PRIVACY NOTICE

OUR PRIVACY POLICY IN SHORT

This is the website of Design Holding S.p.A., head of a group of companies active in the field of design products for furniture and lighting with prestigious brands such as, among others, B&B Italia, Flos, Louis Poulsen, Arclinea, Maxalto, Azucena, Fendi Casa.

We are thrilled to be able to interact with you through our website or in any occasion in which we can collect your personal data. In order to do that, we are subject to certain rules that protect your personal data and privacy. You will find our extended privacy policy below.

This is a summary of our extended notice, by which we wish to draw your attention to certain essential elements.

In some cases, we need your data, because without them we would not be able to respond to specific inquiries you make. Some other processing operations are based on your consent. We believe you would benefit in giving your consent to joint marketing while subscribing to our newsletter, because for example any company of the Group would be able to bring you up to date with respect to new product offerings.

Naturally, you have a number of rights under this notice and applicable laws. They are listed in section 6 of the General Part of the extended privacy notice. We do care about your privacy. If you need to contact us for further clarity on how we use your data, do contact us at the following address <u>privacy@designholding.com</u> and as specified below.

EXTENDED PRIVACY NOTICE

This privacy notice ("Notice") describes how **Design Holding S.p.A.** ("**Design Holding**") and, in the specific cases described, the other companies of the Design Holding Group (the "**Group**" or "**Design Holding Group**") may process your personal data collected through website www.designholding.com (the "**Site**") or on any other occasion in which you may deal with us.

This Notice further describes how the Design Holding and the Design Holding Group companies may further process your personal data for certain jointly controlled marketing purposes.

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., D Studio Copenhagen ApS 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 Design Holding and the other companies of the Group, listed below, which act as joint controllers;
- "you" or "your" refers to the natural or legal person, as the case may be, that interacts with us through our Site or in any other occasions we collect your data referred to by this Notice.

In this Notice you can find the following information in detail:

1. CONTROLLERS

2. HOW YOUR PERSONAL DATA ARE PROCESSED

3. PROCESSING ACTIVITIES

- I. WHEN YOU CONTACT US
- II. APPLICATION FOR JOB POSITIONS WITHIN THE GROUP
- III.A B2C MARKETING ACTIVITIES
- **III.B B2B MARKETING ACTIVITIES**
- **III.C** CUSTOMER SEGMENTATION ACTIVITIES

- IV. PLUG-INS AND INTERACTIONS WITH SOCIAL NETWORKS
- V. BROWSING DATA AND COOKIES
- **VI. ADMINISTRATIVE AND SECURITY PURPOSES**
- VII. 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. CHANGES TO THIS NOTICE
- 8. HOW TO CONTACT THE CONTROLLER
- 9. HOW TO EXERCISE YOUR RIGHTS

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.

1. CONTROLLERS

Under this Notice, **two different types of data controllers (autonomous or joint controllers)** are envisaged with respect to different types of processing.

In particular:

(i) Autonomous controller: if you are consumer, that is when you deal with us for your own needs as an end user, Design Holding will

process your data as **autonomous controller** for B2C marketing purposes ("<u>B2C Marketing Activities</u>"). Design Holding will process your data as autonomous controller also in the context of customer segmentation activities, when you contact us or request a service from us, or when you submit an application for a job position with us. With your consent, your data provided in the context of an application for job positions will be disclosed with all the companies of the Design Holding Group, that will process them as autonomous controllers. Finally, Design Holding processes your data as autonomous controller for administrative and security purposes.

(ii) **Joint controllers**: When you qualify as an employee, collaborator, representative, owner or account acting in any capacity for our business customers or contacts (such as companies, professional firms and self-standing professionals), with your consent all the companies of the **Design Holding Group** will process your data as **joint controllers** for B2B marketing purposes, especially after the subscription to our newsletter ("B2B Marketing Activities").

The details of who does what follow below.

1.1. Autonomous data controller

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

acts as autonomous controller pursuant to Article 4(7) GDPR for the following processing activities: when you contact us or request a service, B2C marketing purposes and customer segmentation, plug-ins and interactions with social networks, browsing data and cookies, administrative and security purposes, comply with legal obligations and exercise of rights before competent authorities (as further detailed under section 3, paragraphs I, III.A, III.C, IV, V, VI, VII of this Notice).

1.2 Joint Controllers for B2B Marketing 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 **Joint Marketing Activities**, performed with your consent by using your personal data collected through this Site and/or when you get in touch with us in any other occasion.

With regard to B2B Marketing Activities the Group companies act as joint controllers, as further described in paragraph III.B 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, Milan (Italy)
- International Design Group S.p.A. with registered office at Via Alessandro Manzoni, 38, 20121, Milan (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 Alessandro Manzoni, 38, 20121, Milan (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, Milan (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)		

FLOS JAPAN CO. LTD	1-23-5, Higashi-azabu, Minato-Ku, Tokyo, 106-0044 (Japan)	
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• 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 Holland BV	Dorpsstraat 18 - 1431 CD Aalsmeer Postbus 375 - 430 AJ Aalsmeer (The Netherland)			
Louis Poulsen Switzerland AG	Töpferstrasse 5 - CH-6004 Lucerne (Switzerland)			

• The following affiliates of B&B Italia S.p.A.

Arc Linea Arredamenti S.p.a.	Viale Pasubio 70, Caldogno (Italy)
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)

• The following affiliate of Fashion Furniture Design S.p.A.

Fashion Furniture Design UK limited	3rd Floor, Palladium House, London, W1F 7LD,
Trasmon annitare Besign or mines	0.0.1.00.7.0.0.0.0.0.7.0.0.0.7.1.1.7.2.7

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 processing activities relating to job applications

Through the careers section of Design Holding's website, or on other occasions when Design Holding receives or collects applications for job positions, the personal data you provide in the context of your application will be collected in the interest of the whole Group of companies mentioned above. Subject to your consent, each of the aforementioned companies may receive your data and process them acting as an autonomous data controller in relation to the purpose of personnel selection.

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 or through the Site of Design Holding S.p.A.

I. WHEN YOU CONTACT US OR REQUEST A SERVICE

a) When you contact us through the "Contact us" section of the Site or otherwise

Controller	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
Design Holding	Personal information (e.g. name, surname) Contact details (e.g. e-mail address, phone number, postal address) Any other information that you choose to share in your message or in the attachments	Purpose: deal with and provide a feedback to your requests including when you send us your portfolio Legal Basis: consent (provided with a clear affirmative action e.g. when contacting us seeking information) Article 6(1)(b) GDPR	Data subject (you)	Impossibility to deal with your request	

Design Holding	Identification data (name, surname) Professional information (role, company name, country) Contact information (e-mail address)	Purpose: send you alerts concerning company yearly reports, company interim reports and other company communications relevant for institutional investors Legal basis: fulfillment of a request of the data subjects - Art. 6(1)(b) GDPR	Data subject (you)	Not receiving the requested e-mail alerts	The data will be stored only until you decide to receive the e-mail alerts You can unsubscribe at any time, using the unsubscribe link included in each communication
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II. APPLICATION FOR JOB POSITIONS WITHIN THE GROUP

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. **You are invited** to not provide us with this kind of data. 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. Design Holding may carry out selection processes for the entire Group when and therefore your data provided in the context of selection processes may be shared, subject to your consent, with other Group companies.

Controller	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
Design Holding	Personal information	Purpose: as part of the	Data subject (you)	Impossibility to deal	1 (one) year*

1	1,	l 12		
S.p.A.	(e.g. name, surname)	application and	with your requests	
	Contact details (e.g.	selection process,		
Other companies of	e-mail address,	need to carry out pre-		
•	phone number,	contractual measures at		
	postal address)	the request of the data		
	Special categories of	subject, also on behalf		
	data relating to your	of all companies of the		
	qualifications, education	Design Holding Group		*Extension possible if
	and			necessary to comply
the Design Holding				with a legal
Group	professional career;	<u>Legal Basis</u> : need to		obligation or to
Group	Photograph/personal	Legal basis. Heed to		defend a right
	portrait (if contained	perform a contract -		before a competent
	in CV)	Article 6(1)(b) GDPR		authority
		Explicit consent for		
	Data that could	special categories of		
	reveal your racial or	data - Article 9(2)(a)		
	ethnic origins, health	GDPR		
	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)			
	,			

III.A B2C MARKETING ACTIVITIES

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

If you are a consumer, with your consent, provided within the Site at the subscription to the newsletter or at any other contact occasion with Design Holding, including off-line, 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 by Design Holding for engaging in B2C marketing activities relating to all the products of Design Holding Group.

Controllers	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
Design Holding	Personal information (name, surname) Preferences and interests and cluster derived data. Country of residence Zip code and address Contact details (e.g. phone number, e-mail address)	Purpose: marketing activities (i.e. newsletter, promotional communications via e-mail, telephone, sms, and ordinary mail, surveys, market searches) relating to products, services and initiatives Legal Basis: your consent - Article 6(1)(a) GDPR	Data subject (you)	Impossibility to receive marketing communications	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

III.B B2B MARKETING ACTIVITIES

This paragraph describes how your personal data can be processed for B2B marketing purposes, when you qualify as an employee, collaborator, representative, owner or account in any capacity of our B2B clients (companies, professional firms and sole professionals).

With your consent, provided within the Site at the subscription to the newsletter or at any other contact occasion with Design Holding, including off-line, 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 B2B marketing activities relating to all the products of Design Holding Group by each of the Companies of the Design Holding Group as joint controllers.

Controllers	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
	Personal information	<u>Purpose</u> : marketing	Data subject (you)	Impossibility to	7 (seven) years
	(name, surname, tax	activities (i.e.		receive marketing	from the consent*

Companies of the Design Holding Group as joint controllers	code) Preferences and interests and cluster derived data. Country of residence Zip code and address	newsletter, promotional communications via e-mail, telephone, sms, and ordinary mail, surveys, market searches) relating to products, services and initiatives.	communications.	*Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority;
	Contact details (e.g. phone number, e-mail address) Invoice data Payment data	Legal Basis: your consent - Article 6(1)(a) GDPR		

III. CUSTOMER SEGMENTATION ACTIVITIES

This paragraph describes how your personal data can be processed to perform customer segmentation, either in the context of B2B or B2C activities.

Controllers	Categories of data	Purpose and legal	Source of data	Consequences of	Retention period
		basis of the		not providing	
		processing		data	

Design Holding Broad and non-invasive categories, such as the geographic area where you are located and whether you are a customer or a professional client Broad and non-invasive categories, such as the geographic area where you are located and whether you are a customer or a professional client Data subject (you) N/A N/A To (seven) years from the data collection on non-invasive categories of data Legal Basis: legitimate interest of the company – Article 6(1)(f) GDPR
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IV. 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 (either consumers or business 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, **Design Holding** 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.

V. BROWSING DATA AND COOKIES

When a user (either acting as a consumer or as a business 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.

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.

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	Source of data	Consequences of	Retention period
		basis of the		not providing	
		processing		data	

Design Holding	Personal data	<u>Purpose</u> : storing	Data subject (you)	N/A	The data will not
	collected	your Personal Data		, .	be stored for a
	according to the	in the Group CRM			period of time
		·			
	above paragraphs	Database for			exceeding those
		administrative			indicated in the
		purposes, including			paragraphs above
		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 company- Article			
		6(1)(f)			
		GDPR			

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

This paragraph describes the processing operations carried out by 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
Design Holding and 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	Purpose: exercise defence of a right before a competent authority (e.g. judicial, administrative) Legal Basis: legitimate interest of the controller - Article 6(1)(f) GDPR	Data subject (you)	N/A	Time necessary for the purpose of exercise and/or defend the specific right involved* Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority
Design Holding and Joint Controllers (DH Group	Personal data collected according to the	Purpose: compliance legal obligation	Data subject (you)	N/A	Time necessary for the purpose of complying with the

Companies)	paragraphs and other data that can be suitable for the specific	Legal Basis: need to comply with a legal obligation - Article 6(1)(c) GDPR	legal obligation concerned
	intended purpose		

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

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 Design Holding or, when applicable, 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:

- 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 Design Holding 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 EUROPEAN UNION AND THE EUROPAN ECONOMIC AREA

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; (iv) the erasure is required by law (art. 17 GDPR); (v) 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 needs 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. 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.

8. 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:

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

9. 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.

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, Milan (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 Alessandro Manzoni 38, 20122, Milan (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 Milan (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, Milan (Italy)
- As well as the Affiliates of the above companies as listed in paragrah 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.