# PRIVACY POLICY WEBSITE WWW.MONCLER.COM

Privacy Policy Change Notification Date: July 31st, 2025

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#### 1. Introduction

Welcome to the website www.moncler.com.

Moncler Korea Inc., part of the Moncler Group, provides the following information about the collection and processing of the user's personal data. During the use of the site or its services (hereinafter, the "Website" and the "Services"), information and personal data concerning users of the Site are collected.

For this reason, in accordance with the provisions of the General Data Protection Regulation no. 2016/679 ("GDPR"), Personal Information Protection Act ("PIPA"), and applicable national legislation (together, "Privacy Legislation"), we have created this document (hereinafter "Privacy Policy") for the purpose of describing what personal data we collect, the purposes and methods of its processing and the security measures used to protect it.

Pursuant to the GDPR, 'processing' is defined as any operation, including the mere collection and/or storage, of personal data of any natural person (hereinafter, the "Data Subject" or the "User"), 'controller' is defined as the natural or legal person who determines the purposes and means of the processing, and 'personal data' is defined as any information relating to a natural person, identified or identifiable even indirectly by reference to any other information.

## 2. Data Controllers and Data Protection Officer

The following companies, both belonging to the Moncler Group, jointly act as Data Controllers (hereinafter also referred to as "Moncler" or the "Data Controllers"):

Moncler Korea Personal Data Protection Governance and Contact Information:

Moncler Korea operates under the centralized governance model of the Moncler Group to protect customers' personal data and handle related inquiries and complaints. As part of this structure, Moncler S.p.A. (Headquarters) has appointed a Data Protection Officer (DPO).

However, this DPO does not bear legal responsibility for the processing of personal data by Moncler Korea under Korean law. Moncler Korea has not appointed a separate Chief Privacy Officer (CPO), but in accordance with Article 31 of the Personal Information Protection Act of Korea, the Representative Director concurrently assumes legal responsibility as the CPO.

In practice, the Group's Chief Information Security Officer (CISO) oversees the establishment and operation of the information security and personal data protection framework across all Moncler Group companies. The Representative Director of Moncler Korea retains final legal accountability for personal data protection under Korean law.

Moncler Korea works closely with the DPO and the Group CISO to continuously implement appropriate technical and

organizational measures in compliance with applicable Korean laws and the Information Security Management System (ISMS) certification standards.

Joint Data Controllers and Contact Details:

Moncler Korea Inc.

Address: 2F, 60-26 Apgujeong-ro, Gangnam-gu, Seoul, Korea

Email: privacy@moncler.co.kr

Moncler Korea processes users' personal data to manage online sales activities (e.g., order and payment management), in-store pickup and return services (e.g., pick-up in store, return in store, click from store, and click and reserve), and personalized user experience on the website.

Industries S.p.A.

Address: Via Stendhal 47, 20144 Milan, Italy

VAT and Tax Code: 04804070961

Industries S.p.A. processes users' personal data for marketing activities (e.g., newsletters) and for building both group and individual user profiles (profiling).

Data Protection Officer (Industries S.p.A) Address: Via Stendhal 47, 20144 Milan, Italy

Email: dpo@moncler.com

Chief Privacy Officer (Moncler Korea)

In accordance with the Personal Information Protection Act of Korea, the following individual has been designated as the Chief Privacy Officer (CPO) responsible for the overall management of personal data processing, complaint handling, and remedies for data subjects:

Name: Yongtaik Lee

Title: President / Chief Privacy Officer (CPO)

Email: <u>privacy@moncler.co.kr</u>

The current Chief Privacy Officer is the Representative Director of Moncler Korea. Should a new officer be designated, this Privacy Policy will be updated and announced accordingly.

Data subjects may contact the Chief Privacy Officer (CPO) regarding any inquiries, complaints, or requests concerning their personal data. Moncler Korea will respond sincerely and promptly in accordance with Korean data protection laws and the ISMS certification standards.

Personal Data Protection Department (Moncler Korea) Department Name: IT Department, Moncler Korea Inc. Address: 2F, 60-26 Apgujeong-ro, Gangnam-gu, Seoul, Korea

Email: privacy@moncler.co.kr

Data subjects may contact the CPO or the Personal Data Protection Department regarding any privacy-related inquiries, complaints, or remedy requests that arise while using Moncler Korea's services. Moncler Korea will respond promptly and in good faith in accordance with applicable laws.

## 3. Categories of personal data processed

The Data Controllers will process the following categories of personal data (hereinafter collectively referred to as "Personal Data"):

# 3.1. Browsing data

During their normal operation, the computer systems used to operate the Website acquire some of the User's Personal Data, the transmission of which is implicit in the use of Internet communication protocols.

This information is not collected for the purpose of identifying the User, but may lead his/her identification if, for example, it is combined with information held by a third party. This category of data includes the IP address and domain name of the computer, the URI (Uniform Resource Identifier) addresses of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical code indicating the status of the reply given by the server and other parameters relating to the operating system. We use this data for the sole purpose of obtaining anonymous statistical information on the use of the Website and to check it is working properly.

The data collected is deleted immediately after processing. The data could be used to ascertain responsibility in the event of cybercrime committed to the detriment of the Services.

## 3.2. Registration information and further information provided by the User

Use of the Website does not require the creation of a personal account. However, to access certain pages reserved for registered users and, for example, to send us a request for information or feedback on the Services, the User must create a personal account and become a registered User. When creating an account, the User will be asked to enter certain Personal Data, such as (i) first and last name, (ii) e-mail address, and (iii) date of birth to create a (iv) password.

In addition, personal data directly provided by the User when placing an order to purchase an item will be collected and processed, and this consists of data collected by sending electronic mail, interacting with the functionality of the Website and requesting Services offered by the Website.

The Personal Data we collect and process for the purpose of order fulfillment includes (i) first and last name, (ii) nationality, (iii) e-mail address (iv) shipping address, (v) shipping and payment methods and, subject to consent, (vi) purchasing habits. Please note that purchasing habits information is an optional consent item, and not consenting will not restrict the use of services.

In addition, we may collect information generated during the use of Moncler's services, such as (i) order history, (ii) exchange and return history, (iii) wishlist items, (iv) appointment bookings, and (v) aftercare service requests. We may also collect, based on the User's selection, additional information including (i) preferences, (ii) gender, and (iii) phone number.

If the User collects, processes and discloses information about third parties to us, he/she must do so in accordance with the provisions of the Privacy Policy and, therefore, the User must provide the third parties with prior notification of processing and, if necessary, obtain their free and express consent before processing.

# 4. Purpose of the Processing and Nature of Data Provision

The User's Personal Data will be processed exclusively for the following purposes in accordance with applicable Korean data protection laws (PIPA). The categories of data processed, legal basis, and whether user consent is required are specified for each purpose:

# (a) Creation of a User Account

- Personal Data Processed: Full name, email address, password, date of birth (if applicable)
- Legal Basis: Performance of a contract (PIPA Article 15(1)2)
- Consent Type: Required
- Details: Necessary to allow user registration and authentication for account access.

## (b) Responding to Inquiries or Feedback

- Personal Data Processed: Name, contact information (email or phone number), content of the inquiry or feedback
- Legal Basis: Performance of a contract (PIPA Article 15(1)2)
- Consent Type: Required
- Details: For handling user requests submitted via online forms, chat, phone (00852800969300), or email (client.service kr@moncler.com or privacy@moncler.co.kr).

# (c) Provision and Management of Services via the Website

- Personal Data Processed: Account information, order history, interaction logs
- Legal Basis: Performance of a contract (PIPA Article 15(1)2)
- Consent Type: Required
- Details: Includes registration, service updates, and participation in website-based events or features.

# (d) Sales and After-Sales Service Management

- Personal Data Processed: Customer name, shipping/billing address, purchase and payment information, return/refund records
- Legal Basis: Performance of a contract; legal obligations under the Electronic Commerce Act and Commercial Act (PIPA Article 15(1)2 and 3)
- Consent Type: Required

• Details: To manage sales, invoicing, customer support, and CRM activities.

## (e) Compliance with Legal Obligations and Fraud Prevention

- Personal Data Processed: Identity verification data, transaction records, IP address
- Legal Basis: Legal obligation (PIPA Article 15(1)3)
- Consent Type: Required
- Details: For compliance with domestic and international regulations (e.g., anti-money laundering laws) and fraud detection measures.

# (f) Direct Marketing (with user's prior consent)

- Personal Data Processed: Name, contact details (email, mobile number)
- Legal Basis: User consent (PIPA Article 15(1)1, Article 22(2))
- Consent Type: Optional
- Details: To send marketing materials (e.g., newsletter, promotions) via email, SMS, phone, or instant messaging.

# (g) Profiling for Marketing Purposes

- Personal Data Processed: Purchase history, behavioral data, profiling cookies
- Legal Basis: User consent (PIPA Article 15(1)1)
- Consent Type: Optional
- Details: Moncler uses the "Moncler Digital Data Architecture" system to create individual profiles and provide targeted communications and personalized experiences.

## (h) Online Advertising and Social Media Targeting

- Personal Data Processed: Behavioral data from cookies, social media interaction data, purchase preferences
- Legal Basis: User consent (PIPA Article 15(1)1), obtained via cookie banner and social media tools
- Consent Type: Optional
- Details: To display personalized ads based on behavior, through digital platforms such as Meta or Instagram, with data shared as permitted by cookie and platform policies.

# (i) Aggregated Strategic and Business Intelligence

- Personal Data Processed: Aggregated or pseudonymized usage and transaction data
- Legal Basis: Legitimate interest (PIPA Article 15(1)6)
- Consent Type: Not required when anonymized
- Details: To perform statistical analysis, forecasting, and business strategy planning to improve products and services.

# (j) Legal Rights and Dispute Management

- Personal Data Processed: Any data necessary for legal claims or enforcement
- Legal Basis: Legal obligation or legitimate interest (PIPA Article 15(1)3 or 6)
- Consent Type: Required where not based on legal mandate
- Details: To assert or defend Moncler's legal rights in administrative, judicial, or extrajudicial procedures.

# (k) Quality Monitoring and Complaint Handling

- Personal Data Processed: Call recordings, complaint records, customer interaction logs
- Legal Basis: Legitimate interest (PIPA Article 15(1)6)
- Consent Type: Required (informed via automated voice notice)
- Details: To ensure customer service quality and manage user disputes. Voice recording notice will be provided at the beginning of the call.

#### Additional Information on Data Provision:

- Provision of Personal Data for purposes (a), (b), (c), (d), (e), (i), (j), and (k) is mandatory for service execution. Refusal may result in limited access to certain website features or services.
- Provision of Personal Data for purposes (f), (g), and (h) is optional, and refusal will not affect access to the Website or the ability to purchase Moncler products.

#### 5. Legal basis for processing

The processing of Personal Data under Article 4 is based on lawful grounds defined in the Personal Information Protection Act (PIPA) of Korea. The legal basis and corresponding personal data items are described below:

• With reference to points (a), (b), (c), and (d)

Legal Basis: Fulfillment of a contractual obligation (PIPA Article 15(1)2)

Purpose: Provision of membership services, order processing, and customer support

#### Personal Data Processed:

Name, email address, date of birth, password, nationality, shipping information, payment details, phone number, order and return history, after-sales service records, inquiry history (including Live Chat)

#### • With reference to point (e)

Legal Basis: Compliance with legal obligations (PIPA Article 15(1)3), including obligations related to fraud prevention and record keeping under applicable laws

#### Personal Data Processed:

Name, email address, membership and transaction status, delivery and payment history, service usage records

• With reference to points (f), (g), and (h)

Legal Basis: Prior and explicit consent of the data subject (PIPA Article 15(1)1)

Purpose: Marketing, profiling, and personalized online advertising

Consent Method: Separate opt-in at the time of data collection or through the cookie banner displayed on the Website

#### Personal Data Processed:

Title, gender, name, date of birth, contact details, preferred channel, purchasing preferences, wishlist items, cookies, browsing behavior, IP address, device information

## • With reference to point (i)

Legal Basis: Legitimate interest of the organization to improve service quality and operational efficiency (PIPA Article 15(1)6)

#### Personal Data Processed:

Demographic data, purchase behavior, preferences, device and browsing information, pseudonymized aggregated usage data

#### • With reference to point (j)

Legal Basis: Legitimate interest to establish, exercise or defend legal rights (PIPA Article 15(1)6)

## Personal Data Processed:

Relevant personal data required for legal or administrative proceedings

#### • With reference to point (k)

Legal Basis: Fulfillment of a contractual obligation (PIPA Article 15(1)2)

Purpose: Provision of customer support services by phone

#### Personal Data Processed:

Audio recordings of phone inquiries and consultation records

# 6. Data processing and archiving methods

User's Personal Data will be processed both in paper form and using electronic means and always in compliance with the security requirements of applicable legislation, with particular but not exclusive reference to art. 32 of the GDPR. Our security measures include contractual arrangements with any contractor (e.g. service providers) or other party in order to protect the security and confidentiality of the User's Personal Data in accordance with the provisions of our Privacy

Policy. Specifically, we implement the following measures:

- Managerial measures: Establishment and enforcement of a Personal Data internal management plan, operation of dedicated organization, provision of periodic education on protection of Personal Data for employees, etc.
- Technical measures: Management of the right to access the Personal Data processing system, etc., installation of the access control system, encryption of unique identification data, etc., installation and renewal of security programs
- Physical measures: Restrictions on the access to physical storage facilities storing Personal Data, including computer rooms and data rooms.

## 7. Period of use and storage of Personal Data

We will retain the User's Personal Data until the purpose for their use is achieved according to our internal data retention policy.

For the personal data as of Section 5 and 6 above, letter (a), (b), (c), and (d), we have a retention period of 10 years from the time of initial collection for User's Personal Data that is processed for our invoicing and accounting purposes, save for the circumstances in which national applicable law may provide for different retention requirements. Specifically, such data may include:

Storage of tax invoices and receipts;

Records of financial transactions (e.g., payment histories, refunds, transaction logs);

Documentation necessary for external audits or tax inspections.

In principle, we will promptly destroy User's Personal Data in our possession once we achieve the purpose of collection and use of the Personal Data.

However, we will retain the following categories of Personal Data for the duration indicated below:

- User registered data: this data will be stored for as long as the account is active and for the subsequent 10 years from the last purchase, for administrative purposes.
- payment data: these data will be retained until such time as the payment has been confirmed and the administrative and accounting formalities relating hereto have been completed and for the subsequent 10 years from the last purchase, for administrative purposes.
- data collected in connection with the use of Services offered on the Website (e.g. "pick-up in store", "return in store", "click from store", "click and reserve"): such data is stored until the service has been fully performed and for the subsequent 10 years from the last purchase, for administrative purposes.
- data related to User requests to our Customer Service department: relevant data will be retained until the request is resolved.

For the Personal Data as of Section 5 and 6 above, letter (f), (g) and (h), the Personal Data processed for marketing and/or profiling purposes will be kept a period of 7 years as per the authorization obtained from the Italian Data Protection Authority, issued on May 25, 2018, in favor of Industries S.p.A. After this retention period, the data will be automatically deleted or permanently and irreversibly anonymized.

For the data retention period of the cookie we make reference to what set out in deep in the cookie policy

For the Personal Data as of Section 5 and 6 above, letter (i) (j), the Personal Data processed for analysis purposes will be retained for the time set out in relation to the main purposes for which they have been collected, save for the objection right, and for the time necessary in order to protect the specific right (sub. j).

If we are required to retain Personal Data by applicable legal obligations (i.e., point (e) referred in Section 4 and 5), such as those set forth below, we will retain the Personal Data for the relevant retention period and the purposes required by such legal obligations.

- Records of website visits and IP addresses used: 3 months (as required under the Protection of Communications Secrets Act)

## 7.1. Procedure and modalities for the storage and destruction of Personal Data

In principle, we will promptly destroy User's Personal Data in our possession once we achieve the purpose of collection and use of his/her Personal Data. The process and method for destroying Personal Data after the retention periods are as follows:

- Process of destruction: Personal Data recorded and stored in the form of electronic files and identified for removal is irreversibly anonymized in a manner that prevents any future recovery/reproduction.

Personal Data recorded and stored in the form of paper documents shall be shredded or incinerated.

# 8. Scope of communication

#### 8.1. Internal and external communication of Personal Data

Personal Data is accessible to duly authorized personnel of the Moncler Group (e.g., Digital, CRM, Retail, IT) as necessary and is disclosed to third parties in the following cases: (i) when disclosure is required by laws and regulations applicable to legitimate third party recipients, such as authorities and public bodies for their respective institutional purposes, e.g. anti-money laundering legislation, court authorities; (ii) in the event of extraordinary transactions (e.g. mergers, acquisitions, sale of business, etc.).

It is expressly stated that Industries S.p.A. and Moncler Korea Inc. do not disclose your personal data to third parties for marketing or profiling purposes.

However, with reference to profiling, marketing and customer relationship management (to provide the User with the same level of service worldwide), other companies in the Moncler Group may access User's Personal Data as data processors, based on instructions received from Industries S.p.A.

The following are the details regarding the third parties to whom we lawfully provide Personal Data.

Moncler Korea Inc.'s Provision of Personal Data to Third Party

Name of the	Purposes of use by the recipient	Items of the	Periods of
recipient	r r	information to be	retention/use by
		transferred	the recipient
Moncler Group	to manage sales and post-sales activities	first and last name, e-	10 years
Companies	for Korean Customers	mail address, date of	,
1		birth, password,	
		nationality, shipping	
		address, shipping	
		methods, payment	
		records (payment	
		currency, information	
		related to payment	
		methods), phone number,	
		order history, exchange	
		and return history (only	
		when consent to profiling	
		is given), aftercare	
		service requests, records	
		of customers'	
		consultation and	
		inquiries through various	
		channels such as Live	
		Chat (product and	
		service-related	
		information)	
Industries S.p.A.	to carry out marketing and profiling	gender, date of birth,	7 years
	activities and CRM Analysis	phone number, email	
		address, preferred	
		contact method, country	
		of residence, purchasing	
		habits (purchases and	
		returns history),	
		collections' preferences,	
		cookies, browsing habits	
		(online sessions/online	
		visits history), IP	
		address, Device ID, city,	
		shipping address	

Industries S.p.A.'s Provision of Personal Data to Third Party

Name of the	Purposes of use by the	e recipient	Items of the	Periods of
recipient			information to be	retention/use by
			transferred	the recipient
[Moncler Group Companies]	to carry out marketing activities	and profiling	gender, date of birth, phone number, email address, preferred contact method, country of residence, purchasing habits (purchases and returns history), collections' preferences, cookies, browsing habits (online sessions/online visits history), IP address, Device ID, city, shipping address	7 years
Moncler Korea Inc.	to integrate customer data		gender, date of birth, phone number, email address, preferred contact method, country of residence, purchasing habits (purchases and returns history), collections' preferences, cookies, browsing habits (online sessions/online visits history), IP address, Device ID, city, shipping address	7 years

Personal Data is also shared with our service providers, e.g. for services of a technical and organizational nature that are necessary for the purposes referred to in Article 4, such as independent partners, including associates, shipping companies, marketing, payment management, etc. We provide such parties only with the data necessary to perform the agreed services and they act as data processors, based on instructions received from Industries S.p.A. or Moncler Korea Inc. (depending on the relevant Data Controller).

Moncler Korea Inc.'s Outsourcing of Personal Data

Data Processor (Outsourcee)	Description of Outsourced Tasks
Cegid Group	Retail sales database management and storage
Crea Vision	HelpDesk services
Adyen	Payment Gateway services
Kakao	Push messages - personalized ad delivery based on customer interest

Industries S.p.A.'s Outsourcing of Personal Data

Data Processor (Outsourcee)	Description of Outsourced Tasks				
Salesforce, Inc.	Managing E-commerce solutions and hosting website solutions				
Riskified	Fraud Prevention Tool				
Dynamics	Customer profiling data storage				
Skynet	Helpdesk services				
Meta	Delivery of personalized ad based on customer's interest and measure advertisement effectiveness				
Google	Analytics: data tracking – Cloud: data analysis – Advertising: personalized ad delivery based on customer interest and measure advertisement effectiveness				
Microstrategy	Clienteling analysis				

## 8.2. Cross-border transfer of Personal Data

For the performance of certain processing activities concerning the User's Personal Data, We communicate such data to external parties located in countries that do not belong to Korea (hereinafter referred to as "Third Countries"), the list of which is provided below and will be updated from time to time. The lawfulness of such transfers is ensured through mechanisms under Article 28-8 of PIPA, including obtaining the data subject's consent or entering into a data processing agreement in accordance with the privacy policy. With reference to points (f), (g) and (h), we directly collect personal data from Italy.

These external parties will process your Personal Data as independent data controllers or as data processors, regularly appointed by Moncler Korea Inc. and Industries S.p.A. in accordance with the legislation regulating data protection (depending on the role they have in relation to the processing). If you choose not to consent to the overseas transfer of personal data, you may indicate your refusal in the proper consent form. However, please note that, although you would be still able to purchase on this Website, refusal may result in your inability to be provided with targeted communications by e-mail (newsletter), phone, SMS, MMS, instant messaging and traditional mail, or with a customized management of the relationship between Moncler and you.

Specifically, we transfer personal data to Third Countries as follows:

Moncler Korea Inc.'s Cross-border Transfer of Personal Data

Recipient' s Name (Contact Informatio n)	Countr y where Recipie nt is Locate d	Recipient's Purpose of Using the Personal Data	Items of Personal Data to be Transferre d	Time and Method of Transfer	Period of Retenti on and Use by Recipie nt	Description of Outsourced Tasks	Legal basis of the cross- border transfer
Moncler Group Companies	Global	to manage sales and post-sales activities, to integrate customer data	gender, date of birth, phone number, email address, preferred contact method, country of residence, purchasing habits (purchases and returns history), collections' preferences, cookies, browsing habits (online sessions/onli ne visits history), IP address, Device ID, city, shipping address	transferre d remotely via network immediat ely upon collection	7 years	N/A	[PIPA Article 28-8(1)(iii)(Contract with Data Subject)]
Industries S.p.A.	Italy	to perform marketing and	gender, date of birth,	transferre d	7 years	N/A	[PIPA Article 28-

		profiling, to	phone	remotely			8(1)(i)(Conse
		integrate customer data	number, email address, preferred contact method, country of residence, purchasing habits (purchases and returns history), collections' preferences, cookies, browsing habits (online sessions/onli ne visits history), IP address, Device ID, city, shipping	via network immediat ely upon collection			nt of Data Subject)]
Kakao Corp.	South Korea	Send push messages to KaKao users and advertising services (including personalized/targ eted advertising)	address IP address, Mobile Advertising Identifiers (ADID, IDFA), KaKao account information (nickname, email address, phone number, profile picture, gender)	transferre d remotely via network immediat ely upon collection	1 year	Customer Communicat ion & Advertismen t	[PIPA Article 28- 8(1)(i)(Conse nt of Data Subject)]
Cegid Group	France	Retail sales database management and storage	first and last name, e- mail address, date of birth, password, nationality, shipping address, shipping methods, payment records (payment currency, information	transferre d remotely via network immediat ely upon collection	10 years	Retail sales database management	[PIPA Article 28- 8(1)(i)(Conse nt of Data Subject)]

			related to				
			payment				
			methods),				
			phone				
			number,				
			order				
			history,				
			exchange				
			and return				
			history,				
			aftercare				
			service				
			requests,				
			records of				
			customers'				
			consultation				
			and				
			inquiries				
			through				
			various				
			channels				
			such as Live				
			Chat				
			(product and				
			service-				
			related				
			information)				
			first and last				
			name, e-				
			mail				
			address, date				
			of birth,				
			password,				
			nationality,				
			shipping				
			address,				
			shipping				
			methods,				
			payment records				
				transferre			
			(payment	d			[PIPA (Article
		Retail sales	currency, information	remotely			15(1)(ii),
Riskified		database sales	related to	via		Retail sales	PIPA);
Kiskiiieu	Israel	management and	payment	network	10 years	database	( <u>fulfilment</u> of
		storage	methods),	immediat		management	a legal
		storage	phone	ely upon			obligation];
			number,	collection			
			order	Concention			
			history,				
			exchange				
			and return				
			history,				
			aftercare				
			service				
			requests,				
			records of				
			customers'				
			consultation				
			and				
			inquiries				
	<u> </u>	l .		<u> </u>	l	İ	

	through		
	various		
	channels		
	such as Live		
	Chat		
	(product and		
	service-		
	related		
	information)		

**Industries S.p.A.'s Cross-border Transfer of Personal Data** 

<b>Industries S.</b> p	o.A.'s Cross-	border Transfer of	Personal Data				
Recipient' s Name (Contact Informatio n)	Country where Recipient is Located	Recipient's Purpose of Using the Personal Data	Items of Personal Data to be Transferre d	Time and Method of Transfer	Period of Retenti on and Use by Recipie nt	Description of Outsource d Tasks	Legal basis of the cross- border transfer
Moncler Group Companies	Global	to manage sales and post-sales activities, to integrate customer data	gender, date of birth, phone number, email address, preferred contact method, country of residence, purchasing habits (purchases and returns history), collections' preferences, cookies, browsing habits (online sessions/onl ine visits history), IP address, Device ID, city, shipping address	transferre d remotely via network immediat ely upon collection	7 years	N/A	[PIPA Article 28- 8(1)(i)(Conse nt of Data Subject)]
Google LLC	Europe (multiple locations)	To provide, measure and improve analytics and advertising services (including personalized/targ eted advertising)	cookies, browsing habits (online sessions/onl ine visits history), IP address, Device ID, city, hashed emails	transferre d remotely via network immediat ely upon collection	50 months	Analytics & Advertisem ent	[PIPA Article 28- 8(1)(i)(Conse nt of Data Subject)]
Meta	Europe	To provide,	cookies,	transferre	2 Years	Advertisem	[PIPA Article

Platforms, Inc.	(multiple locations)	measure and improve advertising services (including personalized/targ eted advertising)	browsing habits (online sessionssits history), IP address, Device ID, city, hashed emails	d remotely via network immediat ely upon collection		ent	28- 8(1)(i)(Conse nt of Data Subject)]
Salesforce, Inc.	EU (salesforc e ecommer ce – data center: EU; salesforce marketing – data center: USA)	To provide e-commerce sales services; to provide direct marketing services	Name, surname, password, title, gender, date of birth, phone number, email address, preferred contact method, country of residence, purchasing habits (purchases and returns history), collections' preferences, cookies, IP address, shipping address, payment method	transferre d remotely via network immediat ely upon collection	7 years	E-Commerce and marketing services	[PIPA Article 28-8(1)(iii)(Contract with Data Subject)]  [PIPA Article 28-8(1)(i)(Consent of Data Subject)]
Microsoft Dynamics	Vendor registered office location Italy  Dynamics datacente r location: EU	Customer profiling data storage	gender, date of birth, phone number, email address, preferred contact method, country of residence, purchasing habits (purchases and returns history), collections' preferences, cookies, browsing habits (online sessions/online visits history), IP	transferre d remotely via network immediat ely upon collection	7 years	customer profiling data storage	[PIPA Article 28-8(1)(i)(Conse nt of Data Subject)]

			address, Device ID, city, shipping address				
Microstrate gy	Italy	Clienteling Analysis	gender, date of birth, phone number, email address, preferred contact method, country of residence, purchasing habits (purchases and returns history), collections' preferences, city, shipping address	transferre d remotely via network immediat ely upon collection	7 years	Clienteling Analysis	[PIPA Article 28-8(1)(i)(Conse nt of Data Subject)]

# 9. Rights of the Data Subject

As a Data Subject, the User may at any time exercise the rights recognized by the Privacy Policy regarding the specific processing of his/her personal data.

Below is a general description of the rights and how to exercise them:

- right of access to Personal Information: the User may obtain confirmation as to whether or not his/her Personal Data is being processed and, accordingly, obtain access to such Personal Data and information relating to the processing. If the User so wish, he/her will be provided with a copy of Personal Data;
- right to rectification of Personal Data: the User can obtain the correction, modification or updating of any inaccurate or out-of-date information, as well as obtaining the completion of incomplete Personal Data, including by providing an additional statement;
- right to withdraw consent: the User may at any time withdraw consent to the processing of his/her Personal Data with respect to any activity aimed at marketing purposes, including profiling. In this regard, please note that marketing activities include sending commercial and promotional communications and carrying out market research and surveys aimed at detecting the degree of satisfaction and adapting commercial offers to the User's interests. Upon receipt of the request, the processing of the User's Personal Data based on such consent will cease, while we will continue to carry out different processing operations or based on different grounds, in full compliance with applicable laws;
- right to deletion of the User's Personal Data (right to be forgotten) if the User's Personal Data, specifically, (i) is no longer necessary for the purposes for which it was collected or processed, or (ii) has been unlawfully processed, or (iii) needs to be deleted to comply with a legal obligation, or (iv) if the User objects to its processing (see "right to object" below) and there is no overriding legitimate reason for Moncler Korea Inc. or Industries S.p.A. to process the User's Personal Data in any way. Once the request, if legitimate, has been received and examined, the User's Personal Data will be deleted;
- the right to limitation of the processing of the User's Personal Data: the User may request that the processing of his/her Personal Data be limited, i.e. that the Personal Data be stored but not used (with the exception of requests made by the User and exceptions provided for by law):

- when the User disputes the accuracy of the Personal Data for the period necessary for Moncler to verify its accuracy;
- when the processing is unlawful, but the User objects to the deletion of his/her Personal Data;
- when, although the Personal Data is no longer necessary to Moncler Korea Inc. or Industries S.p.A. for the purpose of the processing, the User needs it to ascertain, exercise or defend his/her rights in Court;
- when the User objects to the processing, pending verification of whether Moncler Korea Inc. or Industries S.p.A. have legitimate reasons for continuing to process the Personal Data;
- right to object: the User may object at any time to the processing of Personal Data carried out on the basis of a legitimate interest, stating the reasons supporting the request. In the absence of grounds preventing the implementation of the right in accordance with the law, we will cease the processing that is the subject of the objection. the User has the right to object at any time to the processing of his/her Personal Data for marketing and/or profiling purposes, insofar as the processing is related to such purpose, without the need to specify the reason for the objection. In this case, the processing of Personal Data will be suspended immediately.
- right to automated decision: the User has a right not to be subjected to a decision based solely on automated processing ("Automated Decision"), including profiling or systems using artificial intelligence technology, which produces legal effects concerning the User or significantly affects him/her in a similar way. Provided, this does not apply where the Automated Decision is necessary for entering into, or performing, a contract with the User, or is otherwise authorized under applicable laws. In such cases, the User has the right to request an explanation from the Data Controller regarding the decision.

To exercise the rights described above:

- call the toll-free number (003083210794 from Monday to Friday from 10 a.m. to 7 p.m. CEST, excluding public holidays);
- write to Client Service through the "Contact us" section of the Website by filling out the Contact Form and selecting "Privacy" as the Topic;
- contact Moncler Korea Inc. and Industries S.p.A. directly at the addresses indicated in Section 2 above.

If you need to consult regarding complaints or remedies related to personal information, you may contact the specialized organizations listed below.

Contact Organization	Contact Number	Website
Personal Information Dispute Mediation Committee	1833-6972 (no area code)	www.kopico.go.kr
Personal Information Infringement Report Center	118 (no area code)	https://privacy.kisa.or.kr
Supreme Prosecutors' Office Cyber Investigation Division	1301 (no area code)	www.spo.go.kr
National Police Agency Cyber Crime Reporting System	182 (no area code)	https://ecrm.police.go.kr/minwon/m ain

#### 10. Cookies

The Site uses technical cookies and, subject to the consent of the Data Subject, profiling, analytics and social cookies, as well as additional functionalities such as plug-ins and/or buttons.

For further information, Data Subjects are invited to read the Cookie Policy.

Notice on the Collection and Use of Behavioral Information

If third parties are allowed to collect behavioral information through automatic data collection tools, it is recommended to disclose the details regarding such collection, use, and opt-out options.

- 11. Behavioral Information Collection by Third Parties via Automatic Collection Devices.
- 1) The Company permits third parties to collect behavioral information via automatic collection devices, such as third-

party cookies and advertising identifiers, when users visit or use its website or app. This is done for the purpose of improving service efficiency and enabling advertising and marketing activities.

- 2) The behavioral information collected by third parties through the Company's website and app includes the following: <Website>
- <App>
- 3) Users can allow or block the collection of behavioral information by third parties through browser cookie settings.
- ▶ How to Allow/Block Behavioral Information Collection in Web Browsers
- (1) Chrome
- To block third-party cookies:
- 1. Click the ":" icon at the top-right corner of Chrome and go to Settings.
- 2. In the left menu, select Privacy and security, then click Third-party cookies.
- 3. Choose to block third-party cookies.
- To block all cookies:
- 1. Click the ":" icon and select New Incognito Window.
- 2. In Incognito mode, your browsing history, cookies, site data, and form inputs will not be saved.
- (2) Microsoft Edge
- To block third-party cookies:
- 1. Click the "..." icon at the top-right corner and go to Settings.
- 2. Select Privacy, search, and services, then under the Tracking prevention section, choose a level (Balanced or Strict).
- 3. Or go to Cookies and site permissions, then Manage and delete cookies and site data, and enable "Block third-party cookies".
- To block all cookies:
- 1. Click the "..." icon and select New InPrivate window.
- 2. In this mode, history, cookies, and site data are not stored.
- ▶ How to Allow/Block Behavioral Information Collection in Mobile Browsers
- (1) Chrome (Android Devices)
- To block third-party cookies:
- 1. Open the Chrome app and tap the ":" icon, then go to Settings.
- 2. Navigate to Site settings > Third-party cookies, then choose to block.
- 3. To allow specific sites, tap Add site exception and input the site URL.
- To block all cookies:
- 1. Tap the ":" icon and select New Incognito tab.
- 2. In Incognito mode, no data such as history or cookies will be stored.
- (2) Safari (iOS Devices)
- Open Settings on your device, then tap Safari.
- Go to Advanced and enable Block All Cookies.
- (3) Samsung Internet
- To block third-party cookies:
- 1. Open the Samsung Internet app and tap the "≡" icon, then select Privacy.
- 2. Under Privacy Dashboard, tap Smart anti-tracking and set it to Always.
- To block all cookies:
- 1. Tap the Tabs icon, select Turn on Secret Mode, then tap Start.
- 2. In Secret Mode, browsing history and cookies will not be saved.

#### 11. Automated Decision

Moncler operates the Moncler Digital Data Architecture, which involves limited automated decision-making processes based on data collected from various sources such as in-store transactions, anti-counterfeiting websites, and profiling cookies. These processes are designed to generate personalized marketing communications and enhance customer relationship management. Such processing is conducted only with the User's prior and explicit consent.

The data used for this purpose may include purchase history, preferences, behavioral patterns, cookie-based profiling data, and interactions on social media platforms. This information is analyzed to better understand individual User interests and to deliver personalized content through channels such as email, SMS, instant messaging, phone calls, or postal mail.

In some cases, Moncler may utilize profiling technologies and third-party tracking tools (e.g., solutions provided by social media platforms such as Meta) to analyze website usage behavior and optimize advertising strategies tailored to Users' preferences. Any use of such technologies is subject to the User's prior consent.

Moncler does not conduct fully automated decision-making that produces legal or similarly significant effects on Users without human intervention. Users have the right to withdraw their consent at any time and may request clarification or

object to profiling-related decisions. For details, please refer to Section 9 of this Privacy Policy.