

# CUSTOMER PRIVACY POLICY

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# 1. WHAT IS COVERED BY THIS PRIVACY POLICY AND DO OTHER POLICIES APPLY TO YOU?

This privacy policy covers situations where we, Gucci, access, collect, store process, use, disclose or transfer your personal information in paper or electronic form. It also covers situations where approved partners or other members of <u>Kering</u> use your personal information on our behalf.

In some cases, other policies apply to you. It may be the case when you use certain products or services, and in this event:

- You will be notified of these other policies while using the products or services they apply to.
- Such policies will supersede this privacy policy unless they expressly refer to it.

This privacy policy does not cover products or services you might use as provided by other companies acting on their own account.

Our privacy policy does not extend to services provided by other companies acting on their own account, such as franchisees and licensees or when you share information through social media (WeChat, WhatsApp, Baidu, Kakao Talk, Facebook, Twitter, Instagram, etc.), or other online platforms owned and managed by other companies. These other companies have their own privacy policies in place, so remember that the way they use any personal information you give them will be subject to their rules and not ours.

### Want to know more? You may be interested in the following sections of our Privacy Policy:

Who collects & uses your personal information?

With whom do we share your personal information?

What are your rights regarding your personal information?



# 2. WHO COLLECTS & USES YOUR PERSONAL INFORMATION?

We, Gucci, act as the "data controller", which means that we determine "why" and "how" your personal information is collected and used. We are a Italian corporation, located in **Via Tornabuoni 73**, **Firenze**, **Italy** and registered under number 03031300159,

To be able to deliver our products and services to you, we need to share your personal information with approved partners or other members of <u>Kering</u> who generally act as our "data processors". All are bound by an obligation to implement appropriate security measures to protect personal data in their possession, and are bound by a strict confidentiality agreement and specific contractual terms on "how" and "when" they are allowed to use your personal information on our behalf.

Please be aware that certain approved partners, such as our franchisees and licensees or social media, could also determine "why" and "how" your personal information is used. They have their own privacy and cookies policies, so remember that the personal information you give them will be subject to their rules and not ours.

Your local legislation may not refer to the terms "data controller" or "data processor", but respectively to terms such as "data user", "owner", "business", "responsible party", etc., and as "data intermediary", "operator", etc. In order to understand our role, please note that we, Gucci, are the entity who decides on the methods and purposes of the processing of your personal information by determining "why" and "how" your personal information is collected and used. Our "data processors" are entities who use your personal information on our behalf by receiving instructions from us on "how" and "when" they are allowed to use it.

# Want to know more? You may be interested in the following sections of our Privacy Policy:

Why do we collect your personal information?

How do we collect your personal information?

With whom do we share your personal information?

What are your rights regarding your personal information?



# 3. WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

Gucci will collect, hold, use and disclose your personal information for the purposes described in this section. The processing of your personal information will comply with your privacy legislation and rely on the legal bases set out in this section.

If you would like more information on the purposes and legal bases, you can contact us at <u>privacy@</u> <u>gucci.com</u> (or see <u>How can you contact us?</u>).

The processing of your personal information will rely on the legal bases set out in the "<u>General</u> <u>information regarding purposes and legal bases for the use of your personal information</u>" below, unless you are a resident of one of the following countries:

- If you are an Australian resident, please jump to specific information about Australian residents;
- If you are a resident of Qatar, Vietnam, Kuwait, Mexico, Chile or South Korea, please jump to specific information for residents of Qatar, Vietnam, Kuwait, Mexico, Chile or South Korea.

# A. General information regarding purposes and legal bases for the use of your personal information

This paragraph is not applicable to residents of the following countries: Australia, Qatar, Vietnam, Kuwait, Mexico, Chile and South Korea.

• To provide you with the products and services you have purchased or otherwise requested

We will use your personal information to manage our relationship with you and to perform our obligations under the contract you conclude with us when you purchase or otherwise request products or services from us. This can cover various activities such as internal accounting, processing your payment or delivery.

To provide you with the products and services you have requested, we will access, collect, store, process, use, disclose and transfer your personal information for invoicing, payment management and internal accounting.

Certain specific information may be required to provide you with gift cards, customization services, or when you reserve a product, request the repair of a product, or purchase products or services by phone, or on our website or a marketplace. In such cases, we could access, collect, store and use your personal information for delivery, warehouse and return management.

The purposes for which we process your personal information are as follows:	The processing of your personal information is justified on the following legal basis:
Providing you with the products and services you have purchased or otherwise requested either in our stores or online.	
This involves any action necessary to perform our obligations under the sale or service contract you conclude with us (processing of your payment, delivery, return management, etc.).	Performance of a contract.



If you would like more information on the purposes and legal bases, you can contact us at <u>privacy@gucci.com</u> (or see <u>How can you contact us?</u>)

#### • To manage your Gucci profile.

Once you have requested us to create your Gucci profile, your personal information will be linked to this profile, where we will keep all the information we have on you. This could include personal information we obtain directly from you as well as from other sources in accordance with applicable legislation. The information in your Gucci profile is crucial to provide you with the Gucci personalized and tailored experience, and thus it needs to be kept up to date for the best experience.

Once you have asked us to create your Gucci profile, we will supplement it with personal information such as your purchases, preferences and contact details. In this context, please be aware that we use personal identification data, such as your email address or phone number, to link an interaction or a purchase with your Gucci profile. This also applies when checking-out as a guest on our website when making a purchase. In addition, we may use your date of birth to determine that you are old enough to use our services.

In order to keep your personal information accurate, we will take every reasonable step to ensure that personal information we hold is properly updated. Subject to your applicable privacy legislation you may have the right to have your information rectified at any time, and in event please let us know if any of your information needs updating or correcting, and we will make our best efforts to detect and correct inaccurate personal information (data cleansing) and delete any duplicated dataset. This may require us to correct typographical errors or inconsistent personal information.

The purposes for which we process your personal information are as follows:	The processing of your personal information is justified on the following legal basis:
Administering, managing and maintaining your Gucci profile once you have requested us to create it. This could include data cleansing and deduplication.	Performance of a contract or our legitimate interest (where applicable). Once your profile has been created upon your request, to supplement it with the personal information you provide us during our interactions (and such legitimate interest is not overridden by your own interests or fundamental rights).



#### • To provide you with tailored customer service and assistance.

You should have the same unified experience no matter how we communicate. Whether this happens in our stores, on our website, by chat, by phone or by video, and whether you contact us or we contact you, we want to provide you with relevant and tailored customer service.

For this purpose of providing you the Gucci experience, we will collect, store, process, use, disclose and transfer your personal information to be able to identify you. This will allow us to provide you with the tailored assistance you are asking for or to share relevant information with you. In addition, when you contact us, we may retain the personal information you share with us to always provide you with such a customised and personalised experience. This could happen if you are an existing or potential customer. Your personal information will be linked to your Gucci profile, if you have requested us to create one, or to a potential customer profile.

To provide you with a smooth and enjoyable customer experience, know you better to provide you with tailored answers, and to improve the quality and security of our services, we may rely on your consent, proceed in accordance with our contract with you, or take all reasonable steps to enter into a contract with you, or rely on our legitimate interest to improve our services.

We will use the information we have about you to try to identify you when you contact us (whether by phone, video chat, text message, chat, social media, etc.). When we can identify you, we will be able to access personal information available in your Gucci profile or in your potential customer profile, to know when you have previously interacted with us and to provide you with the tailored assistance you are asking for. This could include real-time or subsequent monitoring of your interaction with us (for example on our website or in a store) to identify the products you are looking at or what could be your specific need.

To provide you with adequate customer service, you may be asked if you need further assistance when you are on our website or in a store. On our website, if you do not want to be contacted, kindly close the chat navigation window. This service was implemented for you to enjoy the same service as in one of our physical stores.

If we are not able to identify you, we may create a potential customer profile to allow you to have a unified purchase experience. Indeed, however you interact with us, we will do our best to avoid asking you again for information you have already shared with us.

Your personal information, in particular your Gucci profile if you have created one or the potential customer profile we may create about you, could enable our sales associates to contact you directly in relation to the products and services you have purchased or otherwise requested, such as when a product becomes available again or when an order you have placed has been received in store, or to share with you any other information you have requested from us.

In addition, the monitoring of our interaction (including via voice or video recording, with prior notice to you) enables us to improve the quality and safety of our services and to provide you with tailored answers.



The purposes for which we process your personal information are as follows:	The processing of your personal information is justified on the following legal basis:
Administering, managing and maintaining your Gucci profile	Performance of a contract or our legitimate interest (where applicable)
This will be done if you have requested us to create your Gucci profile and if we are able to identify you. We will supplement your Gucci profile with the personal information you provide us with when you contact us or when we contact you. This could include data cleansing and deduplication.	Once your profile has been created upon your request, to supplement it with the personal information you provide us during our interactions (and such legitimate interest is not overridden by your own interests or fundamental rights).
Administering, managing and maintaining a potential customer profile This will be done if we are not able to identify you. We will supplement this potential customer profile with information you provide us with when you contact us or when we contact you, to avoid asking you again for information you have already shared with us and provide with you tailored assistance about our products and services.	Taking steps at your request prior to entering into a contract or our legitimate interest (where applicable) When we are not able to identify you, to supplement a potential customer profile to provide you tailored assistance (and such interest is not overridden by your own interests or fundamental rights).
Inbound interaction Providing you with the products, services or information you may request when you contact us.	Performance of a contract or taking steps at your request prior to entering into a contract.
Outbound interaction	Performance of a contract or taking steps at your request prior to entering into a contract or our legitimate interest (where applicable)
<b>Contacting you</b> directly in connection with the products, services and information you have requested.	To provide you with an adequate answer when our interaction is not related to the formation or performance of a contract (and such interests is not overridden by your own interests or fundamental rights).



Real-time or further monitoring of our

**interaction**, to enable us to improve the quality and safety of our service and provide

you with better answers.

This monitoring could be implemented during

both inbound and outbound interactions.

Subject to the type of information we collect:

# Performance of a contract or taking steps at your request prior to entering into a contract

When we collect information to provide you with relevant assistance about our products or services.

# Our legitimate interest

When we collect information to improve the quality and safety of our service (and when such interest is not overridden by your own interests or fundamental rights).

# Or your consent to cookies

when such monitoring is done on our website via <u>cookies or other online advertising technologies</u>



#### • To enable you to receive relevant information and tailored marketing content.

You will receive information and updates about us either at your request (with your prior consent where required by law) or when we are authorised by law to send you such information and updates directly. Such communication can be global or local, and may include updates about our products and services, invitations to events, offers, surveys, etc.

Our communications will be customised and specifically designed to be of interest to you, and will be updated with any new personal information linked to your Gucci profile. We will thus use your personal information to send you tailored communications or other customised advertisements or marketing campaigns. This use of your information include some profiling activity.

If you are a resident of the United States or Guam, please also see <u>Specific information on text and</u> <u>instant messages for residents of the United States or Guam residents</u> for more information about how and when we may use your phone number to send you messages.

When you share your contact information with us, we may use this personal information to contact you through related communication channels (such as text message, MMS, e-mail, post, internet means, social media or telephone), with your consent where required. You can of course request us not to use a particular channel of communication or opt-out (unsubscribe) from it by applying the opt-out option that will always be shared with you. If you want to stop receiving communication from us via all communication channels, please send an email to privacy@gucci.com.

As part of the Gucci experience, we will always try to customise and personalise your experience with us. This is why we will use your personal information to send you tailored communications or personalise your journey with us, but only with your prior consent where it is required under applicable privacy legislation. Our communications could include tailored product recommendations we think you might like, personalised marketing content designed to suit your interests, personalised events invitations or, at your request and where available, personalised and customised products. For these purposes, we will use the information you provide to us (for example your date of birth, your country of residence, your preferred means of contact etc.) and/or jointly or independently, certain patterns we may observe when interacting with you (for example where you prefer buying our products, what type of products you like, which occasions you are shopping for etc.). With this information, we may create groups of similar customers (called "persona") to whom we can decide to offer personalised content and experiences both in inbound or outbound interactions. In this context, we may make inferences about you, as derived from your personal information (profiling). For example, if you always purchase our products from the same store (specific location or online), we may consider this store as your preferred one. This will allow us to customise your experience with Gucci based on your interests and shopping habits (i.e. tailored communication). In order to provide you with such customised and personalised experience, in our stores or online, you may be required to log in or identify yourself.

To enrich your personal information, we may use <u>cookies or other online advertising technologies</u>. Via such technologies, we will collect personal information related to your activities on social media and your browsing activity across different websites and devices. (for example: to know if you have visited our website after opening a newsletter you have received). Certain technologies may rely on services provided by other companies acting on their own account (such as social media WeChat, WhatsApp, Baidu, Kakao Talk, Facebook, Twitter, Instagram, or other online platforms). These companies have their own privacy and cookies policies and the way they use the personal information you share with them will be subject to their rules and not ours.



To enrich your personal information, we can match it with personal information held by others (for example, by sharing and matching your information with information held by trusted partners). This process will only be conducted by using customers' unique identifiers and reidentification protocols in order to protect the confidentiality of your personal information.

Personal information linked to your Gucci profile will enable us to create "lookalike campaigns", allowing us to reach new people who are likely to be interested in our products because they are similar to you. We may conduct such lookalike campaigns through our website, social media or other communication means. When lookalike campaigns are conducted, before it is shared your personal information is hashed and turned into short fingerprints that are impossible to reverse.

Using <u>cookies or other online advertising technologies</u> may also enable us to show you online advertisements that are "contextual" (meaning they are shown according to the webpage you are browsing), or "behavioural" or "interest based" (where advertisements are shown to you based on your interests which we have inferred from your information including demographic, geographic and interest-based data). We may use such advertisements to display products or services that are most relevant to you.

If you no longer want to see customised online advertisements, you may request us to delete your Gucci profile or modify your cookie preferences – see "<u>cookies or other online advertising</u> <u>technologies</u>". In addition, some third-party sites allow you to stop seeing advertisements from specific advertisers, so you may also set your preferences on those websites.

The purposes for which we process your personal information are as follows:	The processing of your personal information is justified on the following legal basis:
Sending or presenting you with tailored	Performance of a contract
communication	When we are authorised by law to send you
This includes communication such as updates	such communication without your consent and
about our products and services, invitations	such communication is within the scope of our
to events, offers or surveys.	contractual relationship.
When you share your contact information	Our legitimate interest in providing you with
with us, we will use such personal	customised content.
information to contact you through related	When such interest is not overridden by your
communication channels (such as text	own interests or fundamental rights and
message, MMS, e-mail, post, internet, social	we are authorised by law to send you such
media or telephone).	communication without your consent.
We will always do our best to provide you with tailored communication based in particular on your interests and shopping habits, and improve and customise our services notably via profiling.	Your consent, as provided when you create your Gucci profile. You can always withdraw your consent at any time.



#### Updating and supplementing or enriching your personal information This includes conducting data cleansing and deduplication. This also includes enriching your personal Performance of a contract or compliance information with second party data or with a legal obligation information related to your activities on social media and your browsing activity When such update relates to the administration across different websites and devices. and management of your Gucci profile, Some of the technologies we use (including including taking actions following a cookies) may rely on services provided rectification or erasure request. by other companies acting on their own Any other situation will require your consent, as account (such as social media - WeChat, provided when you create your Gucci profile WhatsApp, Baidu, Kakao Talk, Facebook, Twitter, Instagram or other online platforms). You can always withdraw your consent with us You may have provided your consent to at any time. cookies and other technologies through such platforms. These other companies have their own privacy and cookies policies and the way they use your personal information will be subject to their rules and not ours. **Creating lookalike campaigns** Lookalike campaigns enables us to reach new people who are likely to be interested in our products because they are similar to you. Some of the technologies we use (including Your consent when you accept, at the creation cookies) may rely on services provided by of your Gucci profile, that we link your personal other companies acting on their account information to certain patterns (**Profiling**) (such as social media - WeChat, WhatsApp, (for example by accepting to receive tailored Baidu, Kakao Talk, Facebook, Twitter, communication). Instagram or other online platforms). You You can always withdraw your consent with us may have provided your consent to cookies at any time. and other technologies through such platforms. These other companies have their own privacy and cookies policies and the way they use your personal information will be subject to their rules and not ours. **Online advertisement** Your consent to cookies or other online Presenting you with online advertisements advertising technologies that are "contextual", "behavioural", "interest-based" or "tailored", including You can always withdraw your consent with us by using cookies or other online advertising at any time. technologies



### • To send you non-marketing communications.

Non-marketing communications may be sent upon your request, and/or may be important for your safety and the security of your personal information.

You may still receive such communications even when you opt-out from certain marketing communications. The information communicated may be necessary for the correct performance of our contract with you or be mandatory to comply with some of our legal obligations.

If you are a resident of the United States or Guam, please also see <u>Specific information on text and</u> <u>instant messages for residents of the United States or Guam residents</u> for more information about how and when we may use your phone number to send you messages.

Non-marketing communications can include, but are not limited to: emailing you to verify your identity when you sign up to our services; emailing you for password and/or username reset; notifying you that a particular service has been or will be suspended for maintenance or terminated; notifying you of an upgrade, a rectification or an incident affecting our services that may involve your personal information; notifying you of an update to our privacy policy or Terms of Use; or informing you about any products or services you have requested or purchased.

We will never contact you to ask for your password. Please be aware if you receive any request for this personal information.

The purposes for which we process your personal information are as follows:	The processing of your personal information is justified on the following legal basis:
Providing you with the services and information you requested. For example identity verification, password or username reset, etc.	Performance of a contract
Providing you with the services and information we need to send or provide you. For example information about the suspension of our services, about incidents that may involve your personal information, etc.	Performance of a contract or compliance with a legal obligation (subject to the type of information and service we need to provide you).
Administering and managing your Gucci profile once you have requested us to create your Gucci profile.that may involve your personal information, etc.	Performance of a contract



# • To conduct our business securely and protect our activities.

To deliver our products and services safely to you, perform our contract properly or comply with some of our legal obligations, we will implement fraud prevention and detection measures. Such measures will allow us to adequately perform our contract with you and/or protect our legitimate interests in defending ourselves against fraud.

We may use administrative and technical measures to protect, our website, our systems, our networks, transactions occurring on our website or in our stores, and any other necessary means to protect the personal information we may access or store. For this purpose, we may also be required to verify your identity. Such measures may also be implemented for compliance purposes or to avoid sharing your personal information with any untrusted third parties.

In addition, we may implement certain measures to protect and defend our rights and property, our employees and our business partners in compliance with applicable laws, regulations and international conventions.

The purposes for which we process your personal information are as follows:	The processing of your personal information is justified on the following legal basis:
	Subject to the type of information and service we provide you with;
Implementing fraud prevention, detection and investigation measures to ensure	Performance of a contract or compliance with a legal obligation
physical security and cybersecurity and to safely deliver you products and services.	<b>or our legitimate interests</b> in protecting ourselves against fraud (when such interests is not overridden by your own interests or fundamental rights).
	Compliance with a legal obligation
In accordance with applicable law,	or our legitimate interest (where applicable)
implementing compliance-related and privacy-related activities.	Where the processing is not prescribed by law but is a regulatory expectation (and such interests is not overridden by your own interests or fundamental rights).
	Subject to the type of information we need to use:
	Compliance with a legal obligation
In accordance with applicable law, implementing activities related to the protection of intellectual property rights and management of litigation cases.	or our legitimate interests in protecting our rights (when such interests is not overridden by your own interests or fundamental rights). or the regular exercise of our rights in lawsuits or proceedings, where applicable in your country of residence.



• To assess and better understand our business.

To manage our activities, perform our obligations under our contract with you and comply with our legal obligations, we may need to access and use some of your personal information for finance, management or legal purposes, or business-related analytics & market research activities.

For example, this could occur when we use the invoices we have issued in relation to your purchases for compliance or accountability purposes, or when we analyse personal information to understand the characteristics of our customers (what is the gender proportion, the average age etc.).

In certain limited circumstances, such activity may be based on our legitimate interest when related to business analytics & market research activities

Certain activities which are required when conducting a business may involve the use of your personal information. This could include internal processes (such as finance control, accounting, stock management, production management, internal or external audit), certain legal obligations (for example, record-keeping), or analyses conducted in case of a merger or acquisition.

We may also conduct various business-related analytics & market research activities, which may require us to access or otherwise use some of your personal information, or to send you surveys or customer satisfaction questions in order to gather new or additional information. This notably enables us to analyse and learn how our customers use and interact with us in order to improve products, services and our business in general.

The purposes for which we process your personal information are as follows:	The processing of your personal information is justified on the following legal basis:
Performing activities relating to the sale or service contract you have concluded with us.	Subject to the activity and the type of information we need to use:
For example, accounting, stock management, keeping of records, etc.	Performance of a contract or compliance with a legal obligation.
	Subject to the type of information we need to analyse:
	Performance of a contract
Conducting business-related analytics & market research activities	<b>Our legitimate interests</b> in improving our products or services When such interest is not overridden by your own interests or fundamental rights.
	<b>Your consent</b> , when you answer surveys or customer satisfaction questions.
	You can always withdraw your consent with us at any time.



Sharing necessary information with actual or potential buyers as part of a business transfer	<b>Our legitimate interest</b> in disclosing information necessary to complete our business transactions
	Subject to the type of information we need to use: Compliance with a legal obligation
Sharing necessary information with auditors, law firms, similar corporate professional service providers and data analysis providers	Or our legitimate interest of properly carrying out our business including in compliance with applicable legislation and to better understand and improve our business (when such interests is not overridden by your own interests or fundamental rights)



# • To optimise and manage our website and other means of communication.

We may take certain measures involving the use of your personal information to administer, optimise and improve our means of digital or physical communications such as our website or face-to-face interaction in our stores.

The use of your personal information will allow us to perform our contractual obligations or improve our services in accordance with our legitimate interest. Of course, when we use cookies or other online advertising technologies, your prior consent will always be required.

We may use some of your personal information to administer, optimise and improve our websites, our applications, our content and our other digital offerings, including the services and products offered through our websites, applications or any other digital means of communication to ensure the most user-friendly online navigation experience. We may use such personal information to fix operational problems such as pages crashing and software bugs. Please be aware that to do this, we may use cookies or other online advertising technologies.

The purposes for which we process your personal information are as follows:	The processing of your personal information is justified on the following legal basis:
<b>Fixing operational problems</b> such as pages crashing and software bugs	Subject to the type of information and service we need to analyse:
	<b>Performance of a contract</b> in accordance with the applicable Terms of Use of our services
	Your consent to cookies, when we use <u>cookies or</u> other online advertising technologies
	You can always withdraw your consent at any time.
	Or our legitimate interests when we use <u>cookies</u> or other online advertising technologies for which consent is not required under applicable law
	When such interest is not overridden by your own interests or fundamental rights



Subject to the type of information and service we need to analyse:

**Performance of a contract** in accordance with the applicable Terms of Use of our services

Your consent to cookies, when we use <u>cookies</u> or other online advertising technologies

You can always withdraw your consent at any time.

Or our legitimate interests to administer and improve our means of communication and other systems, in particular when using <u>cookies or</u> <u>other online advertising technologies</u> for which consent is not required under applicable law

When our legitimate interest is not overridden by your own interests or fundamental rights

If you would like more information on the purposes and legal bases, you can contact us at <u>privacy@gucci.com</u> (or see <u>How can you contact us?</u>)

### B. Specific information for Australian residents

Understanding how our means of communication are used and administer,

optimise and improve them.

This can include auditing the downloading of personal information from the Website.

Gucci will collect, hold, use and disclose your personal information for the following primary purposes. If you would like more information, you can contact us at <u>privacy@gucci.com</u> (or see <u>How</u> <u>can you contact us?</u>).

#### • To provide you with the products and services you have purchased or otherwise requested

We will use your personal information to manage our relationship with you and to perform our obligations under the contract you conclude with us when you purchase or otherwise request products or services from us. This can cover various activities such as internal accounting, processing your payment or delivery.

To provide you with the products and services you have requested, we will access, collect, store and use your personal information for invoicing, payment management and internal accounting.

Certain specific information may be required to provide you with gift cards, customization services, or when you reserve a product, request the repair of a product, or purchase products or services by phone, or on our website or a marketplace. In such cases, we could access, collect, store and use your personal information for delivery, warehouse and return management.

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### • To manage your Gucci profile.

Once you have requested us to create your Gucci profile, your personal information will be linked to this profile, where we will keep all the information we have on you. This could include personal information we obtain directly from you as well as from other sources in accordance with applicable legislation. The information in your Gucci profile is crucial to provide you with the Gucci personalized and tailored experience, and thus it needs to be kept up to date for the best experience.

Once you have asked us to create your Gucci profile, we will supplement it with personal information such as your purchases, preferences and contact details. In this context, please be aware that we use personal identification data, such as your email address or phone number, to link an interaction or a purchase with your Gucci profile. This also applies when checking-out as a guest on our website when making a purchase. In addition, we may use your date of birth to determine that you are old enough to use our services.

In order to keep your personal information accurate, we will take every reasonable step to ensure that personal information we hold is properly updated. Subject to your applicable privacy legislation you may have the right to have your information rectified at any time, and in event please let us know if any of your information needs updating or correcting, and we will make our best efforts to detect and correct inaccurate personal information (data cleansing) and delete any duplicated dataset. This may require us to correct typographical errors or inconsistent personal information.

• To provide you with tailored customer service and assistance.

You should have the same unified experience no matter how we communicate. Whether this happens in our stores, on our website, by chat, by phone or by video, and whether you contact us or we contact you, we want to provide you with relevant and tailored customer service.

For this purpose of providing you the Gucci experience, we will collect, store and use your personal information to be able to identify you. This will allow us to provide you with the tailored assistance you are asking for or to share relevant information with you. In addition, when you contact us, we may retain the personal information you share with us to always provide you with such a customised and personalised experience. This could happen if you are an existing or potential customer. Your personal information will be linked to your Gucci profile, if you have requested us to create one, or to a potential customer profile.

To provide you with a smooth and enjoyable customer experience, know you better to provide you with tailored answers, and to improve the quality and security of our services, we may rely on your consent, proceed in accordance with our contract with you, or take all reasonable steps to enter into a contract with you, or rely on our legitimate interest to improve our services.

We will use the information we have about you to try to identify you when you contact us (whether by phone, video chat, text message, chat, social media, etc.). When we can identify you, we will be able to access personal information available in your Gucci profile or in your potential customer profile, to know when you have previously interacted with us and to provide you with the tailored assistance you are asking for. This could include real-time or subsequent monitoring of your interaction with us (for example on our website or in a store) to identify the products you are looking at or what could be your specific need.



To provide you with adequate customer service, you may be asked if you need further assistance when you are on our website or in a store. On our website, if you do not want to be contacted, kindly close the chat navigation window. This service was implemented for you to enjoy the same service as in one of our physical stores.

If we are not able to identify you, we may create a potential customer profile to allow you to have a unified purchase experience. Indeed, however you interact with us, we will do our best to avoid asking you again for information you have already shared with us.

Your personal information, in particular your Gucci profile if you have created one or the potential customer profile we may create about you, could enable our sales associates to contact you directly in relation to the products and services you have purchased or otherwise requested, such as when a product becomes available again or when an order you have placed has been received in store, or to share with you any other information you have requested from us.

In addition, the monitoring of our interaction (including via voice or video recording, with prior notice to you) enables us to improve the quality and safety of our services and to provide you with tailored answers.

• To enable you to receive relevant information and tailored marketing content.

You will receive information and updates about us either at your request (with your prior consent where required by law) or when we are authorised by law to send you such information and updates directly. Such communication can be global or local, and may include updates about our products and services, invitations to events, offers, surveys, etc.

Our communications will be customised and specifically designed to be of interest to you, and will be updated with any new personal information linked to your Gucci profile. We will thus use your personal information to send you tailored communications or other customised advertisements or marketing campaigns. This use of your data include some profiling activity.

When you share your contact information with us, we may use this personal information to contact you through related communication channels (such as text message, MMS, e-mail, post, internet means, social media or telephone), with your consent where required. You can of course request us not to use a particular channel of communication or opt-out (unsubscribe) from it by applying the opt-out option that will always be shared with you. If you want to stop receiving communication from us via all communication channels, please send an email to <u>privacy@gucci.</u> com.

As part of the Gucci experience, we will always try to customise and personalise your experience with us. This is why we will use your personal information to send you tailored communications or personalise your journey with us, but only with your prior consent where it is required under applicable privacy legislation. Our communications could include tailored product recommendations we think you might like, personalised marketing content designed to suit your interests, personalised events invitations or, at your request and where available, personalised and customised products. For these purposes, we will use the information you provide to us (for example your date of birth, your country of residence, your preferred means of contact etc.) and/or jointly or independently, certain patterns we may observe when interacting with you (for example where you prefer buying our products, what type of products you like, which occasions



you are shopping for etc.). With this information, we may create groups of similar customers (called "persona") to whom we can decide to offer personalised content and experiences both in inbound or outbound interactions. In this context, we may make inferences about you, as derived from your personal information (profiling). For example, if you always purchase our products from the same store (specific location or online), we may consider this store as your preferred one. This will allow us to customise your experience with Gucci based on your interests and shopping habits (i.e. tailored communication). In order to provide you with such customised and personalised experience, in our stores or online, you may be required to log in or identify yourself.

To enrich your personal information, we may use <u>cookies or other online advertising technologies</u>. Via such technologies, we will collect personal information related to your activities on social media and your browsing activity across different websites and devices. (for example: to know if you have visited our website after opening a newsletter you have received). Certain technologies may rely on services provided by other companies acting on their own account (such as social media WeChat, WhatsApp, Baidu, Kakao Talk, Facebook, Twitter, Instagram, or other online platforms). These companies have their own privacy and cookies policies and the way they use the personal information you share with them will be subject to their rules and not ours.

To enrich your personal information, we can match it with personal information held by others (for example, by sharing and matching your information with information held by trusted partners). This process will only be conducted by using customers' unique identifiers and reidentification protocols in order to protect the confidentiality of your personal information.

Personal information linked to your Gucci profile will enable us to create "lookalike campaigns", allowing us to reach new people who are likely to be interested in our products because they are similar to you. We may conduct such lookalike campaigns through our website, social media or other communication means. When lookalike campaigns are conducted, before it is shared your personal information is hashed and turned into short fingerprints that are impossible to reverse.

Using <u>cookies or other online advertising technologies</u> may also enable us to show you online advertisements that are "contextual" (meaning they are shown according to the webpage you are browsing), or "behavioural" or "interest based" (where advertisements are shown to you based on your interests which we have inferred from your information including demographic, geographic and interest-based data). We may use such advertisements to display products or services that are most relevant to you.

If you no longer want to see customised online advertisements, you may request us to delete your Gucci profile or modify your cookie preferences – see "<u>cookies or other online advertising</u> <u>technologies</u>". In addition, some third-party sites allow you to stop seeing advertisements from specific advertisers, so you may also set your preferences on those websites.



### • To send you non-marketing communications.

Non-marketing communications may be sent upon your request, and/or may be important for your safety and the security of your personal information.

You may still receive such communications even when you opt-out from certain marketing communications. The information communicated may be necessary for the correct performance of our contract with you or be mandatory to comply with some of our legal obligations.

Non-marketing communications can include, but are not limited to: emailing you to verify your identity when you sign up to our services; emailing you for password and/or username reset; notifying you that a particular service has been or will be suspended for maintenance or terminated; notifying you of an upgrade, a rectification or an incident affecting our services that may involve your personal information; notifying you of an update to our privacy policy or Terms of Use; or informing you about any products or services you have requested or purchased.

We will never contact you to ask for your password. Please be aware if you receive any request for this personal information.

#### • To conduct our business securely and protect our activities.

To deliver our products and services safely to you, perform our contract properly or comply with some of our legal obligations, we will implement fraud prevention and detection measures. Such measures will allow us to adequately perform our contract with you and/or protect our legitimate interests in defending ourselves against fraud.

We may use administrative and technical measures to protect, our website, our systems, our networks, transactions occurring on our website or in our stores, and any other necessary means to protect the personal information we may access or store. For this purpose, we may also be required to verify your identity. Such measures may also be implemented for compliance purposes or to avoid sharing your personal information with any untrusted third parties.

In addition, we may implement certain measures to protect and defend our rights and property, our employees and our business partners in compliance with applicable laws, regulations and international conventions.

#### • To assess and better understand our business.

To manage our activities, perform our obligations under our contract with you and comply with our legal obligations, we may need to access and use some of your personal information for finance, management or legal purposes, or business-related analytics & market research activities.

For example, this could occur when we use the invoices we have issued in relation to your purchases for compliance or accountability purposes, or when we analyse personal information to understand the characteristics of our customers (what is the gender proportion, the average age etc.).

In certain limited circumstances, such activity may be based on our legitimate interest when related to business analytics & market research activities



Certain activities which are required when conducting a business may involve the use of your personal information. This could include internal processes (such as finance control, accounting, stock management, production management, internal or external audit), certain legal obligations (for example, record-keeping), or analyses conducted in case of a merger or acquisition.

We may also conduct various business-related analytics & market research activities, which may require us to access or otherwise use some of your personal information, or to send you surveys or customer satisfaction questions in order to gather new or additional information. This notably enables us to analyse and learn how our customers use and interact with us in order to improve products, services and our business in general.

# • To optimise and manage our website and other means of communication.

We may take certain measures involving the use of your personal information to administer, optimise and improve our means of digital or physical communications such as our website or face-to-face interaction in our stores.

The use of your personal information will allow us to perform our contractual obligations or improve our services in accordance with our legitimate interest. Of course, when we use cookies or other online advertising technologies, your prior consent will always be required.

We may use some of your personal information to administer, optimise and improve our websites, our applications, our content and our other digital offerings, including the services and products offered through our websites, applications or any other digital means of communication to ensure the most user-friendly online navigation experience. We may use such personal information to fix operational problems such as pages crashing and software bugs. Please be aware that to do this, we may use <u>cookies or other online advertising technologies</u>.

Your personal information may be collected, used, held or disclosed for other purposes with your consent or where otherwise permitted by applicable legislation.

# C. Specific information for residents of Qatar, Vietnam, Kuwait, Mexico, Chile or South Korea

Gucci will collect, hold, use and disclose your personal information for the following purposes. The processing of your personal information is in most cases justified on the legal bases set out in this section. When we require information from you for the below mentioned purposes, we generally request you to submit this to us voluntarily. If you choose not to provide certain personal information, you may not be able to benefit from some of our services for which the provision of such personal information is necessary.

If you would like more information on the purposes and legal bases, you can contact us at privacy@gucci.com (or see <u>How can you contact us?</u>).

# • To provide you with the products and services you have purchased or otherwise requested

We will use your personal information to manage our relationship with you and to perform our obligations under the contract you conclude with us when you purchase or otherwise request products or services from us. This can cover various activities such as internal accounting, processing your payment or delivery.



To provide you with the products and services you have requested, we will access, collect, store, process, use, disclose and transfer your personal information for invoicing, payment management and internal accounting.

Certain specific information may be required to provide you with gift cards, customization services, or when you reserve a product, request the repair of a product, or purchase products or services by phone, or on our website or a marketplace. In such cases, we could access, collect, store and use your personal information for delivery, warehouse and return management.

### The purposes for which we process your personal information are as follows:

Providing you with the products and services you have purchased or otherwise requested either in our stores or online.

This involves any action necessary to perform our obligations under the sale or service contract you conclude with us (processing of your payment, delivery, return management, etc.)

For purchases made on our website, the contract is our Terms and Conditions of Sale.

The processing of your personal information is justified on the following legal basis:

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
<b>Your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.	Performance of a contractWhen you provided us with your personal information in relation to an online purchase or any other request for products or services made onlineAny other situation will require your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us,	<b>Your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us,.



### • To manage your Gucci profile.

Once you have requested us to create your Gucci profile, your personal information will be linked to this profile, where we will keep all the information we have on you. This could include personal information we obtain directly from you as well as from other sources in accordance with applicable legislation. The information in your Gucci profile is crucial to provide you with the Gucci personalized and tailored experience, and thus it needs to be kept up to date for the best experience.

Once you have asked us to create your Gucci profile, we will supplement it with personal information such as your purchases, preferences and contact details. In this context, please be aware that we use personal identification data, such as your email address or phone number, to link an interaction or a purchase with your Gucci profile. This also applies when checking-out as a guest on our website when making a purchase. In addition, we may use your date of birth to determine that you are old enough to use our services.

In order to keep your personal information accurate, we will take every reasonable step to ensure that personal information we hold is properly updated. Subject to your applicable privacy legislation you may have the right to have your information rectified at any time, and in event please let us know if any of your information needs updating or correcting, and we will make our best efforts to detect and correct inaccurate personal information (data cleansing) and delete any duplicated dataset. This may require us to correct typographical errors or inconsistent personal information.

The purposes for which we process your personal information are as follows:

Administering, managing and maintaining your Gucci profile once you have requested us to create it. This could include data cleansing and deduplication.

The processing of your personal information is justified on the following legal basis:			
Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea	
	Performance of a contract		
Our legitimate interest Once your profile has been created upon your request, to supplement it with the personal information you provide us during our interactions (and such legitimate interest is not overridden by your own interests or fundamental rights)	When you provided us with your personal information in relation to an online purchase or any other request for products or services made online Any other situation will require <b>your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us,	<b>Your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us,	



### • To provide you with tailored customer service and assistance.

You should have the same unified experience no matter how we communicate. Whether this happens in our stores, on our website, by chat, by phone or by video, and whether you contact us or we contact you, we want to provide you with relevant and tailored customer service.

For this purpose of providing you the Gucci experience, we will collect, store, process, use, disclose and transfer your personal information to be able to identify you. This will allow us to provide you with the tailored assistance you are asking for or to share relevant information with you. In addition, when you contact us, we may retain the personal information you share with us to always provide you with such a customised and personalised experience. This could happen if you are an existing or potential customer. Your personal information will be linked to your Gucci profile, if you have requested us to create one, or to a potential customer profile.

To provide you with a smooth and enjoyable customer experience, know you better to provide you with tailored answers, and to improve the quality and security of our services, we may rely on your consent, proceed in accordance with our contract with you, or take all reasonable steps to enter into a contract with you, or rely on our legitimate interest to improve our services.

We will use the information we have about you to try to identify you when you contact us (whether by phone, video chat, text message, chat, social media, etc.). When we can identify you, we will be able to access personal information available in your Gucci profile or in your potential customer profile, to know when you have previously interacted with us and to provide you with the tailored assistance you are asking for. This could include real-time or subsequent monitoring of your interaction with us (for example on our website or in a store) to identify the products you are looking at or what could be your specific need.

To provide you with adequate customer service, you may be asked if you need further assistance when you are on our website or in a store. On our website, if you do not want to be contacted, kindly close the chat navigation window. This service was implemented for you to enjoy the same service as in one of our physical stores.

If we are not able to identify you, we may create a potential customer profile to allow you to have a unified purchase experience. Indeed, however you interact with us, we will do our best to avoid asking you again for information you have already shared with us.

Your personal information, in particular your Gucci profile if you have created one or the potential customer profile we may create about you, could enable our sales associates to contact you directly in relation to the products and services you have purchased or otherwise requested, such as when a product becomes available again or when an order you have placed has been received in store, or to share with you any other information you have requested from us.

In addition, the monitoring of our interaction (including via voice or video recording, with prior notice to you) enables us to improve the quality and safety of our services and to provide you with tailored answers.



### Administering, managing and maintaining your Gucci profile

This will be done if you have requested us to create your Gucci profile and if we are able to identify you. We will supplement your Gucci profile with the personal information you provide us with when you contact us or when we contact you. This could include data cleansing and deduplication.

The processing of your personal information is justified on the following legal basis:		
Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
	Performance of a contract	
Our legitimate interest Once your profile has been created upon your request, to supplement it with the personal information you provide us during our interactions (and such legitimate interest is not overridden by your own interests or fundamental rights).	<ul> <li>When you provided us with your personal information in relation to an online purchase or any other request for products or services made online.</li> <li>Any other situation will require your consent, as provided when you create your Gucci profile or otherwise choose to enter into a contract or voluntarily share your information with us.</li> </ul>	Your consent, as provided when you create your Gucci profile or otherwise choose to enter into a contract or voluntarily share your information with us.

The purposes for which we process your personal information are as follows:

Administering, managing and maintaining a potential customer profile This will be done if we are not able to identify you. We will supplement this potential customer profile with information you provide us with when you contact us or when we contact you, to avoid asking you again for information you have already shared with us and provide with you tailored assistance about our products and services.

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Our legitimate interest		
When we are not able to identify you, to supplement a potential customer profile to provide you tailored assistance (and such interest is not overridden by your own interests or fundamental rights).	Your consent As deemed obtained when you choose to enter into a contract or voluntarily share your information with us.	Your consent As deemed obtained when you choose to enter into a contract or voluntarily share your information with us.



Inbound interaction – Providing you with the products, services or information you may request **when** you contact us

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
<b>Your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.	<ul> <li>Performance of a contract</li> <li>When you provided us with your personal information in relation to an online purchase or any other request for products or services made online</li> <li>Any other situation will require your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.</li> </ul>	<b>Your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.

The purposes for which we process your personal information are as follows:

**Outbound interaction** - Contacting you directly in connection with the products, services and information you have requested

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
	Performance of a contract	
Our legitimate interest To provide you with an adequate answer when our interaction is not related to the formation or performance of a contract (and such interests is not overridden by your own interests or fundamental rights).	<ul> <li>When you provided us with your personal information in relation to an online purchase or any other request for products or services made online</li> <li>Any other situation will require your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.</li> </ul>	<b>Your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.



**Real-time or further monitoring of our interaction**, to enable us to improve the quality and safety of our service and provide you with better answers.

This monitoring could be implemented during both inbound and outbound interactions.

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Subject to the type of information we collect:		
Our legitimate interest		
When we collect information to improve the quality and safety of our service (and when such interest is not overridden by your own interests or fundamental rights)	Your consent, as deemed obtained when you choose to enter into a contract or voluntarily share your information with us.	Your consent, as deemed obtained when you choose to enter into a contract or voluntarily share your information with us.
Your consent, as deemed obtained when you choose to enter into a contract or voluntarily share your	When we collect information to provide you with relevant assistance about our products or services	When we collect information to provide you with relevant assistance about our products or services
information with us.	Or your consent to cookies	Or your consent to cookies
When we collect information to provide you with relevant assistance about our products or services	when such monitoring is done on our website via <u>cookies</u> <u>or other online advertising</u> <u>technologies</u>	when such monitoring is done on our website via <u>cookies</u> <u>or other online advertising</u> <u>technologies</u>
Or your consent to cookies		
when such monitoring is done on our website via <u>cookies</u> <u>or other online advertising</u> <u>technologies</u>		



# • To enable you to receive relevant information and tailored marketing content.

You will receive information and updates about us either at your request (with your prior consent where required by law) or when we are authorised by law to send you such information and updates directly. Such communication can be global or local, and may include updates about our products and services, invitations to events, offers, surveys, etc.

Our communications will be customised and specifically designed to be of interest to you, and will be updated with any new personal information linked to your Gucci profile. We will thus use your personal information to send you tailored communications or other customised advertisements or marketing campaigns. This use of your information include some profiling activity.

When you share your contact information with us, we may use this personal information to contact you through related communication channels (such as text message, MMS, e-mail, post, internet means, social media or telephone), with your consent where required. You can of course request us not to use a particular channel of communication or opt-out (unsubscribe) from it by applying the opt-out option that will always be shared with you. If you want to stop receiving communication from us via all communication channels, please send an email to <u>privacy@qucci.com</u>.

As part of the Gucci experience, we will always try to customise and personalise your experience with us. This is why we will use your personal information to send you tailored communications or personalise your journey with us, but only with your prior consent where it is required under applicable privacy legislation. Our communications could include tailored product recommendations we think you might like, personalised marketing content designed to suit your interests, personalised events invitations or, at your request and where available, personalised and customised products. For these purposes, we will use the information you provide to us (for example your date of birth, your country of residence, your preferred means of contact etc.) and/or jointly or independently, certain patterns we may observe when interacting with you (for example where you prefer buying our products, what type of products you like, which occasions you are shopping for etc.). With this information, we may create groups of similar customers (called "persona") to whom we can decide to offer personalised content and experiences both in inbound or outbound interactions. In this context, we may make inferences about you, as derived from your personal information (profiling). For example, if you always purchase our products from the same store (specific location or online), we may consider this store as your preferred one. This will allow us to customise your experience with Gucci based on your interests and shopping habits (i.e. tailored communication). In order to provide you with such customised and personalised experience, in our stores or online, you may be required to log in or identify yourself.

To enrich your personal information, we may use <u>cookies or other online advertising technologies</u>. Via such technologies, we will collect personal information related to your activities on social media and your browsing activity across different websites and devices. (for example: to know if you have visited our website after opening a newsletter you have received). Certain technologies may rely on services provided by other companies acting on their own account (such as social media WeChat, WhatsApp, Baidu, Kakao Talk, Facebook, Twitter, Instagram, or other online platforms). These companies have their own privacy and cookies policies and the way they use the personal information you share with them will be subject to their rules and not ours.

To enrich your personal information, we can match it with personal information held by others (for



example, by sharing and matching your information with information held by trusted partners). This process will only be conducted by using customers' unique identifiers and reidentification protocols in order to protect the confidentiality of your personal information.

Personal information linked to your Gucci profile will enable us to create "lookalike campaigns", allowing us to reach new people who are likely to be interested in our products because they are similar to you. We may conduct such lookalike campaigns through our website, social media or other communication means. When lookalike campaigns are conducted, before it is shared your personal information is hashed and turned into short fingerprints that are impossible to reverse.

Using <u>cookies or other online advertising technologies</u> may also enable us to show you online advertisements that are "contextual" (meaning they are shown according to the webpage you are browsing), or "behavioural" or "interest based" (where advertisements are shown to you based on your interests which we have inferred from your information including demographic, geographic and interest-based data). We may use such advertisements to display products or services that are most relevant to you.

If you no longer want to see customised online advertisements, you may request us to delete your Gucci profile or modify your cookie preferences – see "<u>cookies or other online advertising</u> <u>technologies</u>". In addition, some third-party sites allow you to stop seeing advertisements from specific advertisers, so you may also set your preferences on those websites.

#### The purposes for which we process your personal information are as follows:

#### Sending or presenting you with tailored communication

This includes communication such as updates about our products and services, invitations to events, offers, surveys.

When you share your contact information with us, we will use such personal information to contact you through related communication channels (such as text message, MMS, e-mail, post, internet, social media or telephone).

We will always do our best to provide you with tailored communication based in particular on your interests and shopping habits, and improve and customise our services notably via profiling.

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Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
<b>Our legitimate interest</b> in providing you with customised content		
When such interest is not overridden by your own interests or fundamental rights and we are authorised by law to send you such communication without your consent	<b>Your consent</b> , as provided when you create your Gucci profile.	<b>Your consent</b> , as provided when you create your Gucci profile.
Your consent, as provided when you create your Gucci profile.		



# Updating and supplementing or enriching your personal information

This includes conducting data cleansing and deduplication.

This also includes enriching your personal information with second party data or information related to your activities on social media and your browsing activity across different websites and devices.

Some of the technologies we use (including cookies) may rely on services provided by other companies acting on their own account (such as social media - WeChat, WhatsApp, Baidu, Kakao Talk, Facebook, Twitter, Instagram or other online platforms). You may have provided your consent to cookies and other technologies through such platforms. These other companies have their own privacy and cookies policies and the way they use your personal information will be subject to their rules and not ours.

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
	Performance of a contract	
Your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us Or compliance with a legal obligation When such update relates to the administration and management of your Gucci profile, including taking actions following a rectification or erasure request.	<ul> <li>When you provided us with your personal information in relation to an online purchase or any other request for products or services made online, and such update relates to the administration and management of your Gucci profile</li> <li>Or compliance with a legal obligation</li> <li>When taking actions following a rectification or erasure request.</li> <li>Any other situation will require your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.</li> </ul>	Compliance with a legal obligation When taking actions following a rectification or erasure request. Any other situation will require your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us

The processing of your personal information is justified by the following legal basis:



# Creating lookalike campaigns

Lookalike campaigns enables us to reach new people who are likely to be interested in our products because they are similar to you.

Some of the technologies we use (including cookies) may rely on services provided by other companies acting on their account (such as social media - WeChat, WhatsApp, Baidu, Kakao Talk, Facebook, Twitter, Instagram or other online platforms). You may have provided your consent to cookies and other technologies through such platforms. These other companies have their own privacy and cookies policies and the way they use your personal information will be subject to their rules and not ours.

The processing of your personal information is justified by the following legal basis:

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Your consent, when you	Your consent, when you	Your consent, when you
accept, at the creation of	accept, at the creation of	accept, at the creation of
your Gucci profile, that	your Gucci profile, that	your Gucci profile, that
we link your personal	we link your personal	we link your personal
information to certain patterns	information to certain patterns	information to certain patterns
(Profiling) (for example by	(Profiling) (for example by	( <b>Profiling</b> ) (for example by
accepting to receive tailored	accepting to receive tailored	accepting to receive tailored
communication).	communication).	communication).

The purposes for which we process your personal information are as follows:

#### **Online advertisement**

Presenting you with online advertisements that are "contextual", "behavioural", "interest- based" or "tailored", including by using <u>cookies or other online advertising technologies</u>

The processing of your personal information is justified by the following legal basis:

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Your consent to <u>cookies</u>	Your consent to <u>cookies</u>	Your consent to <u>cookies</u>
or other online advertising	or other online advertising	or other online advertising
<u>technologies</u>	<u>technologies</u>	<u>technologies</u>



### • To send you non-marketing communications.

Non-marketing communications may be sent upon your request, and/or may be important for your safety and the security of your personal information.

You may still receive such communications even when you opt-out from certain marketing communications. The information communicated may be necessary for the correct performance of our contract with you or be mandatory to comply with some of our legal obligations.

Non-marketing communications can include, but are not limited to: emailing you to verify your identity when you sign up to our services; emailing you for password and/or username reset; notifying you that a particular service has been or will be suspended for maintenance or terminated; notifying you of an upgrade, a rectification or an incident affecting our services that may involve your personal information; notifying you of an update to our privacy policy or Terms of Use; or informing you about any products or services you have requested or purchased.

We will never contact you to ask for your password. Please be aware if you receive any request for this personal information.

Providing you	with the services and information y	vou requested.
	entity verification, password or userr	
The processing of your pe	rsonal information is justified by	the following legal basis:
Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.	Performance of a contract When you provided us with your personal information in relation to an online purchase or any other request for products or services made online. Any other situation will require <b>your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.	<b>Your consent</b> , as provided when you create your Gucci profile or deemed obtain whe you otherwise choose to ente into a contract or voluntarily share your information with u



	<b>services and information we need</b> the suspension of our services, abour personal information, etc.	
The processing of your personal information is justified by the following legal basis:         Qatar       Vietnam       Kuwait, Mexico, Chile and South Korea		
Your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us, Or compliance with a legal obligation (subject to the type of information and service we need to provide you).	Subject to the type of information and service we need to provide you: Compliance with a legal obligation, Or performance of a contract When you provided us with your personal information in relation to an online purchase or any other request for products or services made online, Otherwise your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.	Subject to the type of information and service we need to provide you: <b>Compliance with a legal</b> <b>obligation</b> <b>Or your consent</b> , as provided when you create your Gucci profile or deemed obtain whe you otherwise choose to ente into a contract or voluntarily share your information with u



The purposes for which we process your personal information are as follows:		
Administering and managing	<b>your Gucci profile</b> once you have re profile.	quested us to create your Gucci
The processing of your pe	rsonal information is justified by	<i>t</i> he following legal basis:
Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
<b>Your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.	Performance of a contract When you provided us with your personal information in relation to an online purchase or any other request for products or services made online Any other situation will require your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.	<b>Your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us.



# • To conduct our business securely and protect our activities.

To deliver our products and services safely to you, perform our contract properly or comply with some of our legal obligations, we will implement fraud prevention and detection measures. Such measures will allow us to adequately perform our contract with you and/or protect our legitimate interests in defending ourselves against fraud.

We may use administrative and technical measures to protect, our website, our systems, our networks, transactions occurring on our website or in our stores, and any other necessary means to protect the personal information we may access or store. For this purpose, we may also be required to verify your identity. Such measures may also be implemented for compliance purposes or to avoid sharing your personal information with any untrusted third parties.

In addition, we may implement certain measures to protect and defend our rights and property, our employees and our business partners in compliance with applicable laws, regulations and international conventions.

Implementing fraud prevention, detection and investigation measures to ensure physical security and cybersecurity and to safely deliver you products and services.		
Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
	Subject to the type of	
	information and service we	
Compliance with a legal obligation	provide you with:	
-	Compliance with a legal	Subject to the type of
<b>or our legitimate interests</b> in protecting ourselves against	obligation,	information and service we provide you with:
fraud, preventing criminal	or performance of a contract	
activity or collecting relevant formation thereon or initiating an investigation thereof,	When you provided us with your personal information in relation to an online purchase or any	Compliance with a legal obligation
and collecting information necessary for the investigation of any criminal activity, based	other request for products or services made online	Or your consent, as provide when you create your Gucc profile or deemed obtain whe
on an official request from the nvestigating authorities (when	Otherwise <b>your consent</b> , as provided when you create	you otherwise choose to enter into a contract or voluntarily
such interests is not overridden by your own interests or	your Gucci profile or deemed obtain when you otherwise	share your information with u
fundamental rights)	choose to enter into a contract or voluntarily share your information with us	



### The purposes for which we process your personal information are as follows:

In accordance with applicable law, implementing compliance-related and privacy-related activities

The processing of your personal information is justified by the following legal basis:

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Compliance with a legal obligation or our legitimate interest	Compliance with a legal obligation	Compliance with a legal obligation
Where the processing is not prescribed by law but is a regulatory expectation (and such interests is not overridden by your own interests or fundamental rights)	<b>Or your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us	<b>Or your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us

The purposes for which we process your personal information are as follows:

In accordance with applicable law, **implementing activities related to the protection of intellectual property rights and management of litigation cases** 

The processing of your personal information is justified by the following legal basis:

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Subject to the type of information we need to use:	Subject to the activity and the type of information we need to use:	Subject to the activity and the type of information we need to use:
Compliance with a legal obligation	Compliance with a legal obligation	Compliance with a legal obligation
<b>or our legitimate interests</b> in protecting our rights (when such interests is not overridden by your own interests or fundamental rights)	<b>Or your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us	<b>Or your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us

If you would like more information on the purposes and legal bases, you can contact us at <u>privacy@gucci.com</u> (or see <u>How can you contact us?</u>)



### • To assess and better understand our business.

To manage our activities, perform our obligations under our contract with you and comply with our legal obligations, we may need to access and use some of your personal information for finance, management or legal purposes, or business-related analytics & market research activities.

For example, this could occur when we use the invoices we have issued in relation to your purchases for compliance or accountability purposes, or when we analyse personal information to understand the characteristics of our customers (what is the gender proportion, the average age etc.).

In certain limited circumstances, such activity may be based on our legitimate interest when related to business analytics & market research activities

Certain activities which are required when conducting a business may involve the use of your personal information. This could include internal processes (such as finance control, accounting, stock management, production management, internal or external audit), certain legal obligations (for example, record-keeping), or analyses conducted in case of a merger or acquisition.

We may also conduct various business-related analytics & market research activities, which may require us to access or otherwise use some of your personal information, or to send you surveys or customer satisfaction questions in order to gather new or additional information. This notably enables us to analyse and learn how our customers use and interact with us in order to improve products, services and our business in general.

### The purposes for which we process your personal information are as follows:

Performing activities relating to the sale or service contract you have concluded with us. For example, accounting, stock management, keeping of records, etc.

The processing of your personal information is justified by the following legal basis:		
Vietnam	Kuwait, Mexico, Chile and South Korea	
Subject to the activity and the type of		
information we need to use:	Subject to the activity and the type of information	
Compliance with a legal obligation,	we need to use:	
or performance of a contract	Compliance with a legal obligation,	
When you provided us with your		
	Or your consent, as provided when you create	
products or services made online,	your Gucci profile or deemed obtain when	
Otherwise <b>your consent</b> , as provided	you otherwise choose to	
	enter into a contract or	
choose to enter into a contract or	voluntarily share your information with us	
	Vietnam Subject to the activity and the type of information we need to use: Compliance with a legal obligation, or performance of a contract When you provided us with your personal information in relation to an online purchase or any other request for products or services made online, Otherwise your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise	



### The purposes for which we process your personal information are as follows:

### Conducting business-related analytics & market research activities

The processing of your personal information is justified by the following legal basis:

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Subject to the type of information we need to analyse: Our legitimate interests in improving our products or services When such interest is not overridden by your own interests or fundamental rights. Your consent, when you answer surveys or customer satisfaction questions.	Performance of a contract When you provided us with your personal information in relation to an online purchase or any other request for products or services made online Any other situation will require your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us	Your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us

The purposes for which we process your personal information are as follows:

Conducting business-related analytics & market research activities

The processing of your personal information is justified by the following legal basis:

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Subject to the type of information we need to analyse: Our legitimate interests in improving our products or services When such interest is not overridden by your own interests or fundamental rights. Your consent, when you answer surveys or customer satisfaction questions.	<ul> <li>Performance of a contract</li> <li>When you provided us with your personal information in relation to an online purchase or any other request for products or services made online</li> <li>Any other situation will require your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us</li> </ul>	<b>Your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us



### The purposes for which we process your personal information are as follows:

### Sharing necessary information with actual or potential buyers as part of a business transfer

The processing of your personal information is justified by the following legal basis:

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
<b>Our legitimate interest</b> in disclosing information necessary to complete our business transactions	Your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us	Your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us

The purposes for which we process your personal information are as follows:

Sharing necessary information with auditors, law firms and similar corporate professional service providers, data analysis providers

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I ne processing of v	your personal informatic	on is justified by the	e tollowing legal pasis:
ine precessing er j			e lene wing legal babiel

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Subject to the type of information we need to use:	Subject to the type of	Subject to the type of
Compliance with a legal	information we need to use:	information we need to use:
obligation	Compliance with a legal obligation,	Compliance with a legal obligation,
Or our legitimate interest of properly carrying out our business including in compliance with applicable legislation and to better understand and improve our business (when such interests is not overridden by your own interests or fundamental rights)	<b>Or your consent</b> , as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us	<b>Or your consent</b> , as provided when you create your Gucci profile or deemed obtain wher you otherwise choose to enter into a contract or voluntarily share your information with us

If you would like more information on the purposes and legal bases, you can contact us at privacy@gucci.com (or see <u>How can you contact us?</u>)



### • To optimise and manage our website and other means of communication.

We may take certain measures involving the use of your personal information to administer, optimise and improve our means of digital or physical communications such as our website or face-to-face interaction in our stores.

The use of your personal information will allow us to perform our contractual obligations or improve our services in accordance with our legitimate interest. Of course, when we use cookies or other online advertising technologies, your prior consent will always be required.

We may use some of your personal information to administer, optimise and improve our websites, our applications, our content and our other digital offerings, including the services and products offered through our websites, applications or any other digital means of communication to ensure the most user-friendly online navigation experience. We may use such personal information to fix operational problems such as pages crashing and software bugs. Please be aware that to do this, we may use <u>cookies or other online advertising technologies</u>.

Fixing operational problems such as pages crashing and software bugs The processing of your personal information is justified by the following legal basis:			
Subject to the type of information and service we need to analyse:	Subject to the type of information and service we need to analyse:		
Your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us, Or your consent to cookies, when we use <u>cookies or other</u> online advertising technologies Or our legitimate interests when we use <u>cookies or other</u> online advertising technologies for which consent is not required under applicable law When such interest is not overridden by your own interests or fundamental rights	<ul> <li>Performance of a contract</li> <li>When you provided us with your personal information in relation to an online purchase or any other request for products or services made online</li> <li>Any other situation will require your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us,</li> <li>Or your consent to cookies, when we use cookies or other online advertising technologies</li> </ul>	Your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us <b>Or your consent</b> to cookies, when we use <u>cookies or other</u> <u>online advertising technologie</u>	



### The purposes for which we process your personal information are as follows:

**Understanding how our means of communication are used** and administer, optimise and improve them.

This can include auditing the downloading of personal information from the Website.

Qatar	Vietnam	Kuwait, Mexico, Chile and South Korea
Subject to the type of information and service we need to analyse: Your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us, Your consent when we use cookies or other online advertising technologies Or our legitimate interests to administer and improve our means of communication and other systems, in particular when using cookies or other online advertising technologies for which consent is not required under applicable law When our legitimate interest is not overridden by your own interests or fundamental rights	<ul> <li>Performance of a contract</li> <li>When you provided us with your personal information in relation to an online purchase or any other request for products or services made online</li> <li>Any other situation will require your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us,</li> <li>Or your consent to cookies, when we use cookies or other online advertising technologies</li> </ul>	Your consent, as provided when you create your Gucci profile or deemed obtain when you otherwise choose to enter into a contract or voluntarily share your information with us, Or your consent to cookies, when we use <u>cookies or other</u> online advertising technologies

The processing of your personal information is justified by the following legal basis:

If you would like more information on the purposes and legal bases, you can contact us at <u>privacy@gucci.com</u> (or see <u>How can you contact us?</u>)



### 4. WHAT PERSONAL INFORMATION DO WE COLLECT?

When you interact with us or our approved partners, you may provide us with the following categories of personal information (that may include sensitive information in accordance with applicable legislation).

### A. Identifiers & Gucci profile information

This set of personal information enables us to identify you, manage your Gucci profile, provide you with customer service and assistance and, in some cases, to contact you, including by sending you relevant information and tailored marketing content on the ground of the legal bases set out in this privacy policy.

The list below is provided to give you an overview of the type of information we may collect. However, the collection of this information is not systematic: only the information necessary to fulfill each purpose will be collected and used.

It could include, when your applicable privacy legislation allows us to collect such personal information, your first name, last name, pseudonym, signature, email address, postal address, date of birth, place of birth, login name, phone number, unique personal identifier, customer number, online identifier, social media accounts (and related information collected through social log-in), gender, country of residence, lifestyle/interests, Internet Protocol (IP) address, account name, social security number, state identification card, driver's license number, passport number, nationality, or other similar identifiers, physical characteristics or description (for example characteristics such as your size where relevant to the products and services we would offer you), and certain personal financial information. We will take steps to minimise information that is collected to what is necessary in relation to the purposes for which it is processed.

In some countries, some personal information could be considered sensitive, special or protected. We will collect and use such information only where no other option is available, and always comply with the applicable privacy legislation to collect, protect and use safely your personal information (in particular, by seeking your consent where required).

If you are an employee of a Kering entity, we may process certain information regarding your employment, and we invite you to refer to the employee privacy policy that has been made available to you.

### B. Transaction information & commercial information (including audio)

This set of personal information enables us to provide you with the products and services you have requested, manage your Gucci profile, provide you with relevant customer service and assistance, secure our communications and to manage and better understand our business.

The list below is provided to give you an overview of the type of information we may collect. However, the collection of this information is not systematic: only the information necessary to fulfill each purpose will be collected and used.

It could include personal information on the products and services you purchase, obtain



or consider, their price, size, collection, when the product was bought, if it was returned, product defects, comments you made on the product or the service we have provided to you, purchasing and consumer histories or trends, etc. This could also include personal financial information relating to how you paid for your products or your bank details when you request a refund, or audio recordings (and their transcript) when you contact our customer service. We will take steps to minimise information that is collected to what is necessary in relation to the purposes for which it is processed.

Some personal information will be linked to your Gucci profile when you identify yourself in the stores, through customer services or on our website. In addition, when contacting our customer service, we may record your conversation with prior notice to you.

Under certain applicable privacy legislation, particular transaction and commercial details are considered sensitive. We will collect, store and use such personal information with the highest level of care in accordance with the applicable legislation and with your consent where required.

### C. Personal life information and inferences

This set of personal information enables us to always offer you the optimum service by understanding you better. We use it to manage your Gucci profile, provide you with relevant customer service and assistance and also, in certain circumstances, to contact you for example by sending you relevant information, updates and tailored marketing content.

The list below is provided to give you an overview of the type of information we may collect. However, the collection of this information is not systematic: only the information necessary to fulfill each purpose will be collected and used.

It could include your preferences regarding fashion events, how you have used certain products, food allergies when you explicitly choose to share this information with us, personal information regarding your family (if you have obtained their consent to share such information with us, where this is required by applicable law), your life habits, how you use our website or third-party websites such as social media, your answers to our surveys or any other personal information we may collect when it is directly or indirectly linked to you. We may draw inferences from any of the information identified above to create a profile about you, reflecting your preferences, characteristics, trends, predispositions, aptitudes and attitudes.

Under certain applicable privacy legislation, some personal life information is considered sensitive. In this context, we will collect, store and use such personal information only where no other option is available and with the highest level of care in compliance with the applicable privacy legislation (including with your consent where required).

### D. User-generated content

This set of personal information enables you to provide us with personal information relating to you or to third parties. In certain circumstances it enables us to contact you.

The list below is provided to give you an overview of the type of information we may collect. However, the collection of this information is not systematic: only the information necessary to fulfill each purpose will be collected and used.



It could include pictures of you or other individuals, or any other type of content such as texts, feedbacks, opinions, personal information regarding other individuals you may provide us with (for example when participating in a contest or sharing personal information with our sales associates or through social media), "tagging" or "liking" our social media page or any content published by us, or any personal information you may provide in the public domain. You may remove such content at any time if you no longer want us to use it.

You shall avoid sharing third-party personal information through such means or you should ensure that they have given prior authorisation to such sharing.

### E. Technical, electronic & localisation information

This set of personal information enables better delivery of the service you expect from us.

It could include personal information related to your interactions with us and allows us to manage your Gucci profile, provide relevant customer service and tailored marketing content, establish communications and conduct our business securely, assess and better understand our business, and optimise and manage our website and other means of communication.

The list below is provided to give you an overview of the type of information we may collect. However, the collection of this information is not systematic: only the information necessary to fulfill each purpose will be collected and used.

This could happen in a store (e.g. when a purchase is made in a specific store and then linked to a Gucci profile), or when contacting our customer services (why do you contact us? what means have you used?) or when using our website (do you use tablets, phones, computers? what use are you making of our website?).

Some personal information will be shared with us automatically from the device or the service provider you are using (e.g. social media). We can collect personal information shared by your device such as your IP address, device type, unique device identification numbers (device identifier), browser type, time zone settings, broad geographic location (e.g. country or city-level location); online activity (such as your internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements) and other technical personal information or personal information shared by the service provider. Such service providers have their own privacy and cookies policies, so remember that the personal information you give them will be subject to their rules and not ours.

In addition, we may be able to collect personal information on how you have interacted with us, including certain personal navigation information (including the pages accessed and links clicked, bugs and errors, browsing patterns) and your preferences (such as your language preference).

Some of this personal information may be collected using <u>cookies or other online advertising</u> <u>technologies</u>.

### F. Additional information for Californian residents

• Characteristics of classes protected under federal or California law

We will always try to avoid collecting and using the information in the list below. However, this may occur in cases where no other option is available. In this event, we will take steps



to minimise the data collected, use the highest level of care and always comply with the applicable privacy legislation (in particular, by seeking for your consent where required). It could include familial status, disability, sex, national origin, religion, color, race, sexual orientation, gender identity and gender expression, marital status, veteran status, medical condition, ancestry, source of income, age, or genetic information.

• Categories of information collected over the past 12 months.

Please note that the categories mentioned in this section What personal information do we collect? also represent the categories of personal information that we have collected over the past 12 months.

Want to know more? You may be interested in the following sections of our Privacy Policy:

Why do we collect your personal information?



### 5. WHEN DO WE COLLECT YOUR PERSONAL INFORMATION?

When you interact with us, either online or in person, you may share with us your personal information when:

- A. You buy a product or subscribe to a service;
- **B.** You create a Gucci profile, join our loyalty scheme, participate in a contest, join a reward program or link your social media account to your Gucci profile;
- C. You subscribe to our newsletter;
- **D.** You interact with us or seek advice and share personal information through our websites, our social media pages, our sales associates in a store, at a trade show, at events or through our customer services;
- E. You use your device to browse activity across different websites:
- **F.** A personal shopper, or any other agent acting on your behalf interacts with us in particular to buy a product or subscribe to a service for you;
- **G.** Your information is shared with us by our approved partners, with your prior consent where required.

### Want to know more? You may be interested in the following sections of our Privacy Policy:

Why do we collect your personal information?

What personal information do we collect?

What personal information do we collect from third-party sources?

How do we collect your personal information?



### 6. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We mainly obtain information directly from you and process them by automated means when you interact with us. When you interact with us, either online or in person, we collect your personal information through:

- A. Our sales associates (in stores) or our customer services (for example by phone or chat) when you share personal information with us;
- **B.** Our websites or our applications, whether you are registered or not, by completing surveys, registration processes or forms. We may also use <u>cookies or other online advertising</u> <u>technologies</u> for this purpose;
- **C.** Any means we make available to you for example, when you buy a product, we may collect certain personal information relating to your payment such as the purchase price and date and product reference (we do not keep any of your personal banking information for longer than necessary to complete the transaction);
- **D.** From third-party sources such as social media.

More broadly, we collect your personal information through any means you may use to interact with our sales associates, whether in our stores or through our customer services via phone, email, chat or text message. Our sales associates or customer services may use various means to collect your personal information during or after the interaction.

In addition, we may obtain personal information from services provided by other companies to update or supplement your personal information, for example when you link your social media profile with your Gucci profile. These companies have their own privacy and cookies policies in place, so remember that the personal information you give them will be subject to their rules and not ours.

### Want to know more? You may be interested in the following sections of our Privacy Policy:

Why do we collect your personal information?

What personal information do we collect?

What personal information do we collect from third-party sources?

What are your rights regarding your personal information?

Who are our third-party sources?



### 7. WHO ARE OUR THIRD-PARTY SOURCES?

We mainly obtain information directly from you. From time to time, we may also obtain information on you from third-party sources.

We will only gather such information when the third parties either have obtained your consent or are otherwise legally allowed to share such information. In certain limited circumstances, some third parties may be required to disclose your personal information to us.

For more information on our sharing of information with these third-party sources, please refer to the section <u>With whom do we share your personal information?</u>

Our third-party source categories could include:

- **A.** Our retailers and distributors, as they can collect your personal information when you interact with them;
- B. Our affiliates and subsidiaries;
- C. Our event partners, as you can share certain personal information when you interact with them;
- **D.** Social media in accordance with their own privacy policies;
- E. Our technology partners and market research organisations;
- F. Our business and approved partners;
- G. Vendors who provide services on our behalf;
- H. From your devices, such as when you visit our websites;
- 1. Your family or friends, such as when they provide us with your contact information, so we can send information that may interest you;
- J. Online advertising companies;
- K. Consumer reporting agencies;
- L. Consumer data resellers (for example, in connection with online advertising);
- M. Enforcement or judicial authorities or any other public authority; and
- N. Government entities.

### Want to know more? You may be interested in the following sections of our Privacy Policy:

Who collects & uses your personal information?

Why do we collect your personal information?

What personal information do we collect?

What personal information do we collect from third-party sources?

What are your rights regarding your personal information?

With whom do we share your personal information?



### 8. SHOULD YOU ALWAYS SHARE YOUR PERSONAL INFORMATION WITH US?

You may not always be required to provide us with the personal information that we are asking you for: any personal information that is required is clearly marked as mandatory.

When you do not wish to share certain personal information with us, you may simply not provide it to us, or opt-out of the processing of your personal information when this option is offered to you.

However, if you choose not to provide certain personal information, you may not be able to benefit from some of our services for which the provision of such personal information is necessary.

We may ask you to provide us with personal information to meet certain legal requirements. In such cases, we will notify you in due time and advise you as to whether your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

### Want to know more? You may be interested in the following sections of our Privacy Policy:

Why do we collect your personal information?

What personal information do we collect?

How do we collect your personal information?



### 9. FOR HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

Our general approach is to retain your personal information only for as long as it is needed.

- A. When you have a Gucci profile, a potential customer profile or subscribe to our newsletters, we generally retain your personal information for 5 years from the last interaction you initiated with us.
- **B.** When you interact with our customer services, we generally retain the recordings of the calls for 45 days (unless a longer retention period is required by law), and the other personal information you have shared with us (including personal information shared by mail, chat or text message or when our interaction is transcribed) for 5 years from the last interaction you initiated with us.
- **C.** When we use <u>cookies or other online advertising technologies</u>, your consent shall only be valid for a maximum period of 13 months.

We may retain personal information for a shorter or longer time, for instance, where we are obliged to do so in accordance with relevant legal, tax and accounting requirements.

Last interaction shall be defined as the last contact you initiated which is traceable by our systems or by a sales associate. Last contact could be the last time a call, sales email, or meeting was proposed to you and to which you responded favorably. For instance, clicking on a link included in an email (except for a link to unsubscribe from receiving marketing content), having a chat on our website or attending an appointment in one of our stores are considered a last contact. Conversely, opening an email or visiting our website without logging in would not qualify as last contact.

Before deleting your personal information from your Gucci or potential customer profile, we will contact you to inform you of such deletion and you may ask us to keep your personal information. By not answering you agree to the deletion of any personal information that we are not legally obliged to keep for longer in accordance with legal, tax and accounting requirements.

We will destroy your personal information without delay once it is no longer necessary (e.g., if the purposes of collection/use of the personal information have been accomplished, if the statutory retention period expires) in a way that prevents such personal information from being restored or recovered. If printed on paper, the personal information will be destroyed by shredding, incinerating, or some other similar method and, if saved in electronic form, the personal information will be destroyed by technical methods which ensure that the personal information cannot be restored or recovered thereafter.

In specific circumstances we may also retain your personal information for longer according to the applicable statute of limitations so that we have an accurate record of your dealings with us in the event of any complaints or challenges.

### Additional information for South Korean residents:

We may retain certain personal information in accordance with the following legal requirements:

• Records on contracts and withdrawal of subscriptions: 5 years (as required under the Act on



Consumer Protection in Electronic Commerce Transactions)

- Records on consumer complaints and processing of disputes: 3 years (as required under the Act on Consumer Protection in Electronic Commerce Transactions)
- *Records of log-ins: 3 months (as required under the Protection of Communications Secrets Act)*

### Want to know more? You may be interested in the following sections of our Privacy Policy

Why do we collect your personal information?

What personal information do we collect?



### 10. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We, Gucci, are strongly committed to keeping your personal information safe.

To do so, we design our services with your safety in mind. Within our group, we have dedicated teams managing and ensuring the security and privacy of your personal information. We have adopted specific technical and organisational security measures to protect personal information against accidental or unlawful destruction, accidental loss, alteration, unauthorised disclosure or access.

For example, whenever personal information is passed between your device and our servers, we ensure that it is encrypted using Secure Sockets Layer ("SSL") and/or other security methods. We implement Hyper Text Transfer Protocol over Secure Socket Layer ("HTTPS") in order to protect your connection to our website. All your personal information is stored on secured servers.

We have also established a specialised personal information security management system. For example, we strictly control the scope of authorisation of our employees who have access to the personal information that we collect and process. We regularly review our information collection, storage and processing practices, including physical security measures, to guard against any unauthorised access and use.

We conduct security and privacy protection training courses and tests on a regular basis to enhance our employees' awareness of the importance of protecting personal information. We take commercially reasonable steps to make sure that our business partners and third-party service providers are able to protect your personal information. Our employees and those of our business partners and third-party service providers who have access to your personal information are subject to enforceable contractual obligations of confidentiality and specific contractual privacy provisions.

In the event of a security incident resulting in any breach of personal information, as qualified by law, we have an emergency response plan in place to prevent the expansion of such security incidents. In addition, we will report such personal information breach to the relevant supervisory authority as required by applicable law, and inform you via an appropriate channel as and where required by applicable law.

Please also note that in order to keep your personal information secure, we may from time to time, have to reset your password.

However, you should be aware that no service can be completely secure, and you play a key role in keeping your personal information safe. For the best possible protection of your personal information outside the limits of our control, your devices should be protected (e.g. by updated antivirus software) and your internet service providers should take appropriate measures for the security of personal information transmission over the network (e.g. with firewalls and anti-spam filtering). You accept the inherent security implications of interacting over the Internet and will not hold us or our partners responsible for any security incident or breach of personal information unless it is due to our negligence.

If you have any concerns that your personal information has been put at risk, for example if someone could have found out your password, please contact us as soon as possible.

Want to know more? You may be interested in the following sections of our Privacy Policy:

Where do we store your personal information?



### 11. WHERE DO WE STORE YOUR PERSONAL INFORMATION?

We operate globally and may transfer your personal information to other companies within Kering or to approved partners in locations around the world. We want you to have the best service and customer experience, whether online or in person all over the world. For this purpose, we may have to share your personal information outside the country where you have first shared it with us. When we do so, it will always be for the purposes described in this privacy policy and where we are satisfied with the levels of protection and security implemented in compliance with applicable privacy legislation. This sharing of your personal information is necessary to enable us to perform the contracts we have with you or take steps at your request, prior to entering into a contract, in order to offer you a global customer experience.

In most cases, the personal information we collect from you will be stored in servers located in the European Union or Switzerland. However, this may vary depending on the country in which the information is collected or applicable legislation. For more information about the location where your personal information is stored, you can contact us at <u>privacy@gucci.com</u> (or see <u>How can you contact us?</u>)

Personal information we collect from you in the People's Republic of China will be stored in servers located in People's Republic of China, European Union and Switzerland.

[Personal information we collect from you in the Russian Federation will be stored in servers located in the Russian Federation, and may be transferred outside the Russian Federation in compliance with applicable legislation].

You should be aware that personal information stored outside the country where it was collected may be available to government authorities of the countries where it is stored, under applicable data disclosure laws of those countries.

We want to ensure that your personal information is always safely used and available to you, wherever you want to access it and for whatever reason you wish to use it.

When we share, use or transfer personal information in particular from the European Union, we use standard contractual clauses approved by the European Commission, or put in place other measures under applicable privacy legislation, to ensure that such transfer provides adequate safeguards. You can contact us at <u>privacy@gucci.com</u> (or see <u>How can you contact us?</u>) for more information about these safeguards including how to obtain copies of this information.

### Want to know more? You may be interested in the following sections of our Privacy Policy:

What personal information do we collect?

How do we protect your personal information?



### 12. DO WE SELL YOUR PERSONAL INFORMATION?

We do not sell your personal information and have not done so in the past 12 months.

We may allow selected third parties (such as approved advertising partners) to collect your personal information via automated technologies on our websites (see "<u>Do we use cookies or other online</u> <u>advertising technologies?</u>") in an effort to provide you with content and advertisements that may be of interest to you and on the legal bases set out in this privacy policy.

However, to the extent our transfers of your personal information to certain third-parties may be interpreted as a "sale" under California privacy law, if you are a Californian resident you have the right to opt out of that sale.

If you are a Californian resident, you also have the right to opt out of such disclosure of your information for online interest-based advertising purposes.

Californian residents' rights are further described in the section: "Information for Californian residents" under the provision attached to the following question: "<u>What are my rights regarding my personal information?</u>"

### Want to know more? You may be interested in the following sections of our Privacy Policy:

Why do we collect your personal information?

Do we use cookies or other online advertising technologies?



### 13. WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may share and disclose your personal information for business purposes with the categories of recipients listed below. We may also receive personal information about you from some of them as our third-party sources. If you would like more information about the sharing of your personal information, including the list of recipients, please contact our privacy team and Data Protection Officer at privacy@gucci.com (or see How can you contact us?)

### A. Approved partners acting as service providers

To use your personal information, we rely on approved partners. All approved partners are bound by an obligation to implement appropriate security measures to protect personal data in their possession, and bound by a strict confidentiality agreement and specific contractual provisions on "**how**" and "**when**" they are allowed to collect and use your personal information. Your personal information may be accessible to the following authorised personnel on a need-to-know basis:

### Kering and other affiliates of our group

Our parent company <u>Kering</u> and its affiliates are our main approved partners. They will have access to your personal information but will never use it in contradiction to this privacy policy.

<u>Kering</u> and its affiliates enable us to: offer you our products and services (e.g. via wholesale management and sales processes); provide you with our customer service (e.g. responding when you contact us by phone, mail, text message, chat or social media); manage your Gucci profile (e.g. by keeping your information safe and performing IT-related functions attached to your Gucci profile); and, through shared services, to manage and better understand our business.

### • Retailers, resellers, delivery providers, fulfilment companies and transaction partners

These partners mainly enable us to provide you with the products and services you have requested (e.g. ensuring your bank can proceed with payment, or delivering a product you have purchased on our website).

They can also be involved in managing your Gucci profile (e.g. linking your purchase to your Gucci profile so you can easily find it again, or providing your personal information when you access your Gucci profile).

# • Marketing services, advertising providers, communication (email, SMS, MMS) providers and social networks

They help us manage your Gucci profile, provide you with relevant information, updates, and tailored marketing content (e.g. by sending you emails based on your previous purchases or on sweepstakes, contests and advertisements you have browsed ), and send you non-marketing communications. We may also use postal delivery providers. They enable us to send you any communication and marketing content (e.g. letters and event invitations).

Social networks enable us to provide you with relevant information and updates, marketing content (e.g. advertisements based on look-alike profiles) and relevant customer service (e.g. when you use social media to contact us). Please be aware that they have their own privacy and



cookies policies in place, so the personal information you give them will be subject to their rules and not ours.

### • IT service providers

These partners enable us to:

- Provide you with the products and services you have requested (e.g. by managing our e-commerce website and our applications, ) and manage your Gucci profile (e.g. by making sure it is available at any time when you interact with us, and linking your purchases to it);
- Provide you with relevant customer service (e.g. by allowing you to use chat services);
- Send you relevant information, updates and marketing content (e.g. by sending you tailored emails, SMS, MMS, chat messages etc.);
- Send you non-marketing communications (e.g. by emailing you to verify your identity when you sign up);
- Undertake transactions securely (e.g. by identifying potential behaviour that could be a threat to your personal information or guarding against third-party misuse of your payment details to purchase products);
- Assess and better understand our business (e.g. by providing personal information visualisation tools); and
- Optimise and manage our website and other means of communication (e.g. by ensuring that our website is always available based on your browsing habits).
- Audit, law firms and similar corporate professional service providers, data analysis providers

These partners enable us to better understand and conduct our business (they include accountants, lawyers and auditors who may need to use your personal information). In addition, data analysis providers may enable us to provide you with relevant information, updates and marketing content (e.g. by analysing your answers to a survey, providing insights and helping us to analyse trends and improve our products and services).

### B. Approved partners acting also on their own account

To use some of your personal information (see "<u>Why do we collect your personal information</u>"), we rely on approved partners. Certain approved partners may be able to determine "why" and "how" your personal information is used.

### • Franchisees and licensees

Certain points of sale, carrying out their business under the Gucci name, may act as independent data controllers and are able to determine "why" and "how" they use the personal information you share with them. Please be aware that our privacy policy does not extend to services provided



by other companies on their own account. They have their own privacy policies in place, so remember that any personal information you give them will be subject to their rules and not ours.

### • Disclosure of transaction details to Riskified Ltd. and processing of transaction details by Riskified Ltd. in accordance with Riskified's <u>Privacy Policy</u>

When you purchase products on our website, we might disclose your transaction details to Riskified Ltd., a company with registered offices at 30 Kalisher St., Tel Aviv 6525724, Israel (hereinafter referred to as "Riskified"), that will carry out security and anti-fraud checks on the transactions carried out on our website. The disclosure may be based on our legitimate interest in preventing fraudulent online transactions or the legal basis applicable in your country of residence (see Why do we collect your personal information?).

Riskified will also process your transaction's details as a data controller (i) in order to review purchases for possible fraudulent activity; (ii) by storing your transactions' details in its database for use in enhancing its anti-fraud services; and; (iii) to develop additional services, all in accordance with Riskified's Privacy Policy.

Riskified will process your transaction details by automated means and will aggregate them with other personal information relating to transactions concluded by you on other e-commerce platforms, in order to assess the regularity of the payment, according to pre-determined criteria. [Your personal information will be processed by Riskified in the State of Israel and is transferred according to the adequacy decision of the European Commission, adopted on 31 January 2011, which recognises that the legal system of the State of Israel ensures an adequate level of protection of personal information.]

• Certain social media such as Facebook page insight, in accordance with <u>Facebook Page</u> <u>Insights Data</u> Policy.

Page insights are aggregated statistics created from certain events logged by Facebook servers when you interact with our Facebook pages and the content associated with them. Page insights are subject to <u>Facebook personal information about Page Insights Data</u>.

Please be aware that other social media (WeChat, WhatsApp, Baidu, Kakao Talk, Facebook, Twitter, Instagram, etc.), may also be able to determine "why" and "how" your personal information is used. They have their own privacy and cookies policies, so remember that the personal information you give them will be subject to their rules and not ours.

### C. Actual or potential buyers as part of a business transfer

We may disclose your personal information to an actual or a potential buyer (and its agents and advisers) in relation to any actual or proposed divestiture, merger, acquisition, joint venture, bankruptcy, dissolution, reorganisation, or any other similar transaction or proceeding in compliance with applicable laws and regulations. Where this is required, we will take steps to minimise any data that is shared.



# D. Law enforcement body, regulatory body, government agency, court, lawyers to comply with laws and defend our rights and interests

We may disclose your personal information to any competent law enforcement body, regulatory body, government agency, court or other third party where we believe disclosure is (i) required as a matter of applicable law or regulation, (ii) necessary to exercise, establish or defend our legal rights, or (iii) necessary to protect your interests or those of any other person, and on the legal basis set out in this privacy policy. Where this is required, we will take steps to minimise any data that is shared.

### E. At your request or for our legitimate interest or compliance with laws and regulations

We may disclose your personal information to any other person: with your consent; where we have an overriding legitimate interest (on balance with your interests) to do so; or where we have a legal or regulatory obligation to do so.

### Want to know more? You may be interested in the following sections of our Privacy Policy:

Why do we collect your personal information?

What personal information do we collect?

What are your rights regarding your personal information?

Can the privacy policy change?

Do we use cookies or other online advertising technologies?



### 14. HOW DO WE ADDRESS THE PRIVACY OF CHILDREN?

Protecting the safety and privacy of children is very important to us.

By creating your Gucci profile, or by registering through any means, or by placing an order, you confirm that you have reached the age of consent in your country of residence (or, if you are under the age of consent, that your parent(s) or legal guardian(s) also agree(s) to such registration or order when they can give you such authorisation under the law of your country of residence).

If we become aware (including through a request from your parent(s) or legal guardian(s)) that we have inadvertently received personal information in contradiction to the above, we will delete such personal information from our records.

Want to know more? You may be interested in the following sections of our Privacy Policy:

Should you always share your personal information with us?

For how long do we keep your personal information?

How do we protect your personal information?

Where do we store your personal information?



### 15. WHAT ARE YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION?

Subject to your applicable privacy legislation, you may be entitled to one or more of the following rights and exercise them on your own or via a legal representative acting on your behalf. We, **Gucci**, are committed to protecting your rights and allowing you to exercise them. You will never be discriminated against when you exercise your right in good faith under any applicable privacy law.

If you need any further information regarding your rights, how to exercise any of your rights, or if you have any complaints or questions regarding our privacy practices, please contact our privacy team and Data Protection Officer at <u>privacy@gucci.com</u> (or see <u>How can you contact us?</u>).

### A. Right of access, rectification and erasure

Under certain circumstances you may have the right to request access to and obtain a copy of any of your personal information that we may hold. Such right of access also includes the right to receive information in particular about the purposes of the processing, the categories of personal information concerned, the categories of recipients to whom your information may be disclosed, and the envisaged period for the retention of your information.

You may also request correction of any inaccurate personal information relating to you and to request the deletion of your personal information. You can see and update most of this personal information yourself online, or by contacting our customer services, or by emailing our privacy team at <u>privacy@gucci.com</u> (or see <u>How can you contact us?</u>).

*Specifically, subject to your applicable privacy legislation, your right of access may include:* 

- the right to request whether and how your personal information is processed and whether it has been shared with a third party in the preceding 12 months, in particular if you are an Aruban resident.
- the right to obtain confirmation that we process personal information about you, to request information about the public and private entities with whom we have shared your personal information, and to request information about the possibility of denying consent and the consequences of such denial, in particular if you are a Brazilian resident.
- if we cannot satisfy your request for correction, the right to request that a statement of correction be attached to your information noting that a correction has been sought but not made, in particular if you are a resident of New Zealand.
- the right to be informed of any disclosure of inaccurate personal information about you, in particular if you are a resident of Qatar.

### B. Right to withdraw consent

Where processing of your personal information is based on your consent, you have the right to withdraw it at any time. For example, if you no longer wish to receive electronic marketing communications, you can change the settings in your Gucci profile, use the 'unsubscribe' link provided in our emails, text the STOP number in our text messages, or contact us directly and we will stop sending you communications. Please note that the withdrawal of your consent will not affect the lawfulness of processing based on your consent as carried out before such withdrawal. If you are a resident of the United States or Guam, please also see <u>Specific information on text and</u> instant messages for residents of the United States or Guam residents.



### C. Right to personal information portability

Under certain conditions, you may have the right to receive personal information you have provided to us within a structured, commonly used and machine-readable format, and also to require us to transmit it to another data controller where this is technically feasible.

### D. Right to restriction of processing

Subject to privacy legislation applicable to you, you may have the right to restrict our processing of your personal information in particular where:

- you contest the accuracy of the personal information (until we have taken sufficient steps to correct or verify its accuracy);
- the processing is unlawful, but you do not want us to erase the personal information;
- we no longer need your personal information for the purposes of the processing, but you require such personal information to establish, exercise or defend legal claims; or
- you have objected to processing that has been justified on legitimate interest grounds, pending verification as to whether we have compelling legitimate grounds to continue processing.

Where personal information is subject to restriction in this way, we will only process it with your consent or to establish, exercise or defend legal claims, in accordance with local legislation.

Specifically, subject to your applicable privacy legislation, your right to restriction of processing may include:

- the right to request the anonymization, blocking or deletion of any unnecessary or excessive personal information or personal information processed unlawfully, in particular if you are a Brazilian resident.
- the right to request us to stop transferring your personal information to a third party, in particular if you are a Vietnamese resident.

### E. Right to object to processing

Where we rely on legitimate interest to process personal information, you may have the right to object to that processing. In this case, we must stop using your personal information for that purpose unless we can either demonstrate compelling legitimate grounds for processing that override your interests, rights and freedoms or where we need to process the personal information in order to establish, exercise or defend legal claims. Where we rely on legitimate interest as a justification for processing, we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

Where your personal information is processed for direct marketing purposes, you may also have the right to object to this at any time. This includes profiling to the extent that it is related to such direct marketing. For example, if you wish to object to receiving electronic marketing communications,



you can change the settings in your Gucci profile, or use the 'unsubscribe' link provided in our emails, or text the STOP number in our text messages, or contact us directly and we will stop sending you communications.

If you are a resident of the United States or Guam, please also see <u>Specific information on text and</u> instant messages for residents of the United States or Guam residents.

### F. Deceased person rights to privacy

To exercise rights on behalf of a deceased individual, you may be required to provide us with proof that you are an immediate family member or executor of the deceased person. Subject to applicable privacy laws, we may not be able to support your request. Please be informed that under certain laws (for example in France), you can define directives relating to the storage, erasure and communication of your personal information after your death.

# G. Specific information on text and instant messages for residents of the United States or Guam residents

This section applies when you provide prior express consent to receive text messages or instant messages from **Gucci**]. Messages that you may receive from us may include one time or recurring text or instant messages relating to our products, our services, our activities or including any other information that you have requested. At enrollment for recurring messaging programs, we will specify the frequency and number of messages.

You may opt-out of receiving future messages by texting STOP to the number indicated in our message. For help or for more information, you may contact us at <u>privacy@gucci.com</u> (or see <u>How</u> <u>can you contact us?</u>).

Messages are subject to the terms and conditions of your mobile carrier. Standard message and data rates may apply. Marketing and non-marketing text and instant messages may be sent to your mobile number using an automatic dialing system.

We cannot guarantee timing or receipt of the messages, as this may be affected by forces outside of our control. In the event that a message is delayed, or not received, we are not responsible for any related impacts.

You agree to provide us with a valid mobile number. If you change your mobile phone number, you agree to opt out of receipt of texts and instant messages prior to changing your mobile number.

### H. Specific information for Californian residents

### Your rights

If you are a Californian resident, subject to certain conditions and limitations, you may have the following rights with respect to personal information about you:

**A.** *Right of access* - You may be entitled to request that we disclose to you personal information we have collected about you, in the preceding 12 months, the categories of sources from which the information was collected, the purposes of collecting the information, the categories of third



parties we have shared the information with, and the categories of personal information that have been shared with third parties for a business purpose.

- **B.** *Right of data portability In some instances, you may have the right to receive the information about you in a portable and readily usable format.*
- **C.** *Right to have personal data erased Subject to certain conditions, you may be entitled to request that we delete personal information about you. We will not delete personal information about you when the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information by law.*

If you chose to exercise any of these rights, we will not discriminate against you on the basis of choosing to exercise your privacy rights. We may, however, charge a different rate or provide a different level of service to the extent permitted by law.

### Sale of your personal information

As set out in the section <u>Do we sell your personal information</u>?, we do not sell your personal information nor have we done so in the past twelve months. We may allow selected third parties (such as approved advertising partners) to collect your personal information via automated technologies on our websites in an effort to provide you with content and advertisements that may be of interest to you and on the legal bases set out in this privacy policy.

However, to the extent our transfers of your personal information to certain third-parties may be interpreted as a "sale" under California privacy law, you have the right to opt out of that sale of your personal information. Please note that we will still share your information in ways that are not a "sale," such as with our service providers, for our own online advertising purposes.

For information about how to manage cookies and opt out of online interest-based advertising, please review your browser or see our section "Do we use cookies or other online advertising technologies?". Your opt-out of interest-based advertising on your browser will be specific to the web browser or device you use at the time you exercise your opt-out rights; if you use multiple web browsers or devices, you will need to opt-out from each browser and device. Opting-out of the use of your information for interest-based advertising purposes does not mean you will stop seeing ads, including interest-based ads.

If you are a Californian resident you also have the right to submit a Shine the Light Request: you may have the right to request that we provide you with a list of certain categories of personal information we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year, as well as the identity of those third parties.

### Verification of your request

Before providing you with the above rights, we must be able to verify your identity. In order to verify your identity, you will need submit information about yourself, including, to the extent applicable, providing your account login credentials or other account information, answers to security questions, your name, government identification number we already have on file, date of birth, contact information, or other personal identifying information. We will match this information against information we have previously collected about you to verify your identity and your request.



To the extent you maintain an account with us, we will require you to login to that account as part of submitting your request. If we are unable to verify your identity as part of your request, we will not be able to satisfy your request. We are not obligated to collect additional information in order to enable you to verify your identity. For deletion requests, you will be required to submit a verifiable request for deletion and then to confirm separately that you want personal information about you deleted.

### *How to make your request*

You may make one request per calendar year. In your request, please attest to the fact that you are a Californian resident and provide a current California address for your response. You may request this information in writing by contacting us at <u>privacy@gucci.com</u>, calling our toll-free number +1.877.482.2430.

### When can you expect to hear from us

We will confirm receipt of your request within 10 business days and provide information about how we will process the request, including the verification process and expected response time. Please allow up to forty-five (45) days for a response, from the day the request is received. We may require an additional forty-five (45) calendar day extension.

"Additional Information: to the extent permitted by applicable law, we may charge a reasonable fee to comply with your request. This statement is available in alternative formats upon request. Please contact <u>privacy@gucci.com</u> or +1.877.482.2430 to request this statement in an alternative format.

### I. Right to lodge a complaint

You also have the right to lodge a complaint with your local supervisory authority if you consider that the processing of your personal information infringes applicable law.

If you are a resident of a Member State of the European Economic Area, you may refer to the list of data protection authorities in the European Economic Area available <u>here</u>.

Under applicable legislation, you may have the right to bring complaints relating to the processing of your personal information before civil courts, in particular if you are a Chilean resident.

### J. Modalities of response to your requests, additional information or assistance

If you need any further information regarding your rights or how to exercise any of your rights, or if you have any complaints or questions regarding our privacy practices, please contact our privacy team and Data Protection Officer at <a href="mailto:privacy@protection">privacy@protection@protection@protection@privacy@protection@protect

To help protect your privacy and maintain security, we will take steps and may require you to provide certain information to verify your identity before granting you access to your personal information or complying with your request.

Where permissible under applicable law, we reserve the right to charge a fee for instance if your request is manifestly unfounded or excessive, to cover the administrative costs incurred by your request. We will endeavour to respond to your request as soon as possible and in any case within the applicable timeframe.



In certain countries (such as if you are a Californian resident), if you ask us to provide you with specific pieces of personal information, we will require you to sign a declaration under penalty of perjury that you are the person whose personal information is the subject of the request.

If you designate an authorised agent to make an access, deletion or opt-out of sale request on your behalf (a) we may require you to provide the authorised agent written permission to do so, and (b) for access and deletion requests, we may require you to verify your own identity directly with us.

Want to know more? You may be interested in the following sections of our Customer Privacy Policy:

Who collects & uses your personal information?

How do we protect your personal information?

Where do we store your personal information?

With whom do we share your personal information?



### 16. CAN THE PRIVACY POLICY CHANGE?

We may occasionally make changes to this privacy policy, for example to comply with new requirements imposed by applicable laws or technical requirements. We will post the updated privacy policy on our website. We therefore encourage you to review this page every so often.

We may also notify you in case of material changes and, where required by applicable law, we will seek your consent to those changes.

If we wish to process your personal information for a new purpose not described in this privacy policy, where necessary we will inform you and where required we will seek your consent.

Want to know more? You may be interested in the following sections of our Privacy Policy:

What is covered by this privacy policy?

Who collects & uses your personal information?



### 17. DO WE USE COOKIES OR OTHER ONLINE ADVERTISING TECHNOLOGIES?

We use cookies to personalise content and ads, to provide social media features and to analyse our traffic data. We also share information on your use of our site with our social media, advertising and analytics partners. You can read more about any of our purposes or the vendors that we use by clicking on 'Cookie Settings.' This preference centre is accessible at any time through the 'Cookie Settings' button located on every page.

When you visit any website, it may store or retrieve information using your browser, mostly in the form of cookies. This information might be personal information about you, your preferences or your device and is mostly used to make the site work as you expect it to. The information does not usually directly identify you, but it can give you a more personalised web experience. Because we respect your right to privacy, you can choose not to allow some types of cookies.

At any time you have the option to accept or decline the use of cookies using the on/off settings of the preference centre, by clicking the 'Cookie policy' link located on the footer of every page you are browsing.

### A. What is a cookie?

A cookie is a small piece of data (text file) that a website – when visited by a user – asks your browser to place on your device in order to remember information about you, such as your language preference or login information. Those cookies are set by us and are called first party cookies. We also use third-party cookies – which are cookies from a domain other than that of the website you are visiting – for our advertising and marketing initiatives.

### B. Why do we use cookie?

Cookies are used for various purposes, such as allowing the user to navigate between pages seamlessly, implementing the user's preferences and improving their overall browsing experience, by customising the website according to their navigation and user profile as a Gucci customer. They can also help ensure that the adverts seen online by the user are more relevant to them and their interests.

### C. What types of cookie do we use?

*Our website uses several types of cookie which have different durations. In particular we use:* 

- Session cookies, which only last for the duration of a browsing session and facilitate your experience on our website; and
- Persistent cookies, which last for more than one visit and memorise your preferred settings regarding our website.

These cookies can also be categorised as follows, depending on who sets them on our website:

- First party cookies, which are supplied by the publisher of the website you are visiting, so that it functions properly.



- Third party cookies, which are set on the website by third parties, and are intended to collect data in different ways and for several purposes, for example: collection of analytics data and information on social interactions and behaviours, and also for promotional activities.

### D. What categories of cookie are on our website?

The types of cookie used on our website serve different purposes and can fall into one of the categories below.

### Strictly necessary cookies

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you that amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will then not work. These cookies do not store any personally identifiable information.

### Performance & analytics cookies

These cookies allow us to count visits and determine traffic sources, so we can measure and improve the performance of our site. They help us to find out which pages are the most and least popular and see how visitors move around the site. All information that these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited our site.

### Functionality cookies

These cookies enable the personalisation of website content by recognising users and remembering their preferences. They may be set by us or by third-party providers whose services we have added to our pages. If you do not allow these cookies, some or all of these services may not function properly.

### Profiling and targeting cookies

These cookies may be set through our site by our advertising partners. They may be used by those companies to build a Gucci profile of your interests and show you relevant advertisements on other sites. They do not directly store personal information but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

### Social cookies

These cookies are set by a range of social media services that we have added to the site and which enable you to share our content with your friends and networks. They can track your browser across other sites and build a profile based on your interests. This may influence the content and messages you see on other websites you visit. If you do not allow these cookies you may not be able to use or see these sharing tools.



### E. Do we share data collected through cookies?

We may collect information on our website through cookies and share it with third parties such as social networks or advertising platforms, as well as other companies within Kering, advertising agencies/providers and IT providers (e.g. hosting providers), with your consent where required.

### F. How to customise your cookie settings

At any time you have the option to accept or decline the use of cookies using the on/off settings of the preference centre, by clicking on the 'Cookie policy' link located on the footer of every page you are browsing.

Because we respect your right to privacy, you can choose not to allow some cookies. However, blocking some types of cookies may affect your experience of the site and the services we are able to offer.

If you use multiple browsers (e.g. Internet Explorer, Google Chrome, Firefox, etc.), you must repeat this procedure for each one, and if you connect to the web from multiple devices (e.g. from work and at home), then you will need to set your preferences on each browser on each device.

Please note that if you completely disable cookies from the browser, some of our website functionalities might be lost, for example, normal browsing of the site and purchasing activity, while any personalised activity such as the advertising you receive when you visit this website will not be tailored to your interests.

For more information on third-party cookies (e.g. advertising or targeting cookies) and how to disable them directly from the browser instead of our preference centre, we invite you to read the relevant privacy policy and opt-out guidelines which can be found here: <u>https://www.youronlinechoices.com/</u> **G. How to contact us** 

# If you have any questions regarding our privacy practices or how we handle your data, please contact our privacy team and Data Protection Officer by sending an email to <u>privacy@gucci.com</u> (or see How can you contact us?).

### H. More information

We invite you to read our privacy policy for full details of how we process your personal information.



### 18. HOW CAN YOU CONTACT US?

If you have any questions regarding our privacy practices or how we handle your information, please contact our privacy team and Data Protection Officer by sending an email to <u>privacy@gucci.com</u>.

Californian residents may also call our toll-free number: +1.877.482.2430.

Malaysian residents may also use the following contact details: +603 2381 4108

South Korean residents may use the following contact details:

- Gucci domestic representative designated for South Korea: Sean Kim / 35F, 517 Yeongdong-Daero, Gangnam-Gu, Seoul, Korea / <u>sean.kim@gucci.com</u>
- Gucci DPO: Sohee Han / <u>sohee.han@gucci.com</u> +82 2 3452 1921

