

Privacy Policy

pursuant to Article 13 of Legislative Decree no. 196 of 30 June 2003

Personal data protection code

With this note, Gruppo Coin S.p.A. intends to inform users visiting the website "www.ovs.it" (hereinafter the "**Website**") of the Policy adopted regarding Personal Data Protection, emphasising its commitment and focus on protecting the privacy of visitors to the Website.

Visitors may browse the Website freely and are not obliged to register, except in certain areas of the same, in which the user can freely and expressly provide a series of personal data in order to access services for which their specific consent is required. Therefore, in cases where the visitor intends to provide their personal data in order to access those additional services, pursuant to Article 13 of Legislative Decree no. 196 of 30 June 2003, Personal data protection code, they will be expressly informed that this is required and (by way of example) of the purposes and methods for and with which the data will be used by Gruppo Coin, in addition to the right to request that the data provided be erased or updated at any time.

Information on personal data protection

Gruppo Coin S.p.A. hereby provides the following information, pursuant to and by effect of Legislative Decree no.196/2003 "Personal data protection code" (hereinafter the "Code").

1. Data Controller and Supervisor

The Data Controller of the personal data is Gruppo Coin S.p.A., with legal office in Mestre (Venice), in via Terraglio, 17, postcode 30174, through its division OVS (hereinafter "**OVS**").

The Data Supervisor, with regard to the management of the Website, is the head of the Oviess General Brand Management Division. You may request to be notified of the name of the Data Supervisor, and receive a full list of the Data Supervisors by writing to the addresses indicated at point 7.

2. Types of personal data processed

You do not need to be registered to access the Website. However, some sections in the Website do require you to register, or use a username and password (e.g. to complete the on-line purchasing process). There are also certain services for which you must provide your data should you wish to use them (e.g. your data may be required if you wish to access the Newsletter services, contact us, share your "Wish List" with a friend, etc.).

Should OVS acquire information and personal data about users, it will notify the same in advance, pursuant to Art.13 of Legislative Decree 196/2003, of the purposes for which said data are required and of the procedures engaged for their use. If necessary, OVS will arrange to acquire the user's specific consent for the relative use of the data. For example, personal data such as the user's name and surname, telephone number, email address and other information that the user consents to provide may be requested to enable the user to access the services of the Website, and these must be provided by filling in a specific registration form. OVS will only use the personal data collected on-line for the purposes indicated during registration.

The data relative to the user's connection to and browsing on the Website (such as the URI-Uniform Resource Identifier addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relative to the user's operating system and IT environment) are only collected for the purpose of gathering anonymous statistical information about the use of the Website and to check that it works correctly, and these are erased immediately after processing. The data could be used to verify the responsibility in the case of alleged IT crimes damaging the Website: with the exclusion of this hypothesis, the data is erased after the period of time required to provide the services illustrated in the Website.

With reference to the data relative to the user's browsing within the Website, please also see point 6 below regarding the Profiling tools used by the Website.

3. Optional nature of the user's decision to provide personal data

Whether the user provides the personal data is generally an optional decision. Only in certain cases, failure to confer the data can prevent the user from accessing specific services and obtaining the object of the request (e.g. registration is required to proceed and purchase products online).

4. Data processing procedures and field of communication

The data can be processed both electronically and in paper form. OVS guarantees that the personal data provided via the Website will be processed lawfully and correctly, in full compliance with the legislation in force, and will maintain the strictest confidentiality regarding the data provided during registration. All the information collected is sent via a protected connection to prevent it being intercepted by third parties. The safety of the Website is guaranteed and certified by a leading company in the provision of services regarding Internet security.

The data will not be communicated or disseminated to third parties except within the limits and under the conditions expressly indicated in the note provided to the user from time to time, and only upon receipt of authorisation from the same.

5. Links to other sites

This note is only applicable to the OVS Website and is not valid for any other websites that may be consulted by the user via links on the same. OVS cannot be held responsible for the personal data provided by the users to external parties or to any other websites that may be linked to the OVS Website.

6. "Profiling" and/or customisation tools

OVS does not carry out any promotional communication and/or advertising activities **without the user's prior explicit consent**.

The Website uses "Cookies": these are text files which are sent from a web server (which is the computer on which the Website visited is running) to the user's browser (Internet Explorer, Mozilla Firefox, Google Chrome, etc.) and memorised in the hard disk of the user's computer when they visit the Website. The cookie allows the Website to identify the user's PC by way of the information memorised therein each time that the user reconnects to the Website using the same PC.

By using cookies we can make it easier for the user to browse the Website.

The cookies **do not collect** information that directly identify the user. Indeed, OVS cannot track any personal information that directly identifies the user using the cookies (e.g. name, surname) unless this is directly provided by the user. Moreover, another Website cannot use a cookie sent by the OVS Website to access other information contained in the user's computer. Once saved in the computer, the cookie can only be read by the Website that created it.

What type of cookies does OVS use?

Temporary cookies

These are the so-called "session cookies." They are issued by the Website on the user's computer during browsing but are only memorised for the duration of the browsing session. This means that when the user closes their browser, the cookies are erased automatically and disappear, and do not remain memorised on the computer. They are formed by random numbers generated by the server and are used to help ensure that the Website can be browsed safely and efficiently.

This kind of cookies make it easier for the user to browse the Website, for example by remembering the data the user has provided when filling in forms on the Website (so-called user input cookies), recognising the user after they have logged into the Website (so-called authentication cookies), customising the interface of the Website based on the preferences indicated by the user etc.

These cookies do not require the user's prior, explicit consent as they are mandatory data needed for the purposes of supplying the service requested by the user of the Website (ex art. 122, section 1, of the Code).

Permanent cookies

These cookies are issued by the Website on the user's computer during browsing, and are also memorised beyond the duration of the browsing session, until they expire or are erased by the user in question.

The use of this kind of cookies requires the explicit and informed consent of the user (ex art. 122, section 1, of the Code). When the user visits the Home Page of the OVS Website, if they view and acknowledge the banner with a note on the cookies present therein, in this way they are specifically authorising the use of the cookies in question. If the user has set their Internet Browser (e.g. Explorer, Firefox, Chrome) to accept the use of cookies, this is also valid as a form of user consent (ex art. 122, section 2, of the Code).

Moreover, should the user register on the Website and specifically authorise their browsing to be monitored, the data relative to the browsing session on the Website may be associated with their personal data.

We are pleased to provide the following information regarding the cookies used in the Website:

- 1) The **domain name** from which the Website server transmits the cookies is: www.ovs.it
- 2) **Purpose of data collection:** the cookies are used to (i) make browsing on the Website easier and quicker, (ii) improve the browsing experience by suggesting the best products and promotions based on the user's browsing history.
- 3) **Data collected:** the following information is memorised: the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters relative to the user's operating system and IT environment).

4) **Validity of the cookies:** the Website uses session cookies (or cookies that are automatically erased when the browser is closed), and permanent cookies (or cookies that are kept until they are erased by the user, if applicable), which do not in any case last for more than six months.

5) **Requirement to accept cookies:** accepting cookies is not mandatory but some contents and functions may be blocked if they are deactivated, although it will still be possible for the user to browse the Website.

6) **Deactivation and erasure of cookies:** cookies can be deactivated or erased at any time. To do this, you must consult the information reported in your browser's User Manual (Help Page). In particular, if you prefer not to receive cookies you can set your browser to warn you when a cookie is present so that you can decide whether to accept it or not; it is also possible to automatically refuse all cookies, by activating the appropriate option in the browser.

7) **Data communication:** the information collected via cookies is confidential and is not communicated to third parties. The cookies (sent from the domain www.ovs.it) contain the following information: a numerical ID which unequivocally identifies OVS and a numerical ID that identifies the user (who browses within the Website), both memorised in our database; a numerical ID that unequivocally identifies the user's browsing "record") in our database; a pseudo-random alphanumeric session ID which is automatically erased from the browser when it closes (session cookie).

No other tools are used to profile users in this Website (e.g. spyware).

7. Location of data processing

The data relative to the services provided by the Website is processed in the legal office of OVS indicated at point 1 above by those appointed for this purpose by the Marketing Management Division.

8. Rights of the interested parties

Pursuant to Article 7 of Legislative Decree 196/2003 you have the right to request information on how your data is processed from the Data Supervisor, including 1) obtaining, without delay, confirmation as to whether or not personal data concerning you exists[...]; 2) obtaining: a) information on the source of the personal data, the purposes and methods of the processing, the logic applied to the processing, if the latter is carried out with the help of electronic means, the identification data concerning the data controller, data processors and the entities or categories of entity to whom or which the personal data may be communicated and to whom or which the personal data may be communicated and to whose knowledge said data may come in their capacity as data processors or persons in charge of the processing; having the data updated, amended

or integrated; b) the erasure, anonymisation or blocking of data that have been processed unlawfully [...]; 3) fully or partially opposing the processing of your personal data for the purposes of advertising, disseminating advertising materials, direct sale, market research or market communication.

9. Right to review

OVS reserves the right to review its current "Privacy Policy" at its exclusive discretion, in any way and/or at any time, without any need to submit advance notice.

You may exercise your rights as per Art. 7 of Legislative Decree 196/2003 at any time using the form Contact Us (www.ovs.it/on/demandware.store/Sites-ovs-italy-Site/it_IT/CustomerService-Show?cid=ovs-).

The integral text of Legislative Decree no. 196 of 30 June 2003 can be consulted on the Website of the Italian Data Protection Authority www.garanteprivacy.it/.