email [privacy@otb.net](mailto:privacy@otb.net" \t "_blank), or at the address Via dell’Industria 2, 36042 Breganze (Vi), Italy or to Diesel S.p.a, email privacy@diesel.com, or at the address Via dell’Industria 4-6, 36042 Breganze (Vi), Italy. The OTB Data Protection Officer can be contacted at the email address dpo@otb.net. The Diesel Data Protection Officer can be contacted at the email address dpo@otb.net.

**To submit your request:**

In order to exercise your rights, to disclose, correct, delete and suspend use of your Personal Data, an inquiries or complaints with regard to the processing of your Personal Data, you may contact our Customer Support, and necessary procedure will be informed after we confirm your identification of the individual making such request. However, please note that we may not be able to respond to your request if it does not meet the requirements.

1. **Amendment of the Privacy Policy**

The contents of the Privacy Policy are subject to be changed, amended and abolished, or the Privacy Policy may be terminated without prior notice. Changes to the Privacy Policy become effective from the instant that the new Privacy Policy is published on the website of Diesel Japan.