

### **PRIVACY & COOKIES POLICY**

### 1. PRIVACY NOTICE

In this page, we want to inform you about website <u>http://centrostyle.com/</u> management, in reference to processing of the personal data of users who consult the website. This notice is provided pursuant to the European Regulation 2016/679 dictated on the protection of natural persons regarding the processing of personal data, as well as the free movement of such data (hereinafter Regulation) for users of the services of our website, provided via Internet. The notice does not apply to other websites consulted via our links, for which the Data Controller is not liable in any way.

### 2. DATA CONTROLLER

Data Controller of the data processed when your browse this website is Centro Style S.p.A., based in Via G. D. Martinengo, 7 - Vedano Olona (VA).

### 3. PLACE OF PROCESSING

The processing connected to the web services of this web site take place in Italy, at the before mentioned headquarters of the Data Controller and are taken care of by employees and collaborators of the Data Controller authorized to process.

### 4. PURPOSE OF PROCESSING AND LEGAL BASIS

The data will be subject by us to computer or manual processing for the performance of the following purposes:

#### If you are a customer (distributor or optic)

- a) To allow registration to the reserved area of this website, to carry out the management of customers and obligations arising from the contract to which you are a party (management of orders, shipments and returns); to activate web payment procedures, to carry out administrative, accounting and tax activities based on obligations established by law or regulation; the legal basis for processing is the execution of contractual obligations;
- b) To carry out commercial and promotional activities, as well as market research and surveys on the quality of services received from Centro Style S.p.A., (by sending e-mail, fax, SMS, paper mail or through telephone contact as well as through messages sent via the instant messaging service like WhatsApp or similar) and communicate, even abroad, to third parties who will carry out activities instrumental to the above purposes; the legal basis is your consent;
- c) To carry out profiling and profiled marketing activities: the legal basis is your consent;
- d) To send our newsletter; the legal basis is your consent.

#### If you are a prospect (optic)

- a) To process your requests from the contact section to qualify you as our customer; the legal basis is the legitimate interest of the data subject;
- b) To carry out commercial and promotional activities, as well as market research and surveys on the quality of services receviced from Centro Style S.p.A., (by sending e-mail, fax, SMS, paper mail or through telephone contact as well as through messages sent via the instant messaging service like WhatsApp or similar) and communicate, even abroad, to thirs parties who will carry out activities instrumental to the above purposes; the legal basis is your consent;
- c) To send our newsletter; the legal basis is your consent.



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### 5. DATA COMMUNICATION

Personal Data may be disclosed to individuals who manage the website, to technological and instrumental partners that the Data Controller uses for the provision of the services requested by users, to individuals who, on behalf of the Data Controller, carry out accounting and tax management activities; as well as to subjects to whom the right to access the data is recognised by provisions of law and/or secondary regulatory matters thereof.

The personal data provided by users who request informative material (requests for information, answers to questions, etc..) or other communications are used only to perform the service or provision requested and are communicated to third parties only where this is necessary for that purpose.

The data will not normally be transferred outside the European Union. In this regard, we guarantee that the transfer can only take place to subjects who have provided suitable guarantees for the processing of data through appropriate regulatory/contractual instruments such as the signing of standard contractual clauses.

# 6. TYPES OF DATA PROCESSED

#### Browsing Data

The Computer systems and software procedures used to operate this website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. This data is not collected to be associated with identified data subjects, but by its very nature could, through processing and association with data held by third parties, allow users to be identified.

This data category includes the IP addresses or domain names of the computers used by users connecting to the site, 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 response, the numerical code indicating the status of the response given by the server (successful, error) and other parameters relating to the user's operating system and computer environment.

This data is used for the sole purpose of obtaining anonymous statistical information on the use of the site and to check that it is functioning correctly. The data could be used to ascertain responsibility in the event of hypothetical computer crimes against the site.

#### Data provided voluntarily by the user

If you optionally, explicitly and voluntarily send electronic mail to the addresses present on this website, your e-mail address and any other personal data included in the message will be acquired in order to respond to your requests, to send our newsletter we will ask you a valid e-mail.

We will require other data such as gender, age, province, however it is not mandatory to provide such information.

For the <u>registration to the reserved area and the purchase</u> we will require identification data, a valid e-mail address, a shipping address. The data relating to the bank transaction are not stored on the owner's computer systems.

### 7. DATA PROCESSING PROCEDURE

Personal data is processed primarily by automated means and will be stored in such a way as to minimise, through the adoption of appropriate and preventive security measures, the risks of destruction or loss, including accidental loss, of the data, unauthorised access or processing that is not permitted or does not comply with the purposes of collection.





### 8. DATA RETENTION

Personal data will be processed for as long as it is necessary to achieve the purpose for which they were collected.

Thereafter, personal data will be deleted or anonymized.

Promotional and marketing activities will be carried out for 24 months from the last useful contact with the customer.

To carry out profiling activities we will use data from the last 12 mobile months.

# 9. OPTIONAL PROVISION OF DATA

Apart from what is specified for browsing data, the user is free to provide personal data to request the services offered by the company. Failure to provide such information may make it impossibile to obtain the information requested.

If the processing is based on your consent, you may revoke it at any time; the revocation of consent does not affect the correctness of the processing carried out before the revocation.

### 10. MINORS

No personal data should be entered on the site by minors without the prior consent of their parents or guardians. The data controller encourages all parents and guardians to instruct minors on the safe and responsible use of their personal data on the Internet. The controller, however, undertakes not to retain or knowingly use any personal data collected from minors for any purpose whatsoever, including disclosure to third parties.

### 11. RIGHTS OF INTERESTED PARTIES

Finally, we inform you that you will be able to exercise the rights covered by the Reguolation by writing to privacy office of data controller in Via G.D. Martinengo, 7 - Vedano Olona (VA). In particular, you may:

• Access to your personal data, obtaining evidence of the objectives pursued by the Data Controller, the categories of data involved, the recipients to whom the data may be communicated, the applicable retention period, the existence of automated decision-making processes, including profiling, and, in such cases, significant information on the logic used, as well as the importance and possible consequences for the data subject, if not already indicated in this Privacy Policy;

- Allow to correct inaccurate personal data without delay;
- In the cases provided by law, allow to delete data;
- Allow to limit or oppose processing when allowed based on the provisions of law applicable to the specific case;
- If deemed appropriate, lodge a complaint with the supervisory authority.

### **12. LINK TO OTHER WEBSITES**

The site may contain hyperlinks to other websites, proposed in order to provide a better service to its users. The controller is no way responsible for the content of the websites accessed by users through its site. The existence of a hyperlink to another site does not therefore imply approval or acceptance of responsibility by the data controller for the content of the new site accessed, including in relation to the policy adopted for the processing of personal data and its use.





#### **13. COOKIES POLICIES**

The website uses cookies and similar technologies to guarantee correct functioning of the procedures and to improve the experience of using on-line applications.

Cookies are small text files sent to your browser to recognize it when you return to this website.

In this policy, cookies also include all other similar technologies (tags, scripts, etc.). Cookies allow the data controller to collect information about the use of the website, such as the pages visited and the duration of the user's session.

In particular, on this site are used session cookies and permanent cookies.

- Session cookies make it possible to keep track of navigation data, such as the web pages you visited and the options you used. When you close your Internet browser, the session ends and the cookies is deleted.
- Permanent cookies, on the other hand, allow the website to recognize the user on subsequent visits.

This website uses the following types of cookies:

#### • "Technical" cookies

These cookies are needed for browsing and guarantee secure and efficient browsing of the website. Technical cookies are both persistent cookies and session cookies. In the absence of these cookies, the site or some portions of it may not function properly.

Therefore, Technical cookies are always used, regardless of user preferences. The duration of these cookies is strictly limited to the work session or they can use a longer time to remember the visitor's choices.

Below is a summary of the technical cookies used on this website.

COOKIES NAME	TYPE	FUNCTION	DURATION	FIRST PART/THIRD PART	INFORMATION ABOUT THIRD PART
PHPSESSID	Technical	User session Management	Session	First part	
uslog	Technical	User session Management	Session	First part	



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# • Analytical Cookies

Analytical cookies are used to collect and analyse traffic and usage of a website. There are first-part or third part cookies; they are collected and managed to monitor and improve the performance of the host site (performance cookies). The deactivation of these cookies can be performed without any loss of functionality. (For further information on Google's cookie policy, please refer to the following link: <a href="http://www.google.com/intl/it\_ALL/analytics/learn/privacy.html">http://www.google.com/intl/it\_ALL/analytics/learn/privacy.html</a>).

COOKIE NAME	TYPE	FUNCTION	DURATION	FIRST PART/THIRD PART	INFORMATION ABOUT THIRD PART
lang	Preference	Stores the language chosen by the user	1 day	First part	
_at.hist.#	Statistics	Used by the AddThis social sharing platform to store user history of the addThis sharing widget	Persistent	Third part	AddThis
_ga	Statistics	User ID for statistical purposes	2 year	Third part	Google
_ga_#	Statistics	It records a unique ID used to generate statistical data about how the visitor uses the website	2 year	Third part	Google

Below is a summary of the Analytical cookies used on this website.

We mask certain portions of the IP address within the cookie to minimize the identification of the data subject.

### • Profiling Cookies

These cookies are used to track the user browsing and create profiles on his tastes, habits, choices, etc These cookies make it possible to trasmit to the user's terminal advertising messages in line with the preferences already manifested by the same user in online browsing.

Only if the user has given his consent, the site provides cookies that are not strictly necessary in order to allow the user to browse the website with full functionality, in the absence of consent these cookies will be blocked.

Through profiling cookies, Data Controller collects information on the use of the Website and user preferences (e.g. page visited, session duration). Data Controller may use the information received through cookies in combination with other customer data for analytical purposes, in order to improve the user's experience on the website and the services offered.





Below is a summary of the profiling cookies used on this website:

COOKIE NAME	TYPE	FUNCTION	DURATION	FIRST PART/THIRD PART	INFORMATION ABOUT THIRD PART
_atuvc	Marketing	Updates the counter of the site's social sharing features	1 year	Third part	AddThis
_at.cww	Marketing	Used by the social sharing platform Addthis	Persistent	Third part	AddThis
_fbp	Marketing	Used by Facebook to provide a variety of advertising products such as real-time offers from third part advertisers	3 months	Third part	Facebook
ads/ga- audiences	Marketing	Retargeting	Session	Third part	Google
at-lojson- cache-#	Marketing	Used by the platform of social sharing Add This	Persistent	Third part	AddThis
at-rand	Marketing	Used by the platform of social sharing Add This	Persistent	Third part	AddThis
loc	Marketing	Geolocation, to determine the geographic location (at the state level) of users sharing information with each other	1 year	Third part	AddThis
tr	Marketing	Used by Facebook to deliver a variety of advertising products as real-time offers from third-party advertisers	Session	Third part	Facebook
uvc	Marketing	Detects how often the social sharing service AddThis engages with the same user	1 year	Third part	Addthis
xtc	Marketing	Records the user's sharing of content via social media	1 year	Third part	AddThis

### 14. TOTAL OR PARTIAL COOKIES DISABLING

Total or partial disabling of technical cookies could prevent use of certain functions of the website reserved to registered users. However, use of public contents is possible even when cookies are completely disabled. Disabling "Third part" cookies does not affect browsing in any way.

The setting must be defined specifically for the different websites and web applications.

The best browsers allow different settings to be defined for "proprietary" cookies and "Third part" cookies. The procedures for disabling cookies of several browsers are shown below.

#### Edge

- 1. Open Microsoft Edge.
- 2. Select Settings and more > Settings > Privacy, search and services.
- 3. Under Clear browsing data, select Choose items to delete.
- 4. Under time range choose a time interval.
- 5. Select Cookies and other site data, then Delete now.





### Chrome

- 1. Select the Chrome menu icon.
- 2. Select Settings.
- 3. In the Privacy and Security section, click Cookies and Other Site Data.
- 4. Click Shows all cookies and site data. Remove all.
- 5. Confirm by clicking Clear All.

## Firefox

- 1. Click on the menu button and select Options.
- 2. Select the Privacy and Security Panel.
- 3. In the Advances Tracking Protection section, select Custom and check the Cookies box.
- 4. Use the drop-down menu to choose the types of cookies to block.
- 5. Close the "about: preferences" page. Any changes you have made will be saved automatically.

### Explorer

- 1. In Internet Explorer select the tools button and then select Internet Options.
- 2. Select the Privacy tab and, under Settings, select Advanced, then choose whether you want to accept, block, or be prompted for proprietary or third part cookies.

# Safari

- 1. Go to the Safari menu (icon at the top right of the browser) and select Preferences.
- 2. In the pop-up window that opens, select the Security icon (in the shape of a padlock).
- 3. Under the "Accept Cookies" heading, select the "Never" button.
- 4. You can choose your preference clicking on "my preference about cookies"

# 15. SOCIAL MEDIA POLICY

Centro Style uses social media to promote its products and services, to collect comments and suggestions about the customer experience, and to respond to inquiries from visitors:

Facebook: <u>https://www.facebook.com/centrostyle/</u>

Instagram: <u>https://www.instagram.com/centrostyle\_official/?hl=it</u>

Youtube: <u>https://www.youtube.com/channel/UCpZq\_joudeANp6x6Zjvq6cg</u>

Linkedin: https://www.linkedin.com/company/centro-style-s-p-a-/

The processing of personal data of users is carried out according to the policies in use at the platforms used. Personal or special data included in public comments or posts within Data Controller social channels may be removed. The data shared by users through private messages sent directly to the managers of the channels will be treated in accordance with current law on protection of personal data and this privacy policy.

# 16. UPDATES

This document may be periodically updated for legal or operational reasons. Therefore, we invite users to periodically review this cookie policy.

