## Privacy Information Notice

This Privacy Information Notice provides you with information on how **Flos S.p.A.** and the **other companies in the Group controlled by Flos B&B Italia Group S.p.A.** collect and process your data. Depending on your location, various data protection laws may apply to the processing of your personal data, and different information may be required to be provided to you.

If you are in:

- the European Union: please refer to the Privacy Notice
- the United States: please refer to the <u>Privacy Notice</u> and the <u>Additional Privacy Information for</u> <u>California Residents</u>



### **Privacy Notice**

This privacy notice ("**Notice**" or "**Privacy Notice**") describes how **Flos B&B Italia Group S.p.A.** ("**FBB Group**"), **Flos S.p.A.** ("**Flos**"), the **Affiliates** and the other **Group Companies** (as defined below) process your personal data collected through, *inter alia*, the **Flos** website (the "**Site**"), in stores operated directly by **Flos** and **Affiliates** (the "**Stores**"), during events in which **Flos** and **Affiliates** participate or in any other way.

In this Notice:

"Affiliates"	means <b>Flos</b> affiliated entities listed in the <u>Group Companies annex</u> below and therefore part of the joint controllership regime for marketing and profiling activities
"Applicable Data Protection Laws"	means Regulation (EU) 2016/679 of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data ("GDPR"), and any other applicable data protection legislation or equivalent provision
"Group"	means the group of companies from time to time controlled, directly or indirectly, by FBB Group
"Group Companies"	means the companies listed in the <u>Group Companies annex</u> below, that are the companies of the Group included in the joint controllership regime for marketing and profiling activities as set out in this Notice. This list can be updated from time to time to the extent that new companies become Group Companies or current companies exit the Group
"Personal Data"	means any information relating to an identified or identifiable natural person
"you" or "your"	refers to you as the natural person whose Personal Data are collected, when you either purchase a product through the Site or in a Store, or when using a service offered by Flos and/or its Affiliates, or when accessing the Site, or in any other way coming into contact with Flos, its Affiliates or the Group.

### 1. Data Controllers and Processing activities

Under this Notice, there are different data controllership regimes depending on the data processing activity performed.

Each of the following sections describes the **processing activities** carried out by Flos, its Affiliates and Group Companies, detailing:

 $\stackrel{\textcircled{}}{\frown}$  the data controller

the categories of Personal Data

 $\frac{1}{2}$  the **purposes** of processing and the relevant **legal basis** 

the applicable **retention period** 

In case of joint controllership, an extract of the Joint Controllership Agreement is available upon request by writing at the following e-mail address: <u>flos@privacy.com</u> or <u>privacy@flosbebitaliagroup.com</u>.

### 1.1 When you purchase our products or services

The following applies when you purchase products or services from Flos or its Affiliates.

Controller	Categories of Personal Data	Purpose and legal basis of the processing	Retention period
For purchases on our Site: Flos	<ul> <li>Personal information (name, surname, tax code)</li> <li>Country of residence</li> <li>Zip code and</li> </ul>	Sale of products and provide sale and connected services, such as delivery services. Legal basis: performance of a contract. If you do not provide the data, the company will not be able to perform the contract.	Up to 10 years (for invoicing and accounting purposes) after the end of the contractual relationship. At the end of the
For purchases in Store: Flos	postal address • Contact details (e.g. phone number, e-mail address)	<ul> <li>Provision of after-sale services including fraud prevention, returns, guarantee and customer support.</li> <li>Legal basis: performance of a contract. If you do not provide the data, the company will not be able to perform the contract.</li> </ul>	retention period, data may be alternatively deleted or irreversibly anonymized.
For after sale services: Flos, Antares Iluminación S.A.U., Flos France Sas, Flos Scandinavia As, Flos Norge As, Flos Japan Co. Ltd., Flos U.S.A. Inc. as the case may be (depending on where you completed your purchase), each as an autonomous controller.	<ul> <li>Type of user (B2B or B2C)</li> <li>For B2B customers: Profession</li> <li>Invoice data</li> <li>Payment data</li> </ul>	Provision of customer satisfaction questionnaires and surveys. Legal basis: legitimate interest of the company to assess customer satisfaction, adequately balanced with your interests in light of the limits of the data processing. You may object to this processing, by writing to the contact details indicated in paragraph 6.	1 year following completion of the purchase. At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.

### 1.2 When you create an account, contact us or request/subscribe to a service



Flos	<ul> <li>Personal information (name, surname)</li> </ul>	Create and manage your personal account on the	Until you <b>request the</b>
	<ul> <li>Contact details (e-mail address, phone number, address)</li> </ul>	Site; manage your requests and/or manage your subscription to our services.	deletion of your account, or you unsubscribe to the
	Type of user     (B2B or B2C)	<b>Legal basis:</b> performance of a contract. If you do not provide the data the	service or as far as necessary to fulfill your request,
	<ul> <li>Country of residence</li> <li>For B2B customers: Profession, e-mail address, work e-mail address, work telephone number, name of the company/business/ organization you work for</li> </ul>	provide the data, the company will not be able to provide the service or handle your request.	depending on which is applicable. At the end of the retention period, data may be alternatively deleted or irreversibly
	<ul> <li>In case of requests: any other information you may share with us necessary to handle your request</li> </ul>		anonymized.

### 1.3 When you register to an event or otherwise meet us

The following applies when you **register to an event** of one or more companies of the Group, of the entire Group, or in which **Flos** and/or its **Affiliates** and/or the Group participates, either via an online form on the Site or directly on-site at the event or otherwise meet us (e.g., in-person meetings, networking events) and provide us with your business card or contact information for potential professional collaboration.

Controller	Categories of Personal Data	Purpose and legal basis of the processing	Retention period
Flos or Flos U.S.A., as the case may be (Flos U.S.A. only for events located in the U.S.A.), each acting as an autonomous controller	<ul> <li>Personal information (name, surname)</li> <li>Contact details (e-mail address, phone number, postal address)</li> <li>Type of user (B2B or B2C)</li> <li>Country of residence</li> <li>In addition for B2B customers: Profession, name of the company/business/ organization you work for</li> </ul>	Manage your registration to the event. Legal basis: performance of a contract. If you do not provide the data, the company will not be able to register you to the event.	For the duration of the event. At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.
Flos or Flos U.S.A., as the case may be (Flos U.S.A. only for events located in	<ul> <li>Image captured in photos and/or videos taken during the event</li> </ul>	Use of your image, captured in photos and/or videos taken during the event, for	For the duration established by the

the U.S.A.), each acting as an <b>autonomous</b> controller		the purposes specified in the release form for image usage that you signed or is made available to you. <b>Legal basis:</b> performance of a contract (release form).	release form for image usage. At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.
Flos or Flos U.S.A., as the case may be (Flos U.S.A. only for events located in the U.S.A.), each acting as an autonomous controller	<ul> <li>In case of B2B individuals, when you register to an event or meet us otherwise (e.g., in-person meetings, networking events) for a possible professional collaboration:</li> <li>Qualification as B2B user</li> <li>Personal information (name, surname)</li> <li>Contact details (e-mail address, phone number, postal address)</li> <li>Country of residence</li> <li>Profession</li> <li>Name of the company/business/ organization you work for</li> <li>Interactions with the individual</li> </ul>	Limited to B2B/ professional individuals: contact you to enhance or start business opportunities on a project-specific basis. Legal basis: legitimate interest of the controller. You have the right to object to this processing, by writing to the contact detail indicated in paragraph 6	In case of B2B individuals who registered to an event: <b>7 years from the data</b> <b>collection</b> In case of B2B individuals who met us otherwise (e.g., in- person meetings, networking meetings, etc.): <b>18 months from</b> <b>the last interaction</b> with such B2B individual (e.g., exchange of emails) At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.

### 1.4 When you send your application/CV

The following applies when you submit your CV or send an application to **Flos** or **Affiliates** through the career section of the Site to the companies of the Group, or in any other ways (e.g., via LinkedIn, via e-mail, headhunter agencies, etc.).

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**.

Controller	Categories of Personal Data	Purpose and legal basis of the processing	Retention period
Flos or the Affiliate to which you have sent your CV, each acting as an autonomous controller	<ul> <li>Personal information (name, surname)</li> <li>Contact details (e- mail address, phone number, postal address, country of residence)</li> <li>Data relating to your qualifications, education and professional career</li> <li>Photograph/personal portrait (if contained in CV)</li> <li>Date and place of birth (if contained in CV)</li> <li>Other personal information included in the CV/application you sent us</li> </ul>	Manage the application/CV received via the Site or another channel for the selection process. Legal basis: performance of pre- contractual activities. If you do not provide the data, the controller will not be able to handle your application process. Share the application/CV with other companies of the Group to enable them to consider the application/CV for the selection process within their entities. Legal basis: legitimate interest to optimize the selection process by companies of the Group, adequately balanced with your interests in the light of the limits of the data processing. You may object to this processing, by writing to the contact details indicated in paragraph 6.	2 years from the date of collection, save for the applicability of the data retention period provided by the privacy information notice for employees and officers, if the candidate is hired. At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.

### 1.5 B2C marketing and profiling purposes

The following applies to **marketing and profiling** activities carried out in relation to you, when you qualify as a **consumer**, namely you act and purchase services/products for personal use and not for a business purpose.

We may collect this data directly from you or from our partners or other third-party entities, in compliance with Applicable Data Protection Laws requirements.

Controller	Categories of Personal Data	Purpose and legal basis of the processing	Retention period
Flos and FBB Group acting as	<ul> <li>Qualification as B2C user</li> <li>Personal information (name, surname)</li> </ul>	Marketing activities ( <i>i.e.</i> , newsletter, promotional communications via e-mail, SMS, and ordinary mail, surveys, market searches) relating to products, services and initiatives.	7 years from the consent At the end of the retention period, data may be

joint controllers	<ul> <li>Country of residence, zip code and postal address</li> <li>Contact details (phone number, e- mail address)</li> </ul>	<b>Legal basis:</b> your consent. If you do not provide your consent, you will not receive marketing communications.	alternatively deleted or irreversibly anonymized.
	<ul> <li>Invoice data</li> <li>Your preferences and interests</li> <li>Your previous purchases and activities (including attendance to events) on the Site and in Store</li> </ul>	Profiling activities. Legal basis: your consent. If you do not provide your consent, no profiling activities will be performed.	7 years from the consent At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.
	<ul> <li>Broad and non-invasive categories, including:</li> <li>Geographic area where you are located</li> <li>Sales/purchase volume</li> <li>Whether you are a consumer or a professional client</li> </ul>	Perform customer segmentation based on non-invasive categories of data. Legal basis: legitimate interest to understand the users' preferences and, if marketing consent has been given, provide communications of products /services/events that may be of interest to the consumer, based on a high-level and non-intrusive customer segmentation that adequately balances the interests of the subjects. You have the right to object to this processing, by writing to the contact details indicated in paragraph 6.	7 years from the data collection At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.

### 1.6 B2B marketing and profiling activities

The following applies to **marketing and profiling** activities carried out in relation to you, when you qualify as a **professional**, namely you act and purchase services/products for business purposes.

We may collect this data directly from you or from our partners or other third-party entities, in compliance with data protection law requirements.

Controller	Categories of Personal Data	Purpose and legal basis of the processing	Retention period
the Group Companies acting as joint controllers	<ul> <li>Qualification as B2B user</li> <li>Personal information (name, surname)</li> <li>Country of residence, zip code and postal address</li> </ul>	Marketing activities ( <i>i.e.</i> newsletter, promotional communications via e-mail, SMS, and ordinary mail, surveys, market searches) relating to products, services and initiatives.	7 years from the consent At the end of the retention period, data may be alternatively deleted or

Contact details     (phone number, e- mail address)	<b>Legal basis:</b> your consent. If you do not provide your consent, you will not receive marketing communications.	irreversibly anonymized.
<ul> <li>Invoice data</li> <li>Your preferences and interests</li> <li>Your previous purchases and activities (including attendance to events) on the Site and in Store</li> </ul>	Profiling activities. Legal basis: your consent. If you do not provide your consent, no profiling activities will be performed.	7 years from the consent At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.
Broad and non-invasive categories, including:	Perform customer segmentation based on non-invasive categories of data.	7 years from the data collection
<ul> <li>Geographic area where you are located</li> <li>Sales/purchase volume</li> <li>Whether you are a consumer or a professional client.</li> </ul>	Legal basis: legitimate interest to understand the users' preferences and, if also marketing consent has been given, to provide communications of products /services/events that may be of interest to the consumer, based on a high-level and non-intrusive customer segmentation that adequately balances the interests of the subjects. You have the right to object to this processing, by writing to the contact detail indicated in paragraph 6.	At the end of the retention period, data may be alternatively deleted or irreversibly anonymized.

### 1.7 Social plug-ins and cookies

The Site allows interactions with third-party websites and social networks (e.g., Facebook, Instagram, Pinterest, X) through hyperlink, sharing buttons, social plug-ins and other similar instruments. For the data processing activities carried out on third-party websites, please refer to the privacy information notices published therein.

The Site can also collect certain browsing information (e.g., IP address, device and browser, navigation on the Site) via **cookies** and other **tracking technologies**, also of third parties.

These data may be collected:

- to ensure the proper functioning and security of the Site;
- to improve the Site and for analytics purposes;
- for tracking and profiling purposes.

For more information on how these data are collected, please refer to the Cookie Policy.

### 1.8 Comply with legal obligations, exercise/defend our rights and other purposes

This paragraph describes the processing operations carried out by FBB Group, **Flos** and the other Group Companies for the purpose of exercise of their rights before a competent authority or to comply with legal obligations imposed on them.

Controller	Categories of Personal Data	Purpose and legal basis of the processing	Retention period
the Group Companies (each acting as autonomous / joint controller depending on the purpose of the data processing activity for which the Personal Data are collected)	Personal Data collected according to the previous sections.	Exercise and/or defense of a right before a competent authority (e.g. judicial, administrative) Performance of business operations (e.g., mergers and acquisitions) Internal auding, reporting and other business/organizational purposes <b>Legal basis:</b> legitimate interest of the controller. You have the right to object to this processing, by writing to the contact detail indicated in paragraph 6.	Statute of limitations, time strictly necessary to perform internal auditing, reporting and other business/organizational purposes (whichever shorter) and, in any case, retention shall not exceed 10 (ten) years from the termination of the contractual relationship, unless further retention is necessitated by ongoing disputes and/or retention period established for the fulfillment of the purposes listed in the previous sections
	Personal Data collected according to the previous sections.	Compliance with a legal obligation <b>Legal basis:</b> need to comply with a legal obligation.	Time necessary for the purpose of complying with the legal obligation

### 2. How your Personal Data are processed

Your Personal Data are processed through computer, automated and/or paper forms in compliance with the principles and provisions of the Applicable Data Protection Laws.

Personal data are collected, elaborated, transferred and stored by using appropriate security measures (physical, logical and organizational) to protect them from possible breaches (such as destruction, loss, alteration, unauthorized 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. Who your Personal Data can be disclosed to

**Your Personal Data may be disclosed to third parties**, where strictly necessary for each purpose of processing described in the previous paragraphs, in particular:

Service providers	Companies of the Group	Payment service providers	Other third parties
The companies of the	Companies of the	Providers of	Our direct or indirect
Group and third-party entities providing specific	Group – <u>other than</u> <u>those acting as joint</u>	payment services or payment	shareholders;
services in the marketing,	controllers and listed in	gateways/platforms	

You may request more detailed information on those subjects to whom your Personal Data may be disclosed by writing to the contact details as indicated in paragraph 6 ("How to exercise your rights").

### 4. 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"), including the United States, the People's Republic of China and Singapore.

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**. If no adequacy decision has been taken by the European Commission, the data transfers will be carried out by relying on appropriate safeguards, including conclusion of **Standard Contractual Clauses**.

Please note that the United States, Japan, the United Kingdom, Switzerland and South Korea, countries in which some of the companies of the Group are established, benefit from **adequacy decisions** of the European Commission and therefore your data can be shared with those jurisdictions based on the adequacy decision.

### 5. Your rights

processors.

In accordance with the Applicable Data Protection Laws, and in particular with the provisions of the GDPR, **your rights in relation to the Personal Data that we process** under this Notice are the following:

Access you can obtain information about the prod of that Personal Data.		you can obtain information about the processing of your Personal Data and a copy of that Personal Data.
$\langle \rangle$	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.

	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.
$\oslash$	Restriction	you may request the restriction of the processing of your Personal Data where: (i) you contest the accuracy of the Personal Data for the period necessary to verify their accuracy; (ii) the processing is unlawful and you request the restriction of their use instead of erasure; (iii) the controllers no longer needs the Personal Data for the purposes of the processing, but you require them for the establishment, exercise or defense of legal claims; (iv) you have objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override yours.
X	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 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 defense of legal claims. Your right to object to direct marketing purposes can be exercised at any time. Your objection to processing carried out through automated means is also valid for processing carried out with traditional means.
OFF	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.
	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.

### 6. How to exercise your rights



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 <u>flos@privacy.com</u> and/or <u>privacy@flosbebitaliagroup.com</u> (the latter e-mail address to be used only in connection with B2C or B2B marketing or profiling purposes).



You may also at any time lodge a complaint with the Competent Data Protection Authority or bring an action before the competent national courts.

### 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, and we recommend to regularly consult 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 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.

### **Group Companies**

The Group Companies for the purposes of the joint controllership regime for marketing and profiling activities covered by this Privacy Notice are the following:

1. Flos B&B Italia Group S.p.A.	with registered office at Via dei Mercanti 12, 20121, Milan (Italy)				
2. Flos S.p.A.	with registered office at Via Angelo Faini, 2 – 25073 Bovezzo (Brescia) and the following Affiliates:				
	<ul> <li>Antares Iluminación S.A.U., Calle Mallorca N. 1 - Polígono Industrial De Reva, Riba-Roja De Túria - 46394 Valencia (Es)</li> </ul>				
	• Flos Benelux Nv, Bdc/Esplanade, 1 Bus 95 - 1020 Brussel (Be)				
	• Flos France Sas 20-22, Passage Dauphine - 75006- Paris (Fr)				
	• Flos GmbH, Hitdorfer Straße 10, 40764 Langenfeld (De)				
	• Flos Bv, Cruquiusweg 109 S - 1019 Ag Amsterdam (NI)				
	• Flos Scandinavia As, Kuglegårdsvej 13-17, 2450 Koebenhavn (Dk)				
	<ul> <li>Flos Sverige AB, c/o Aspia AB Pontus Falck Box 1017 SE-251 12 Helsingborg (Sw)</li> </ul>				
	• Flos Norge As, Sjolyst Plass 4 - 0278 Oslo (No)				
	<ul> <li>Flos UK Ltd, Crown Chambers, Princes Street, Harrogate, North Yorkshire</li> <li>- Hg1 1nj (Gb)</li> </ul>				
	• Flos Japan Co. Ltd, 1-23-5, Higashi-Azabu, Minato-Ku, Tokyo, 106-0044 (Japan)				
	• Flos U.S.A. Inc., New York, 36 E 31st Street, Suite 402, NY 10016 (USA)				
	Antares Iluminacion Pte. Ltd., 50 Raffles Place#30-00 Singapore Land Tower Singapore 048623				
3. B&B Italia S.p.A.	with registered office at Via Alessandro Manzoni, 38, 20121, Milan (Italy) and its Affiliates:				
	Arc Linea Arredamenti Spa, Viale Pasubio 70, 36030 Caldogno (Italy)				
	• B&B Italia London Ltd 250 Brompton Road, Cross SW3 2AS, London (UK)				
	B&B Italia München GmbH, Maximiliansplatz 21, 80333 München (Germany)				
	• B&B Italia Paris S.à.r.l., 3 Rue du Colonel Moll, 75017 Paris (France)				
	• B&B Italia USA, Inc., 150 East 58th Street, New York (USA)				
4. Louis Poulsen A/S	with registered office at Kuglegårdsvej 19-23, DK-1434, Copenhagen (Denmark) and its Affiliates:				
	<ul> <li>Luminous Designs Investment ApS, Kuglegårdsvej 19 - 1434 Copenhagen (Denmark)</li> </ul>				

	<ul> <li>Louis Poulsen Germany GmbH, Grünstraße 15, D-40212 Düsseldorf – c/o Mindspace Germany GmbH (Germany)</li> </ul>
	Louis Poulsen Sweden AB, Box 23013 S-104 35 Stockholm (Sweden)
	<ul> <li>Louis Poulsen Norway AS, Lysaker Brygge 37/39 N-1366 Lysaker (Norway)</li> </ul>
	• Louis Poulsen Finland Oy, Kyllikinportti 2 FIN-00240 Helsinki (Finland)
	<ul> <li>Louis Poulsen Japan Ltd., 3F/4F AXIS Bldg., 5-17-1 Roppongi, Minato-ku, Tokyo, 106-0032, Japan</li> </ul>
	<ul> <li>Louis Poulsen Holland BV, J.A. van Seumerenlaan 7, 1Hg, 1422XS Uithoorn, Nederland (The Netherland)</li> </ul>
	<ul> <li>Louis Poulsen Switzerland AG, c/o Berater &amp; Partner AG, Töpferstrasse 5</li> <li>- CH-6004 Lucerne (Switzerland)</li> </ul>
	<ul> <li>Louis Poulsen USA, Inc., 36 East 31st Street, Floor 4, New York NY 10016, USA</li> </ul>
	<ul> <li>Louis Poulsen UK, Ltd., c/o Goodwill Limited, 20 Red Lion Street, WC1R 4PS, London (UK)</li> </ul>
	Louis Poulsen Asia Pte Ltd, 5 Purvis Street, #01-02, Singapore 188584     (Singapore)
5. Flos B&B Italia Group Korea LLC	with registered office at 9th Floor, 428, Seolleung-ro, Gangnam-gu, Seoul, South Korea

Changes to the list of Group Companies under the joint controllership regime will be notified according to the Privacy Notice.

# Additional Privacy Information for California Residents

In this section, Flos, Flos USA and the other Group Companies provide information for **California residents**, as required under California privacy laws, including the California Consumer Privacy Act as amended by the California Privacy Rights Act ("**CCPA**").

The CCPA requires that we provide California residents certain **specific information** about how we handle their personal information, whether collected online or offline.

In this section:

**"Personal** means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. It does not include publicly available data as defined by the CCPA.

This section does not address or apply to the handling of personal information that is subject to an exemption under the CCPA.

#### 1. Notice at Collection

The table identifies the categories of personal information we may collect about you (and may have collected in the prior 12 months) and the categories of third parties to whom we may disclose this information for a business or commercial purpose.

Our collection, use, sale, sharing and disclosure of personal information about a California resident will vary depending upon the circumstances and nature of our interactions or relationship with such resident.

Categories of personal information	Do we collect?	Do we disclose for business purpose(s)?	Do we sell or share?	Third-party disclosure for business or commercial purposes
Name, Contact Information and other Identifiers: such as a real name, alias, address, unique personal identifier, online identifier, Internet Protocol (IP) address, email address, account name, or other similar identifiers.	YES	YES	NO	<ul> <li>The companies of the Group, Affiliates and subsidiaries</li> <li>Regulators, government entities and law enforcement</li> <li>Independent professionals and auditors</li> </ul>
Customer Records: Includes information such as name, user ID or username, account name,	YES	YES	NO	The companies of the Group, Affiliates and subsidiaries

contact information, and financial or payment information (i.e., payment type, payment card details, billing and shipping address).				<ul> <li>Regulators, government entities and law enforcement</li> <li>Independent professionals and auditors</li> </ul>
Purchase History and Tendencies: Commercial information including records of products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies.	YES	YES	NO	<ul> <li>The companies of the Group, Affiliates and subsidiaries</li> <li>Regulators, government entities and law enforcement</li> <li>Independent professionals and auditors</li> </ul>
Internet or other electronic network activity information: including, browsing history, clickstream data, search history, and information regarding a resident's interaction with our websites, application, advertisement, service	YES	YES	YES	<ul> <li>The companies of the Group, Affiliates and subsidiaries</li> <li>Regulators, government entities and law enforcement</li> <li>Advertising networks</li> <li>Analytics providers</li> <li>Social networks</li> <li>Independent professionals and auditors</li> </ul>
Professional or employment-related information: Employment history, qualifications, licensing, disciplinary record.	YES	YES	NO	<ul> <li>The companies of the Group, Affiliates and subsidiaries</li> <li>Regulators, government entities and law enforcement</li> <li>Independent professionals and auditors</li> </ul>
Sensitive Personal Information: limited to account login and password	YES	YES	NO	<ul> <li>Regulators, government entities and law enforcement</li> <li>Independent professionals and auditors</li> </ul>
<b>Profiles and Inferences:</b> drawn from any of the information identified above to create a profile reflecting a resident's preferences, characteristics, psychological trends, predispositions, behavior, attitudes.	YES	YES	NO	<ul> <li>The companies of the Group, Affiliates and subsidiaries</li> <li>Regulators, government entities and law enforcement</li> <li>Independent professionals and auditors</li> </ul>

### 2. Sources of Personal Information

We generally collect personal information from the following categories of sources:

- Directly or indirectly from you;
- Our affiliates and subsidiaries;
- Our service providers;
- Our business partners;
- Social networks.

### 3. Purposes for Collecting and Disclosing Personal Information

As described in the **Data Controllers and Processing Activities** sections in our main Privacy Notice, we collect and process personal information, including sensitive personal information (account creation and management only), for the following business or commercial purposes:

Products and services	Marketing and profiling	Applications and communications	Legal compliance and business
<ul> <li>Manage product sales;</li> <li>Provide pre-sale or after-sale services;</li> <li>Provide customer satisfaction questionnaire or surveys;</li> <li>Offer services through our websites:</li> <li>Create and manage your account;</li> <li>Register to an event.</li> </ul>	<ul> <li>Profiling, analytics and improvement (including to offer personalized services);</li> <li>Marketing and promotions;</li> <li>Perform market surveys and researches.</li> </ul>	<ul> <li>Job applications;</li> <li>Communicate with you (e.g., for support services, responding to information requests).</li> </ul>	<ul> <li>Security and protection of our rights;</li> <li>Compliance and legal process;</li> <li>Auditing, reporting, and other internal operations;</li> <li>General business and operational support.</li> </ul>

### 4. Retention of Personal Information

### We retain your personal information for as long as needed or permitted, based on the reason we obtained it (consistent with applicable law).

When deciding how long to keep your personal information, we consider whether we are subject to any legal obligations (e.g., any laws that require us to keep records for a certain period before we can delete them) or whether we have taken any legal positions (e.g., issued any legal holds or otherwise need to preserve the information). Rather than delete your data, we may also deidentify it by removing identifying details. Where we have committed to maintaining and using personal information in a deidentified form, we agree not to reidentify deidentified data except as permitted by applicable law.

### 5. Sales and Sharing of Personal Information

The CCPA defines:

"sale"	as disclosing or making available personal information to a third-party in exchange for monetary or other valuable consideration
"sharing"	as disclosing or making available personal information to a third-party for purposes of cross- contextual behavioral advertising

We do not disclose personal information to third parties in exchange for monetary compensation.

However, by using third-party advertising and tracking tools on our Site we may be "selling" or "sharing" the following categories of personal information: *identifiers (IP addresses),* and *internet or other electronic network activity information.* We disclose these categories to third-party advertising networks, analytics providers, and social networks for purposes of marketing and advertising. We do not sell or share sensitive personal information or personal information about individuals we know are under age sixteen (16).

### 6. Sensitive Personal Information

We do not collect, use, or disclose "Sensitive Personal Information" beyond the purposes authorized by the CCPA. Accordingly, we only use and disclose sensitive personal information as reasonably necessary and proportionate:

- to perform our services requested by you;
- to help ensure security and integrity, including to prevent, detect, and investigate security incidents;
- to detect, prevent and respond to malicious, fraudulent, deceptive, or illegal conduct;
- to verify or maintain the quality and safety of our services;
- for compliance with our legal obligations;
- to our service providers who perform services on our behalf; and
- for purposes other than inferring characteristics about you.

### 7. California Privacy Rights

California law grants California residents certain rights, subject to exceptions, to make requests relating to their personal information as set forth below.

Yes	Right to Opt-out of Sale and Sharing of Personal Information	California residents have the right to opt-out of our sale or sharing of their personal information.
?	Request to Know	California residents have the right to request and, subject to certain exemptions, receive a copy of the specific pieces of personal information that we have collected about them in the prior 12 months and to have this delivered either (a) by mail or (b) electronically in a portable and, to the extent technically feasible, readily useable format that allows the resident to transmit this information to another entity without hindrance. California residents also have the right to request that we provide them certain information about how we have handled their personal information in the prior 12 months. California residents may make Requests to Know up to twice every 12 months.
Ū	Request to Delete	Subject to certain exceptions, California residents have the right to request deletion of their personal information that we have collected from them and to have such personal information deleted, except where an exemption applies.
$\langle \rangle$	Request to Correct	California residents have the right to correct inaccurate personal information that we maintain about them.
SNN A	Request to Limit	California residents have the right to opt-out of the use and disclosure of their sensitive personal information if we use that information for any purpose other

		than the purposes permitted under the CCPA. However, we do not use or disclose sensitive personal information in a manner that would trigger this right.
8=8	Right to Non- Discrimination	We will not discriminate against you in terms of price or service level for exercising any of the rights described above.

#### Submitting Requests

 Right to
 If you are a California resident you may exercise the above rights by contacting us at:

 Know,
 (888) 860-4311 (toll free only for US)

 Correct
 flos@privacy.com

 submit a webform, available here web form

Before responding to your request, we must first verify your identity using the personal information you have already provided to us. When you exercise your privacy rights, please provide us with your full name, the email you used to contact us, and your address. We will take steps to verify your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information to verify your identity, or where necessary to process your request. If we are unable to verify your identity after a good faith attempt, we may deny the request and, if so, will explain the basis for the denial.

To exercise your right to opt-out of the "sale" or "sharing" of personal information, please use our cookie preferences tool available by clicking on the <u>cookie management section</u> (by clicking on

Right to Opt Out of Sales and Sharing the for at the bottom left of our Site). You also have the right to opt-out of "sales" and "sharing" of your personal information using an opt-out preference signal (Global Privacy Control). If our Site detects that your browser or device is transmitting an opt-out preference signal, we will opt that browser or device out of cookies on our Site that result in a "sale" or "sharing" of your personal information. If you come to our Site from a different device or from a different browser on the same device, you will need to opt-out, or use an opt-out preference signal, for that browser and/or device as well.

### 8. Authorized Agent

You may designate someone as an authorized agent to submit requests and act on your behalf. Authorized agents will be required to provide proof of their authorization in their first communication with us, and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

#### 9. Changes to this Notice

We may change, update, or modify this Notice from time to time, so please be sure to check back periodically. We will post any updates to this Notice here. If we make any changes to this notice that materially affect our practices regarding our use of the personal information, we have previously collected from you, we will endeavor to provide you with notice, such as by posting notice on our Site.

### 10. Contact Us

If you have any questions or concerns regarding this Policy or our privacy practices, you may contact us at <u>flos@privacy.com</u>.