

BENEFEEET PRIVACY POLICY

Art. 13 of EU Regulation 2016/679 General Data Protection Regulation

Dear Customer, we are committed to protecting your personal data in accordance with EU Regulation 2016/679 (the “Regulation”).

We provide below all the information you need to understand how we process your data and for what purposes. However if you have further questions about we protect your privacy, please send an e-mail to privacy@geox.com and we will reply as soon as possible.

Who Processes Your Personal Data?

Geox S.p.A. (“**Geox**”), Data Controller, with registered office at Via Feltrina Centro n. 16, Biadene di Montebelluna (TV), Italy, is the company that collect and process your personal data, pursuant to the Regulation.

Why Do We Process Your Data?

Geox may use personal data and any data related to your purchases:

- to enable your registration in the *benefeeet* loyalty programme – operating on the www.geox.com website and at the participating retail outlets (the list of which can be consulted on www.geox.com or in the information material) - which will allow you access to the rewards, discounts, promotions and initiatives described in the *benefeeet* Rules.

Without these data we will not be able to execute the loyalty contract you entered into by joining *benefeeet*.

Moreover, **only if you have provided your consent**, Geox may use your data for:

- **marketing Purposes: updating you** (through the Newsletter, by e-mail, phone, instant messages, posts, messages or communication of initiatives on social networks, etc.) on our products, services (e.g., how to buy the products, home delivery, etc.) or initiatives (e.g., competitions), **sending you advertising and promotional material, including personalised material** (if you have provided your specific consent).
- **analysing Your preferences:** analysing your data (and that of any of your children if provided), your interests and purchasing preferences, and improving our business offering.
- **market research:** seeking your participation in market research to determine your degree of satisfaction with our products and services.

You can always freely withdraw your consent and if you do not wish to provide it, you can still join *benefeeet*, but the services we offer you will be restricted.

Your consent may be withdrawn by writing to privacy@geox.com or simply by accessing your personal area on the www.geox.com website, *benefeeet* section.

Please note that in the event of withdrawal of consent for the sending of updates, advertising/promotional communications or market research, you will no longer receive any type of communication, in any form. If you wish, you may withdraw your consent solely for the receipt of communications by electronic means (eg. e-mail, text messages, telephone calls, instant messages), while continuing to receive marketing communications only by mail or telephone contact with an operator, where provided.

Are All the Requested Data Necessary?

All data marked “**mandatory**” are necessary to enable you to join *benefeeet* and guarantee your access to member-only promotions.

On the other hand, if you do not provide the data marked “**optional**”, you can still register with *benefeeet*, but we will not be able to update you on our products, services or initiatives, send you promotional material, analyse your interests and preferences, send you personalised communications or contact you to carry out market research.

How Do We Process Your Data?

Your data will be processed primarily electronically. If you give us your consent, Geox may analyse your information (such as purchase data), in order to understand your tastes and your preferences (e.g.s by ascertaining which products you have purchased), so that we can improve the offers we send to you, and also personalise them (for example, if you have purchased ballet flats in the past, we may send you our new Women's Catalogue), or invite you to participate in competitions or market research.

The data of your children, if provided, will allow us to give you promotions regarding our kids products.

Please note that all of our data analytics concerning your data and your preferences will not be solely performed on machines, but will always be carried out and assessed by our company representatives.

How Long Do We Keep Your Data?

Your data will be processed for the entire duration of your *benefeeet* registration.

If you agree to our processing sales-related data, we will process them:

- for 12 months in order to analyse your preferences;
- for 24 months for the purposes of sending you promotional materials and communications.

Remember, you can always change your consent.

Who Will Have Access to Your Data?

Your data will not be disseminated to the public.

In order to manage your membership of benefee^t and allow us to process your data for purposes related to your consent, your data will only be processed by persons Geox has specifically authorised to process data, and by external data processors on behalf of Geox, including: **(i)** companies that analyse your purchases; **(ii)** companies responsible for managing “Customer Service”; **(iii)** companies responsible for the preparation, handling and sending of newsletters, advertising and promotional materials; **(iv)** companies that organise and manage market research; **(v)** companies responsible for the management of our website and related IT files ; **(vi)** companies that are part of the Geox group and that operate their retail outlets abroad; **(vii)** third-party companies that manage franchised “Geox” stores.

A complete list can be requested from privacy@geox.com.

Finally, if you give us your consent for marketing purposes, your e-mail address may be temporarily disclosed - in encrypted and secure form - to social networks (e.g., Facebook, Google+, Instagram, etc.) to enable you to receive news or advertising.

Is Your Data Transferred Outside the European Union?

To enable us to properly manage *benefee^t*, your personal data may be transferred to countries outside the European Union, in particular, the United States.

Your data will be transferred in full compliance with the law and with international agreements.

The applicable privacy legislation provides that your specific consent is not required for the transfer to third countries when: your data is transferred to a country that guarantees an adequate level of protection (Article 45 of the Regulation) or; on the basis of the adoption of adequate safeguards (Articles 46 and 47 of the Regulation); and in particular on the basis of the adoption of binding rules for groups of companies, the adoption of contractual clauses approved by the European Commission or adherence to the Privacy Shield framework with the USA.

Your data will be transferred to third countries in full compliance with the guarantees, safeguards and rights provided by privacy legislation (and in particular in application of the Privacy Shield agreement with the United States, and the standard contractual clauses approved by the European Union). In any case, upon simple request to privacy@geox.com you may obtain information on the existence of an adequacy decision or on the appropriate safeguards adopted to allow your data to be transferred, and on the means of obtaining such data or the place where they are being made available.

By writing to privacy@geox.com, you can request further information on the transfer of your data and the safeguards provided for the protection thereof.

What Are Your Rights?

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

- confirmation as to whether or not your personal data is being processed;
- access to your personal data;
- rectification of inaccurate personal data concerning you or completion of incomplete personal data;
- erasure of your personal data without undue delay;
- restriction of processing of your personal data;
- notification regarding rectification, erasure or restriction of processing of your personal data;
- the right to receive personal data in a structured, commonly used and machine-readable format;
- set guidelines regarding the fate of your personal data after your death (where applicable).

You may also always:

- **object to the processing of your data, particularly for marketing purposes or the analysis of your purchasing habits or preferences;**
- **withdraw your consent;**
- **submit a complaint to the relevant Data Protection Authority.**

Who Can You Contact in the Case of a Complaint?

If you believe that the processing of your data violates the provisions of the Regulation, you can always submit a complaint to the Italian Data Protection Authority (www.garanteprivacy.it), or to the Data Protection Authority of the country in which you reside, work, or ultimately in the place where you believe the violation occurred.

How Can You Contact the Data Protection Officer?

The Data Protection Officer may be contacted at the e-mail address dpo@geox.com.