

PRIVACY POLICY

WEBSITE WWW.MONCLER.COM

1.	Introduction.....	1
2.	Data Controllers and Data Protection Officer.....	1
3.	Categories of personal data processed.....	1
4.	Purpose of the processing and nature of data provision	2
5.	Legal basis for processing.....	3
6.	Data processing and archiving methods	3
7.	Period of use and storage of Personal Data	4
8.	Scope of communication	4
9.	Rights of the Data Subject	5

* * *

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**”) 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 privacy@moncler.co.kr, 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 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: dpo@moncler.com.

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, (iii) date of birth and to create a password.

In addition, personal data directly provided by the User when placing an order to purchase an item will be collected and processed, 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.

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 [online form](#), the live chat available on the Site, by telephone on 00852800969300 or by e-mail at client.service_kr@moncler.com or privacy@moncler.co.kr;
- (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;
- (g) 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 Moncler 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 protect 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)**
fulfilment of a contractual obligation, 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;
- **with reference to point (e)**
fulfilment of a legal obligation to which the Data Controllers are subject in the course of its business;
- **with reference to points (f), (g) and (h)**
consent of the Data Subject, 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.
- **with reference to point (i)**
Moncler legitimate interest (section 6 (1) (f) GDPR) to verify and improve the quality of the offered services and the company processes efficiency;
- **with reference to point (j)**
Moncler legitimate interest to protect its rights (section 6 (1) (f) GDPR).
- **with reference to point (k)**
fulfilment of a contractual obligation, in particular the provision of the Services requested by the User through a phone call to the Client Service.

No new and specific data collection is required as Moncler will pursue this additional purpose, if necessary, by processing data collected for the above mentioned purposes.

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.

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 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).

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.

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.).

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).

It is expressly stated that Industries Sp.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.

8.2. Data transfer abroad

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, the European Union (EU) or the European Economic Area (EEA) (hereinafter referred to as "**Third Countries**"), the list of which will be updated from time to time and/or available upon request; the lawfulness of such transfer is, in any case, guaranteed through the mechanisms provided for by art. 46 of the GDPR, since Moncler has executed the Standard Contractual Clauses approved by the European Commission (supplemented by additional technical/organizational/legal measures) or, as applicable, due to the existence of an adequacy decision pursuant to the APPI and/or Art. 45 of the GDPR issued by the European Commission.

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).

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 own Personal Data: 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 data portability: the User may request to receive his/her Personal Data processed pursuant to his/her consent or a contract entered into with him/her, in a structured, machine-readable format. If the User so wishes, and if the transfer is reasonable and technically possible, we may, at the User's request, transfer his/her Personal Data directly to a third party indicated by him/her;
- 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.

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.

To obtain the list of our external data processors, of the third parties with whom Moncler Korea inc. and IndustriesS.p.A. share User's Personal Data, please contact the Data Controllers through the modalities set forth above.

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.