# PRIVACY POLICY WEBSITE WWW.MONCLER.COM

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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 Data Controllers are the following companies, both belonging to the Moncler Group (hereinafter also "Moncler" or "Data Controllers"):

- **Moncler Korea Inc.**, with registered offices at 60-26 2F, Apgujungro, Gangnamgu, Seoul, Korea, email <u>privacy@moncler.co.kr</u>, will process User's personal data in order to manage online sales activity (e.g. managing orders and payments), as well as for "pick-up in store", "return in store", "click from store" and "click and reserve" services, navigation experience through the Website and access to reserved services;
- **Industries S.p.A.**, with registered office in Milan 20144, via Stendhal, 47, VAT and Fiscal Code 04804070961, will process User's personal data in order to conduct marketing activities (e.g. newsletters) and building of group and individual profiles (profiling).

The User can contact the Data Controllers free of charge by writing to the e-mail to [Name of DPO/department responsible for performing personal data protection tasks and handling related complaints] (e-mail address privacy@moncler.co.kr), or by sending a registered letter with acknowledgement of receipt to the registered offices, as identified above.

Industries S.p.A. has appointed a Data Protection Officer (DPO), domiciled for the purpose at the offices of Industries S.p.A. and available at the following address: <a href="mailto:dpo@moncler.com">dpo@moncler.com</a>.

## 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 fulfilment include (i) first and last name, (ii) nationality, (iii) e-mail address (iv) shipping address, (v) shipping and payment methods and, subject to consent, (v) purchasing habits.

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

Personal Data will be used exclusively for the following purposes:

- (a) to create an account;
- (b) to respond to and manage requests for information and/or User feedback, via the <u>online form</u>, the live chat available on the Site, by telephone on 00852800969300 or by e-mail at <u>client.service\_kr@moncler.com</u> or <u>privacy@moncler.co.kr</u>;
- (c) to provide the services requested through the Website, including registration and subsequent updates and to manage the activities organized through the Website;
- (d) to manage sales activities and to provide sales and after-sales services, such as administration, accounting, returns and guarantee management, customer relationship management;
- (e) to ensure compliance with legal obligations, national and EU regulations (including anti-money laundering regulations), to prevent fraud and to exercise rights in legal proceedings.
- (f) for direct marketing with your previous consent, which is optional, Moncler will process your personal data for additional purposes like marketing activities, commercial or advertising communications, direct sales, market researches, by e-mail, (newsletter), phone, SMS, MMS, instant messaging;
- for profiling for marketing purposes –Moncler has realized a specific system composed by various applications and related infrastructure, called "Moncler Digital Data Architecture for Customer Profilation" (hereinafter also "Moncler Digital Data Architecture"), which collects, from different sources (i.e. your purchases instore, through Monclient App, from anti counterfeiting websites, from profiling cookies), and elaborates information related to preferences, purchase habits on purchases made by you worldwide even through other Moncler Group's companies appointed as data processors for this purpose, in order to build individual profiles for the purposes of providing you, only with your previous content which is optional, 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;
- (h) for online advertising and Social Media in case of interaction with the Data Controllers' social media pages, if you granted your consent to the use of profiling cookie on the Website (which are mentioned in Section 10 below), Moncler shall process your personal data in order to show you marketing announcements and contents matching with your interests, in consideration of the preferences and of the purchase habits identified

through cookie and/or other tracing systems of social media manager (like Meta) and/or after the analysis that social media carry out on their users. In particular, Moncler shall be able to show targeted marketing content through digital platforms in consideration of your interests or of your behavior and on the basis of all those information which could be collected through profiling activities carried out on the Website and shared with digital platforms, or using the instruments made available by social media;

- (i) for aggregated analysis of strategic and business intelligence: through the Moncler Digital Data Architecture Moncler will also carry out aggregated analysis of strategic and business intelligence on the processed data and information, on the basis of legitimate interest, in consideration of entrepreneurial and market needs to conduct activities of general analysis and forecast, developing statistic elaborations and company's strategic models, so improving products and services offered to its customers;
- (j) to defend its own rights Moncler will process personal data in order to protects its rights in judicial, administrative and extrajudicial proceedings and in any disputes arisen in relation to the Services;
- (k) monitoring the quality and verifying the effectiveness of the assistance services offered by Moncler, managing any disputes and complaints eventually made by the User and managing customer relations, also by means of recording telephone calls with the Client Service.

The provision of the User's Personal Data for purposes (a), (b) (c), (d), (e), (i), (j) and (k) is optional, but necessary in order to provide the Services requested. If the User refuses to provide such information, he/she will still be able to use the Site, but will not be able to access some of our Services reserved for registered users, purchase Moncler products and we will not be able to handle the User's requests.

With specific reference to the purpose referred to in purpose (k), the User will be notified in advance of registration by a short information notice issued by a recorded voice at the beginning of the telephone call, with a reference to this full information notice.

Consent to the processing of Personal Data for the marketing and profiling purposes referred to in points (f), (g) and (h) is optional and refusal will have no consequences on the navigation of the Site and/or the purchase of Moncler products.

## 5. Legal basis for processing

The legal basis for the processing of the Personal Data referred to in Article 4 above is:

#### with reference to points (a), (b) (c) and (d)

<u>fulfilment of a contractual obligation (Article 15(1)(iv), PIPA)</u>, in particular the provision of Services requested by the User via the Site or, in the case of point (b), by WhatsApp chat or by telephone call or e-mail;

Specific Personal Data Items Processed: first and last name, e-mail address, date of birth, password, nationality, shipping address, shipping methods, payment records (payment currency, information 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).

#### • with reference to point (e)

<u>fulfilment of a legal obligation</u> to which the Data Controllers are subject in the course of its business (Article 15(1)(ii), PIPA);

Legal Basis	Specific Personal Data Items Processed
Improvement the accuracy of fraud prevention tools	Purchase history, service usage history, name, email address, membership status, payment history, delivery information

## • with reference to points (f), (g) and (h)

consent of the Data Subject (Article 15(1)(i), PIPA), given by means of a specific and separately expressed expression of will, only after having read this Privacy Policy. The User may at any time specify the preferred method of contact from among those listed above and he/she may refuse to receive promotional communications through any or all of the contact methods.

In relation to the consent for letter (h), we make reference to the cookie policy (section 10); in such case the consent is granted through the specific banner which can be found when you access the Website and can be revoked at any time with the modalities specified in the same cookie control panel.

Specific Personal Data Items Processed: title, gender, name, surname, date of birth, phone number, email address, preferred contact method, country of residence, purchasing habits (purchases, exchanges and returns history), wishlist

items, collections' preferences, cookies, browsing habits (online sessions/online visits history), IP address, Device ID

#### with reference to point (i)

Moncler <u>legitimate interest</u> (section 6 (1) (f) GDPR, Article 15(1)(vi), PIPA) to verify and improve the quality of the offered services and the company processes efficiency;

Specific Personal Data Items Processed: 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

## with reference to point (j)

Moncler legitimate interest to protect its rights (section 6 (1) (f) GDPR, Article 15(1)(vi), PIPA).

Specific Personal Data Items Processed: all Personal Data mentioned above

#### with reference to point (k)

<u>fulfilment of a contractual obligation (Article 15(1)(iv), PIPA)</u>, in particular the provision of the Services requested by the User through a phone call to the Client Service.

Specific Personal Data Items Processed: Recording of customers' consultation and inquiries through phone calls' registration

## 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. 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 recipie		Purposes of use by the recipient	Items of the information to be transferred	Periods of retention/use by the recipient
Moncler Companies available request]	Group [List upon	to manage sales and post-sales activities for Korean Customers	first and last name, e- mail address, date of 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	10 years

		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 activities and CRM Analysis	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

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

Name of the	VISION OF Personal Data to Third Par Purposes of use by the recipie	•	s of the	Periods of
recipient	i ur poses of use by the recipie		tion to be	retention/use by
recipient			sferred	the recipient
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[Moncler Group	to carry out marketing and pr	0 0	ite of birth,	7 years
Companies] [List available upon	activities		mber, email	
-г			ferred contact	
request]			country of	
		residence,	purchasing	
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		returns	history),	
			preferences,	
			owsing habits	
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			y), IP address,	
			city, shipping	
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Moncler Korea Inc.	to integrate customer data	_	te of birth,	7 years
		1	mber, email	
			ferred contact	
		-	country of	
			purchasing	
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		returns	history),	
			preferences,	
			owsing habits	
		\	essions/online	
			y), IP address,	
			city, shipping	
		address		

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
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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 [List available upon request]	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,	transferre d remotely via network immediat ely upon collection	7 years	N/A	[PIPA Article 28-8(1)(iii)(Contract with Data Subject)]

			purchasing habits (purchases and returns history), collections' preferences, cookies, browsing habits (online sessions/onli ne visits history), IP address, Device ID, city, shipping address				
Industries S.p.A.	Italy	to perform marketing and profiling, 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	transferre d remotely via network immediat ely upon collection	7 years	N/A	[PIPA Article 28-8(1)(i)(Conse nt of Data Subject)]
Kakao Corp.	South Korea	Send push messages to KaKao users and advertising services (including personalized/targ eted advertising)	IP address, Mobile Advertising Identifiers (ADID, IDFA), KaKao account information (nickname, email address,	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)]

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Cegid Group	France	Retail sales database management and storage	phone number, profile picture, gender) first and last name, e- mail address, date of birth, password, nationality, shipping address, shipping methods, payment records (payment currency, information 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	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)]
			(product and service- related information) first and last				
Riskified	Israel	Retail sales database management and storage	name, e-mail address, date of birth, password, nationality, shipping address, shipping methods, payment records	transferre d remotely via network immediat ely upon collection	10 years	Retail sales database management	[PIPA (Article 15(1)(ii), PIPA); (fulfilment of a legal obligation];

	(		
	(payment		
	currency,		
	information		
	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		
	Chat (product and service- related information)		

**Industries S.p.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 [List available upon request]	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	transferre d remotely via network immediat ely upon collection	7 years	N/A	[PIPA Article 28- 8(1)(i)(Conse nt of Data Subject)]

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			(online sessions/onl ine visits history), IP address,				
			Device ID, city, shipping address				
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 Platforms, Inc.	Europe (multiple locations)	To provide, measure and improve advertising services (including personalized/targ eted advertising)	cookies, browsing habits (online session/visit s history), IP address, Device ID, city, hashed emails	transferre d remotely via network immediat ely upon collection	2 Years	Advertisem ent	[PIPA Article 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	Customer profiling data storage	gender, date of birth, phone number,	transferre d remotely via	7 years	customer profiling data storage	[PIPA Article 28- 8(1)(i)(Conse nt of Data

	Italy		email	network			Subject)]
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	datacente		contact	collection			
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	location:		country of				
	EU		residence,				
	EU		purchasing				
			habits				
			(purchases				
			and returns				
			history),				
			collections'				
			preferences,				
			cookies,				
			browsing				
			habits				
			(online				
			sessions/onl				
			ine visits				
			history), IP				
			address,				
			Device ID,				
			city,				
			shipping				
			address				
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			phone	remotely			8(1)(i)(Conse
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			email	network			Subject)]
			address,	immediat			
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			residence,				
			purchasing				
			habits				
			(purchases				
			and returns				
			history),				
			collections'				
			preferences,				
			city,				
			shipping address				
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# 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.

## 11. Automated Decision

Moncler operates the Moncler Digital Data Architecture that performs automated decision-making based on data collected from various sources (e.g., in-store purchases, Monclient App, anti-counterfeiting websites, profiling cookies). This system processes data worldwide in cooperation with other Moncler Group companies appointed as data processors for this purpose. The objective of such automated decisions is to build individual customer profiles to provide personalized marketing communications or to enable customized relationship management between Moncler and its customers. Such processing is performed only for Users who have given their explicit consent.

The data used for this purpose may include purchase history, preferences, purchasing habits, profiling cookie data, and information relating to social media interactions. This data is analyzed to infer Users' interests or behavior, which is then used to deliver targeted communications such as newsletters, phone calls, SMS, MMS, instant messaging, and traditional mail.

The Moncler Digital Data Architecture integrates and analyzes data from various channels to tailor marketing strategies to each User. This may include the use of profiling cookies on the Website, as well as third-party tracking systems (e.g., tools provided by social media managers such as Meta), to analyze online activity and deliver personalized advertising based on specific interests and purchasing patterns.

Users have the right to refuse or withdraw their consent to such processing at any time. For more information about the right to object to or request an explanation of automated decisions, please refer to Section 9 of this Privacy Policy.