

PRIVACY POLICY

Article 13 of the EU Regulation 2016/679 *General Data Protection Regulation (the "Regulation")*

Dear Customer, below we provide you with detailed information on how we process your data.

Who is the Controller

Geox S.p.A. ("Geox"), with registered office in Biadene di Montebelluna (TV), Italy, Via Feltrina Centro no. 16, privacy@geox.com, is the company that processes your personal data in its capacity as Controller.

How you can contact us and the Data Protection Officer

If you have any questions, need information or wish to exercise your rights, you can contact us by sending an e-mail to privacy@geox.com or by writing to: Geox S.p.A., Customer Service, Via Feltrina Centro no. 16, 31044, Biadene di Montebelluna (TV), Italy.

The Data Protection Officer can be contacted by e-mail at dpo@geox.com.

Why we process your data

Below we explain the purposes for which we collect and use your data, and the legal basis for processing it:

Purpose	Legal basis
Joining the <i>Benefeet</i> loyalty programme , which operates on the www.geox.com website and at participating points of sale (the list of which can be viewed at www.geox.com): this allows you to access benefits (e.g., accumulate the purchases made, use accrued vouchers, enjoy discounts, access digital challenges that allow you to receive prizes), promotions and dedicated initiatives under the terms of the <i>Benefeet</i> rules available in shops and at www.geox.com .	Performance of the contractual relationship
To Activate your personal MyGeox account and allow you to access the "omnichannel" (multi-channel) services offered by Geox, to update your data and any consents you may have given, to monitor your purchases made in shop or on the Geox website and your <i>Benefeet</i> status.	Performance of the contractual relationship
Access to services (e.g., the geox@home service that allows home delivery of products; dedicated after-sales service; making an appointment in the shop, etc.).	Performance of the contractual relationship
Sending service communications related to purchases made and the <i>Benefeet</i> programme (e.g., reminders on the value of purchases made and vouchers accrued, communications relating to unlocked and completed digital missions, receipt of award codes, communications on the expiry dates of the period for spending accumulation and use of vouchers, on the birthday discount, etc.).	Performance of the contractual relationship
Updating (by means of newsletters, e-mail, telephone contact, instant messages, paper mail, messages or communications of initiatives on social networks, etc.) on our products, services (e.g., purchasing methods, home delivery, etc.) or initiatives (e.g., competitions), and sending advertising and promotional material , including personalised material , and participation in market research - by means of e-mail or telephone contact - to check your degree of satisfaction with our products and/or services.	Your consent is optional.
Analysis of your data (and those of your children, if any), your interests and your purchasing preferences in order to improve our commercial offer and send you personalised advertising and promotional material.	Your consent is optional.

Purpose	Legal basis
Claiming a right (including in court) and/or preventing and detecting any fraud or other unlawful conduct.	Geox's legitimate interest in complying with the rules of the <i>Benefect</i> programme and preventing fraud or unlawful conduct.
Processing of data for statistical purposes in aggregated and anonymous form.	The legitimate interest of Geox in analysing the business activities carried out.

The required data and consents

The "**compulsory**" data marked with (*) are necessary for you to join the Single Digital Profile and guarantee you access to promotions and services reserved for members.

Please note that if you wish to accumulate the purchases made and have access to the reserved *Benefect* advantages, you will need to inform us that you are enrolled in the programme at the time of your purchases in shop (online, via your MyGeox account, everything is done automatically); otherwise you can still complete your purchases, but we will not be able to record and process your purchases for you to accrue the advantages.

You can update your persona details at any time by accessing your personal MyGeox account or by writing to privacy@geox.com. Please note that for security reasons, the date of birth (yours or your children's, if specified) and the e-mail address used to create your account can only be changed by writing to privacy@geox.com.

Your consents are all "**optional**" and will always be freely revocable and, if you do not want to give them, you can still join the Single Digital Profile, but we will not be able to update you on our products, services or initiatives, send you advertising material, analyse your interests and preferences, send you personalised communications, contact you for market research purposes.

You may revoke your consent at any time by writing to privacy@geox.com or simply by logging into your personal MyGeox account. If you no longer wish to receive commercial communications by e-mail, you can also use the unsubscribe option in each e-mail.

How we process your data

The data required for membership will be used to create your Single Digital Profile and allow you to join *Benefect* (granting you discounts/prizes, associating your spending volumes - the amount of your receipts - to spending levels provided in the programme rules; allow you to access the benefits reserved for members - e.g.: receiving the birthday discount, etc.); activate your personal MyGeox account, thus allowing you to shop online and independently update your data and consent; access services (e.g., *geox@home*, after-sales service, etc.).

If you give us your consent, we may analyse your data in order to try to understand your tastes and preferences (e.g., by analysing which products you have bought or put in your shopping cart or wish list; when you shop and how; which products interest you; etc.), so that we can improve and send you interesting offers, including personalised offers (e.g., if you have bought women's footwear in the past, we may send you our new Women's Catalogue, or promotions on women's products or matching products; if you have children, we may send you communications on products for children).

Our analysis activities shall not be carried out in an exclusively automated manner, but shall always involve the intervention and evaluation of our personnel in charge.

Geox may carry out specific, non-continuous checks to verify compliance with the *Benefect* rules, the correct use of the reserved advantages and the services used, and to protect itself against fraudulent conduct, in compliance with the applicable legislation and the corporate procedures and regulations in force.

How long we keep your data

Your personal and membership data for the Single Digital profile are kept during the entire duration of your registration (more specifically, the *Benefect* programme rules are renewed year by year). If you do not purchase for more than 5 years, your data and your registration shall be erased.

Unless otherwise required by law, your purchase details shall be stored for 36 months for the purpose of analysing your preferences or sending you advertising material and commercial communications (only if you give us your specific consent). If you withdraw your consent, your data shall only be processed for the

purposes provided for by law.

Who will have access to your data

Your data shall not be disclosed to the public.

In order to manage your membership in the Single Digital Profile and to allow us to process your data for the purposes for which you have given us your consent, your data shall be processed by persons specifically authorised by Geox (in particular, the CRM, e-commerce, Information Technology and point of sale departments), as well as, in their capacity as Data Processors, by **(i)** companies in charge of processing the value of purchases made and discount vouchers (e.g., as provided for in the *Benefeet* rules); **(ii)** companies analysing your purchases; **(iii)** companies in charge of providing customer support (both in relation to after-sales services and the management of “privacy requests”); **(iv)** companies in charge of processing, managing and sending newsletters and advertising and promotional material; **(v)** companies that organise and manage market research; **(vi)** companies in charge of managing our website and computer archives; **(vii)** suppliers of IT services;

(viii) companies of the Geox Group that manage points of sale in Italy and abroad, or that provide logistics services; **(ix)** third party companies that manage franchised “Geox” points of sale. A full list can be obtained from privacy@geox.com.

If you give us your consent for marketing purposes, your e-mail address (or your mobile phone number) may be temporarily disclosed - in encrypted and protected form - to social networks (e.g., Facebook) which will process your data - in their capacity as joint data controllers - to the extent necessary for you to see news or advertising relating to Geox on the social network. Further information on the use of social networks and the exchange of data with Geox is available in the [Cookie Policy](#) of the Geox website.

Transfer of your data outside the European Union

For all of the above purposes, your personal data shall not be systematically transferred to countries outside the European Union and shall reside on servers located within the European Union.

If you request services from one of our shops abroad that require access to your data, the transfer of your data - which can be only viewed by a shop representative - shall take place on the basis of adequacy decisions approved by the European Commission (e.g., for the UK, Canada, etc.) or with your specific consent. By writing to privacy@geox.com for more information.

What are your rights

By writing to privacy@geox.com, you may at any time exercise your rights under Articles 15 to 22 of the Regulation, including:

- obtaining confirmation as to whether or not personal data concerning you are being processed;
- obtaining access to your personal data (e.g., by requesting what data are processed, for what purposes and in what manner);
- obtaining aid in the rectification of inaccurate personal data or the integration of incomplete personal data;
- obtaining the erasure of your personal data (where applicable);
- obtaining the restriction of processing of your personal data (where applicable);
- receiving your personal data in a structured, commonly used and machine-readable format (where applicable).

You can also **object at any time to the processing of your data, in particular for the purpose of analysing your purchasing habits or preferences, or for marketing purposes**, as well as **withdrawing your consent** (by writing to privacy@geox.com, using the “unsubscribe” link present in all e-mails or by modifying the consent given in your personal MyGeox account).

Who you can address to lodge a complaint

If you believe that the processing of your personal data is in violation of the provisions of the Regulation, you may always make a complaint with the Italian Data Protection Authority (www.garanteprivacy.it), or, if different, with the Data Protection Authority of the country in which you reside or work or of the place where you believe the violation occurred.