**INFORMATION NOTICE ON THE PROCESSING OF PERSONAL DATA PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION 679/2016 (“GDPR”)**

Your privacy is extremely important to us, please read this information notice carefully. We wish to inform you in a complete and transparent manner about the personal data processing that the companies listed in paragraph 1 below will carry out on your personal data provided by you and/or collected in the context of the contacts you will possibly have with us, including for example the following:

* interacting with our pages on the social networks (e.g. Facebook, Twitter, Instagram, etc.);
* visiting our stores
* contacting our Customer Service.

**1. WHO COLLECT YOUR PERSONAL DATA**

The companies collecting and processing personal data as autonomous data controllers (hereinafter the “**Data Controllers**” or the “**Companies**”) or as joint controllers are:

* **OTB S.p.A. (“OTB”)**, with registered office in Italy, Breganze (Vi), Via dell’Industria 2, 36042, telephone +390445306555, email [privacy@otb.net](mailto:privacy@otb.net); OTB’s Data Protection Officer (“DPO”) can be contacted at [dpo@otb.net](mailto:dpo@otb.net)
* **Staff International S.p.A. (“Staff”)**, with registered office in Italy, Noventa Vicentina (Vi), Via del Progresso 10, 36025, telephone +390444784500, email [customer\_privacy@staffinternational.com](mailto:customer_privacy@staffinternational.com); the Staff’s Data Protection Officer (“DPO”) can be contacted at [dpo@otb.net](mailto:dpo@otb.net).

OTB and Staff carry out some activities as joint controllers, taking jointly the decisions regarding the purposes and means of personal data processing. Hereafter, the term “**Joint Controllers**” means Staff and OTB jointly considered when they process data as joint controllers.

To facilitate your understanding of the processing activities carried out by the above mentioned subjects as Controllers or Joint Controllers, we have prepared this document explaining which processing activities are carried out autonomously by each company.

**2. WHAT PERSONAL DATA WE PROCESS**

Each Company collects different categories of personal data according to the purpose for which it processes them.

Herein below we specify which categories of personal data are collected; in the following paragraph we will explain for what purposes each category of data is processed by each Data Controller or by the Joint Controllers as appropriate (hereinafter also “**Personal Data**” if processed jointly).

* **Biographical Data**: name, middle name, surname, date of birth, gender;
* **Contact Data**: address of residence (street, city, province, State, CAP/ZIP CODE), domicile, email address, telephone number, mobile number;
* **Sales Data**: shipping and billing address, method of delivery and payment, name of the credit card holder and expiry date of the card, information requested by the Customer Service, VAT number and/or tax code, passport number (the passport number will be used only for purposes related to payment where required by a law and within the limits of that law), Global Blue card number;
* **Purchase Data:** detail of the purchased products (e.g. size, price, discount, model, collection, calculated spending level, abandoned cart, etc.);
* **Data collected in the shop**: birthday, presumed age group, in some countries the social network ID, gender, method and date of registration, store and sales assistant preferences, language, product categories of interest, methods of use services, preferences on services possibly noted in the shop, redemption campaign, events attendance, other brands purchased, products tried in the dressing room but not purchased.

**3. FOR WHAT PURPOSES WE PROCESS YOUR PERSONAL DATA**

In this paragraph we explain for what purposes each category of data is processed by each Data Controller or Joint Controller.

**3.1 PURPOSES OF STAFF**

Staff is the company of the OTB Group that sells and promotes the products of the brand “Just Cavalli”. It is the company maintaining the contacts with you if you decide to purchase the products, if you participate in initiatives promoted by Staff as prize competitions or other promotional initiatives. Staff will process Personal Data for the following purposes.

1. **Sales activities and response to other requests made by customers**

If you purchase “Just Cavalli” products in our shops, possibly by telephone or through other methods provided for by Staff, Staff will process your Biographical Data, Contact Data and Sales Data to conclude the sale, as well as for all activities strictly connected and related to it, such as delivery or other administrative and accounting obligations.

Similarly, Staff may need to verify the requirements for participating to special discount programs (e.g. verifying if the purchase made is a first purchase or other requirements of the regulation) and to process your Biographical Data or Contact Data to respond to any further requests that you may formulate through the Customer Service, through telephone or chat, such as information or assistance requests.

Legal basis: this processing is based on the performance of a purchase contract to which you are a party; the provision of the Personal Data listed above is necessary for this purpose, since otherwise Staff will not be able to process your request.

1. **Marketing**

Only with your consent, Staff will process the Biographical Data, Contact Data and Purchase Data for marketing purposes, that is for advertising on social networks to which you are registered or sending advertising or direct sales material, carrying out market research, commercial communication with automated contact methods (e-mail, newsletter, SMS, MMS, online messaging platforms, etc.) and traditional contact methods (mail).

Legal basis: this processing is based on the consent you have given.

You can at any time withdraw your consent to receive the above-mentioned communications by clicking on the appropriate option in each marketing email received, as well as by writing to the address [customer\_privacy@staffinternational.com](mailto:customer_privacy@staffinternational.com), or otherwise by contacting the Company at the addresses indicated in paragraph 1.

1. **Participation in prize contests**

Staff will be able to process your Biographical Data to allow you to participate in prize contest that Staff could organize. In certain situations, for example to proceed with the delivery of the prize, your Contact Data could also be processed. If participation in the contest requires further information, these will be requested to you upon release of a specific privacy policy.

Legal basis: this processing is based on the performance of a contract for attending the relevant prize contest to which you are a party; the provision of the Personal Data listed above is necessary for this purpose, since otherwise Staff will not be able to process your request.

**3.2 PURPOSES OF THE JOINT CONTROLLERS (STAFF AND OTB)**

Staff and OTB operate as Joint Controllers on the basis of a specific agreement for the purpose indicated below.

1. **Customer profiling**

With your consent, the Joint Controllers will be entitled to process Biographical Data, Contact Data, Sales Data, Purchase Data and Data collected in the shop for profiling purposes and for business analysis, that is for analysis on your purchase preferences consisting of automated processing of the above mentioned Personal Data. This processing is aimed at analytically knowing or predicting your purchasing preferences also in order to create customer profiles and customize the commercial offer so that it is more in line with your preferences.

Legal basis: this processing is based on the consent you have given.

You will be entitled at any time to withdraw your consent to be subject to profiling by writing to [customer\_privacy@staffinternational.com](mailto:customer_privacy@staffinternational.com) or otherwise by contacting the Joint Controllers at the addresses indicated in paragraph 1.

**3.3 PURPOSES OF ALL DATA CONTROLLERS OR JOINT CONTROLLERS**

Finally, each Data Controller or Joint Controller may need to comply with a specific legal provision to which it is subject or to defend its own right in court.

1. **Purposes related to the obligations established by laws or regulations, by decisions/requests of competent authorities or by supervisory and control bodies**

Each Data Controller or Joint Controller may process your Personal Data to comply with a legal obligation to which it is subject.

Legal basis: compliance with a legal obligation.

The provision of Data for this purpose is mandatory because in the absence of Data the Data Controller or the Joint Controller will not be in a position to comply with their legal obligations.

1. **Defense of rights during judicial, administrative or extra-judicial proceedings and in disputes arising in connection with the services offered**

Your Personal Data may be processed by each Data Controller or Joint Controller to defend their rights or take legal action or make claims against you or third parties, including the prevention of fraud.

Legal basis: this processing is based on the legitimate interest pursued by the Data Controller or Joint Controller to protect their rights.

**4. WHAT HAPPENS IF YOU DO NOT PROVIDE PERSONAL DATA**

Some Personal Data that we will indicate you from time to time during the purchase process are necessary for the completion of the purchase contract and for administrative and accounting purposes.

In the description of the purposes in paragraph 3, we specified when it is necessary to provide Personal Data. Where not expressly indicated as mandatory, therefore, the provision of Personal Data is optional and there will be no consequences if you do not provide them, if not the impossibility for the Data Controllers or Joint Controllers to act as described (for example, the impossibility to carry out marketing activities).

**5. HOW AND HOW LONG WE WILL PROCESS PERSONAL DATA**

The Personal Data provided to and/or collected by the Data Controllers or the Joint Controllers are processed and stored with automated tools and, in some cases, may be processed and stored on a paper backing. In particular, the Personal Data processed for purposes of marketing and of marketing in line with your preferences will be entered and stored in the Customer Relationship Management (or CRM) systems that allow the processing of Personal Data for these purposes.

The Personal Data will be stored for the time necessary to achieve the purposes for which they were collected. In particular, the following rules will apply.

* Data collected to enter into and perform purchase contracts, including payments: up to the conclusion of administrative and accounting obligations. The billing Data will be archived for 10 years from the fiscal year-end;
* Data related to data subjects’ requests: the Data will be stored until the request is satisfied;
* if you have provided your consent, the Data processed for purposes of marketing and profiling will be stored for a period of 7 years (also according to an *ad hoc* provision provided for by the Italian Supervisory Authority, upon Staff’s request) unless you revoke your consent. In this case, upon withdrawal of your consent, we will delete your Data.

In any event, for technical reasons, the end of the processing and the consequent definitive deletion or irreversible anonymisation of the relevant Personal Data will be definitive within thirty days of the aforementioned deadlines.

With particular reference to the judicial protection of our rights or in case of requests by the authorities, the Data processed will be kept for the time necessary to process the request or to pursue the protection of one’s own right..

**6. WHERE PERSONAL DATA MAY BE TRANSFERRED**

For the purposes indicated above, we may also transfer your Personal Data to third countries, not belonging to the European Union, which may possibly do not guarantee the same level of protection. The transfer to third countries will always take place in accordance with the provisions of the GDPR, i.e., by collecting your consent, when necessary, or by adopting any other measures necessary to ensure the security of the Personal Data being transferred. These measures possibly include agreements incorporating the so-called “standard contractual clauses” issued by the European Commission.

You can ask for information regarding these third countries and how to obtain a copy of the appropriate safeguards using the following email: [customer\_privacy@staffinternational.com](mailto:customer_privacy@staffinternational.com) or the contact details indicated in paragraph 1.

**7. WHO WILL PROCESS PERSONAL DATA**

Personal Data will be processed by:

* employees and collaborators of the Data Controllers or of the Joint Controllers processing Data under the authority of the Data Controllers or of the Joint Controllers;
* third parties established in the European Union and also outside the European Union, Data Processors, used by the Data Controllers or Joint Controllers in particular for services of: Personal Data acquisition and data entry, shipping, mailing of promotional material, after sales assistance and Customer Service, market research, management and maintenance of the CRM systems through which the Data Controllers or Joint Controllers carry out processing activities for marketing and profiling purposes and of the other corporate information systems of the Data Controllers or Joint Controllers of the processing. The complete list of Data Processors appointed by the Data Controllers or Joint Controllers can be requested to the following email address [customer\_privacy@staffinternational.com](mailto:customer_privacy@staffinternational.com) or writing to the postal addresses indicated above.

Personal Data may also be disclosed to third parties, independent data controllers, in particular to freelancers or companies providing legal or tax advice and assistance and to companies managing payments made by debit or credit cards or for fraud prevention and management activities.

Personal Data will not be disseminated in any way. In the event of your consent, the Personal Data may be disclosed to Roberto Cavalli S.p.A. owner of the “Just Cavalli” brand) for his own marketing activities as an independent data controller.

**8. YOUR RIGHTS**

Pursuant to Chapter III of the GDPR, you have the right to ask each Data Controller 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 data 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 prefer that the processing of your Personal Data is carried out solely through traditional contact methods, you can object to the processing of your Personal Data carried out through automated contact methods.

You also have the right to withdraw, in whole or in part, the consent to the processing of Personal Data concerning you for the purpose of sending advertisements or direct selling or for carrying out market research or commercial communication with automated contact methods (e-mail, other remote communication systems via communication networks such as, for instance: SMS, MMS, messaging platforms, etc.) and traditional contact methods (mail).

The exercise of these rights, which can be done through the contact details indicated in paragraph 1, is not subject to formal constraints. In the event that you exercise any of the above mentioned rights, it will be the responsibility of the Data Controller or Joint Controller that you contacted to verify if you are entitled to exercise the right and to provide you with an answer, normally within a month.

As regards the Joint Controllers relationship, please note that OTB and Staff entered into a specific agreement pursuant to article 26 of the GDPR, an extract of which is available for consultation contacting each of the Joint Controllers using the contact details indicated under paragraph 1.

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 the addresses indicated in paragraph 1. The OTB’s Data Protection Officer can be contacted at the email address [dpo@otb.net](mailto:dpo@otb.net). The Staff’s Data Protection Officer can be contacted at the email address [dpo@otb.net](mailto:dpo@otb.net).

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