

EXTENDED PRIVACY NOTICE

This privacy notice ("**Notice**") relates to two separate groups of data processing operations: **i**) one governed by the EU General Data Protection Regulation (EU Regulation 2016/679 - "**GDPR**"), to the extent that such processing operations are carried out by companies established within the EU. In particular, it describes in pursuance of Article 13 of the GDPR how B&B Italia S.p.A. ("**B&B Italia**"), a company belonging to the Design Holding Group (the "**Group**") may process your personal data collected through this e-commerce website (the "**Site**") for marketing and profiling purposes jointly with Design Holding and other companies of the Design Holding Group. The specific rules applying to such processing operations subject to the GDPR are covered by Sections A) and B) of this notice; **ii**) the second one describing how B&B Italia USA Inc ("**B&B USA**") and YDesign Group LLC ("**YDesign**") process your data in the United States, pursuant to US law, for their own purposes. The specific rules applying to such processing are covered by Sections A) and C) of this notice

In this Notice:

- "**Design Holding Group**" or "**Group**" means each and all of the following companies: Design Holding S.p.A., Flos S.p.A., International Design Group S.p.A., B&B Italia S.p.A., Louis Poulsen A/S, Fashion Furniture Design S.p.A. and their respective subsidiaries as listed below. This list can be updated from time to time to the extent that new companies become part of the Group or current companies exit;
- "**us**", "**we**" or "**our**" means, as the case may be, B&B Italia S.p.A. or the Design Holding Group companies or in connection with the processing operations described in Section C), B&B USA and/or YDesign.
- "**you**" or "**your**" refers to the natural or legal person, as the case may be, that purchases the Products through the Site or in Store.

This policy is comprised of three parts:

A) GENERAL PART, where you can find the following information in detail:

1. PLUG-INS AND INTERACTIONS WITH SOCIAL NETWORKS

2. BROWSING DATA AND COOKIES

3. CHANGES TO THIS NOTICE

B) EU SPECIAL PART, in which you will find a **description of the specific processing operations that may be carried out by B&B Italia with respect to the personal data that we collect through this Site and/or when you make contacts with us on occasion of purchases made through this Site and/or because you have provided us with your data upon making inquiries or otherwise by getting in touch with us.**

In the EU Special Part you will find information about the processing operations divided in the following paragraphs:

1. CONTROLLERS

2. HOW YOUR PERSONAL DATA ARE PROCESSED

3. PROCESSING ACTIVITIES

I. REGISTRATION ON THE TRANSACTIONAL AND NON-TRANSACTIONAL SITE

II. WHEN YOU CONTACT US THROUGH OUR TRANSACTIONAL AND NON-TRANSACTIONAL SITE

III. MARKETING ACTIVITIES RELATING TO SIMILAR PRODUCTS

IV. B2C MARKETING AND PROFILING ACTIVITIES

V. B2B MARKETING AND PROFILING ACTIVITIES

VI. ADMINISTRATIVE AND SECURITY PURPOSES

VII. WHEN YOU DIRECTLY CONTACT THE CONTROLLERS

VIII. COMPLY WITH LEGAL OBLIGATIONS AND EXERCISE OF RIGHTS BEFORE COMPETENT AUTHORITIES

4. WHO YOUR PERSONAL MAY BE DISCLOSED TO

5. TRANSFER OF PERSONAL DATA OUTSIDE THE EEA

6. YOUR RIGHTS

7. HOW TO CONTACT THE CONTROLLERS

8. HOW TO EXERCISE YOUR RIGHTS

C) US Special Part, in which you will find a **description of the specific processing operations that will take place in the United States with respect to the personal data that B&B USA and YDesign collect through this Site and/or when you make contacts with them on occasion**

of purchases made through this Site and/or because you have provided them with your data upon making inquiries or otherwise by getting in touch with them.

In the US Special Part you will find information about the processing operations divided in the following paragraphs:

- 1. Managing Information Preferences**
- 2. Information You Voluntarily Submit**
- 3. How We Use Your Information**
- 4. Marketing and Communications.**
- 5. Disclosures to Service Providers**
- 6. Other Disclosures**
- 7. Public Areas and External Sites**
- 8. Security**
- 9. Children's Privacy Statement**
- 10. Processing in the United States**
- 11. California Residents**

Protection and privacy of your personal data are a priority for us. This Notice is constantly updated. The head of this Notice shows the latest update date. We invite you to constantly check the Notice to be informed about any updates, provided that as it concerns the list of companies part of the Design Holding Group, the relevant update might occur at later than the actual variation of the Group's composition, due to technical and organizational reasons.

A) GENERAL PART

Products marketed on this website (the "Site") are sold on behalf of B&B Italia USA Inc ("B&B USA") by YDesign Group LLC ("YDesign"), acting as merchant of the records for B&B USA. In addition to B&B USA and YDesign, subject to your consent where necessary, your Data may also be processed by B&B Italia S.p.A. ("B&B Italia") and by the other companies of the "Design Holding Group" (hereinafter also the "Group") for marketing and profiling purposes.

In this General Part you can see common rules about how your data are processed by B&B USA, YDesign and B&B Italia,

1. PLUG-INS AND INTERACTIONS WITH SOCIAL NETWORKS

The Site may interactions with third parties websites (e.g. the other companies of the Group) and social networks (e.g. Facebook, Instagram, LinkedIn) through hyperlink, sharing button, social plug-in and other similar instruments.

By accessing one of the areas of the Site equipped with this type of tool, the Internet browser will connect the data subjects directly to the servers of the third-party websites in question, thus transferring their personal data to the providers of those Websites.

Depending on the specific agreements in place with the providers of such third-party websites, B&B Italia may act as autonomous controller or joint controllers with respect to such data transfers. With regard to the methods of privacy protection and processing of personal data collected by the operators of third- party websites with which the interactions described above occur, please refer to the relevant websites.

2. BROWSING DATA AND COOKIES

Cookies

When a user visits the Site, the controllers may collect the following browsing information:

- Technical information, including IP address;
- Information about the devices used by users, browser and operating systems, etc.
- Information about navigation on the Site, including URLs of the pages visited and activities that are performed on the page, dates and times of navigation, time spent, clickstream.

This information is collected for the proper operation, management, maintenance and improvement of the Site, as well as to ensure that users' browsing is safe and to be able to establish liability in the event of security breaches. They may also be used to allow us to obtain statistics on the use of the Website with the possibility of analyzing the data also in aggregate form and to carry out profiling activities.

Users are always free to decide whether to provide the controllers with their browsing data, for example by choosing to disable cookies through the settings of their browsers. However, refusal to provide information necessary for navigation purposes may make it impossible to carry out activities strictly related to navigation itself and, therefore, also to consult and interact with the Website.

We keep these data only for the time strictly necessary for the purposes for which they are collected.

Through the Website, navigation data is collected through the use of cookies. To learn more about how cookies work, and how to activate and deactivate them, please consult our cookie policy which is accessible through this Site.

Analytics

We use Google Analytics, a web analytics service of Google, Inc. ("Google"), to collect and summarize data regarding usage of the Services. Google uses cookies to obtain this information. We use the information obtained from Google Analytics to improve the Services. To learn more about Google Analytics and Google's privacy practices, please visit: www.google.com/policies/privacy/partners/. For information on how to opt out of data collection by Google Analytics visit: <https://tools.google.com/dlpage/gaoptout?hl=en>

Do Not Track

Our Services do not respond to web browser "do not track" signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of Logged Information about an individual consumer's online activities over time. Visit www.donottrack.us to find out more about "do not track."

3. CHANGES TO THIS NOTICE

This Notice is subject to periodic updates. To this end, we indicate the last update date at the beginning of this Notice. If you have already submitted your personal data, any change that substantially affects the processing of personal data, will be communicated to you through the appropriate channels in order to ensure that you are effectively aware of the way your data is processed, with a view to full transparency of the processing operations and full and adequate protection of your rights.

B) EU SPECIAL PART

The data processing operations described in this EU Special Part will be carried out by companies established in the EU or, even when not carried by EU based companies, are so designed that your data will be stored in the EU and transferred from the EU to the companies that are not EU based. This is why the processing operations described in this Special Part, supplemented by those described in the General Part above, are subject to the EU General Data protection Regulation.

1. CONTROLLERS

Under this notice, **three different types of data controllers** are envisaged with respect to different types of processing.

In particular, for the processing operations that are related to you interacting with us as a **consumer**, that is when you deal with us for your own needs as an end user, B&B Italia will qualify as sole controller when it processes personal data for the purposes of performing contracts you are a party to or to respond to your queries, whereas with your consent **B&B Italia** and **Design Holding** will process your data as **joint controllers** for marketing and profiling purposes ("**B2C Marketing and Profiling Processing Activities**").

When you qualify as an employee, collaborator, representative, owner or account in any capacity of our business customers or contacts (such as companies, professional firms and self-standing professionals), B&B Italia will qualify as sole controller when it processes personal data for the purposes of performing contracts you are a party to or to respond to your queries, whereas with your consent all the **Group companies** will process your data as **joint controllers** under the law, in order to make B2B marketing propositions embracing our Group's full potential of product offerings designed on your needs and possibly carry out profiling in order to tailor our Group's offerings to your preferences ("**B2B Marketing and Profiling Processing Activities**").

Finally, for administrative and security purposes your data will be stored in the Group CRM by Design Holding S.p.A.

The details of who does what follow below.

1.1. **Autonomous data controller**

With regard to the Processing Activities referred to in paragraph I, II, III of this Notice, the following company shall act as autonomous controller pursuant to Article 4(7) GDPR

- **B&B Italia S.p.A.**, with registered office at Via Manzoni 38, 20121 Milan (Italy)

1.2 Joint Controllers for B2C and B2B Marketing and Profiling Processing Activities

The companies of the Group will act under a joint controllership agreement pursuant to Article 26 GDPR, under which they determine together the means and purposes of the processing operations relating to **B2B and B2C Joint Marketing and Profiling Activities**, performed with your consent by using your personal data collected through this Site or in Store and/or when you make contacts with us on occasion of purchases made through our transactional Site or in Store and/or because you have provided us with your data upon making inquiries or otherwise by getting in touch with us, including on occasions of visits to shops and stores managed by the Group companies or by third parties on their behalf.

With regard to the B2C Processing Activities referred to in paragraph IV of this Notice, the following company shall act as joint controllers:

- **B&B Italia S.p.A.**, with registered office at Via Manzoni 38, 20121 Milan
- **Design Holding S.p.A.** with registered office in Via Alessandro Manzoni, 38, 20121, Milan (Italy)

With regard to the B2B Processing Activities the Group companies act as joint controllers are described in paragraph V of this Notice.

The joint controllers members of the Group (collectively the "**Joint Controllers**") are currently the following companies:

- Design Holding S.p.A., with registered office at Via Alessandro Manzoni, 38, 20121, Milano (Italy)
- International Design Group S.p.A. with registered office at Via Alessandro Manzoni, 38, 20121, Milano (Italy)
- Flos S.p.A. with registered office at Via Angelo Faini, 2 - 25073 Bovezzo (Brescia)
- B&B Italia S.p.A., with registered office at Via Durini 14, 20122, Milano (Italy)
- Louis Poulsen A/S, with registered office at Kuglegårdsvej 19-23, DK-1434, Copenhagen (Denmark)
- D Studio - Copenhagen ApS, with registered office at Kuglegårdsvej 13, DK-1434, Copenhagen (Denmark)
- Fashion Furniture Design S.p.A. with registered office at Via Alessandro Manzoni, 38, 20121, Milano (Italy)
- The following affiliates of Flos S.p.A.

ARES SRL	Via dell'Artigianato, 24 -20881 Bernareggio 8 (MB)
FLOS BESPOKE SRL	Via Alcide De Gasperi, 2 - 25060 Collebeato (BS)
ANTARES ILUMINACIÓN SAU	Calle Mallorca n. 1 - Polígono Industrial de Reva, Riba-roja de Túria - 46394 Valencia (ES)
FLOS BENELUX NV	BDC/ESPLANADE 1 Bus 95 - 1020 Brussel (BE)
FLOS FRANCE SAS	20-22 Passage Dauphine - 75006- Paris (FR)
FLOS GMBH	Obermünsterstr. 18 - 93047 Regensburg (DE)
FLOS BV	Cruquiusweg 109 S - 1019 AG Amsterdam (NL)
FLOS SCANDINAVIA AS	Sydhavnsgade 28 - 2450 Koebenhavn (DK)
FLOS SVERIGE AB	Lützengatan 1 - 115 20 Stockholm (SW)
FLOS NORGE AS	Sjolyst Plass 4 - 0278 Oslo (NO)
FLOS UK LTD	Crown Chambers, Princes Street, Harrogate, North Yorkshire - HG1 1NJ (GB)

- The following affiliates of Louis Poulsen A/S

Luminous Designs Investment ApS	Kuglegårdsvej 19 - 1434 Copenhagen (Denmark)
Louis Poulsen Germany GmbH	Liesegangstrasse 17 D-40211 Düsseldorf - Postfach 190136 D-40111 Düsseldorf (Germany)
Louis Poulsen Sweden AB	Box 23013 S-104 35 Stockholm (Sweden)
Louis Poulsen Norway AS	Lysaker Brygge 37/39 N-1366 Lysaker (Norway)
Louis Poulsen Finland Oy	Kyllikinportti 2 FIN-00240 Helsinki (Finland)

Louis Poulsen Japan Ltd.	AXIS Building 3F Minato-ku - Tokyo Japan 106-0032
Louis Poulsen Switzerland AG	Töpferstrasse 5 - CH-6004 Lucerne (Switzerland)
Louis Poulsen Holland BV	Dorpsstraat 18 - 1431 CD Aalsmeer Postbus 375 - 430 AJ Aalsmeer (Nederland)

Arc Linea Arredamento Spa	Viale Pasubio 70, Caldogno, Italia
B&B Italia London Ltd	250 Brompton Road, Cross SW3 2AS, London (UK)
B&B Italia München GmbH	Maximilianplatz 21, Munich (Germany)
B&B Italia Paris S.à.r.l.	3 Rue du Colonel Moll, 75017 Paris (France)
B&B Italia Contract France sas	33 Rue Galilee, 75116, Paris (France)

- The following affiliates of B&B Italia S.p.A.
- The following affiliates of Fashion Furniture Design S.p.A.

Fashion Furniture Design UK limited	3rd Floor, Palladium House, London, W1F 7LD, (UK)
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Changes to Group's structure should be expected. Although we will seek to update this notice accordingly, such update might be delayed.

The essence of the joint controllership agreement entered into by the companies of the Group can be consulted at the end of this privacy policy.

1.3 Autonomous data controller for administrative and security purposes

With regard to the processing operations referred to in paragraph VI of this Notice, relating to both B2B and B2C processing activities, the following company shall act as autonomous controller pursuant to Article 4(7) GDPR

- **Design Holding S.p.A.** with registered office in Via Alessandro Manzoni, 38, 20121, Milan (Italy)

2. HOW YOUR PERSONAL DATA ARE PROCESSED

Your personal data are processed through computer, automated and/or manual means in compliance with the principles of lawfulness, fairness, transparency, accuracy, integrity, data minimization and purposes and storage limitation, as well as in accordance with the provisions of the GDPR and applicable legislation on the protection of personal data. Personal data are collected, elaborated, transferred and stored by using appropriate security measures (physical, logical and organisational) to protect them from possible breaches (such as destruction, loss, alteration, unauthorised disclosure or accidental or unlawful access to such personal data) and to ensure that processing is carried out only for the purposes described in this Notice.

3. PROCESSING ACTIVITIES

Each of the following paragraphs describe the processing activities carried out within B&B Italia. When so specifically indicated in the tables below, the processing activities concerned shall be intended for subjects qualifying as both consumer (B2C) and business (B2B) users or customers.

I. REGISTRATION ON THE TRANSACTIONAL AND NON-TRANSACTIONAL SITE

This paragraph describes how your personal data are processed when you register your product and/or create a profile online in our Site.

Controller	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
B&B Italia	Personal information (name, surname) Contact details (e-mail address, mail address, phone number) For B2B customers:	Creation of a profile or registration of a product on the Site <u>Legal Basis:</u> need to perform a	Data subject	Impossibility to create a profile or register a product on the Site	Data retained until the cancellation of the account* *Extension possible if necessary to

	Profession, e-mail address, work e-mail address, work telephone number, name of the company/business/organisation you work for. Country of residence	contract - Article 6(1)(b) GDPR			comply with a legal obligation or to defend a right before a competent authority
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II. WHEN YOU CONTACT US THROUGH OUR TRANSACTIONAL AND NON-TRANSACTIONAL SITE OR OTHERWISE

a) When you contact us through the contact us section of our website or otherwise

Controller	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
B&B Italia	Personal information (e.g. name, surname) Contact details (e.g. e-mail address, phone number, postal address) For B2B customers: Profession, e-mail address, work e-mail address, work telephone number, name of the	Deal with and provide a feedback to your requests including when you send us your portfolio <u>Legal Basis:</u> consent (provided with a clear	Data subject	Impossibility to deal with your requests	Time necessary to deal with and provide a feedback to your requests* *Extension possible if necessary to comply with a legal obligation or to

	<p>company/business/organisation you work for.</p> <p>Any other information that you choose to share in your message or in the attachments</p>	<p>affirmative action e.g. when contacting us seeking information) - Article 6(1)(a) GDPR</p>			<p>defend a right before a competent authority</p>
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b) When you book an appointment

Controller	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
B&B Italia	<p>Personal information (e.g. name, surname)</p> <p>Contact details (e.g. e-mail address, phone number, postal address)</p> <p>For B2B customers: Profession, e-mail address, work e-mail address, work telephone number, name of the company/business/organisation you work for.</p>	<p>Deal with and provide a feedback to your requests including, when you book an appointment</p> <p><u>Legal Basis:</u> consent (provided with a clear affirmative action) -</p>	Data subject	Impossibility to deal with your requests	<p>Time necessary to deal with and provide a feedback to your requests*</p> <p>*Extension possible if necessary to comply with a legal obligation or to defend a right before a</p>

	Any other information that you choose to share in your message or in the attachments	Article 6(1)(a) GDPR			competent authority
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c) When you contact us through the career section of our website or otherwise you send us your application

As part of the application and selection process, we do not normally ask you to provide us with Personal Data that may reveal your health conditions, religious beliefs, sexual orientation, trade union membership, political opinions, criminal record or criminal charges. If, in the course of the selection process, you provide us with such data (e.g. because they are contained in your CV) we will only process them with your express consent. Failing this, we will not consider this data for selection purposes and will delete it as soon as possible.

Controller	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
B&B Italia	Personal information (e.g. name, surname) Contact details (e.g. e-mail address, phone number, postal address) Data relating to your qualifications,	As part of the application and selection process, need to carry out pre-contractual measures at the request of the data subject	Data subject	Impossibility to deal with your requests	1 (one) year* *Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority

	<p>education and professional career; Photograph/personal portrait (if contained in CV);</p> <p>Data that could reveal your racial or ethnic origins, health conditions, religious beliefs, trade union membership and political opinions, only if provided by you during the assessment process (e.g. if contained in your CV).</p>	<p><u>Legal Basis:</u> need to perform a contract - Article 6(1)(b) GDPR</p> <p>Explicit consent provided with an explicit affirmative action - Article 9(2)(a) GDPR</p>			
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III. MARKETING ACTIVITIES RELATING TO SIMILAR PRODUCTS

This paragraph describes how your personal data can be processed by B&B Italia for marketing purposes relating to products similar to those you have purchased. Pursuant to the applicable legislation, those processing activities do not need your consent but are based on the legitimate interest of the controller. Anyway, you always have the right to object to the processing pursuant to Article 21 GDPR.

Controller	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
B&B Italia	For both B2C and B2B customers Personal information (name, surname) E-mail address, work e-mail address	Marketing activities (i.e. newsletter, promotional communications via e-mail) relating to products similar to those you purchases <u>Legal Basis:</u> legitimate interest of the controller* - Article 6(1)(f) GDPR and Article 130(4) Legislative Decree n. 196/2003 *Opt-out always granted	Data subject	N/A	7 (seven) years from the last purchase* *Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority;

IV. B2C MARKETING AND PROFILING PROCESSING ACTIVITIES

This paragraph describes how your personal data can be processed for B2C marketing and profiling purposes.

With your consent, personal data processed according to this paragraph will be stored on a common database within the Group held by Design Holding and may be used for engaging in marketing activities relating to B&B Italia branded products.

Furthermore, with your specific consent, your personal data may be used for profiling operations aimed at the realization of personalized marketing messages and/or product offerings based on your preferences (including activities and purchases concluded on the Website and in Store and possibly other data that we may correlate). Profiling can also be based on personal information collected through cookies, as better explained in the cookie policy which can be accessed through this Site.

Controllers	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
B&B Italia Design Holding	Personal information (name, surname, tax code) Purchase history Preferences and interests and cluster derived data. Country of residence Zip code and address Contact details (e.g. phone number, e-mail address)	Marketing activities (i.e. newsletter, promotional communications via e-mail, telephone, sms, and ordinary mail, surveys, market searches) relating to products, services and initiatives. <u>Legal Basis:</u> your consent - Article 6(1)(a) GDPR	Data subject	Impossibility to receive marketing communications. No consequences for the purchase or the other activities on the website	7 (seven) years from the consent* *Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority;

	Invoice data Payment data				
B&B Italia Design Holding	Personal information (name, surname, tax code) Country of residence Zip code and address Contact details (e.g. phone number, e-mail address) Invoice data Payment data Your preferences and interests. Your previous purchases and	Profiling activities aimed at the realization of personalized marketing messages and/or offerings based on your preferences (including activities and purchases done on the Site) and relating to branded products <u>Legal Basis:</u> your consent - Article 6(1)(a) GDPR	Data subject	Impossibility to receive personalized marketing communications from the Group. No consequences for the purchase or the other activities on the website	7 (seven) years from the consent * *Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority

	<p>activities on the Site and in Store</p> <p>Your belonging to specific clusters identified by age/gender/profession</p>				
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V. B2B MARKETING AND PROFILING PROCESSING ACTIVITIES

This paragraph describes the processing activities of personal data that we carry out with regard to employees, collaborators, representatives, owners or accounts in any capacity of our B2B customers (companies, professional firms and sole professionals).

Controller	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
Joint Controllers (DH Group companies)	<p>Personal information (name of the company/business/organisation you work for, tax code)</p> <p>Purchase history.</p> <p>Preferences and interests and cluster derived data.</p>	<p>Marketing activities (i.e. newsletter, promotional communications via e-mail, telephone, sms, and ordinary mail, surveys, market searches) relating to branded products,</p>	<p>Data subject</p> <p>Organisations that manage fairs and events in which we have taken part as exhibitors, subject to the prior consent of</p>	<p>Impossibility to receive marketing communications.</p> <p>No consequences for the purchase or the other activities on the website</p>	<p>7 (seven) years from the consent*</p> <p>*Extension possible if necessary to comply with a legal obligation or to defend a right before a</p>

	<p>Country of residence</p> <p>Zip code and address</p> <p>Contact details (e.g. phone number, e-mail address)</p> <p>Invoice data</p> <p>Payment data</p>	<p>services and initiatives.</p> <p><u>Legal Basis:</u> your consent - Article 6(1)(a) GDPR</p>	<p>the data subject to the disclosure of personal data to third parties for the purpose of sending promotional messages for marketing purposes;</p> <p>Social networks to which you are subscribed, subject to your prior consent</p>		<p>competent authority;</p>
<p>Joint Controllers (DH Group Companies)</p>	<p>Personal information (name of the company/business/organisation you work for, tax code)</p> <p>Purchase history.</p> <p>Preferences and interests.</p> <p>Country of residence</p>	<p>Profiling activities aimed at the realization of personalized marketing messages and/or offerings based on your preferences (including activities and purchases done</p>	<p>Data subject</p> <p>Organisations that manage fairs and events in which we have taken part as exhibitors, subject to the prior consent of</p>	<p>Impossibility to receive marketing communications.</p> <p>No consequences for the purchase or the other activities on the website</p>	<p>7 (seven) years from the consent*</p> <p>*Extension possible if necessary to comply with a legal obligation or to defend a right before a</p>

	<p>Zip code and address</p> <p>Contact details (e.g. phone number, e-mail address)</p> <p>Invoice data</p> <p>Payment data</p>	<p>on the Site and in Store) and relating to branded products</p> <p><u>Legal Basis:</u> your consent - Article 6(1)(a) GDPR</p>	<p>the data subject to the disclosure of personal data to third parties for the purpose of sending promotional messages for marketing purposes;</p> <p>Social networks to which you are subscribed, subject to your prior consent</p>		<p>competent authority;</p>
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VI. ADMINISTRATIVE AND SECURITY PURPOSES

This paragraph describes the processing operations carried out by Design Holding for the purpose of storing your Personal Data in the Group CRM Database for administrative purposes, including purposes aimed at ensuring the same level of network and information security.

Controllers	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
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Design Holding	Personal data collected according to the above paragraphs	Storing your Personal Data in the Group CRM Database for administrative purposes, including purposes aimed at ensuring the same level of network and information security to all Personal Data individually collected by the companies of the Group <u>Legal Basis:</u> legitimate interest of the companies of the Group - Article 6(1)(f) GDPR	Data subject	N/A	The data will not be stored for a period of time exceeding those indicated in the precedent paragraphs
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VII. WHEN YOU DIRECTLY CONTACT THE CONTROLLERS

This paragraph describes the processing activities carried out by B&B Italia, Design Holding and the Joint Controllers for the purpose of dealing with your requests made when you contact us through the relevant contact channel provided through the Website.

Controllers	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
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B&B Italia Design Holding Joint Controllers (DH Group Companies)	Personal information (e.g. name, surname) Contact details (e.g. e-mail address, phone number, postal address) Information contained in your request and provided to the controllers	Deal with and provide a feedback to your requests <u>Legal Basis:</u> consent (provided with a clear affirmative action while contacting us seeking information) - Article 6(1)(a) GDPR	Data subject	Impossibility to deal with your requests	Time necessary to deal with and provide a feedback to your requests* *Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority
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VIII. COMPLY WITH LEGAL OBLIGATIONS AND EXERCISE OF RIGHTS BEFORE COMPETENT AUTHORITIES

This paragraph describes the processing operations carried out by B&B Italia, Design Holding and the Joint Controllers for the purpose of exercise of their rights before a competent authority or to comply with legal obligations imposed on them.

Controllers	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
B&B Italia Design Holding Joint Controllers (DH Group Companies)	Personal data collected according to the precedent paragraphs and other data that can	Exercise and/or defence of a right before a competent authority (e.g.	Data subject	N/A	Time necessary for the purpose of exercise and/or defend the specific right involved*

	be suitable for the specific intended purpose	judicial, administrative) <u>Legal Basis:</u> legitimate interest of the controller - Article 6(1)(f) GDPR			Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority
B&B Italia Design Holding Joint Controllers (DH Group Companies)	Personal data collected according to the precedent paragraphs and other data that can be suitable for the specific intended purpose.	Compliance with a legal obligation <u>Legal Basis:</u> need to comply with a legal obligation - Article 6(1)(c) GDPR	Data subject	N/A	Time necessary for the purpose of complying with the legal obligation concerned

4. WHO YOUR PERSONAL MAY BE DISCLOSED TO

When necessary for the purposes described in this Notice, your personal data may be disclosed to third parties as shown in this paragraph.

a) Data processors

B&B Italia, the Joint Controllers and Design Holding, where applicable, have appointed third parties for the provision of services relating to the Site (e.g. webmaster, IT consultant and system integrator, e-commerce platform, CRM marketing platform, customer care service provider). Such third parties will process your personal data on behalf and under the instructions of B&B Italia, Design Holding or the Joint Controllers pursuant to Article 28 GDPR.

These subjects have been selected among professionals who guarantee the implementation of appropriate technical and organizational measures, so that the processing is always carried out in compliance with applicable legislation and ensuring the protection of data subjects' rights.

b) Other third parties

Your personal data might be disclosed to other third parties that would process it as autonomous controllers, such as:

- Carriers of products purchased through the Website.
- Providers of payment services or payment gateways/platforms used to purchase products through the Website (e.g. PayPal, credit card service providers, banks, financial intermediaries etc.).
- Third parties in the context of any mergers/acquisitions that may involve the Group, to the extent strictly necessary for the purposes of the transaction based on a legitimate interest, and in any event to the extent permitted by the applicable law.
- Professionals such as lawyers, auditors or accountants.
- Third parties such as judicial and/or administrative authorities, law enforcement agencies where necessary for the exercise or protection of rights of B&B Italia and/or, where applicable, Design Holding as well as to comply with statutory obligations.

You may request more detailed information on those subjects to whom your personal may be disclosed by contacting us as indicated in the paragraph "How to contact the controllers".

5. TRANSFER OF PERSONAL DATA OUTSIDE THE EEA

For the purposes of the processing described in this Notice, your personal data may be transferred to countries outside the European Economic Area ("EEA"), which includes all Member States of European Union, Norway, Liechtenstein, and Iceland.

If that is the case, we ensure that all possible transfers outside the EEA will be made in such a way as to guarantee the full protection of your rights and freedoms. Namely, with regard to the third country to which the data is transferred, if no adequacy decision has been taken by the European Commission, the data transfers will be carried out by relying on an appropriate safeguard pursuant to Article 46 GDPR. Furthermore,

a data transfer impact assessment considering the relevant legislation of the third country concerned will be always carried out in order to determine if your data would be actually protected in case of transfer outside EEA or if further security measures are necessary. Please note that Japan, the United Kingdom and Switzerland, countries in which some of the Companies of the Group are established, benefit from adequacy decisions of the EU Commission and therefore your data can be shared with those jurisdictions.

6. YOUR RIGHTS

In accordance with the applicable legislation, and in particular with the provisions of the GDPR and other applicable laws, your rights in relation to the personal data that we process under this Notice are the following:

- **Access:** you can obtain information about the processing of your personal data and a copy of that personal data (art. 15 GDPR);
- **Rectification:** if you believe that your personal data is inaccurate or incomplete, you may request that such data be corrected or modified by following your instructions (art. 16 GDPR);
- **Erasure:** except as provided for by applicable laws, you have the right to request the erasure of your personal data, when: (i) the data are no longer necessary for the purposes for which they were collected and processed; (ii) you withdraw your consent to the processing if processing is based on your consent; (iii) you object to the processing for direct marketing purposes or to the processing carried out for other purposes and there are no overriding legitimate grounds to continue with the processing; (iv) your data are processed unlawfully; (v) the erasure is required by law (art. 17 GDPR); (vi) you are a child and your personal data have been collected in relation to the offer of information society services directly to you;
- **Restriction:** you may request the restriction of the processing of your personal data where: (a) you contest the accuracy of the personal data for the period necessary to verify their accuracy; (b) the processing is unlawful and you request the restriction of their use instead of erasure; (c) the controllers no longer need the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; (d) you have objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override yours (art. 18 GDPR);
- **Object:** on grounds relating to your particular situation, you have the right to object to the processing of your personal data based on the legitimate interest of the controllers (Article 6(1)(f) GDPR) and the controllers will continue to process your data only if there are compelling legitimate grounds for the processing which override your interests, rights and or for the establishment, exercise or defence of legal claims. Your right to object to direct marketing purposes is absolute and can be exercised at any time in the manner

indicated in the “How to contact the controllers” section. Your objection to processing carried out through automated means is also valid for processing carried out with traditional means (art. 21 GDPR);

- **Withdrawal of consent:** if the processing of your personal data is based on consent, you have the right to withdraw your consent at any time (art. 7 GDPR);
- **Data portability:** where the processing is based on consent or on a contract and is carried out by automated means, you have the right to obtain in a structured format, commonly used and machine-readable format the personal data you provided us with and, where technically feasible, to have them transmitted to another data controller.

7. HOW TO CONTACT THE CONTROLLERS

To exercise your rights, and for any query or clarification on how your personal data are processed and used pursuant to this Notice, you can contact:

a) for the processing operations for which B&B Italia act as autonomous controller:

Company	Contact details
B&B Italia	E-mail: privacy@bebitalia.com

b) for the processing operations for which Design Holding act as autonomous controller:

Company	Contact details
Design Holding S.p.A.	E-mail: privacy@designholding.com

c) for the processing operations for which the Group companies act as joint controllers, the single point of contact identified below:

Company	Contact details
Design Holding S.p.A.	E-mail: privacy@designholding.com

8. HOW TO EXERCISE YOUR RIGHTS

In order to protect your rights and your personal data, you may at any time decide to lodge a complaint with the competent supervisory authority or to bring an action before the competent national courts.

Anyway, the controllers always invite you to contact them first for any need relating to your personal data.

C) US SPECIAL PART

This C) US SPECIAL PART relates to the processing operations for all web sites and mobile web sites owned or operated by YDesign Group, LLC, as merchant of records, and B&B Italia USA Inc., including the web site currently located at <https://shop.bebitalia.com/en/us/> (the "Site"), any applications (e.g., iPhone applications, iPad applications, Android applications, etc.) offered by Operator, and any other applications, interactive features, blogs, social media platforms, and resources offered by Operator through traditional Internet websites, mobile devices or other platforms (all of which are collectively referred to as the "Services"). In this C) US special part we explain how we collect, use, and protect Volunteered Information (defined below) and Logged Information (defined below) when you use the Services and your choices for managing your information preferences. By using the Services, you signify your assent to this Privacy Policy and the [Terms of Use](#). The processing operations described in this US Special Part are intended to take place only in the USA with respect to US residents, as they concern data collected on occasion of contacts made through the B&B Italia US e-commerce website and/or on occasion of purchases made through such website. Therefore these processing operations are not subject to the EU GDPR.

1. Managing Information Preferences

We will not disclose information to third parties for their direct marketing purposes without your consent. If, after providing consent, you want to opt out of having your information disclosed to third parties for their direct marketing purposes, please let us know by sending us an email at privacy@designholding.com.

You may review, correct, update, or change your Volunteered Information (as defined below) at any time by contacting us at:

YDesign Group, LLC

1850 Mt. Diablo Blvd Ste 510

Walnut Creek, CA 94596

Email: privacy@designholding.com

2. Information You Voluntarily Submit

We may collect information that personally identifies you, such as your name, address, telephone number, email address, credit card information, billing information, or other data which can be reasonably linked to such information ("Volunteered Information") if you choose to share such information with us. For example, you may be required to provide us with certain Volunteered Information to register with the Services, make purchases, sign up for certain services (such as text alerts, mobile phone applications, and other communications services), subscribe to a newsletter, enter sweepstakes, contests, or other promotions, and at other times. The decision to provide this information is optional; however, if you decide not to register or provide such information, you may not be able to use certain features of the Services.

3. How We Use Your Information

We do not sell your information to third parties and we will not otherwise disclose your information to third parties without your express permission or as expressly disclosed in this Privacy Policy.

4. Marketing and Communications.

We use your information (both your Volunteered Information and Logged Information) for internal purposes only, such as to fulfill orders, send service notifications, to customize the content you see, to fulfill your requests for services, to improve the Services, to conduct research, to solicit your feedback and input about the Services, and to provide more relevant products through the Services. Volunteered Information and Logged Information may be combined with data collected from other sources so that we may further improve the relevance of products, services, and advertisements offered on or through the Services.

We may send you marketing communications and materials by email [or regular mail] to keep you informed of new products, promotions, and to provide other information we think may be of interest to you. To stop receiving these communications, you may change your preferences <<here>> or by clicking any "unsubscribe" link in any marketing email you receive from us. It may take [up to 48 hours] to process your request. Note that we will continue to send you administrative and service communications (including order updates and other information relating to the Services and your account.)

We may also conduct interest-based advertising on both Operator-owned and operated sites and unaffiliated third-party sites. These ads, also known as personalized or targeted ads, are displayed to you based on certain of your activities such as purchasing on our sites or visiting sites that contain our content or ads. We conduct such marketing using different ad exchanges and networks and advertising technologies such as web beacons, pixels, ad tags, cookies, and mobile identifiers. For more information about such technologies and companies that provide users

the ability to “opt-out” of the collection of information through such technologies, visit: www.aboutads.info/choices and <https://thenai.org/opt-out/>.

5. Disclosures to Service Providers

From time to time, we may establish a business relationship with other persons or entities whom we believe trustworthy and whom we have asked to confirm that their privacy practices are consistent with ours ("Service Providers"). For example, we may contract with Service Providers to provide certain services, such as credit card processing, shipping and fulfillment, data management services, Web hosting and Web development. We provide our Service Providers with the information reasonably necessary for them to perform these services. Each Service Provider must agree (a) to implement and maintain reasonable security procedures and practices appropriate to the nature of the information involved in order to protect your information from unauthorized access, destruction, use, modification, or disclosure and (b) not to retain, use, or disclose the information for any purpose other than for the specific purpose of performing the services for us, or as otherwise permitted by law.

6. Other Disclosures

Aggregate Information. We may use, and disclose to third parties, certain aggregated Logged Information regarding the Services (e.g., number of visits, page views, number of registered members who reside in a particular geographic location, etc.). However, such aggregated information does not identify you individually.

To Affiliated Entities. DiWe may share your information with entities controlling, controlled by, or under common control with Operator. In the event that Operator is merged, sold, or in the event of a transfer of some or all of our assets, we may disclose or transfer your information in connection with such transaction.

For Legal Reasons. In certain instances, we may disclose your information when we believe it is necessary to identify, contact, or bring legal action against persons or entities in order to protect Operator or our users or when we believe that the law or legal process requires such disclosure.

7. Public Areas and External Sites

Please be advised that whenever you voluntarily post information to any community or interactive areas of the Services (e.g., by posting a product review), such information can and may be accessed by the public. We urge you not to post any of your personal information in any publicly

accessible area of the Services – if you do, any person or entity with access to such information could potentially use it for any purpose, including sending unsolicited communications.

The Services may contain links to, or advertisements about, third-party websites, applications or other properties (“Other Sites”). Other Sites may also reference, advertise, or link to the Services. We do not endorse or sponsor Other Sites and are not responsible for the privacy practices or the content of Other Sites. The practices described in this Privacy Policy do not apply to information gathered by third parties through Other Sites. We encourage you to read the privacy policies of each and every website that you visit.

8. Security

Information that we collect is stored on servers that Operator manages, using standard security procedures and practices appropriate to the nature of the information in an effort to protect information from unauthorized access, destruction, use, modification, or disclosure. However, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect information transmitted on or through the Services, we cannot and do not guarantee or warrant the security of any information you transmit on or through the Services, and you do so at your own risk.

9. Children’s Privacy Statement

The Services are not directed to children. We do not knowingly collect information from children under the age of 13. If we become aware that we have inadvertently received information from a child under the age of 13, we will delete such information from our records.

10. Processing in the United States

The Services are operated solely in the United States. Your information and communications may be transferred to and maintained on servers or databases located outside your state, province, or country. By providing any information to us, all users, including, without limitation, users in the member states of the European Union, Canada or elsewhere outside of the United States, fully understand and unambiguously consent to this Privacy Policy. If you are located outside of the United States, the laws of the United States may not be as protective of your privacy as those in your location. By using our Properties, you agree that the collection, use, transfer, and disclosure of your Volunteered Information and communications will be governed by the applicable laws in the United States.

11. California Residents

These additional notices are provided under the California Consumer Privacy Act (“CCPA”) and apply to California residents in addition to the other provisions of this Privacy Policy.

As described above, we do not sell your information to any third party.

If you are a California resident, you have the following rights:

- You may request, no more than two times each year, that we disclose to you the following for the 12-month period preceding our receipt of your request:
 - o The categories of personal information we have collected about you;
 - o The categories of sources from which the personal information is collected;
 - o The business or commercial purpose for collecting your personal information;
 - o The categories of third parties with whom we share personal information; and
 - o The specific pieces of personal information we have collected about you.
- You may request that we delete any personal information that we have collected from or about you. Except as provided under the CCPA, we will delete such information in response to your request.

To make a request, you may contact us via mail, email:

YDesign Group, LLC

1850 Mt. Diablo Blvd Ste 510

Walnut Creek, CA 94596

Email: privacy@designholding.com

In order to respond to your requests, we may need to verify your identity. We will not discriminate against you in the provision of the Services in response to your exercise of these privacy rights. We will respond to your request within 45 days of receipt of your request, after verification, unless we need additional time, in which case we will let you know and may extend the period an additional 45 days as permitted by the CCPA.

We collect information in the following categories and for the following purposes:

Category Business and Commercial Purposes:

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, and email address •
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments;
- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors;

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Debugging to identify and repair errors that impair existing intended functionality;
- Internal research for technological development and demonstration;
- Verifying or maintaining the quality of the Services and to improve, upgrade, or enhance the Services.

Internet or other electronic network activity information, including, but not limited to, browsing history and information regarding an interaction with an Internet website, application, or advertisement • Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors;

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Debugging to identify and repair errors that impair existing intended functionality;
- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments;
- Internal research for technological development and demonstration;
- Verifying or maintaining the quality of the Services and to improve, upgrade, or enhance the Services.

Geolocation Data • Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments;

- Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance;
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
- Debugging to identify and repair errors that impair existing intended functionality; Short-term, transient use, including, but not limited to, the contextual customization of ads;
- Internal research for technological development and demonstration;
- Verifying or maintaining the quality of the Services and to improve, upgrade, or enhance the Services.

ESSENCE OF THE JOINT CONTROLLERSHIP AGREEMENT PURSUANT TO ART. 26 (2) GDPR

This information is provided in accordance with Art. 26 (2) ("GDPR"). It describes the essence of the Joint Controllership Agreement pursuant to Art. (26) GDPR signed by the companies that are part of the Design Holding Group.

1- The Parties

The companies that are part of the Agreement are the following:

- **Design Holding S.p.A. (VAT NUMBER IT10446470964)**, with registered office at Via Alessandro Manzoni, 38, 20121, Milano (Italy)
- **Flos S.p.A. (VAT NUMBER IT00290820174)**, with registered office at Via Angelo Faini, 2, 25073, Bovezzo (Italy)
- **B&B Italia S.p.A. (VAT NUMBER IT07122350965)**, with registered office at Via Durini, 14, 20122, Milano (Italy)
- **Louis Poulsen A/S (VAT NUMBER DK59742817)**, with registered office at Kuglegårdsvej 19 DK-1434 København K, Copenhagen (Denmark)
- **International Design Group S.p.A. (VAT NUMBER IT 10462810960)**, with registered office at Via Alessandro Manzoni 38 - 20121 Milano (Italy)
- **D Studio - Copenhagen ApS**, with registered office at Kuglegårdsvej 13, DK-1434, Copenhagen (Denmark)
- **Fashion Furniture Design S.p.A.**, with registered office at Via Alessandro Manzoni, 38, 20121, Milano (Italy)
- As well as the Affiliates of the above companies as listed in paragraph 1.2 of the privacy policy.

The Agreement is open to the adhesion by other companies that are or will in the future become part of the same group of Companies (currently Design Holding group).

2- Subject matter of the Agreement

Personal Data included in the Database can be processed: a) by each Brand, either singularly or collectively, for B2B marketing and profiling activities relating to the Brands of DH Group for what concern B2B customers (i.e. when an individual qualifies as an employee, collaborator, representative, owner or account in any capacity of our business customers (such as companies, professional firms and self-standing professionals) (the "B2B Joint Activities"); b) by the single Brand concerned, with the exclusion of Fashion Furniture Design S.p.A. and its affiliates, and Design Holding S.p.A. for B2C customers (i.e. when individuals qualify a non-

professional end user) (the "B2C Joint Activities"). Notwithstanding the fact that Design Holding hosts and directly manages the database, the Parties jointly determine the means and purposes of the Joint Activities and shall therefore qualify as joint data controller pursuant to Article 26 of the GDPR. The Parties define every aspect relating to the performance and implementation (either by themselves or through third parties appointed as Processors) of the Joint Activities, if necessary also through the conclusion of specific and additional written agreements detailing the personal data shared, the means, the purposes of the Joint Activities, the security measures to be adopted and the relevant technical standards.

The Parties acknowledge that, with regard to the processing activities of personal data different from the Joint Activities carried out under the Agreement each Party shall autonomously determine the purposes and means of processing. Therefore, in this respect, each Party shall qualify as autonomous Controller and it assumes separate responsibilities under applicable legislation.

3- General obligations of the Parties

The Parties will carry out the Joint Activities through computer, automatized and/or paper instruments in compliance with the principles of fairness, lawfulness, transparency, accuracy, integrity, data minimization and purpose and storage limitation, as well as in accordance with the provisions of the GDPR and the applicable data protection legislation.

The Parties guarantee the security and confidentiality of the personal data subject to the Joint Activities in light of the GDPR and applicable data protection legislation.

The Parties undertake to process the Personal Data falling under the Joint Activities only for the purposes for which they agreed and, also after the termination for any reason of the Agreement, not to use the Personal Data for different purposes, unless this is necessary for the fulfilment of legal obligations or for the protection of the Parties' rights before any competent authorities.

The Parties undertake to adopt all technical, logic and organizational security measures pursuant to Article 32 GDPR, in order to guarantee the protection of Personal Data processed under the Agreement and to ensure a level of security appropriate to the risks to the rights and freedoms of the Data Subjects.

Should this be necessary to ensure the proper carrying out of the Joint Activities, each Party shall undertake to adopt and sign with third parties - the Processors - specific contracts or other legal acts pursuant to Article 28 of the GDPR.

In case of a Personal Data Breach (as defined in Article 4(12) of the GDPR), or in the event that a Party has reason to suspect that such a breach may reasonably occur, it will notify the other Parties immediately and in any case within a maximum of 12 (twelve) hours from the moment in which it became aware of the breach or from the moment in which it became aware of information that would suggest the occurrence of such a breach. In this case, each Party undertakes to provide maximum cooperation and assistance in order to identify and implement all corrective measures to eliminate or in any case limit the effects of the breach as much as possible.

4- Transfer of Data outside EEA

The Parties acknowledge and agree that if the Personal Data processed under the Agreement should be transferred or processed - also through Processors or Sub-Processors - in a country located outside the European Economic Area ("**EEA**") for which no adequacy decision has been issued by the European Commission, they shall resort to one of the mechanisms provided for by Articles 46 ff GDPR. In particular, the Parties shall resort to the standard clauses for the transfer of personal data to third countries approved by the European Commission, as well as assess the actual level of protection of personal data ensured to the Data Subjects in the aforementioned country. The Parties shall take into account both the mechanisms pursuant to Articles 46 ff GDPR concretely adopted and the legislation of that third country of destination, and adopt, if necessary, additional security measures aimed at the protection of personal data, such as cryptography.

5- Rights of the Data Subjects/Single Point of Contact

The Parties have designated a single contact point of contact for the exercise of the Data Subjects rights pursuant to Articles 15-22 GDPR, this being Design Holding S.p.A., that can be contacted at the following e-mail address: privacy@designholding.com (the "Leading Party").

Notwithstanding the foregoing, Data Subjects may validly contact each of the Parties in order to enforce their rights with respect to the Joint Activities and each Party shall comply with the same procedure established by the Parties for the management of Data Subjects' requests. If necessary, the Party who first receives the request (the "Receiving Party") shall communicate it to the other Parties within 3 working days, sending them a copy, in order to collaborate actively to give timely feedback to these requests and agree on the actions to be taken in accordance with the provisions of paragraph 3 below.

All requests made by the Data Subjects to enforce their rights must be delivered in a manner that allows the verification of the identity of the relevant Data Subjects (e.g. by means of a named email address) and the identity of persons that they may appoint as their representative.

The Receiving Party shall provide the Data Subjects with information on action taken on their requests without undue delay and in any event within 1 (one) month of receipt of the request. That period may be extended by 2 (two) further months where necessary, taking into account the complexity and number of the requests. The Receiving Party shall inform the Data Subjects of any such

extension within 1 (one) month of receipt of the request, together with the reasons for the delay. Each response should be agreed upon in advance by the Parties before being provided. Where possible, the Receiving Party shall provide all feedbacks to the Data Subjects on privacy matters from dedicated e-mail account.

6- Liability

Where the Parties are involved in the same processing and where they are, pursuant to Article 82, paragraphs 2 and 3 of the GDPR, responsible for any damage caused by processing, each Party shall be held liable for the entire damage in order to ensure effective compensation of the Data Subject.

Each Party shall remain solely and exclusively liable for the damage caused by its own processing infringing the GDPR, as well as if it has acted in a manner that is different from or contrary to the requirements contained in this Agreement.