PRIVACY POLICY

Welcome on Signorvino!

This privacy policy describes the personal data we collect when you browse this website or when you visit a "Signorvino" shop. It also lists the purposes of processing and the rights you are entitled to as data subject. Click on each paragraph of this privacy notice: you will obtain important information about your personal data.

We reserve the right to periodically update the content of this page. We therefore invite you to consult this privacy notice regularly to stay up to date with any changes that may have occurred since your last consultation.

INTRODUCTION

This is where you can find all the information about the personal data we collect when you browse our website or visit our shops. In addition to this policy, you can also check our <u>Cookie Policy</u>.

On this website you will also find social buttons/widgets, i.e. social network icons (e.g. Instagram, Google and X): these 'buttons' allow you to have a one-click interaction straight with the specific social network. In some sections you can also use the so-called social login, which allows you to access your reserved area using the credentials of your favourite social platform. By using the social login, you accept the terms, conditions of use and privacy policy of the social platform itself.

Remember that this policy applies only to the services available on www.signorvino.com or in Signorvino shops; if on our website there are references to third-party sites, please check their privacy policies.

We constantly update the information on this page, so check back if you want to know the latest changes!

DATA CONTROLLER & DPO

The Data Controller is Signorvino S.r.l, with legal seat in Via Portici Umberto Primo 5/3, Malcesine, Verona (Italy).

We don't do everything on our own, however...

We do actually process your personal data together with Calzedonia S.p.A. ("Joint Controller"), which is also based in Via Portici Umberto Primo 5/3, Malcesine, Verona (Italy).

You can contact both Signorvino S.r.l. and Calzedonia S.p.A. by writing to <u>privacy@oniverse.it</u>. Signorvino S.r.l. and Calzedonia S.p.A. have appointed a Data Protection Officer (DPO), who you can contact at <u>dpo@oniverse.it</u>.

PURPOSES

Click on each title to find out what data we use and for what purposes.

Browsing the website

We want to enable you to browse our website easily, and us to be able to carry out statistical analysis (in aggregated form) in order to check that the website is working properly and to detect possible liability in the event of cybercrimes.

What data do we need? IP addresses, domain names, URIs that are collected by our computer systems. What allows us to use this data?

- Offer you the services you need to enable you to browse;
- Our "Legitimate interest". We want to ensure that our systems function properly and investigate possible cybercrimes (eventually also on the ground of a legal obligation).

For how long do we retain the data? 30 days from the date of collection, unless the law or the Authorities require it to be retained for longer in connection with the investigation of possible cybercrimes.

Online products purchasing

We know that when you purchase our products, you want them to reach you as soon as possible. In order to make this happen, we will need to: manage payment for the products you purchase and proceed with their shipment, send you communications regarding the tracking of the shipment and activate (if required) the entire return and refund process.

What data do we need? Your name and surname, your e-mail address and telephone number and, of course, your shipping and billing address. If you want to return the item, you will have to provide us with your IBAN so that we can send you a refund. Remember that we do not process payment data (e.g. your card number and its security code): these data are collected exclusively by the operator of the payment service you have chosen.

What allows us to use this data?

The sales contract concerning the products you purchased on our website or in our sales outlets.

For how long do we retain the data? For the time needed to execute the sales contract and comply with regulatory obligations regarding the purchase and sale of products (e.g. tax regulations).

Customer Care

We offer you support when you need it: via chat, telephone, e-mail, online forms and social media, for any request related to the purchase of our products or services. In order to improve the quality and efficiency of our customer service, we record part of the phone calls we receive (30%). If you contact us in writing, we will keep the requests you send us, in order to provide you with the necessary support and also to handle any disputes concerning your and our rights.

What data do we need? All the data required to answer and support you (e.g. if you contact us via chat we will need your name and e-mail address.

What allows us to use this data?

- The performance of the sales contract concerning the products you have purchased, or the implementation of pre-contractual measures at your request;
- Our "Legitimate interest" in preventing "chat spam", if you contact us via chat;
- Our "Legitimate interest" in improving the quality and effectiveness of our service by recording phone calls;
- Our "Legitimate interest" in defending ourselves, including in court, in the event of legal claims or litigation.

For how long do we retain the data? For as long as necessary to help you. Recordings of phone calls are retained for a maximum of 93 days, while if you have made a complaint or legal proceedings are initiated, we will retain related service requests for 10 years.

Participation in survey

Your opinion is precious: in order to find out what you think of our products and services, our shops and our assistance, and to collect information on your interests and preferences, we will send you satisfaction surveys. Some of these are sent directly by us to all our customers, others to loyalty customers, and others are sent following your request to our customer service. There are also surveys in which you can freely participate by logging into your reserved area and filling in the section dedicated to your interests and preferences.

What data do we need? The data you provided us by filling in the survey and, should you wish to be contacted again, your contact details. If you made a request to our Customer Service, we will also use the identification number of your request.

What allows us to use this data? We will send you surveys if you have agreed to receive our commercial communications. The data you have entered in the survey is used based on your consent, which you give us by completing the survey.

For how long do we retain the data? The data in the survey are processed for up to 1 year from when we collected them. Please note that if you have filled in the section on your interests and preferences in your reserved area but abandoned the survey before completing it, we will keep the data entered for 4 months so that, if you want to resume filling in, you can pick up where you left off.

Loyalty Program "Signorvino Club"

We use your data to enable you to join the loyalty program and to manage it. The data will then be processed in order to send you all the discounts and benefits reserved for members of the loyalty program and, more generally, to manage all the legal and administrative tasks connected with the program.

What data do we need? All the data on the registration form you can find on our website or, if you decide to register in shop, the data that our sales assistants will ask you for (name, surname, address, email address, telephone number); data relating to your purchases, points, coupons and discounts.

What allows us to use this data? Your loyalty program membership contract (you can view the loyalty program regulation here).

For how long do we retain the data? For as long as you are enrolled in the loyalty program, with the exception of information relating to your purchases and your interactions with us, which will only be kept for 12 months after their collection. In the event that you do not use any of the loyalty programs of the brands belonging to Oniverse (Calzedonia, Intimissimi, Atelier Emé, Tezenis, Falconeri and Signorvino) for more than three years, your data will be deleted after this period.

Sending of commercial communications ("Direct Marketing")

If you wish, we will send you commercial communications by post, e-mail, SMS, landline and mobile phone, to inform you about our services and products, to carry out market research and to get your opinion on our products, including those relating to Oniverse's other brands (Calzedonia, Intimissimi, Atelier Emé, Tezenis, Falconeri and Signorvino).

What data do we need? Your contact details (email address and telephone number) and your name and surname.

What allows us to use this data? Your consent. Remember that you can revoke it at any time by writing to privacy@oniverse.it by accessing your private area or by clicking on the appropriate link included in the communications.

For how long do we retain the data? Until your consent is withdrawn.

Profiling

If you are wondering what this is: for us, it is the ability to send you personalised marketing communications based on your profile, purchasing and browsing habits, and use your information to develop products and services in line with our customers' preferences.

What data do we need? Data relating to your purchases - including those relating to Oniverse's other brands (Calzedonia, Intimissimi, Atelier Emé, Tezenis, Falconeri) - your country of origin, your gender and your age, and to your interaction with us through our websites, through Apps - which may be developed by us or by third parties - and through our social channels. We may also examine data relating to your (possible) participation in the loyalty program and the use of the services provided by us. We may also enrich your profile with information lawfully acquired from third parties and made available to Signorvino, with statistical information (e.g. demographic information, geo-referencing data, etc.) as well as with information relating to the electronic tools you use to interact with us.

What allows us to use this data? Your consent. Remember that you can revoke it at any time by writing to privacy@oniverse.it by accessing your private area or by clicking on the appropriate link included in the communications.

For how long do we retain the data? The data regarding your interactions with us will be retained for 12 months from the date of collection; information regarding your purchases will be retained for 3 years from the date of each purchase.

Antifraud

We need to verify that the person who buys is the same person in whose name the payment instrument that is used is registered.

What data do we need? Your name, surname, email address, IP address, details of the order you made, and information on the type of payment instrument used to make the purchase.

What allows us to use this data? Our "Legitimate Interest". We want to prevent and counteract possible fraud.

For how long do we retain the data? For five years after the date on which we collected the data.

Reserved area registration

It will allow you to save certain content, such as your 'wishlist', i.e. your list of favourite products, purchase history, etc.

What data do we need? The data you are asked for in the account registration form. You will find the essential data marked with an asterisk: without that data we will not be able to open your account.

What allows us to use this data? The registration contract in our reserved area.

For how long do we retain the data? If you do not use Oniverse brand accounts for more than 3 years, these accounts and the data relating to them will be deleted

"Stay logged in"

This will make it easier for you to use your reserved area ('account') by saving your login credentials. This means that if you close the web page and reopen it later, you will not have to log in again.

What data do we need? Your login credentials.

What allows us to use this data? : your explicit consent by accepting a cookie (see also <u>Cookie Policy</u>). For how long do we retain the data? the cookie that saves your login credentials will remain active for 6 months. At any time, you can deactivate cookies by accessing the "Cookie Settings" section available on the <u>Cookie Policy</u>.

Purchase of products in shop with shipping at home or in shop

If the product you want is not available online or in the shop, we want to give you the possibility to order it at the shop and receive it where you prefer: at your home or in your favourite 'Signorvino' shop.

What data do we need? Your name and surname, your e-mail address and telephone number, your shipping and billing address, as well as information about the product you purchased. If you wish to return the product, you will need to provide us with your IBAN so that we can provide you with a refund of the price of your purchase.

What allows us to use this data? The sales contract regarding the products you have purchased.

For how long do we retain the data? For the time required to perform the contract and comply with regulatory obligations concerning the purchase and sale of products (e.g. tax regulations).

There are other Data Controllers! In addition to Signorvino S.r.l. and Calzedonia S.p.A., if you have made a purchase at a shop managed by an affiliated company (i.e. a company with which there is a commercial affiliation relationship), that company will also be a Data Controller together with us. If you wish to exercise your rights in regard to this specific purpose, you can contact all the Data Controllers at privacy@oniverse.it

E-Gift Card

What data do we need? The name and e-mail address of the recipient of the E-Gift Card. This data is provided to us by the person who purchases the Gift Card.

What allows us to use this data? Our Legitimate Interest. We want the recipient to receive and use his Gift Card without hindrance.

For how long do we retain the data? For the time strictly necessary to deliver the Gift Card and ensure its use.

Statistical Analysis

We do statistical analysis (in the form of reports or behavioural models) to examine - in an aggregate way - the level of effectiveness of our commercial initiatives and create future initiatives (both commercial - such as new product launches - and promotional) in line with our customers' tastes.

What data do we need? Information about your purchases (including those of other Oniverse brands), your country of origin, your age, your gender, and any other data obtained by reviewing your interaction with us through e-mail, our websites, the section about your interests and preferences in your reserved area, if you have filled it in, and through Apps, whether developed by us or by third parties (for more information, please see their privacy policies).

What allows us to use this data? Our Legitimate Interest. We want to analyse - in pseudonymised form (i.e. without information directly attributable to individual customers) - customer data in order to obtain information that can help us understand customers' purchasing behaviour and the way customers interact with us, in order to be able to compete with players from the same business field.

For how long do we retain the data? Your purchase data - stored in pseudonymised form - for 5 years. Other data - also pseudonymised - for 2 years.

Participation in events and initiatives

To participate in some of our events or initiatives you need to register or make a reservation.

What data do we need? Those requested in the online booking form (e.g. your first and last name, your e-mail address, your telephone number).

What allows us to use this data? Your specific consent given by filling in the registration form.

For how long do we process data? For the duration of the event, you are attending. After the event the data will be deleted.

There are other Data Controllers! In addition to Signorvino S.r.l. and Calzedonia S.p.A., if you have booked an event to be held at the point of sale of one of our affiliated companies, that company will also be a Data Controller along with us. If you want to exercise your rights in relation to this specific purpose, you can contact all the Joint Data Controllers at privacy@oniverse.it

Reserve a table

We need your data to process your request for a table reservation at the Signorvino restaurant you have chosen.

What data do we need? The data requested in the online booking form (e.g. your name and surname, your e-mail address, your telephone number). Data marked with an asterisk are required to complete the booking.

What allows us to use this data? The implementation of pre-contractual measures at your request.

For how long do we retain the data? For the time needed to manage your reservation.

There are other Data Controllers! In addition to Signorvino S.r.l. and Calzedonia S.p.A., if you have booked a table at a restaurant operated by an affiliated company, that company will also be a Joint Data Controller with us. If you have any doubts or questions regarding this specific purpose, you can reach us, and the affiliated company, at privacy@oniverse.it

Personalized assisted sale (reserved to Loyalty Program members)

If you are a member of our loyalty program, you can benefit from personalised advice from our sales assistants.

What data do we need? Your purchases made over the last 12 months.

What allows us to use this data? Our Legitimate Interest in providing loyalty customers with a sales service tailored to their previous purchases.

For how long do we retain the data? For 12 months from the date of their collection.

Product Reviews

Let other customers know how much you enjoyed our products! If you wish, by logging into your reserved area, you can leave a review on our website, linked to the products you have purchased. Your review will be visible to all users visiting our website.

What data do we need? Your e-mail address, your name, your surname, the products you have purchased, the rating and the review you want to give. In any case, on our website, only your name and the initial of your surname will be shown under your review.

What allows us to use this data? We process this data based on your consent expressed by issuing the review and which can be withdrawn at any time by writing to privacy@oniverse.it.

For how long do we retain the data? Your review will be visible in connection with the product you have purchased until it is available on our website and then exclusively in your reserved area. You can request the deletion of your review at any time by writing to privacy@oniverse.it.

E – receipt sending

Not a fan of the paper receipt? If you are a member of our Loyalty Programme, you can ask to have it sent to you by e-mail.

What data do we need? Your e-mail address.

What allows us to use this data? The need to fulfil your request and comply with our contractual and regulatory (e.g. tax) obligations.

For how long do we retain the data? For 10 days after the receipt was issued.

There are other Data Controllers! In addition to Signorvino S.r.l. and Calzedonia S.p.A., if you have made a purchase at a shop operated by an affiliated company, that company will also be a Joint Data Controller with us. If you have any doubts or questions regarding this specific purpose, you can reach us, and the affiliated company, at privacy@oniverse.it

Product availability information

If you wish, you can request to be notified by email regarding the availability of our products (e.g. back in stock).

What data do we need? Your e-mail address.

What allows us to use this data? The implementation of pre-contractual measures at your request.

For how long do we retain the data? We delete your data immediately after informing you that the product you want is back in stock and, in any case, one month after your request.

Invoicing

Do you need an invoice for your purchases? You can request it at the time of payment.

What data do we need? The name and surname, contact details, billing address and residence, tax code, VAT number and recipient code (SDI code) of the person to whom the invoice is addressed.

What allows us to use this data? The need to fulfil our contractual and regulatory (e.g. tax) obligations. For how long do we retain the data? For as long as necessary to fulfil contractual and regulatory obligations regarding the purchase and sale of products (e.g. tax regulations).

There are other Data Controllers! In addition to Signorvino S.r.l. and Calzedonia S.p.A., if you have made a purchase at a shop operated by an affiliated company, that company will also be a Joint Data Controller with us. If you have any doubts or questions regarding this specific purpose, you can reach us, and the affiliated company, at privacy@oniverse.it.

Video surveillance at shops

To ensure the security of our shops, staff and customers, there is a video surveillance system whose images are used to intervene in the event of concrete situations of danger (such as fire, theft, robbery, vandalism and unlawful access) or for the purposes of defence, verification and exercise of our claims and rights.

What data do we need? Your picture.

What allows us to use this data? Our Legitimate Interest in protecting company assets and the safety of our employees and customers.

For how long do we retain the data? The pictures are kept for 72 hours. In the event of a request by the judicial authority or the judicial police or, in any case, in the event of use of the pictures in legal proceedings, the retention period may be extended until the end of those proceedings.

RECIPIENTS

In order to achieve the purposes outlined above, we disclose your data to the following subjects

- staff of the Data Controllers who manage the website and the services available online and in the shops;
- our suppliers (e.g. in IT or consulting), who act as "Data Processors"
- employees of affiliated companies that manage "Signorvino" shops, with reference to the purposes "Signorvino Club Loyalty Program", "Participation in events", "Reserve a table", "Personalised assisted sales", "Sending digital receipts";
- credit institutions, payment intermediaries, shipping agents and carriers, insurance companies: these subjects act as autonomous data controllers and their involvement is necessary to guarantee the use of our services (e.g. making payments; delivering the goods purchased).

TRANSFERS

Some of the data collected is transferred outside the European Union. This is done in compliance with the provisions of the EU Regulation 2016/679 ('GDPR') and in particular, subject to the signing of Standard Contractual Clauses (approved by the EU Commission with Decision No.2021/914/EU) or to countries able to guarantee an adequate level of protection of personal data and therefore recipients of an Adequacy Decision adopted by the EU Commission.

PRIVACY RIGHTS

The GDPR grants you certain rights regarding your personal data, you can exercise them by writing to privacy@oniverse.it. We will reply as soon as possible and in any case no later than 30 days after your request. If necessary, we will ask you for further information to verify your identity. Read on to find out about your rights:

- **Right of access**, i.e., the right to know if a processing of personal data concerning you is in progress and, if confirmed, to obtain a copy of such data and be informed about the origin of the data, the categories of personal data processed, the recipients of the data, the purposes of the processing, the existence of an automated decision-making process (including profiling), the data retention period, the rights provided for by the applicable law;
- Right to request the correction or integration of your data;
- **Right to request the deletion of personal data** if such data are no longer necessary for the purposes for which they were collected, or if we are no longer authorized to process them;
- **Right to obtain the limitation** of the processing of personal data in the following cases: i) you have contested the accuracy of the personal data. You can request a processing limitation for the period necessary to verify the accuracy of the data; ii) we are no longer authorized to process the data, and instead of deleting them, you can ask us to limit their use; iii) if the personal data in our possession, despite being no longer necessary for the purposes for which they were collected, are necessary for you to ascertain, exercise or defend a right in court;

- **Right to data portability**, i.e., the right to receive personal data concerning you in a structured format, commonly used and readable by an automatic device, as well as the right to request for such data to be transmitted to another Data Controller;
- Right to revoke the consent, for the processing based on it;
- **Right to oppose** at any moment to the processing of personal data based on our legitimate interest.

You also have the right to lodge a complaint with the competent data protection supervisory authority if you believe that the processing of your data conflicts with the provisions of the applicable laws.

Last update: January 2025