

Privacy Notice for Visitors of the Outlet and the Website

(Version 3.0)

Pursuant to the European Union General Data Protection Regulation (GDPR 2016/679, Article 13), as a customer/visitor of the website www.torinooutletvillage.com (the "Website"), we hereby inform you about the methods used to process your personal data.

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1. Data Controller

The Data Controller is **Torino Fashion Village S.R.L.**, subject to the management and coordination of Outlet JV Sarl, with registered office at Corso Matteotti No. 10 - Milan (MI), Italy, Tax Code and VAT No. 05481690484, represented by its Legal Representative, Mr. Anthony Patrick Halligan.

2. Data Protection Officer (DPO)

The Controller has appointed a Data Protection Officer (DPO). You may contact the DPO regarding any matter concerning the processing of your personal data at: dpo@torinooutletvillage.com

3. How We Collect Your Personal Data

We collect your personal data in the following circumstances:

- When you register online by accessing the "Register" section of our website;
- When you fill out paper or digital forms (e.g., tablet devices) available at Outlet contact points (Info Points);
- Through personnel present at the Outlet's contact points (Info Points).

4. What Data We Collect and Why (Categories of Data, Purposes, Legal Basis, Nature of Provision, and Retention Period)

4.1. VIP Club Membership

Data Categories: Identification data (e.g., name, surname, tax code), contact data (e.g., email, phone), residence/domicile, login credentials, purchase history and spending level, participation in contests and initiatives reserved for VIP Club members.

Purpose: To manage your VIP Club membership. Failure to provide mandatory data will prevent us from processing your request. You are free to refrain from providing data marked as optional, without this having any effect on your ability to register for the service.

Legal Basis: Performance of a contract or pre-contractual measures.

Retention Period: for the duration of the VIP Club membership and thereafter for the statutory limitation period of 10 years.

4.2. Marketing and Advertising Communications (Newsletter)

Data Categories: Name, surname, email, and automatically collected connection data (IP address, device parameters, ISP name, date/time, unique communication ID).

Purpose: To send newsletters and promotional communications from us and our partners. Providing this data is necessary to receive such communications.

Legal Basis: Consent of the data subject.

Retention Period: 24 months from the date of consent, with renewal request before expiration.

4.3. Profiling

Data Categories: Contact data, residence/domicile, login credentials, purchase data, participation in VIP Club initiatives, browsing data.

Purpose and nature: to create individual profiles, including via automated processing, to send tailored communications and services based on interests and purchasing behavior. Refusal does not affect VIP Club membership;

Legal Basis: Consent of the data subject.

Retention Period: 12 months from the date of consent, with renewal requested before expiration.

4.4. Handling of Inquiries and Requests

Data Categories: Personal identification and contact data, login credentials, purchase data, contest participation.

Purpose: To respond to inquiries, complaints, or suggestions regarding the Outlet, website, or services. Refusal to provide necessary data may prevent handling of the request.

Legal Basis: Legitimate interest of the Controller.

Retention Period: For the duration of the statutory limitation period.

4.5. Telecommunication Connection Data

Data Categories: Automatically collected data (IP address, browser type, device parameters, ISP name, date/time, source and exit pages, region/language settings, server response codes). Cookies may also be stored-please refer to our Cookie Policy.

Purpose: for IT security, network protection, and proper website functioning. These data are mandatory for website use.

Legal Basis: Legitimate interest of the Controller.

Retention Period: Up to 6 months, unless extended for investigation purposes.

Furthermore, we may process your data for the following additional purposes:

- To comply with obligations under applicable national and supranational laws and/or regulations (legal basis: necessity to fulfil legal obligations);

- To defend the Data Controller's rights in the course of judicial, administrative, or out-of-court proceedings, and in the context of disputes related to the services provided (legal basis: legitimate interest in the protection of its rights. Data retention period: until the expiry of the statute of limitations applicable to the right).

5. Special Categories of Personal Data

We do not require you to provide so-called "special categories" of personal data that is, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, or data concerning health, sex life, or sexual orientation.

6. How We Process Your Data

We implement appropriate security measures to prevent unauthorized access, disclosure, alteration, or destruction of personal data, and require the same of our third-party service providers. Data processing is carried out using manual, electronic, and/or telematic tools, with organizational methods strictly related to the purposes stated.

7. Data Disclosure to Third Parties

Your data may be shared with third parties and/or recipients essential to service provision or legal compliance. These parties act as Data Processors on behalf of the Controller and process data solely for the purposes described herein.

Such third parties may include:

- IT and technical support providers;
- Marketing service providers;
- Service providers necessary for service delivery;
- Group companies;
- Consultants and professionals (e.g., lawyers, notaries, auditors);
- Private entities performing inspections;
- Public authorities, courts, and supervisory bodies.

You may request the full list of appointed external processors using the contact methods listed in section 11.

Only authorized personnel will access your data, following internal training and specific instructions.

8. International Data Transfers

Your personal data will not be transferred outside the European Economic Area. Should such a transfer become necessary, we will ensure compliance with applicable data protection laws.

9. Your Rights

As a data subject, you may exercise the following rights:

- **Right of Access:** To know whether your data is being processed and obtain relevant details.
- **Right to Rectification:** To correct inaccurate or incomplete data.
- **Right to Erasure:** To request deletion of your data in specific cases.
- **Right to Restriction:** To limit processing under certain conditions.
- **Right to Data Portability:** To receive your data in a structured format and transmit it to another controller.
- **Right to Object:** To object to processing based on legitimate interests.
- **Right to Lodge a Complaint:** With a supervisory authority if your data is unlawfully processed.
- **Right to Withdraw Consent:** At any time, without affecting previous lawful processing.

10. Exercising Your Rights

You may exercise your rights using the contact methods provided in the section "How You Can Contact Us."

Additionally, with regard to your rights of rectification, erasure, and withdrawal of consent, you may – alternatively or in addition to the above-mentioned methods – act independently by accessing your Personal Area.

11. Contact Us

Email: privacy@torinooutletvillage.com

Mailing Address:

Torino Fashion Village S.R.L.

Via Torino 160,

10036 Settimo Torinese (TO), Italy

We will respond within one month of receiving your request, or within three months in complex cases, in which case you will be informed of the reason for the delay.

12. Changes to This Privacy Notice

We reserve the right to modify or update this Privacy Notice, in whole or in part, at any time, including in response to changes in applicable laws. Please check this section regularly to stay informed of the latest version.