

## **PRIVACY NOTICE**

Pursuant to and in compliance with the regulations on personal data protection, specifically Regulation (EU) 2016/679 ("GDPR") and Legislative Decree 196/2003, as subsequently amended and supplemented ("Privacy Code" and, together with the GDPR, "Privacy Regulations"), Design Management S.r.l. unipersonale, in its capacity as data controller ("DeMa" or "Controller"), wishes to inform you about the purposes and methods by which your personal data will be processed within the scope of "The Mall Club," the loyalty program promoted and managed by DeMa (the "Program").

### **Personal Data Processed**

For the purposes related to the Program, the Controller will process the data you provide when you register for the Program (which may be done online, at the Controller's Welcome Lounges, or through devices made available by the Controller), as well as data related to your purchases (along with any activities you may engage in on the "The Mall" App). Without this data, we would not be able to offer you the benefits and involve you in the initiatives linked to the Program.

In addition to this data, provided directly by you or derived from your use of the virtual identification code assigned to you ("QR Code"), and exclusively with your specific consent, DeMa (unless you have indicated a country of residence other than Italy, as specified below) may generate and process profiling data. This refers to information about your habits, tastes, and purchasing preferences, obtained automatically by analyzing your spending patterns and categorizing you into specific groups (so-called "clusters"). This enables the Controller to offer you services and products that increasingly align with your preferences and needs, adapting over time. Under no circumstances will profiling activities carried out by DeMa result in discriminatory decisions or negatively impact you.

Additionally, the Controller may also process data you provide when creating your account on the themall.it website or the related "The Mall" App. However, this will be subject to the data protection policies described in the relevant privacy notice available on the website and/or App.

### **Purposes and Legal Bases of Processing**

The Controller will process the identified data for the following purposes:

#### **Loyalty**

The Controller will process your personal data for purposes related to your participation in the Program and to assign rewards, benefits, and experiences associated with it (Article 6.1, b) of the GDPR). Failure to provide this personal data will prevent the Controller from allowing your participation in the Program.

#### **Marketing**

Only with your explicit and optional consent (Article 6.1, a) of the GDPR), the Controller may process your personal data to send you informational and promotional material, conduct market research, or carry out commercial communications related to the Program. These communications may be sent via automated contact methods (email, SMS, MMS, App notifications, etc.) or traditional methods (postal mail and operator calls).

#### **Profiling**

Only with your explicit and optional consent (Article 6.1, a) of the GDPR), the Controller may process your personal data for profiling purposes, analyzing your consumption habits and choices in connection with the Program.

If you choose not to provide consent for marketing and/or profiling purposes, this will not prevent you from accessing the Program or limit your ability to enjoy its benefits, rewards, and experiences.

You may revoke your consent at any time by contacting the Controller through the methods specified below. However, this will not affect the lawfulness of processing carried out prior to revocation.

If you have indicated a country of residence other than Italy, we may base profiling activities on the Controller's legitimate interest in better understanding its clientele and providing a personalized luxury experience (Article 6.1, f) of the GDPR).

Additionally, the Controller may process your data:

- To perform statistical and aggregated anonymous analyses, based on its legitimate interest in better understanding its clientele (Article 6.1, f) of the GDPR);

- To comply with legal obligations or orders, decisions, and measures issued by competent authorities (Article 6.1, c) of the GDPR), including the Data Protection Authority;
- To establish, exercise, or defend legal claims, based on its legitimate interest (Article 6.1, f) of the GDPR).

### **Methods of Personal Data Processing**

Your personal data will be processed primarily through electronic and automated means, but also through traditional and manual procedures, always under security measures designed to prevent destruction, loss, modification, or unauthorized disclosure of your data, or accidental or unlawful access.

Your personal data will not be subject to fully automated decision-making processes.

### **Data Retention Period**

Your personal data will be processed and retained by the Controller only for as long as necessary to achieve the identified purposes:

- Data provided upon Program registration and purchase details will be retained for loyalty purposes until you decide to terminate your participation;
- Purchase details processed for marketing and profiling purposes will be retained for 24 months from the date of recording;
- At the end of the Program, the Controller may retain some processed data, such as those related to the balance of coins earned by Program members, for a maximum of 5 years from collection.

Exceptions apply where a longer retention period is required or permitted by law, as specified in the privacy notice available on themall.it.

### **Data Communication and Disclosure**

Processing operations may be performed by:

- Employees and collaborators of the Controller as authorized data processors, specifically trained and bound by confidentiality obligations;
- The Controller's service providers and outsourcers acting as data processors under agreements pursuant to Article 28 of the GDPR;

Your personal data may also be processed by data processors located outside the European Economic Area. In such cases, we will ensure a uniform level of data protection by working only with providers in territories deemed adequate or implementing additional safeguards required by Article 46 of the GDPR (e.g., standard contractual clauses issued by the European Commission).

The Controller may also share certain personal data with commercial partners who act as independent data controllers. Any data shared will be strictly necessary for the assignment of rewards and experiences derived from the Program. We encourage you to review each partner's privacy policies when providing additional data during these experiences.

### **Data Subject Rights**

As a data subject, you have the right to:

- Access your personal data and obtain confirmation of processing and relevant details;
- Request correction or completion of inaccurate or incomplete data;
- Request deletion of your data under specific circumstances;
- Request processing restrictions under certain conditions;
- Receive your personal data in a structured, commonly used format and request its transfer to another controller;
- Object to processing for statistical or aggregated analysis based on the Controller's legitimate interest;
- Withdraw consent at any time without affecting the lawfulness of processing before withdrawal;

- File a complaint with the Data Protection Authority if you believe processing violates applicable laws.

**Controller and Data Protection Officer Contact Information**

The Data Controller is Design Management S.r.l. unipersonale, with registered office in Milan, Via San Paolo no. 7, Tax Code, VAT number, and Milan Business Register number: 05063610488.

To exercise your rights or request information regarding data processing described in this notice, you may contact the Controller at [privacy@themall.it](mailto:privacy@themall.it).

The Data Protection Officer (DPO) can be reached at [dpo@themall.it](mailto:dpo@themall.it).