

## PRIVACY POLICY

Prada Fashion Commerce (Shanghai) Co., Ltd., with registered office in Shanghai, PRC, the company directly operating the selling of products offered on [www.miumiu.com/cn](http://www.miumiu.com/cn) (hereinafter the “Website”) with shipping in the People’s Republic of China and managing the Website, together with its parent company Prada S.p.A., with registered office in Milan (Italy), the operating holding company of the Prada Group, (hereinafter, both referred to as “PRADA”) recognise the importance of maintaining the confidentiality, integrity and security of your personal data (“Personal Data”), and hereby inform you that any Personal Data which you provide to PRADA through our Website, as well as any Personal Data which you may provide to a Prada Group store, including through its subsidiaries and/or affiliates (collectively the “Prada Group”), will be processed in compliance with current applicable laws on privacy and with any specific local regulations applicable from time to time, together with this privacy policy and the principles and general rules of conduct contained in the Code of Ethics adopted by the Prada Group.

By using the Website and services in any way or by agreeing to provide your Personal Data to the Website, you are agreeing to the Privacy Policy. Should you object to any term of the Privacy Policy, you may not use the Website and you should not provide your Personal Data to the Website.

### 1. Type and source of data

#### Browsing data

During their normal operation, the computer systems and software procedures used to operate our Website collect certain personal data (log files). The transmission of such data is inherent to the use of internet communication protocols. This information is not collected in order to be associated to specific data subjects. However, due to its nature, this information can allow users to be identified by means of their processing and integration with data held by third parties. Such information includes the IP addresses or domain names of the computers you use to visit our Website, URIs (Uniform Resource Identifiers) of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical status code of the server reply (successful, error, etc.) and other parameters concerning the user's operating system and computer environment. This data is used with the sole purpose of obtaining anonymous statistical information on the use of our Website and to guarantee its correct operation.

#### Cookies

Our Website uses cookies to ensure its efficient functioning and to improve our services. Cookies are small text files that are sent to your computer (usually to your browser) by the websites you visit. Cookies are stored in your computer to be recognised by those websites on your subsequent visits. For more information on cookies, on the types of cookies used on our Website, on how to disable them and on how you can revoke your consent, see our [cookie policy](#).

#### Personal Data voluntarily provided by the data subject

PRADA collects and processes the Personal Data that you directly and voluntarily provide through our Website when you place online orders and/or register to our Website and/or subscribe to our

newsletter and/or contact our Customer Service. PRADA also collects and processes the Personal Data that you may provide by filling in our Customer Card at our stores or when contacting us for an enquiry. These data include, for example, your first and last name, postal and e-mail address, phone number and date of birth. Furthermore, when you voluntarily send an e-mail through our Website and/or to the addresses indicated in our Website, we collect your e-mail address so that we can reply to any request, as well as any additional Personal Data contained in your message.

If you call our Client Service team or our Client Service team contacts you with the details you have provided to us, please note that calls may be recorded for quality assurance and record-keeping purposes and stored in the data centre located in the European Union. Before recording you will be anyhow advised of this circumstance.

In addition, we may also obtain information about you as a result of authentication or identity checks (for example, you will be asked to present your identity document when you pick up your purchase in-store). We use this information to identify you as a customer, to process your order, to deliver products and services, to process payments but will not be included in the Prada Group customer data base.

## **2. Purpose of the processing**

Your Personal Data may be processed based on the necessity for the provision of the services for the following purposes:

- (a) to respond to all your requests and to manage your relationship with PRADA;
- (b) to fulfil your online purchase orders and perform all management activities connected with it (including administrative management of the contract, delivery of goods, payment processing, management of any claims and litigation, and fraud prevention), and to comply with any applicable legal or regulatory obligations.

Furthermore, subject to your prior consent, your Personal Data may be included in the Prada Group customer data base, managed by the holding company Prada S.p.A., and processed together with the details of your purchases for the following purposes:

- (c) profiling: to perform individual or group studies, surveys, statistical and/or market researches on your preferences with regards to our products, so that we can offer you a personalised service and promote cultural and recreational activities that may interest you;
- (d) marketing: to contact you and/or send you (by post, telephone, e-mail and any other form of electronic communication) information and promotions, including commercial information, newsletters, advertising material, catalogues and invitations to events related to the Prada Group's products and services.

## **3. Processing Methods**

Your Personal Data will be processed by suitable electronic or automated means and computerised tools, or manually and on hard copy, exclusively for the purposes for which they have been collected and guaranteeing the security and confidentiality of any processed information. Your Personal Data will be processed only by the Prada Group's internal staff duly authorised to do so under their respective job duties. Your Personal Data may also be processed by third parties to the extent

necessary and/or instrumental for the above purposes. These third parties will act on behalf of PRADA as data processors (e.g. service providers, carriers, IT technicians or any other suppliers appointed by PRADA to carry out and/or manage any promotional campaigns for PRADA's products and services, etc.).

Please also note that if you consent to the processing of your Personal Data for the purposes referred to under letters (c) and (d) of paragraph 2 above, your data will be automatically visible to, and shared with, all Prada Group stores (inside and outside of the European Union), and PRADA will take all appropriate security and confidentiality measures required by applicable legislation.

#### **4. Nature of the provision of personal data**

The provision of your Personal Data is optional.

However, if you wish to make a purchase order for products offered on our Website, and/or receive information on Prada Group's products and services, and/or contact our Customer Service and/or use any other services offered by the Prada Group, you need to fill in all mandatory fields of the relevant forms.

The processing of your Personal Data for the purposes indicated at letters (c) and (d) of paragraph 2 above is subject to your prior express consent. If you withhold your consent, we may not be able to offer you a personalised service and inform you of any initiatives that may interest you and/or send you any other commercial information on products, initiatives and events of the Prada Group.

You may withdraw your consent to the processing of your Personal Data by us at any time, by writing to PRADA, Via A. Fogazzaro 28, 20135 Milan (Italy), by sending an e-mail at [privacy@prada.com](mailto:privacy@prada.com), or by using the "unsubscribe" link included in all of our commercial electronic communications, and/or by using any other appropriate procedures which may be made available to you.

#### **5. Transfer and disclosure of data**

Whenever necessary and/or instrumental to the above purposes, your Personal Data may be processed on behalf of PRADA by other entities acting as data processor, including:

- Prada Group companies and franchisees that operate Prada Group stores;
- companies, consultants and firms providing advisory and/or consulting activities, or performing related services that are instrumental to data processing on behalf of PRADA.

As PRADA is part of an international network and uses global services your Personal Data may be transferred abroad in accordance with applicable legislation, including to countries outside the European Union where PRADA pursues its interests, by adopting all appropriate security measures and safeguards to ensure an appropriate level of data security.

Your Personal Data will not be used for third-party advertising purposes or for the promotion of products, services or initiatives by entities other than the Prada Group, nor shall they be disclosed to unknown persons under any circumstances.

## 6. Retention period

Your personal data will be processed and stored for as long as required for the purposes for which they were collected, and in accordance with the storage periods provided for by the applicable laws, or until you revoke your consent to the processing, if applicable. After such period, your Personal Data will be automatically and permanently erased or made anonymous.

## 7. Data controllers

For the purpose of managing and executing your online purchase orders referred to at letter (b), of the paragraph 2 above the Data Controller is Prada Fashion Commerce (Shanghai) Co., Ltd. Please contact the Data Controller by writing to Prada Shanghai Commerce (Shanghai) Co., Ltd., Rooms 4109 & 4110, 41/F, Plaza 66 Office Tower Two, No. 1366 Nan Jing Xi Road, Jing An District, Shanghai, PRC, or sending an e-mail to [privacy@prada.com](mailto:privacy@prada.com).

For the other purposes of data processing referred to at letters (a), (c) and (d) of the paragraph 2 above the Data Controller is Prada S.p.A., which will process your Personal Data in accordance with current European privacy laws (Regulation (EU) 2016/679 – “GDPR”). Please contact the Data Controller or Data Protection Officer (“DPO”) by writing to Prada S.p.A., Via Antonio Fogazzaro 28, Milan (Italia), or by sending an e-mail to [privacy@prada.com](mailto:privacy@prada.com).

## 8. Rights of the data subject

Please note that you may exercise the rights under the applicable privacy laws included those of the Articles 15 to 21 GDPR, and specifically the right to request information as to whether your Personal Data is being processed and as to the characteristics of the processing, the right to rectification and erasure of your Personal Data, the right to object to the processing and/or the right to have those Personal Data transmitted to another controller.

You also have the right to withdraw your consent at any time. The withdrawal of your consent will not affect the lawfulness of processing based on your consent before its withdrawal. You may lodge a complaint with the Italian supervisory authority (*Autorità garante per la protezione dei dati personali*) at Piazza di Montecitorio no. 121, 00186, Rome (Italy).

## 9. Contacts

If you have any request on your Personal Data, on this Privacy Policy or on how you might exercise your rights, you may contact the Data Controller or the DPO free of charge at the contact details indicated at paragraph 7.

PRADA reserves the right to amend this Privacy Policy at any time. The Privacy Policy currently in force is the one published on our Website.

Last updated: 24 May 2018