

Privacy Policy

1. Data matter to us.
2. Who is the Data Controller?
3. What data do we collect from our customers, how do we use them and on what grounds?
4. What legal grounds justify the processing of your data?
5. Who are the recipients of your data?
6. Where do we store your data?
7. How long do we store your data?
8. What are your rights when you provide us with your data?
9. Warranties and Warnings.

1. *Data matter to us.*

PARFOIS takes the processing of your data very seriously through the various processing activities carried out by the company.

We are transparent with data subjects regarding the type of data processed, purposes, rights, storage, transfers and obligations to the supervisory authority, the National Data Protection Commission.

By using the Parfois website or placing an order through the website, you are providing Parfois with personal information. For Parfois, the privacy and protection of your personal data is very important. Parfois is committed to complying with applicable law at all times and with this privacy policy ("Privacy Policy").

Each time you use this website you will be subject to the application of the Privacy Policy and Cookie Policy in force at that time, so we suggest that you read these Policies carefully to check whether you agree with their terms.

The Parfois website may contain links to other companies' websites and services with their own privacy policies and/or services provided by third parties installed on your device, which may allow you to access the information contained therein. We recommend you read the privacy policies of such third parties carefully. Parfois is not responsible for the practices or content of such third parties' privacy policies.

Parfois reserves the right to modify the Privacy Policy in light of new legislative and/or regulatory requirements, for security reasons or for the purpose of adapting this policy to fit the instructions of the data protection supervisory authorities.

Whenever the Privacy Policy is changed, you will be informed of the change via the website or, if appropriate, by means of a specific message addressed to you. You will be asked to renew your consent to the revised Privacy Policy.

Please note that acceptance of the Privacy Policy is a condition of Parfois providing goods or services to you.

2. *Who is the Data Controller?*

The company responsible for the processing of personal data is Parfois Italia Srl, with its registered office at Via Trieste 5 – 28066 Galliate (No), Itália Registration in the Novara Company Register at number 02408960033 (hereinafter, " Parfois Italia Srl or Parfois), the owner of the trademark "PARFOIS".

Parfois Italia Srl. is part of a corporate group, the "Parfois Group", and this Privacy Policy applies to all companies within the Parfois Group.

3. *What data do we collect from our customers, how do we use them and on what grounds?*

Parfois collects different types of personal data according to the different purposes and dimensions of the user's/customer's interaction with the company. In any case, please note that we do not knowingly collect personal information from persons under the age of 18. Should we learn that we have unintentionally collected personal information from minors under the age of

18, we will take steps to delete this information as soon as possible, except where we are required by applicable law to retain it.

What personal data do we collect?

The personal data processed may vary depending on the purpose, in particular the following:

- Name and surname;
- Email address;
- Address (for delivery and billing);
- Telephone number;
- Date of birth;
- Tax identification number;
- Browsing data;
- IBAN.

What are the purposes of the processing of personal data?

- a. **Provision of products and services:** Parfois may use your personal data where necessary to fulfil the contract entered into between you and Parfois, in particular, to manage online purchases relating to the purchase and payment of products by any means, issue electronic invoices and duplicates, manage complaints, requests or other matters submitted to Customer Services relating to the products and goods purchased, provide in-store customer service, monitor and/or return or exchange orders, and also prevent abuse and fraud in the use of your data.

When you register as our customer, Parfois will collect the following data:

- **Name and surname;**
- **Email address;**
- **Address (for delivery and billing);**
- **Telephone number;**
- **Date of birth;**
- **Tax identification number;**
- **Browsing data;**
- **IBAN.**

When you do not register as our customer and place your order as a "guest", Parfois will collect the following data:

- **Name and surname;**
- **Email address;**
- **Address (for delivery and billing);**
- **Telephone number;**
- **Tax identification number;**
- **Browsing data;**
- **IBAN.**

- b. **Registration via social networks** *(involves using your social network credentials such as your Facebook or Google+ user login information to create your Parfois account and log in with it):* when you use the social network login option, Parfois will use public profile information that is necessary to create your Parfois account. Parfois will not process any information unconnected with this purpose that is received from social networks. Once the

account is created, the user will have the opportunity to complete it with any information they wish to share with us and that will allow to improve the experience when interacting with us. Any additional information you provide will only be used for the purposes outlined in this Privacy Policy.

- c. **Development of products and services:** Parfois may use your personal data to develop products and services based on the most popular goods and services. However, we will predominantly use aggregate data and statistical information for this purpose. Parfois keeps track of the pages our customers visit within the website to determine which services/products are most requested.

Parfois uses cookies and other tracking technologies to analyse customer interaction with the content of the website, to allow the provision of personalised product recommendations according to the customer's interests and preferences.

For these purposes, information is collected regarding the computer or device (including mobile devices) that you use to access our website, including your IP address, the website from which you accessed our website, your browser type and language, operating system, cookies, the country from which you are accessing, referring and exit pages, URL, platform type, the number of clicks made, domain names, landing pages, pages visited and the order in which you visited them, the time spent on a given page, the date and time you accessed our website, access errors and other similar information that your browser sends us. For more information about cookies, please see the [Cookie Policy](#).

- c. **Communication:** Parfois may use your personal data to communicate with you, in particular, to send you news relating to our products or services, to assist you with

customer service matters, in particular, to respond to and handle your requests and complaints through the Customer Service and Support channels, as well as to monitor the quality of our service or other issues raised by customers.

In this case the following data are collected:

- **name and surname;**
 - **email address;**
 - **telephone number;**
- d. **Marketing:** Parfois may use your personal data, including purchasing and browsing behaviour, for the purposes of opinion research and marketing, including letting you know about our campaigns, promotions, new products and services, birthday offers and sending newsletters (if you consent to subscription), which we will do by sending you electronic mail messages ("email"), push notifications using the Parfois app (if you have enabled notifications on your mobile device through the Parfois app), via social media or other equivalent forms of electronic communication or for research purposes, including market research. The Marketing messages we send you will be personalised and tailored to your personal preferences and interests in accordance with the consent you have given to Parfois to use them.

You can unsubscribe from the Newsletter at any time by referring to the information provided in each communication.

- e. **Profiling:** To send you personalised offers, Parfois may use data that have been identified based on your personal and behavioural preferences, which we collect from your interactions with us, whether through the website, app, helpline or from product usage. In

this case, the following personal data will be collected: a) email; b) name; c) surname; d) birthday; e) country; f) language; g) items added to the cart; h) pages visited;

i) items viewed and/or purchased.

The processing of data for profiling and market research purposes is based on the legitimate interest of Parfois. To this end, Parfois has considered the interests and rights of the data subjects, and the measures taken by the controller to comply with its general obligations in terms of proportionality and transparency, and has concluded that:

a) the impact on people's fundamental rights and freedoms and guarantees is low;

b) such processing can reasonably be expected by the person concerned;

c) the processing of data for the above purposes does not give rise to exclusion, discrimination, defamation or situations that jeopardise the reputation of the data subject and/or their bargaining power.

If you consider that the aforementioned processing may generate some type of emotional repercussion, you may exercise your right to access and/or oppose it, as well as voluntarily exclude yourself with no need to justify it.

Please be advised that you can limit this purpose by using your right of opposition through the link https://dpo.parfois.com/#/landingpage/parfois/en_gb.

For Parfois, the appreciation of the human side of its relationship with the customer is fundamental. Although Parfois will use your data for profiling purposes, such data processing is undertaken solely for the marketing purposes outlined above and Parfois will not make automated decisions in any case, including profiling.

- f. **Improving services available to users:** User's shopping and browsing behaviour data relating to their purchases in physical or online stores, tastes and preferences may be used for the purposes of analysis, user profiling, market research, quality surveys and improving our customer interaction.
- g. **Recruitment:** during the process of receiving applications, analysis, interviews and recruitment, Parfois Italia Srl collects and processes the personal data of candidates, which, with their express consent, may be forwarded to other companies in the Parfois Group. The personal data processed are those contained in the application form and Curriculum Vitae, as well as any personal data that you spontaneously decide to provide to Parfois Italia Srl, including, but not limited to, name, surname, city, country, contact details (email address and telephone number), education and language information, employment history, the number of your visa or residence permit according to your immigration status (should you need a work permit).

4. What legal grounds justify the processing of your data?

- **Entry into a contract:**

Parfois uses your data to manage and fulfil the contract entered into between the customer and the company through the input of data made by the customer via the website or directly on the platform to purchase and sell products, pursue the returns policy, manage incidents or eventual refunds, when applicable, and also to manage and respond to requests regarding complaints and contractual information, and requests to exercise the rights inherent to the holders of the data identified below. The processing of this data only occurs upon activation or request when purchasing goods, and may remain stored for the legally defined periods.

- **Legitimate interest:**

Data processing is also aimed at the prevention and verifications necessary for detecting fraud and other cyber attacks carried out by third parties which put customer data at risk, allowing Parfois to adopt the technical measures required to mitigate, remedy and suppress the risks and potential damages. The company considers that there is also a legitimate interest for the purpose of preparing answers to questions and suggestions made by customers in the segment of the contract entered into for the purchase of products and Customer Support services, and also to verify the quality and development of new products, means and services to customers. Lastly, market research and statistical purposes may require data processing based on profiling for the purpose of demonstrating indicators such as product demand, seasonal sales, geographic viewing areas, and age groups.

- **Compliance with legal obligations:**

Personal data are processed for the purpose of complying with the legal obligations required by national or European Union law, namely, the issuing of invoices, vouchers or other documents associated with the performance of the contract, accounting records in terms of taxes and commercial matters, as well as communication to the respective competent authorities such as the Tax Authority, Occupational Health and Safety Authority, Social Security, commission for gender equality, among others, especially within the scope of recruitment processes, for which legal compliance is required and applicable. Processing and follow-up of complaints, investigation and processing within the scope of the provisions applicable by the sector regulators, pre-litigation and litigation procedures

and all matters and procedural actions within the scope of judicial or administrative proceedings.

- **Holder's consent:**

Parfois also processes your personal data on the basis of your express, positive consent, particularly in connection with subscription to the newsletter to receive communications, personalised or non-personalised promotional communications, news about the company, shops and advertising campaigns, contests and all direct or indirect marketing actions through Parfois or third-party companies, the data subject having expressed their express consent to this. Consent to push notifications with the Parfois app (if you have enabled notifications on your mobile device via the PARFOIS app), via social media or other equivalent forms of electronic communication or for research purposes, including market research.

5. Who are the recipients of your data?

Parfois may subcontract other companies to provide certain services, such as payment management, delivery/collection services, customer service, tax and accounting advice, marketing or website maintenance and digital providers. In such cases, these third-party companies may need access to certain information and user data. Parfois guarantees that, in such cases, these third parties will have limited access to the users' information, restricted only to those data needed to perform the contracted tasks, and that an agreement has been signed between the parties, governing the protection of personal data, whereby these third parties

undertake not to reveal the data, in any way, nor to use them for purposes other than the provision of the contracted services.

For the billing of services and management of purchases through the website, your data may be shared with other entities in the Parfois Group depending on your location, namely Parfois Italia Srl, S.L. and Modessa Polska Sp. Z. o.o.

Similarly, Parfois may communicate your personal data when required to do so by law, in a judicial proceeding or in the context of investigations of suspicious activities.

Our website and our application provide you, in certain circumstances, with social plugins from various social media. Should you decide to interact with a social network such as Facebook, Twitter or Google+ (e.g., through account registration), your activity on our website or in our app will also be available to that respective social network. Should you be connected to one of these social networks during your visit to our website or application, or if you are interacting through one of the aforementioned social network plugins, the social network may include this information in your profile on said social network, in accordance with its privacy settings. If you wish to avoid this type of data transfer, please log out of your social network account before entering our website or application, or change your privacy settings where possible. We advise you to read the privacy policies of the social networks that you use to obtain detailed information about the collection and transfer of personal information, know your rights, and which privacy settings appropriate to your profile you should tick.

The transmission of personal data as described in this Privacy Policy may include international transfers of personal data to countries whose data protection laws are not as comprehensive as those of European Union countries. In accordance with applicable law, we will only transfer personal data to recipients that offer an appropriate level of data protection. In such situations, we

make contractual arrangements to ensure that your personal data remains protected in accordance with European standards.

6. *Where do we store your data?*

Parfois stores your personal data on servers that are kept in a secure environment, protected from unauthorised access. When personal information (such as a credit card number) is provided on the payment website, it is protected by encryption through the Secure Socket Layer (SSL) Protocol and verified by Digicert.

We adopt the technical and organisational measures necessary and appropriate to ensure the confidentiality, integrity and availability of your personal data, as well as the resilience of the processing systems and to prevent the existence of risks, threats and vulnerabilities, as well as the loss, destruction or alteration of data due to misuse or improper access.

Please note that we will only process your data for the purposes for which they were collected, as set out in this Privacy Policy. We frequently review our data collection, storage and processing policies to ensure that we only collect, store and process information that is essential to the provision or improvement of our services.

We have adopted appropriate procedures to ensure that your information is accurate, complete and current, but it is up to you to update or correct your personal information where necessary.

Since the collection of personal data is carried out on an open network (internet), they may eventually circulate on the network without security conditions and may be viewed and/or used by unauthorised third parties for this purpose, despite the fact that appropriate security measures have been taken against accidental or unauthorised destruction and accidental loss and also against unauthorised access, modification or dissemination.

7. How long do we store your data?

We only keep your personal data for as long as is necessary to achieve the purpose for which we collected them, to respond to your needs, your requests to us, or to comply with our legal obligations.

To determine the period for which we store your data, we use the criteria mentioned below. If several criteria apply simultaneously, we will store your personal data under the criterion that entails the storage of your personal data for the longest period of time.

- a. When purchasing products and services, we will store your personal data for the duration of our business relationship, including any complaints that may arise, as well as the period of [10] years after the termination of this relationship, without prejudice to the fulfilment of legal obligations by the controller;
- b. When you contact us to ask questions and request information and clarifications, we will store your personal data for the period of time required to resolve your question/provide you with the information and/or clarifications requested;
- c. When you create a customer account, i.e., when you register on our website, we will store your data until you ask us to delete it;
- d. When you have consented to marketing, we will store your personal data for as long as the purpose for which they were collected remains unchanged or until you unsubscribe or ask us to delete them;
- e. With regard to data collected during the recruitment process, for a maximum period of [5] years after the closure of the recruitment process;

- f. Regarding the use of cookies, we store them for as long as necessary to achieve the purposes inherent to them, as detailed in the Cookie Policy;
- g. The period of time provided for in the applicable legislation; or
- h. Until the specific purpose applicable to certain data ceases to exist.

We may also store some of your personal data to the extent necessary to comply with our legal obligations and to manage or enforce our rights, including via judicial or administrative remedies.

In any of the above situations, if there is a pending judicial, administrative or court-related proceeding, the data will be kept for the duration of the proceeding and up to six months after the final decision is rendered.

At the end of the storage periods referred to above, personal data will be deleted and/or erased in an absolutely secure manner.

8. *What are your rights when you provide us with your data?*

- a. Right to information: our customers have the right to obtain clear, transparent and understandable information about how Parfois uses their personal data. This is the reason why we provide you with this Privacy Policy.
- b. Right to access: in addition to the right to information, you will be able to access your personal data that we process and store. In such cases, Parfois will provide you with a copy of the personal data being processed. In addition, when requested by electronic means, the information will be provided in a commonly used electronic format.

- c. Right to correction: you have the right to correct your personal data if they are incorrect, out of date or if you wish to complete them. To do so, you can contact us or alternatively, if you have registered on the website, by going to your "customer area".
- d. Right to erasure/right to be forgotten: you may ask us to delete your data, however, please note that this is not an absolute right as we may have legal grounds or other legitimate interests for retaining your personal data.
- e. Right to oppose, including from direct marketing: you can unsubscribe from the Parfois Newsletter or opt out of our direct marketing communications at any time, as well as oppose the processing of your personal data. The easiest way to do this is by clicking on the link "*To unsubscribe from our Newsletter click here*" (<https://www.parfois.com/en/gb/unsubscribe/>) in any email or communication we send you, but you can also contact us for this purpose. You may also oppose, at any time, the profiling and use of your data for market research. We emphasise that Parfois does not make automated decisions, including on the basis of profiling based on the data processed.
- f. Right to withdraw your consent to data processing at any time: you may withdraw your consent to data processing where such processing is based on your consent. Withdrawal of consent shall not affect the lawfulness of processing based on consent prior to withdrawal.
- g. Right to lodge a complaint with the supervisory authority: If you consider that the processing of your personal data by Parfois violates the applicable data protection legislation, you may lodge a complaint with the supervisory authority, in Portugal, the National Commission for Data Protection (Comissão Nacional de Proteção de Dados). Please do not hesitate to contact us before making any complaint.
- h. Right to data portability: you have the right to move, copy or transfer data from our database to another database.

- i. Right to restrict processing: you have the right to request that the processing of your data be restricted in the following situations: the processing is unlawful and you do not wish to delete your data, but only to limit it, if the data are no longer needed by Parfois but necessary for the customer or if the customer has exercised the above-mentioned right to oppose, for the period of time during which Parfois analyses whether or not its legitimate grounds for processing override that right.

To request the exercise of any of the rights listed above, you must do it through the link https://dpo.parfois.com/#/landingpage/parfois/en_gb.

For any other questions or clarifications you may contact the Data Protection Officer by the email dpo@parfois.com.

If requested directly in a store, you will be given the address to send a communication to the Data Protection Officer, under the terms listed above.

We remind you that these rights, like any other right, must be exercised reasonably and in good faith by the holder. If requests to exercise your rights are manifestly unfounded or excessive, for example, if you unreasonably and repetitiously ask for information or abuse the right to receive information, in particular by providing false or misleading information, Parfois reserves the right to charge a reasonable fee taking into account the administrative cost of providing the information or to disregard your request.

9. ***Warranties and warnings***

You warrant that the personal information provided to Parfois is true and accurate and you undertake to notify Parfois of any changes or modifications to that information and assume sole responsibility for any loss or damage caused by erroneous, inaccurate or incomplete information.

You are expressly warned that by disclosing personal data on Parfois public media such as Facebook, Google+, Twitter and Instagram, this information may be viewed and used by third parties. Parfois does not read any personal communications posted on its customers' own websites.

10. ***Recommended browsers to view the page correctly***

The Parfois website is optimised for viewing on Google Chrome, Safari, Mozilla Firefox, Microsoft Internet Explorer, Microsoft Edge.