

PRIVACY POLICY

WHOLESALEERS

Prada S.p.A., holding company of the Prada Group, with registered office in Milan (Italy), Via A. Fogazzaro 28, as data controller (hereinafter the “Data Controller” or the “Company”), informs its Clients that the personal data¹ collected during the pre-contractual and contractual relationship with Prada S.p.A., will be processed in compliance with the current applicable legislation on the protection of personal data, including the EU Regulation 2016/679 (“GDPR”), as well as the principles and rules of conduct contained in the Prada Group Code of Ethics.

Purposes and lawful basis of the data processing

Personal data (identification data and contact details, accounting, commercial, administrative and fiscal data) directly referred to the Client (when a natural person) or data, essentially identifying and contact information, referred to the other data subjects (such as collaborators, employees or other contact persons of the Client, etc.) are used by the Data Controller for the instrumental and functional purposes to carry out the pre-contractual and/or contractual relationship between the Client and Prada S.p.A., including the management of your access credentials to our wholesaler websites, as well as for the execution of all obligations of an administrative, accounting and fiscal nature and anything else required by the applicable laws and regulations pursuant to art. 6, paragraph 1, letters b) and c) of the GDPR. The processing of personal data of collaborators, employees and other contact persons of the Client is also based on the legitimate interest of the Data Controller for the correct and efficient management of the relationship with its Clients, in compliance with art. 6, paragraph 1, letter f) of the GDPR. If necessary, personal data may be used for the establishment, exercise and/or defense of the Company’s legal claims; in this case the legal basis is the legitimate interest of the Data Controller pursuant to art. 6, paragraph 1, letter f) of the GDPR.

Method of processing

Personal data will be processed by suitable electronic or automated means and computerized tools, or manually and on hard copy, exclusively for the purposes for which they have been collected and according to criteria of lawfulness and correctness and protecting the security and confidentiality of data through the adoption of appropriate measures to prevent loss, alteration, cancellation, destruction, unauthorized access, processing or disclosure or processing beyond the purposes of collection. The data will be processed by Company’s staff, duly authorized to do so in accordance with their respective job duties. Whenever necessary and/or instrumental to the abovementioned purposes, personal data may be processed by other entities outside the company structure of Prada S.p.A. as indicated in the following paragraph. These third parties will act on behalf of the Company as data processors or independent data controllers.

Disclosure and dissemination

The data collected will not be disclosed and disseminated to unknown persons. Any recipients of the data, external to the company structure of Prada S.p.A., may be the public bodies, the authorities and the supervisory and control bodies for compliance with the law, as well as, when necessary for the purposes indicated above, other Prada Group's companies and/or third party services providers such as consultants in accounting and tax matters, auditing firms, legal and sector consultants, IT assistance providers (collectively “Service Providers”) engaged in the correct and regular pursuit of the described purposes.

As the Company is part of an international network and uses global services personal data may be transferred, even temporarily, abroad, in compliance with applicable legislation, including to locations outside the European Union, by adopting all appropriate security measures and safeguards to ensure an appropriate level of data protection and security.

The Service Providers will process and retain personal data only to the extent necessary for the purposes of providing the entrusted service and to meet any regulatory requirements in accordance with any applicable laws.

Data retention period

¹ ‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

The data will be kept for: (a) as long as required to carry out the purposes for which the Personal Data was collected, (b) the entire duration of the contractual relationship and subsequently for the time necessary for the fulfillment of the purposes deriving from the obligations established by law, in any case within the 10-years prescription period set for the rights and obligations governing the data processing. In the case of judicial litigation, data will be kept for its entire duration, until the time limit for lodging appeals.

Nature of the provision

The provision of data is mandatory for the fulfillments required and sanctioned by law, for the rest the provision is optional but necessary and any refusal to provide the data could prevent the Data Controller from implementing the contractual relationship with the Client and its punctual execution.

Data subject's rights

The data subjects may exercise their rights under the applicable legislation on the protection of personal data at any time and without charge by contacting the Data Controller at the addresses indicated in the next paragraph. In particular, pursuant to articles from 15 to 21 of the GDPR, the data subject may exercise the following rights:

- **Right of access** - right to obtain confirmation as to whether or not personal data concerning him or her are being processed, as well as the right to receive any information relating to their processing or ask for copies of his/her personal data;
- **Right to rectification** - right to obtain the rectification of his or her personal data held by the Data Controller, if data subject thinks they are incomplete or inaccurate;
- **Right to erasure** - right to obtain the erasure of his or her personal data, under certain circumstances such as (i) if personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, (ii) if the data subject withdraws consent on which the processing is based and where there is no other legal ground for the processing, (iii) if the data subject objects to the processing, (iv) if the personal data have been unlawfully processed;
- **Right to restriction of processing** - right to obtain restriction of data processing on the occurrence of certain conditions such as if data subject is concerned about the accuracy of the data or how it is being used. If necessary, data subject can also stop a data controller deleting his/her data;
- **Right to data portability** - right to get his or her personal data in a way that is accessible and machine-readable and ask to transmit those data to another data controller without hindrance;
- **Right to object** - right to object to the processing of his or her data for legitimate reasons;
- **Right to lodge a complaint** - right to lodge a complaint with the Data Controller and/or the competent Supervisory Authority – including the *Garante per la Protezione dei Dati Personali* (www.garanteprivacy.it) - if data subject believes there is non-compliance with the provisions of the applicable laws.

Data controller and contacts

Prada S.p.A.
Via Antonio Fogazzaro 28, 20135 Milan (Italy)

Group Data Protection Officer
Email: privacy@prada.com

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