

WEBSITE PRIVACY POLICY

Information pursuant to Legislative Decree No. 196/2003 and European Regulation 679/2016, for the processing of personal data

[A] Data Subjects: website users (browsing and use of website-tools)

Zegna Baruffa Lane Borgosesia S.p.A. (hereinafter ZBLB) as Data Controller of your personal data pursuant to and in accordance with Legislative Decree No. 196 of June 30, 2003 (hereinafter 'Privacy Code'), and the General Data Protection Regulation EU/2016/679 (hereinafter 'GDPR'), hereby informs you that, as a user of the website www.baruffa.com, the processing of your personal data will be performed on a correctness, relevance, lawfulness, transparency principles basis, as well as aimed at protecting your privacy and rights.

Your personal data will be processed by duly authorized personnel and complying to the above legislation, for which we are delighted to provide you for the below set of information.

[B] Purposes of the Processing: Your data will be processed in connection with your browsing on the website; therefore:

- For technical and functional access to the website;
- Navigation on the web contents, pages and attachments thereto;
- Make ZBLB able to receive, process and answer to queries from-users filed by means of relevant form.

N.B. the website back-end computing systems acquires certain data (e.g., access date, language, browser, location), for which the recording is implicit in use of the Internet protocols. Besides, it is worth to mention that such data are not processed for the purpose of identifying the user; moreover, the system does not detect the I.P. address directly (e.g. platform) or indirectly (e.g. cookies or tracking tools).

The aforementioned data, more details of which will be given herebelow, may possibly be used by ZBLB for the sole scope of preparing anonymous statistics on the use of the site or to verify its proper functioning, or even to protect its rights to prevent offences, data breaches or computer crimes to the detriment of the system and provided services (e.g. art. 615 ter Italian Criminal Code - "Abusive access to an I.T. system")

[C] Legal Grounds:

- Data processing is grounded under Article 6 lett. a) and b) of the GDPR EU/2016/679 (respectively: "*the data subject has given consent to the processing of his or her personal data for one or more specific purposes*" and "*...processing is mandatory for the performance of a contract to which the data subject is party or for the performance of pre-contractual measures taken at the request of the data subject...*", as well as ZBLB's legitimate interest in the website free access and proper functioning on the basis of current technologies.
- The use of form contacts by browsers is exclusively based under Article 6 letter a) of the GDPR EU/2016/679 mentioned above.

[D] Type of Data Processed: For the purposes of the processing, the Data Controller may become aware of the following categories of data:

- **Common Personal Data:** for instance, language, date and time, browser, place, device, user_agent via http request. The system does not detect the I.P. address, which is therefore not given accessible to ZBLB or back-end users of the website;



Zegna Baruffa Lane Borgosesia S.p.A.
SPINNING TRENDS - SINCE 1850

CAPITALE SOCIALE I.V. € 43.120.000 - C.C.I.A.A. BIELLA 161066
REG. IMPRESE BIELLA / CODICE FISCALE 01497250132
PARTITA IVA 01734930025



**Sede amministrativa e
direzione generale**

Via Milano, 160 - 13856 - Vigliano Biellese - Biella - Italy



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- **Special categories of personal data:** For browsing the website, contents and attachments thereto or making use of the contact tool, there is no need to process data referred-to-in Article 9 of the GDPR, notably, e.g. data concerning religious beliefs, political orientation, health status of the user. Anyway, in case you will freely provide for such kind of data when using the contact tool, ZBLB will process those in accordance with the relevant Law or delete abiding by the principle of "minimization". In any case appropriate technical and organizational security measures will be taken.

[E] Method of Processing: your personal data may be processed as it follows:

- Processing will be performed by means of I.T., company server, cloud storage providers or recorded in system and/or browsing log files;

The whole processing is carried out in compliance with Articles 11, 31 et seq. of the Privacy Code and through the adoption of suitable technical and organizational security measures.

[F] Data Communication to Third Parties: the data will be kept in the Company's archives, also stored in cloud provided by third parties, and disclosed exclusively to the competent subjects by Law or by order of a Judicial Authority, as well as to subjects authorized by the Data Controller or others necessary for the maintenance/functioning/updating of the Company's website, being protected the rights of the data subject. Therefore, the data will be in use to the following:

- Internal staff of ZBLB;
- Staff of the web-agency responsible for maintenance, updating of the website;
- Internet solutions offered by the provider "Google LCC." for the development of statistics (limited to browser, city, country, device, region, user_agent data via http request) by means of the "GA4" system abiding by the European Commission's Adequacy Decision of 10/07/2023 and attached "Data privacy framework list";
- Possible providers for the development of marketing campaigns or other services.

N.B. The website contains "social plug-in", being marked by their respective official logos, to enable the user linking to ZBLB's profiles set-up on social networks, to wit:

- "Facebook" and "Instagram" operated by Meta Platform Inc. based at 1601 Willow Rd - 94025 Menlo Park, California, USA; website: <https://facebook.com/>;
- "Linkedin" operated by LinkedIn Corporation based in Sunnyvale, 1000 W Maude Ave, California, USA; website: <https://linkedin.com/>;
- "Pinterest" operated by Pinterest Inc. based in San Francisco, 505 Brannan Strett, California, USA; website: <https://www.pinterest.com/>;
- "Youtube" operated by Google LCC headquartered at 1600 Amphitheatre Parkway, Mountain View, California, 94043, California, USA; website: <https://www.youtube.com/>.

Be aware that the processing of personal data by the social networks thereby is not up-to or performed by ZBLB, but rather it is operated by the respective provider as an independent data controller. The user who does not wish to make use of the plug-ins to access the social profiles of ZBLB, in the event of an error in access, will have to log out of the relevant social network.

[G] Cookies : In addition to browsing data, ZBLB's site avails of "cookies," which are textual elements that are placed on a computer's hard-drive only upon authorization. Cookies have the function of allowing access to website services, being security filters, and to allow web applications to send information to individual users.



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The Site, due to technical IT security reasons, makes use of technical, browsing and functional cookies, as well as analytical cookies (GA4), through the Google Analytics service. The data acquired through Google Analytics may also be used by Google LCC, according to their terms of service.

The data processed through cookies are used for the sole purpose of obtaining anonymous statistics on the use of the site and to check its proper functioning, being deleted immediately after processing.

Technical cookies are necessary to allow the user to navigate the site and to use the services requested. You can disable cookies by denying permission from your browser (e.g. Microsoft Edge, Safari, etc. ..), but in this case it may be difficult to access the site.

For more information, please refer to cookies policy posted on www.baruffa.com and to information reported at www.cookiepedia.co.uk

[H] Data disbursement and data transfer abroad: Your personal data, outside the cases above, will not be disparted.

As for abroad data transfer, it should be noted that the use of services made available by Google (GA4) for the collection of the data at above point D) might cause storage at the provider's servers located in the USA in accordance with the European Commission's Adequacy Decision of 10/07/2023 and annexed "Data privacy framework list".

In other possible cases of outside the EEA data transfer, it will be the responsibility of ZBLB to take action in according to laws, verifying the conditions of adequacy in accordance with Article 45 of the GDPR, by taking appropriate technical and organizational measures, as well as negotiating specific contractual clauses in compliance with Article 46 of the GDPR.

[I] Retention Period: please note that, in according to principles of lawfulness, purpose limitation and data minimization, pursuant to Article 5 of the GDPR, the retention period of your personal data is established for a period of time not exceeding the achievement of the purposes which they are collected and processed for. In detail:

- For providing required services;
- Up-to the achievement of the purposes for which they are collected and processed, abiding by deadlines prescribed by law, or for the protection of the Data Controller's legitimate rights/interests.

[L] Rights of the Data Subject: You have the right to obtain from the Data Controller the erasure, communication, updating, amendment, and integration of your personal data, as well as you may exercise all the rights provided by Articles 15, 16, 17, 18, 19, 20, 21, and 22 of the GDPR and Article 7 of the Privacy Code and in particular:

1. The data subject has the right to ask for confirmation of the existence or non-existence of personal data concerning him/her, even if not yet recorded, by a communication in an intelligible form.
2. The data subject has the right to obtain indication of:
 - a. the origin of the personal data;
 - b. the purposes and methods of processing;
 - c. the logic grouping of the processing carried out with the aid of I.T.;
 - d. the details of the Data Controller, the persons in charge and the representative designated pursuant to Article 5, paragraph 2;
 - e. the subjects or categories of subjects to whom the personal data may be communicated or those who may become aware of them as designated representative in the territory of the State, managers or appointees.
3. The data subject has the right to obtain:
 - a. the updating, amendment or, when interested, the integration of data;



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- b. the cancellation, transformation into anonymous form or blocking of data processed unlawfully, including data whose retention is unnecessary for the purposes for which the data were collected or subsequently processed;
 - c. certification that the operations in letters a) and b) have been brought to the attention, also as regards their content, of those to whom the data were communicated or disseminated, unless this requirement is impossible or involves a manifestly disproportionate commitment to the protected right;
 - d. the portability of the data.
4. The data subject has the right to oppose, in whole or in part:
 - a. for legitimate reasons to the processing of personal data concerning him/her, even if pertinent to the purpose of collection;
 - b. to the processing of personal data concerning him/her for the purpose of sending advertising or direct sales material or for carrying out market research or commercial communication.
5. The data subject also has the right to lodge a complaint with the Data Protection Authority of the member state where he/she resides, works or the alleged violation occurred.

[M] Contact Details of the Data Controller and DPO

- Data Controller: Zegna Baruffa Lane Borgosesia S.p.A. (registered office at Via B. Sella 140, 13835 Valdilana (BI); e-mail: baruffa@baruffa.com; telephone: +39 015 7001; C.F.: 01497250132). Correspondence regarding Privacy may be sent to the administrative office at Via Milano, 160 - 13856 Vigliano Biellese (BI); e-mail: privacy@baruffa.com
- Data Protection Officer (DPO) designated by the Data Controller pursuant to Article 37 of the GDPR: Marco Armoni (e-mail: dpo@baruffa.com; phone: 3383305774; Fiscal Code: RMNMRC64A01D969D)

Zegna Baruffa Lane Borgosesia s.p.a. reserves the right, in any case, to amend and integrate this information notice due to legislative, organizational or business changes.



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