

PRIVACY POLICY

This document concerns the privacy policies regards personal data processed by Assocalzaturifici and Anci Servizi s.r.l. a socio unico, joint controllers within the meaning of art. 26 of Regulation (EU) 2016/679 (hereinafter only GDPR) which, through the company *White, Red & Green Milano S.r.l.*, operates the website <http://www.italianshoes.com>.

The document describes how the personal data of website users and visitors is processed; Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookie, Usage data, First Name, Last Name, Country, Email address.

Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection.

The Personal Data may be freely provided by the User, or collected automatically when using this Application.

Any use of Cookies – or of other tracking tools – by this Application or by the owners of third party services used by this Application, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User.

As required by art. 12 of the GDPR, *Anci Servizi s.r.l. a socio unico* and *Assocalzaturifici* - hereinafter referred to, for the sake of brevity, as Data Controller - have adopted this Privacy Policy to provide the data subject with the information set forth in art. 13 of the GDPR and the communications set forth in artt. 15 to 22 and 34 of the GDPR relating to the processing of the data supplied through website consultation and the filling out of the forms published on the website to activate services offered freely by the Data Controller or to contact the latter.

This is a general Privacy Policy. In specific situations (for example, membership requests, newsletter requests, requests to participate in specific trade shows), the Data Controller adopts specific Privacy Policies, with the relating consent forms to be given in order to authorize data processing.

Consequently, the following Privacy Policy is hereby adopted to provide all visitors or users of the website <https://www.italianshoes.com> corresponding to the home page of the official website of *Italian Shoes* with the information set forth in art. 13 of the GDPR and the communications set forth in artt. 15 to 22 and 34 of the GDPR relating to the processing of the data supplied.

This Privacy Policy is also based on Recommendation no. 2/2001, which the European authorities for the protection of personal data, gathered under the

Work Group established by art. 29 of Directive no. 95/46/EC, adopted on 17 May 2001 to establish the minimum requirements for collecting personal data online, and, in particular, the manner, timing and nature of the information that data controllers must provide to users when they connect to web pages, regardless of their purpose.

Moreover, this Privacy Policy is only valid for the above website, to the exclusion of any other that may be accessed through our links, for which the joint controllers are in no way responsible.

Privacy policy and consent

In compliance with the provisions of the GDPR and the Italian applicable law (Data Protection Code: Italian Legislative Decree 196/03 as amended by Italian Legislative Decree 101/2018), we wish to inform you that your data will be processed by *Assocalzaturifici Italiani* and *Anci Servizi s.r.l. a socio unico*, joint controllers within the meaning of art. 26 of Regulation (EU) 679/2016 (collectively referred to as “Data Controller”), both with offices in *Milan, via Alberto Riva Villasanta, 3*. You may contact the Data Controller by going to the offices at this address, subject to prior appointment, or using the following telephone numbers: *Tel: 02-438291 | Fax: 02.48005833*. The DPO and contact person is *Atty. Laura Marretta*, who may be contacted at *Anci Servizi s.r.l.*'s telephone number: *02.438291* and at the e-mail address: privacy@assocalzaturifici.it

The Data Controller informs third parties that Personal Data provided when contacting the Data Controller - not belonging to the special categories of personal data listed in article 9 of the GDPR - concerning them (including if operating as an individual undertaking, small business person or professional) or their employees, agents, representatives or collaborators (the “Data”), shall be processed in accordance with the provisions of the GDPR. Data is processed, in line with the principles of lawfulness provided for under art. 6 of the GDPR, for purposes relating to the relationship established with the Data Controller; therefore, data processing is legally justified, as required by art. 13 c) of the GDPR, by the purposes for which the relationship is established with the Data Controller, (i.e. the legal basis varies according to the services used by the user and/or the services requested, e.g. the data subject’s consent in case of website browsing and newsletter activation, contract performance in case of website access credentials). The processing of data supplied to the Data Controller will include: the management, extraction, comparison, block, recording, organization, use, storage, database creation, processing throughout the EU and in non-EU countries (countries falling within artt. 45 and 46 GDPR), the development of anonymous statistics by *Confindustria Moda* (a party appointed as processor under art. 28 GDPR for the performance of this service), the possibility to contact the User and to

display contents from external platforms Data processing will include destroying or amending processed data at the data subject's request or consulting the same, notifying future initiatives, processing and emailing soft spam (whose receipt can be objected to by following the procedure indicated in the footer of the Data Controller's emails), erasing data and using it for conferences and meetings. The Data Controller may communicate only given data (in accordance with art. 5 GDPR) to partners with which the company organizes its initiatives - all of which are appointed as external Data Protection Officers pursuant to art. 28 of the GDPR, to *Organizations, Institutions and ITA, Confindustria e Confindustria Moda*.

Contact form (This Application)

Personal Data is collected for the purposes indicated above and using the following services: Contact the User

By filling in the contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form's header. Personal Data collected: Address, Company name, Country, Email address, First Name, Last Name and ZIP/Postal code.

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookie and Usage data.

Place of processing : USA – Privacy Policy – Opt Out (link) Contacting the User.

System Logs and Maintenance

For operation and maintenance purposes, this Application and any third party services may collect files that record interaction with this Application (System Logs) or use for this purpose other Personal Data (such as IP Address).

Data will be processed in paper form and/or electronically by parties specially authorized to do so. Providing data is optional, except for that acquired automatically by the system; however, it is hereby understood that upon continuing to browse the website without disabling cookies (see [Cookie policy](#)), consent shall be deemed to have been provided pursuant to art. 4, para. 11. The Data Controller does not process data on the basis of automated decision-making processes or profiling. Data will be stored for ten years and in any case for the time required to fulfil the purpose of the collection.

The Data Controller also informs you that the right to rectification under art. 16 GDPR, the right to be forgotten under art. 17 GDPR, the right to restriction of processing under art. 18 GDPR and the right to have access to personal data supplied and to all consequential information, as listed in art. 15 GDPR, are guaranteed.

You 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 or object to data processing;
- 2) data portability under art. 20 GDPR;
- 3) 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);
- 4) make a complaint to a controlling authority;

To exercise the rights listed above or for more information, simply send an email to the DPO at the following email address: privacy@assocalzaturifici.it stating the wording: 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. Once your request has been processed, the Data Controller will send its feedback in the terms set forth in art. 12 of the GDPR.

Should the Data Controller intend to process personal data for a purpose other than that for which it was collected, the data subject will be provided in advance with information on this new purpose and all other pertinent information, and the Data Controller will seek his or her prior consent. Please note that the Data Controller uses specific and suitable privacy policies to acquire data in specific areas, which reference is made to for the

corresponding processing operations (e.g. becoming a member of the association, registering for a trade show, etc. ...).

This Application does not support “Do Not Track” requests. To determine whether any of the third party services it uses honor the “Do Not Track” requests, please read their privacy policies.

Please note that, upon website visitors sending emails to the addresses indicated on this website, for purposes specified case by case, the Data Controller shall acquire and subsequently process the sender’s email address and any other personal data included in the missive, adopting the methods specified by and for the purposes indicated in the aforementioned Privacy Policy. Moreover, by sending emails, the website visitors or users are deemed as having read and accepted this note used as Privacy Policy.

Communications on the Data Controller’s activities and newsletters are reserved to given categories of registered users. To supply and manage this service, the Data Controller uses the services and tools provided by the website *MailChimp*. For further information on personal data processing by *MailChimp*, the Data Controller suggests to consult the following link carefully: <https://mailchimp.com/about/security/>. Failure to provide personal data does not have any effect on the user except, in case of the failure to provide required data marked with an asterisk, for the user’s impossibility to enjoy the services requested from which, it is recalled, the user can withdraw at any time, either through the “unsubscribe” button at the end of each communication or by following the instructions given in the emails sent by the Data Controller.

Processing of candidates’ personal data:

In compliance with current privacy regulations, the candidate who spontaneously sends his CV will receive suitable information on personal data processing at the time of the first contact that follows receipt of the CV spontaneously sent by the candidate. During the hiring process, the employer may examine candidates’ “social profiles” where the latter do not have private purposes. Data acquired from these profiles will be collected and subsequently processed only to the extent in which such collection is required and relevant to performance of the job for which the application is submitted; therefore, data collected during the hiring process shall be erased as soon as it is clear that no job offer will be made or that the offer made will not be accepted by the candidate. During the internship period, A.N.C.I. Servizi s.r.l. reserves the right to monitor the interns’ “social profiles” on a non-generalized basis.

USE OF IMAGES acquired from photos and/or videos

During our shows, fairs, collective shows, parties, assemblies or public events, shootings and/or photographs will be taken inside the corresponding location for the single occasion to document these events and promote them. Such images and videos will be posted both on the website and our social network profiles and will never damage the data subject's honor and decorum; the Data Controller will not provide compensation therefor. Please note that your images, drawn from photographs and/or videos during public events, do not require the express consent of the depicted person. In any case, the Data Controller undertakes to act on this point in accordance with the instructions given by the Data Protection Authority with respect to images/videos acquired during public events. It remains understood that should anyone want his/her image removed or cancelled, s/he may contact us at the following address privacy@assocalzaturifici.com stating the wording "Treatment of images" in the subject line and, after examining this request, we will provide therefor. Should photos/videos be taken during private events and/or including close-ups of children or disabled individuals, the Data Controller will provide a suitable privacy policy and collect the corresponding consents from the persons concerned.

Browsing data

During normal operations, the computer systems and software procedures used to operate this website acquire some personal data, the transmission of which is an inherent feature of Internet communication protocols. This data is only used to obtain anonymous statistical information on use of the website and to check its correct functioning, and is deleted immediately after it is processed. The data may be used to ascertain responsibility in the event of hypothetical computer crimes against the website.

Cookies

Cookies are small text files that are deposited by a website on the user's hard disk, thus identifying the user's browser unambiguously. Cookies do not damage your computer and contain no viruses. Cookies are used to speed up web traffic analysis, to communicate when a specific website is visited, and to allow web applications to send information to individual users.

The cookies on our web pages do not reveal data about the user, nor do we use them to transmit personal information. Moreover, our cookies, which can be disabled at any time, are not used to track users.

The cookies on our websites are used exclusively for anonymous statistical analyses and to improve the online help feature. Should we choose to use cookies in other circumstances, we will explain the purpose of their use.

[Click here](#) to view our cookie policy.

Copyright

The documentation, texts, images, brands and anything else published and reproduced on this website is the property of *Assocalzaturifici* and/or licensed to same by third parties. All the contents of this website are protected by the provisions of law relating to copyright and intellectual property. Any reproduction thereof, even in part, is forbidden.

Liability

Assocalzaturifici/Anci Servizi s.r.l. a socio unico shall not be held liable either for the content of the information published on this website or for the use that third parties may make of same, due to any contamination deriving from website access, interconnection, or downloading of material or software from this website.

Consequently, *Assocalzaturifici/Anci Servizi s.r.l. a socio unico* shall not be held liable or in any way obliged to answer for any damage, loss or harm that third parties may suffer as a result of coming into contact with this website or as a result of its use and reliance of the information published on same or of any connected software. The material and information available on the website may be changed or updated without notice.

Although *Assocalzaturifici/Anci Servizi s.r.l. a socio unico* uses the utmost care when uploading information on the website, the latter takes no responsibility regarding the accuracy and completeness of the information provided, the use of which is at the sole risk of the user. Placing said information at the disposal of the user does not grant any licenses on copyrights, patents or any other intellectual property right.

Legal action

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services.

The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

Important definitions for the use of the Application

Usage Data

Information collected automatically from this Application (or third party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the

server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

User

The individual using this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refer.

This Application

The hardware or software tool by which the Personal Data of the User is collected.

Application of the legislation

The Data Controller regularly reviews its compliance with these privacy regulations, which it adapts regularly to reflect the latest requirements.

If you have any questions or concerns regarding these privacy regulations, you can contact the DPO at any time by writing to: privacy@assocalzaturifici.it.

We respond to all users who lodge a formal written complaint to this address in order to get to the bottom of the problem reported. We undertake to cooperate with the competent authorities to resolve any complaints regarding the processing of personal data that should not be resolved directly between the Data Controller and the data subjects.