

## Data Protection (www.geox.com)

### Summary:

- Privacy Policy
- Cookie Policy
- Your privacy rights
- “Feedback” privacy policy
- Geox@home policy (for countries where the service is active)

## PRIVACY POLICY

With this policy we intend to inform the visitors to the website www.geox.com of the policy adopted regarding the Protection of Personal Data, underlining our commitment and attention for the protection of your privacy. Please read carefully our Privacy Policy which applies both in case you access the Site and simply decide to browse using our services, without purchasing any products, and in case you decide to shop with us.

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Geox S.p.A. and Geox Canada Inc. hereby wish to inform visitors to the “www.geox.com” website (hereinafter the “**Website**”) of the policy with respect to collecting, using and sharing of Personal Information of Website users and to emphasize their commitment and attention to protecting the privacy of Website visitors. Please read our Privacy Policy carefully, as it applies when you access, view or use the Website, even when you simply navigate it without purchasing any products, as well as any other collection, use, or disclosure of personal information that you or a third party provide to us.

Please also read the Terms and Conditions of Use of the Website, into which this Privacy Policy is incorporated by this reference, and which, together (and also including any additional documents referenced in, or incorporated into the Terms and Conditions), form the agreement between you and Geox with respect to your use and access to our Website.

Navigation within the Website is free and does not require registration, with the exception of certain areas in which you may freely and expressly provide personal information to access certain services (e.g. to register your account, sign up for email updates or request information, etc.). Data provided by you to access these additional services shall be, to the extent applicable, in accordance with the Personal Information Protection and Electronic Documents Act (Canada), the EU Regulation 2016/679 *General Data Protection Regulation* (the “**Regulation**”), the provisions of this policy, and other applicable privacy laws. “**Personal information**” as used herein means information that can identify an individual directly or through other reasonably available means.

### **Applicability**

This policy applies to information we collect:

- on the Website;
- in email, text, and other electronic messages between you and Geox;
- when you use our “contact us” or similar feature on the Website, when you call our telephone number listed on the Website, or when you send emails to the e-mail address listed on our Website;
- in our brick and mortar stores; and
- through any other means associated with or relating to the Website.

This policy does **not** apply to information collected by:

- us through any other means, including on any other website operated by Geox or any third party (including our affiliates and subsidiaries); or
- any third party, except as otherwise expressly provided herein, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

### **Children Under the Age of 18**

Our Website is not intended for children under eighteen 18 years of age. No one under the age of eighteen (18) may provide any personal information to us or on or through the Website. If you are under eighteen (18), do not use or provide any information on this Website or on or through any of its features, and do not register on the Website, make any purchases through the Website or contact us, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

If we learn we have collected or received personal information from a child under eighteen (18) years of age without verification of parental consent, we will delete that information.

If you believe we might have any information from or about a child under the age of eighteen (18), please contact us at [privacy@geox.com](mailto:privacy@geox.com).

### **Information We Collect About You, How We Collect It and How We Use and Disclose It**

We may collect several types of information from and about users of our Website, including information:

- that is personal information;
- that is about you but individually does not identify or permit us to identify you, such as the type of browser you use; and
- about your internet connection and service provider, the equipment you use to access our Website, your browsing history, and other usage and technical details (some of which may be classified as personal information).

We collect this information:

- directly from you when you provide it to us;

- automatically as you navigate through the Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies and other tracking technologies;
- from third parties, for example, our business partners and affiliates; and
- as otherwise set out in this policy.

## 1. Data Controllers

Geox S.p.A., with its registered office at Via Feltrina Centro 16, 31044 Biadene di Montebelluna, Treviso (Italy), VAT no. IT03348440268, is deemed, pursuant to the Regulation, to be a data controller because it makes decisions as to what personal information about you it requires or needs to collect or process, and how to use and share that data (hereinafter “**Data Controller**”)

and

Geox Canada Inc., with its registered office at 2110 Matheson Boulevard East, Suite 100, Mississauga, Ontario, Canada L4W 5E1, is joint controller with respect to your personal information related to sales of our products to you, invoicing, delivery and after-sales services.

When we refer to “**Geox**” or “**us**”, “**our**” and similar variants in this policy, we are referring to both Geox S.p.A. and Geox Canada Inc., collectively.

## 2. How you can contact us

For any questions, need for information or exercise of your rights, you can contact us by sending an e-mail to [privacy@geox.com](mailto:privacy@geox.com) or by writing to:

Geox S.p.A.  
Via Feltrina Centro n. 16  
31044, Biadene di Montebelluna (TV), Italy.  
Attention: Customer Service

Geox Canada Inc.  
2110 Matheson Boulevard East Suite 100  
Mississauga, Ontario, Canada L4W 5E1  
Attention: Customer Service

Data Protection Officer of Geox S.p.A. can be contacted at [dpo@geox.com](mailto:dpo@geox.com).

## 3. Types of personal information processed

Registration is not required in order to simply view or access the Website. However, there are sections of the Website that do require registration or the use of a username and password to access certain information (e.g., to register your account). There are also services on our Website for which you need to provide your personal details (e.g. to receive our e-mail updates or when you contact us, etc.).

Personal information obtained through the use of the Website will be processed by Geox in accordance with this policy.

The personal information we request on the Website, such as your first and last name, telephone number, mailing address and e-mail address, may be marked as “mandatory” [e.g., indicated with a (\*)] as they are necessary to access the services of the Website you wish to use (e.g., if you place an order). Failure to provide this data marked as “mandatory” will result in our inability to provide you the requested service (e.g., if you fail to give us your email address, we cannot send you our email updates; if you fail to provide your mailing address, we cannot send you any products you may wish to order). Failure to provide data marked as “optional” will not have any consequences.

## 4. Purposes

We may collect information that is not personal information about your computing devices, network, internet service or other technical data pertaining to your equipment, internet service provider and your use of the

Website, without limitation, and process, use or share this data for any purpose without notice to you or consent from you.

Personal information about you is also collected, processed, used, and sometimes shared with third parties as described in this policy, for the following purposes which are related to your use of the Website and our services (e.g., when you purchase our products):

**A) Purchasing:**

Data provided by completing the purchase process on the Website are necessary to:

1. complete the sale of the products you purchased (which allows us to perform our obligations pursuant to our contract with you relating to such sale);
2. fulfil tax and accounting obligations relating to your purchase (e.g., to report taxes you paid on the purchase to the applicable taxing authority and disburse those tax funds to them);
3. handle any after-sales services (e.g. customer service functions, such as if you need to make a return or tell us about a concern with a product you purchased); and
4. to comply with our legal obligations.

Our collection, processing and use of this type of personal data does not require your specific consent pursuant to the Regulation as they are necessary for the performance of the contract.

**B) Sign up email registration (newsletter):**

If you sign up to receive our newsletter email updates on special promotions, new products, events and special offers, you will be required to provide us with your email address.

You will be able to unsubscribe at any time by clicking on the opt-out link in each email.

This personal data will be processed on the basis of your consent (when you sign up to receive our email updates).

**C) Benefect loyalty program:**

If you join our Benefect loyalty program, we will process your data – and data relating to your purchases – to:

1. Create and maintain your Benefect personal account:

With your personal account you may access special members-only services, initiatives and benefits (e.g., getting discounts, access to dedicated promotions, making purchasing faster with “fast checkout”, checking your purchase history, etc.).

Your personal data will be processed on the basis of the contract concluded with you (when you register and open your personal account).

2. Marketing purposes:

If you have provided your consent, you may receive electronic messages, such as emails updates, mobile notifications, SMS and telephone calls which may include promotional offers, contests, and product information from Geox. You can freely withdraw your consent at any time by updating your preferences on the Website. You may also refuse to provide your consent to these activities initially but can still subscribe to Benefect.

3. Analysing your preferences:

We may use the personal information that we collect for the purpose of profiling (a marketing tool we use to understand our customers, which includes analysing your online activities (e.g. your purchases, Website usage data – including pages visited, products you put into your shopping cart on our Website, etc.), so that we may understand your interests and your purchasing preferences, among other things). This activity allows us to improve our offerings and our Website and to personalize our offers to you.

We will process this personal information based only on your consent. You can always freely withdraw your consent by updating your preferences on the Website. You may also refuse to provide your consent to these activities initially but can still subscribe to Benefect.

Please note that all of our data analytics concerning your preferences will not be entirely automated and may be carried out and assessed by our representatives.

Please see our [Benefect Policy](#) for a detailed description of how and for which purposes we process your data.

**D) Contact us:**

We will collect your personal information when you provide it to us through the “contact us” / “Customer Service” or similar available feature (e.g. live chat) on our Website, or if you contact us via e-mail or at the telephone number listed on our Website. Please note that, if you use our live chat feature, your data will be processed for providing you with the requested assistance and customer care purposes.

Collection, processing and use of this type of data is necessary for us to respond to your query or request for information, as well as for allowing us to better improve our products and services. Your consent is not required for this type of processing, being based on the contract concluded with you.

## 5. Security

We may process your personal information in both electronic and paper form.

Geox will use commercially reasonable efforts (and at a minimum, efforts that are in compliance with applicable laws) in an attempt to ensure that your personal information entrusted to us as described in this policy will be processed lawfully.

We will use commercially reasonable efforts to ensure that your personal information collected from the Website is transmitted from the Website to our servers through an https connection, in an attempt to prevent interception by unauthorized third parties.

We implement security measures designed to ensure the security of the Website.

## 6. Data retention

We may retain, share, process and use non-personal information in perpetuity for any purpose.

Any personal information provided to us on or through the Website or when contacting us at the email address or telephone number provided on the Website shall be processed for the lesser of: (i) the length of time specified below; and (ii) the length of time permitted by applicable law:

Purchasing	Your personal information will be processed for as long as it is necessary to manage and complete your purchases, and thereafter as required for us to comply with our tax, accounting and legal obligations; subsequently the data will be deleted or rendered anonymous.
Sign Up Email Registration	Your personal information will be processed for the entire time that you subscribe to the email updates service or, in any event, until your consent is withdrawn (which you may do at any time); thereafter, the data will be deleted or rendered anonymous.
Benefeet loyalty program	The data related to your registration are retained for 5 years from your last purchase, access to your profile, or from your registration. Data concerning the details of your purchases are generally kept, for marketing and analysis purposes, for 36 months. Please see our <a href="#">Benefeet Policy</a> .
Contact Us	Your personal information will be processed for the time it takes to properly handle your request and to allow us to better understand our customers and improve our services; then your personal information will be anonymized (once anonymized, it will no longer be considered personal information).

With regard to the retention times for data collected through the use of tracking technologies (e.g. cookies), please see our Cookie Policy.

## 7. Links to other websites

If you access such other websites by using a link provided on our Website, please be aware that this policy does not apply to collection, processing, transfer or use of your information on such sites. Please review the privacy policy on those third-party sites to understand the third party's privacy policies. We do not control and are not responsible for any data collection, usage, sharing or processing activities of such third parties.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## **8. Tracking and/or personalization tools**

The Website uses "*cookies*" or other tracking technologies, which may be technical (i.e. to facilitate navigation and use of the Website) and/or *profiling* (i.e. to analyse users and their behaviours and preferences, and provide them with targeted advertising). The use of the latter technologies requires your consent.

Also, some content or applications, including advertisements, on the Website may be served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies/ tracking technologies alone or in conjunction with other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content.

In particular:

### **I. Interest-based advertising**

We or third parties such as ad networks and other advertising companies may serve advertisements on our Website and on other websites and social networking sites. We or those third parties may use cookies, tracer tags or web beacons to report certain information about your visits to our Website and other websites, such as web pages you visit and your response to ads, in order to measure the effectiveness of our marketing campaigns, better understand our users and to deliver ads that are more relevant to you, both on and off our Website.

To learn more and to opt-out of having your information used by participating companies for online behavioural advertising purposes, please visit <http://youradchoices.ca/choices>. You can also opt out according to point 8 below "Tracking and/or personalization tools".

Please note that if you choose to opt-out you must opt-out of each web browser on each computer, mobile device and tablet you use. If you opt-out of receiving interest-based ads, you will continue to receive advertising, but it will not be based on online behavioural information about you.

For further information on our use of cookies and other tracking technologies and how to opt out, please see point 8 below "Tracking and/or personalization tools".

### **II. Social Media**

We may offer you the opportunity to engage with our content on or through third-party social networking websites, plug-ins and applications. When you engage with our content on or through third-party social networking websites, plug-ins and applications, you may allow us to have access to certain information associated with your social media account (e.g., name, username, email address, profile picture, gender) to deliver the content or as part of the operation of the website, plug-in or application. When you provide information from your social media account, we may use this information to personalize your experience on the Website and on the third-party social networking websites, plug-ins and applications, and to provide you with other products or services you may request.

For a detailed explanation of the technologies used by this Website and how to deactivate them, please read our Cookie Policy.

## **9. Data processors and disclosures of personal information**

In addition to Geox, the data processing connected with the services provided by or through the Website may be carried out by: (i) authorised data processing personnel appointed by Geox; (ii) companies providing services related to the management, maintenance and development of the Website; (iii) companies entrusted to manage the sales, payment and delivery functions for the products; (iv) companies responsible for the

preparation, handling and sending of email updates, advertising and promotional materials; (v) companies that analyse your purchases (e.g., the type of products and when you purchased them) and the use of our Website (e.g., your browsing on our Website, your interest in our advertising etc.); (vi) companies responsible for the handling of “Customer Service”; and (vii) our affiliates and those who operate our and their respective retail stores.

For information regarding the processing and disclosure of your personal data referred to our Benefeet loyalty program, please visit see our [Benefeet Policy](#).

A complete list of external data processors appointed by Geox can be obtained by contacting [privacy@geox.com](mailto:privacy@geox.com). Geox will endeavour to provide this list within a reasonable time from your verifiable request.

In addition to the foregoing, Geox may: (i) share your personal information with our affiliates (collectively, our “**Affiliates**”) and other third parties who provide services to and on behalf of Geox; (ii) combine information internally across our Affiliates or our different products and services.

The type of information we are legally required to disclose may relate to criminal investigations or government tax reporting requirements. In some instances, such as a legal proceeding or court order, we may also be required to disclose your personal information to authorities. Only the information specifically requested is disclosed and we take precautions to satisfy ourselves that the authorities that are making the disclosure request have legitimate grounds to do so.

Your personal information may be disclosed in situations where we are legally permitted to do so, such as in the course of employing reasonable and legal methods to enforce your rights or to investigate suspicion of unlawful activities. We may release certain personal information when we believe that such release is reasonably necessary to protect the rights, property and safety of ourselves and others.

You also understand and agree that we may use your personal information and disclose your personal information to third parties in connection with the proposed or actual financing, insuring, sale, securitization, assignment or other disposal of all or part of our business or assets (including accounts) for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples, permitting such parties to determine whether to proceed or continue with the transaction, fulfilling any reporting or audit requirements to such parties, and/or disclosing personal information as part of concluding a sale or transfer of assets. Our successors and assigns may collect, use and disclose your personal information for substantially the same purposes as those set out in this Policy. In the event the transaction does not go through, we will require, by contract, the other party or parties to the transaction not to use or disclose your personal information in any manner whatsoever for any purpose, and to return or destroy such personal information.

To complete a requested delivery, we need to share information about you and your order with the other parties who are involved in this process. We will only share personal information in this context to the extent reasonably necessary. For example, your personal information may be listed on a package to identify your name and address as the intended recipient of the package.

If you post a review, make a comment, or otherwise submit personal information on a public forum such as social media accounts or public forums on our Website or other applications, your communications may be viewable by the public.

## **10. Data transfer outside of Canada and the European Union**

To enable us to properly manage our Website, your personal information will be held in the European Union. You acknowledge and agree that, as a result, your personal information may be processed, used, stored or accessed outside Canada and jurisdictions outside Ontario and may be subject to the laws of those jurisdictions. For example, information may be disclosed in response to valid demands or requests from government authorities, courts, or law enforcement in other countries.

When transferring personal information, Geox will use reasonable efforts in an attempt to ensure that such transfer occurs in compliance with the guarantees, safeguards and rights provided by applicable law.

According to the Regulation, your specific consent is not required for the transfer of your personal information between Canada and EU (Canadian legislation has been considered - by the EU Commission - as providing an adequate level of protection with respect to personal information, pursuant to Article 45 of the Regulation). Furthermore, transfer is also permitted pursuant to Articles 46 and 47 of the Regulation (e.g., to companies part of the “Data Privacy Framework” between the US and the EU).

Geox endeavours to comply with these provisions of the Regulation.

Upon request and given a reasonable amount of time for us to respond, you may write to [privacy@geox.com](mailto:privacy@geox.com) to request information on the existence of an adequacy decision or on the safeguards adopted to allow your data to be transferred.

### **11. Privacy Rights**

By writing to [privacy@geox.com](mailto:privacy@geox.com), you can at any time exercise your privacy rights (under Articles 15 to 22 of the Regulations), including accessing your data, updating them, requesting their deletion, requesting copies, revoking your consents or objecting to their processing.

Read in detail about your [Privacy Rights](#).

All such requests will be processed in accordance with the applicable laws.

Please be aware that the making of any of the requests set forth herein does not guarantee that we will comply with your request, if there is a reason for us not to do so in accordance with applicable laws.

### **12. Where to lodge a complaint**

You may always make a complaint to the Office of the Privacy Commissioner of Canada or to the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)), or to the Data Protection Authority of the country in which you reside, if applicable, or, finally, of the place where you believe the violation occurred.

### **13. Applicable law**

This Policy and all related matters shall be interpreted and construed in accordance with the laws of the Province of Ontario and the applicable federal laws of Canada and the EU Regulation 679/2016.

### **14. Amendments to Privacy Policy**

Geox reserves the right to revise, amend or simply update this Privacy Policy, in whole or in part, at its sole discretion, in any manner and/or at any time. If it does so, it will endeavour to: (i) e-mail users registered on the Website to notify them of the change; or (ii) publish on the homepage of the Website a notice of such a change. The revised Privacy Policy will be binding as soon as published and communicated as set forth herein. Please access this section regularly for publication of the most recent and updated Privacy Policy or check your e-mail. If at any point you do not agree with the terms of this Policy, you must not use Geox's services.

\*

## **COOKIE POLICY**

The following information refers to both the use of "cookies" and other tracking tools that may be used (except where otherwise indicated). For convenience we will use the term "**cookies**" to refer to all different tracking technologies, except where expressly stated otherwise.

Information about who we are, how we process personal data, how you can contact us and what your privacy rights are can be found in the Privacy Policy accessible from the "Privacy" section of the Site: <https://www.geox.com>, Privacy.

Geox S.p.A., as the Data Controller ("Geox" or the "Company"), provides the following information.

### **1. Cookies**

Cookies are text files that are sent from a web server (i.e. the computer where the website visited is 'hosted') to the user's browser (Microsoft Edge, Mozilla Firefox, Google Chrome, Opera, Safari, etc.) and stored on the device, whether fixed or mobile, used for browsing. The cookie allows the Website to identify the user's device, through the information stored in it, each time the user reconnects to the Website through that device. Through the use of cookies (or other tracking tools) we can make it easier for you to navigate the Website, as well as analyse your preferences and tastes by verifying your navigation (profiling activities), and consequently offer you a promotion of products and services that are more consistent with your interests and expectations (e.g. by displaying advertisements in line with your interests).



Cookies can be either “session” cookies (when they are only stored for the duration of the website browsing session and are deleted when the browser is closed), or “*persistent*” cookies (when they are stored for a longer period of time, until they expire or are deleted by the user). Moreover, cookies or other tracking tools may be either “first party” (when they are created and used only by the owner of the website that issued them and are not transferred to third parties) or “third party” (when they are issued and managed by parties other than Geox).

An example of other tracking tools is ‘tracking pixels’, small pieces of code integrated into the website which, once downloaded onto the user’s browser, allow the social media provider (e.g. Facebook) to monitor the user’s session, collecting data for analysis and user profiling purposes.

Cookies and tracking tools **do not collect** information that directly identifies the user.

## **2. What types of cookies are used by the Website**

### *Cookies and technical or necessary tools*

These are the cookies used to ensure navigation and therefore the telematic transmission of data on the network are strictly necessary for the provision of the services provided by the Website.

These cookies may be both first-party and third-party cookies and do not require the user’s prior express consent as they are strictly necessary to provide the service requested by the user of the Website.

### *Statistical cookies*

Analytical cookies, also from third parties, allow us to understand how the site is used by users. These cookies do not collect information that directly leads to your identity or to your personal data. The information collected is normally processed in aggregate and anonymous form through the use of partial IP obscuration mechanisms. Those cookies, with the application of further security and minimization techniques, are treated as equivalent to technical cookies and do not require prior consent from the user. Should such measures be not applied, the use of these cookies will require the express and informed consent of the user.

### *Personalisation cookies*

Personalisation cookies record users’ preferences in using the Website (e.g., the language selected and specific country) or facilitate the user browsing within the Website, for example by storing the data provided by the user while filling in the forms on the Website (user input cookies), to recognise the user after they logged-in the Website (cookies for authentication). These instruments are not strictly necessary for browsing the Website and, if kept after closing the browser, they require the user’s consent. Such cookies may be released either from first or third parties.

### *Profiling (or marketing) cookies*

These are cookies that are used to create profiles of the user, for example, in order to send advertisements that are consistent with the user’s preferences (e.g. by using these cookies, the user will be able to see advertisements for the products in which they have expressed an interest on other sites). They can be either first-party cookies or third-party cookies; session or persistent cookies.

Other tracking tools (e.g. Facebook pixels) also work in a similar way (e.g. by allowing advertisements to be displayed to the user on the social network).

The use of these cookies and tools requires the express and informed consent of the user.

Your consent will only be required when you first access the Website: afterwards, we will use a technical cookie to store your consent so that you can access the Website pages directly when you return. Your consent may be withdrawn at any time in the manner specified in paragraph 3 of the Cookie Policy.

No other user profiling tools are used on this Website without your consent (e.g. spyware).

### *Third-party cookies*

The Website uses both “first-party” cookies and tracing instruments, i.e. issued by Geox and by the Website, and “*third-party*” cookies and tracing instruments (e.g. Google Analytics, Social Network cookies, etc.), i.e. instruments issued and managed by subjects other than Geox.

On the Website you can also find social buttons/widgets (social plug-ins), i.e. those particular ‘buttons’ depicting the icons of social networks such as Facebook, Instagram, X, etc.. These buttons allow users who are browsing the Website to reach and interact with social networks with a ‘click’. For more information, see below.

### 3. Your consent

When accessing the Website, the user is shown a warning banner regarding cookies and other tracking tools that may be used.

The banner provides summary information that allows the user to understand which cookies/tools are used and for what purposes; in addition, by using the “settings” button the user can also check in detail which types of cookies and tools are used.

The user is therefore free to choose whether and which cookies and other tracking tools to authorize.

We will record whether the user granted or denied consent to directly access the pages of the Website without having to view the banner once again, save for particular cases (e.g., if the user deletes cookies or if the users must be updated regarding the cookies used).

**NB: consent may be revoked at any time by** simply by (i) clicking the “*Manage Cookies*” link at the bottom of each page of the Website (this newly displays the banner, allowing you to update your consent), or (ii) accessing this Cookie Policy in the section of the Website dedicated to privacy and accessible by selecting the “**Privacy**” link at the bottom of each page of the Website (paragraph 8 provides information on consent granted/denied, with the option to change your previous choices).

Your consent applies to the following websites: [www.geox.com](http://www.geox.com)

### 4. Deactivating/deleting cookies via web browser

You can in any case deactivate/activate or delete cookies at any time by using the settings of your web browser. In particular, if you do not wish to receive cookies, you can set your browser to warn you when a cookie is being sent, so that you can decide whether to accept it or not; you can also automatically refuse all cookies by activating the appropriate option in your browser. You can also delete specific cookies that have already been stored within your browser, or block specific websites from storing cookies on your computer, or block third-party cookies.

Each browser (Firefox, Chrome, Edge, Safari, Opera, etc.) has its own method of managing cookies: in the settings or preferences panel, it is possible to modify/manage the parameters relating to cookies and/or delete them.

In order to do this, it is necessary to consult the information in the browser’s user manual (Help Page) or click on the following links:

- [Edge](#)
- [Chrome](#)
- [Firefox](#)
- [Safari](#)
- [Opera](#).

You can also manage your cookie preferences at <http://www.youronlinechoices.com>.

### 5. Who will have access to your data

The data collected via cookies and other tracking tools will not be disclosed to the public and will be processed by specifically authorised persons within Geox (in particular the CRM, e-commerce, marketing and information technology departments),

In order to manage the Website and, if you give your consent, to analyse your preferences, your navigation and to allow you to view content and promotional announcements that may be of interest to you. The data will be processed by (i) companies in charge of managing the Website, and (ii) providers of computer services. These subjects will act as Data Processors designated by Geox.

#### 5.1 Social networks

Browsing data may, in some cases, be transmitted to social networks (e.g. Facebook, Instagram – see the table below for the list of social networks that interface with the Website). In general, the interaction between a website and a social network is used, for example, to:

- (i) allow users to log-in through the social network (e.g. when you choose to log-in to our reserved area of the Website using Facebook, data is exchanged between the social network and the Website, to enable user recognition and authentication);
- (ii) allow content to be shared on social networks (e.g. if you use the sharing function – the social plug-in – you can post, and thus share, the content that interests you on your social profile);
- (iii) display promotional and advertising content when you visit social networks (e.g. the social network may show you advertisements relating to the Geox brand and the products you have viewed on the Website). This may mainly occur in two ways:
  - a. the data regarding your browsing on the Website, collected through cookies or other tracking instruments shall be shared with the social network which, having identified you, will display advertising content, then provide Geox with statistics on the advertising campaigns carried out;
  - b. if you have provided your email address, this may be exchange (in an encrypted and protected manner) with the social network which, having identified you through your email address, will display advertising content, then provide Geox with statistics on the advertising campaigns carried out.

For such processing, the social networks will process your data – as joint data controllers (Article 26 of the GDPR) - to the extent necessary to, for example, display news/advertisements relating to Geox.

Some information on the processing carried out by social networks within the Website is provided below:

<b>Facebook Facebook, Instagram)</b>	<p><b>(e.g.</b> The Co-Data Controller is Meta Platforms Ireland Ltd. 4 Grand Canal Square, Grand Canal Harbour, .Dublin 2 Ireland.</p> <p>A joint controller arrangement (Article 26 of the Regulation) governs the processing of personal data using the tracking instruments provided by Facebook and present on the Website: the arrangement determines the respective responsibilities for compliance with the obligations under the Regulation regarding joint processing. A copy of this agreement is available at the following link: <a href="https://it-it.facebook.com/legal/controller_addendum">https://it-it.facebook.com/legal/controller_addendum</a></p> <p>Instead, Facebook is the autonomous data controller for the processing of user data carried out subsequently. As data controller, Facebook is responsible for providing the data subjects with the information regarding the processing carried out or allowing them to exercise their privacy rights (Articles 15 – 20 of the Regulation). The Website uses cookies and tracking instruments from Facebook (e.g. pixels) to (i) display promotional and advertising content personalised to users, (ii) provide statistical reports on advertising campaigns and user browsing of the Website, and (iii) improve the posting of content on the Website.</p> <p>For these purposes, the data regarding your browsing on the Website, collected through cookies or other tracking instruments shall be shared with Facebook.</p> <p>Details on how Facebook processes the data, the related legal basis of processing and how you can exercise the privacy rights granted by the Regulation against Facebook are available at <a href="https://www.facebook.com/about/privacy">https://www.facebook.com/about/privacy</a>.</p> <p>The Facebook Data Protection Officer can be contacted at: <a href="https://www.facebook.com/help/contact/540977946302970">https://www.facebook.com/help/contact/540977946302970</a></p>
<b>Pinterest</b>	<p>The Data Controller is Pinterest Europe Limited, with headquarters on the 2nd Floor, Palmerston House, Fenian Street, Dublin 2, Ireland.</p> <p>The Website uses cookies and tracking instruments from Pinterest (e.g. pixels) to (i) display promotional and advertising content personalised to users, (ii) provide statistical reports on advertising campaigns and user browsing of the Website, and (iii) improve the posting of content on the Website.</p> <p>For these purposes, the data regarding your browsing on the Website, collected through cookies or other tracking instruments shall be shared with Pinterest.</p> <p>The details of the arrangement with Pinterest regarding personal data processing can be viewed in Exhibit A at the following link: <a href="https://business.pinterest.com/en-gb/pinterest-advertising-services-agreement/">https://business.pinterest.com/en-gb/pinterest-advertising-services-agreement/</a></p>

	<p>More information on the processing carried out by Pinterest is available at: <a href="https://policy.pinterest.com/en/privacy-policy#section-residents-of-the-eea">https://policy.pinterest.com/en/privacy-policy#section-residents-of-the-eea</a></p> <p>The Pinterest Data Protection Officer can be contacted at the following link: <a href="https://help.pinterest.com/it/data-protection-officer-contact-form">https://help.pinterest.com/it/data-protection-officer-contact-form</a></p>
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For more information on the processing carried out by social networks, please check the privacy policies provided by the social networks (also by clicking the “*Manage Cookies*” link on all pages of the Website, you can see the list of cookies/tracking instruments used on the Website and the links to their respective policies).

## 6. Privacy Rights

By writing to [privacy@geox.com](mailto:privacy@geox.com), you can at any time exercise your rights under Articles 15 to 22 of the Regulations, including accessing your data, updating them, requesting their deletion, requesting copies, revoking your consents or objecting to their processing.

Read in detail about your [Privacy Rights](#).

All such requests will be processed in accordance with the Regulation.

Please be aware that the making of any of the requests set forth herein does not guarantee that we will comply with your request, if there is a reason for us not to do so in accordance with the Regulation.

## 7. Details of the cookies and tracking tools used by the Website

In order to allow you to make a free and informed choice, we indicate below (i) the provider and identification of cookies/tracking tools, (ii) their characteristics and purposes and (iii) their duration/expiry. The same details information is available at the “*Manage Cookies*” link on all pages of the Website, where you can see the list of cookies/tracking instruments used on the Website.

[...]

For **further information** on the processing of your data through the Website, please visit the [Privacy](#) section and read our [Privacy Policy](#)

\*

## DATA PRIVACY RIGHTS

Text to be published on the website (follows .pdf version)



Articles 15 to 22 of the EU Regulation 2016/679 (*General Data Protection Regulation*) grants the data subject the following rights:

**Right of access:** the data subject may request which data concerning him or her are being processed, the purposes of the processing, the categories of data processed, the recipients to whom the personal data have been or will be disclosed, any transfer of the data outside the European Union, the period of storage of the data, the existence of automated decision-making (including profiling), as well as the source of the data that has not been collected from the Data Subject (Article 15 of the Regulation).

**Right to rectification:** the data subject may request the rectification or updating of inaccurate data or, taking into account the purposes of the processing, the supplementation of incomplete personal data (Article 16 of the Regulation).

**Right to erasure (right to be forgotten):** (where applicable) the data subject shall have the right to obtain the erasure of personal data concerning him or her, for example, where the personal data are no longer necessary in relation to the purposes for which they were collected. Therefore, it will not be possible to request the erasure of data if they are required to fulfil a legal obligation (e.g., keeping accounting records or for security purposes) or for the verification, exercise or defence of a right in legal proceedings (Article 17 of the Regulation).

*Right to restriction of processing:* the data subject may request the restriction of processing of the data, for example, where the data subject contests the accuracy of the personal data, for a period necessary to verify the accuracy of that data (Article 18 of the Regulation).

*Notification obligation:* the data subject has the right to be informed of any rectification or erasure or restriction of processing carried out in relation to the personal data regarding him or her, and the recipients to whom the data have been communicated (Article 19 of the Regulation).

*Right to data portability:* (where applicable) the data subject has the right to receive the data that concerns him or her in a structured, commonly used and machine-readable format (i.e., in .excel or .csv format). However, that right is limited only to data processed using automated means and based on a contract with the data subject or his or her consent. Where technically feasible, it will be possible to request the transmission of the data directly to the other data controller (Article 20 of the Regulation).

*Right to object:* (where applicable) the data subject has the right to object at any time, on grounds relating to his or her particular situation, to the processing of personal data concerning him or her carried out, for example, for the pursuit of a legitimate interest of the data controller or third parties (including profiling). The data subject can always object to data processing for direct marketing purposes, including profiling related to such direct marketing (Article 21 of the Regulation).

*Right not to be subjected to automated decisions, including profiling:* (where applicable) the data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or significantly affects him or her, unless the automated decision is necessary (i) for entering into, or performance of, a contract between the data subject and a data controller, (ii) is envisaged by law, in compliance with measures and safeguards, or (iii) is based on the data controller explicit consent (Article 22 of the Regulation).

The full text of the Regulation is available [here](#)

### **How to exercise your rights:**

E-mail: [privacy@geox.com](mailto:privacy@geox.com)

Website [www.geox.com](http://www.geox.com):

- you can use the Customer Service contact form that can be accessed at the footer of the website;
- if you have signed up to the Geox Benefect program or if you have a Geox account, you can, by accessing your profile, change your consent and object to the processing of your data.

*Unsubscribe:* by using the “unsubscribe” link that can be found in all of our e-mails, you can always object to the processing of your data for marketing and promotional e-mail purposes. For further enquiries, please write to us at [privacy@geox.com](mailto:privacy@geox.com)

TELEPHONE 00800 43694369

*Mail:* Geox S.p.A., Customer Service, Via Feltrina Centro No. 16, 31044, Biadene di Montebelluna. Treviso, Italy.

### **How to contact our Data Protection Officer:**

The Geox S.p.A. Data Protection Officer can be contacted at the email address [dpo@geox.com](mailto:dpo@geox.com).

### **Who you can write to for the purpose of lodging a complaint:**

Please note you that, if you are of the opinion that the processing of your personal data is in breach of the provisions of the Regulation, you can always lodge a complaint with the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)), or, should it be different, with the supervisory authority of the country where you reside, work or finally of the place where you believe the breach has occurred (you will find a list of Authorities at: [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en)).

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## **“Feedback” SERVICE**

*The filling in of the questionnaire under the “Feedback” section does not imply the collection of any personal details. Your data will be collected only if you provide it voluntarily during the survey. If you decide to provide your data, it will be processed and stored pursuant to this Privacy Disclosure, which we invite you to read. Moreover, we inform you that, if you are registered with Benefeet (only for selected countries) or with a Geox account, the answers you provide by filling in the questionnaire will be associated with your profile and processed on the basis of the consents you gave upon registration and pursuant to Benefeet or account registration.*

Pursuant to Article 13 of EU Regulation 2016/679 *General Data Protection Regulation* (the “Regulation”)

### **Who is the Data Controller**

Geox S.p.A. (“Geox”), with registered office in Biadene di Montebelluna (TV), Italy, Via Feltrina Centro n. 16, [privacy@geox.com](mailto:privacy@geox.com), is the company that processes your personal data, in its capacity as Data Controller.

### **How to contact us and the Data Protection Officer**

If you have any questions, need information or wish to exercise your rights, you can contact us by sending an e-mail to [privacy@geox.com](mailto:privacy@geox.com) or by writing to: Geox S.p.A., Customer Service, Via Feltrina Centro n. 16, 31044, Biadene di Montebelluna (TV), Italy.

You can contact the Data Protection Officer at the following e-mail address [dpo@geox.com](mailto:dpo@geox.com).

### **Why we process your data**

The data you provide to us voluntarily through the questionnaire in the “Feedback” section will enable us to improve the services and products offered to our clientele.

The data will be processed on the basis of the agreement stipulated with you (if you have purchased our products or used our services) or our legitimate interest in improving our services and products.

### **Requested data**

There is no obligation to provide personal details when filling in the questionnaire, and the answers to our satisfaction survey are optional.

### **How we process your data**

Your personal data will be processed mainly using electronic equipment to improve our products and services. The data will be processed in accordance with the applicable regulations and, nonetheless, in a way that guarantees its security and confidentiality and prevents its unauthorised use or disclosure, alteration or destruction.

If you are registered with Benefeet (only for selected countries) or have a Geox account, your data will be processed pursuant to the privacy disclosure supplied to you upon registration and in conformity to the consents you gave (for example if you gave your consent to the analyses of your preferences and interests when you registered your Benefeet/Geox account, the answers you provided to our survey may be stored). For further information on Benefeet, please read the Policy. For more information on registering a Geox account, please read the relevant [policy](#).

### **How long we keep your data**

Your data will be processed for the time necessary to understand the degree of satisfaction of our customers and will subsequently be stored so that we can improve our services (approximately 90 days, unless you are a registered user); your data will then be erased or stored in anonymous or aggregate form. You can request further information by writing to [privacy@geox.com](mailto:privacy@geox.com).

### **Who has access to your data**

Your data will not be disclosed or transferred to third parties, and may come to be known by the Geox staff authorised to process it and, in their role of data processors, by (i) the company entrusted with managing our “customer service”; (ii) our providers of services used to manage the website; (iii) companies that organise and manage market surveys. The names of the data processors can be requested by writing to [privacy@geox.com](mailto:privacy@geox.com).



### **Transfer of your data to countries outside the European Union**

Your personal details (if provided) may be transferred to countries outside of the European Union but subject to adequacy decisions approved by the European Commission (e.g. United Kingdom, Canada, Argentina, Israel, etc.) or to third countries (e.g. United States) on the basis of agreements or the adoption of contractual clauses approved by the European Commission. You can receive further information by writing to [privacy@geox.com](mailto:privacy@geox.com).

### **Your rights**

By writing to [privacy@geox.com](mailto:privacy@geox.com), you may at any time exercise your rights under Articles 15 to 22 of the Regulation, including accessing your personal data, updating them, requesting their erasure, requesting a copy of them, revoking your consent or opposing to the processing of them.

Please read your privacy policy in detail.

### **Who you can contact to submit a complaint**

Should you feel that the data processing concerning you breaches the provisions of the Regulation, you can submit a claim to the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)) or, if different, to the data protection authority of the country where you live or work or where you believe the breach occurred.

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**GEOX@HOME PRIVACY POLICY**  
**pursuant to Article 13 of EU Regulation 2016/679 of 27 April 2016**  
***General Data Protection Regulation***

Pursuant to Article 13 of EU Regulation 2016/679 *General Data Protection Regulation* the “Regulation”)

### **Who is the Data Controller**

Independent data controllers are the company managing the “Geox” shop where you made your purchases, as indicated in the tax document issued when the product was purchased, and Geox S.p.A. (with registered office at Via Feltrina Centro No. 16), which is the company that manages the *Geox@home* service (hereinafter called the “**Data Controller**” or the “**Company**”).

### **How you can contact us and the Data Protection Officer**

If you have any questions, need information or wish to exercise your rights, you can contact us by sending an e-mail to [privacy@geox.com](mailto:privacy@geox.com) or by writing to: Geox S.p.A., Customer Service, Via Feltrina Centro No. 16, 31044, Biadene di Montebelluna. Treviso, Italy.

The Data Protection Officer designated by Geox group can be contacted at the e-mail address [dpo@geox.com](mailto:dpo@geox.com).

### **Why we process your data**

Your personal data are processed on computer media - in such a way as to guarantee their security and confidentiality - with a view to handling your home-delivery or point-of-sale purchase through the *Geox@home* service.

### **The required data and consents**

The processing of your data does not require your consent and is carried out on the basis of the contractual relationship executed with you that concerns your purchase and the *Geox@home* service. We ask you to provide all of the data that has been requested. It is “compulsory” because it is required for processing and delivering your purchase; failure to provide the data indicated as “optional” will have no consequences.

### **Who will have access to your data**

Personal data will not be disclosed or transferred to third parties and may be processed, for the indicated purposes, with: (i) companies in charge of the customer service; (ii) providers of services that are essential for performing the contract executed with you (e.g. forwarding agents); (iii) suppliers of management applications; (iv) single-brand points of sale with the “Geox” sign (e.g. if you request delivery of the product at one of our

shops); (v) companies belonging to the Geox Group involved in managing the *Geox@home* service in your country. Where necessary, the Company has appointed the recipients of your personal data as Data Processors (Article 28 of the Regulation). The names of the Data Processors may be requested by sending a request to the following addresses.

Your data will be processed by the persons authorised to processing pursuant to Article 29 of the Regulation (each one limited to its area of responsibility)

### **How long we keep your data**

The data shall be kept for 36 months for the purposes of the legal warranty on the products that have been purchased and the management of the *Geox@home* service.

### **Your rights**

By writing to [privacy@geox.com](mailto:privacy@geox.com), you may at any time exercise your rights under Articles 15 to 22 of the Regulation, including accessing your personal data, updating them, requesting their erasure, requesting a copy of them, revoking your consent or opposing to the processing of them. Please read your privacy rights in detail.

### **Who you can contact to submit complaint**

Please note that, if you are of the opinion that the processing of your personal data is in breach of the provisions of the Regulation, you can always lodge a complaint with the Italian Data Protection Authority ([www.garanteprivacy.it](http://www.garanteprivacy.it)), or with the supervisory authority of the country in which you live or work or in which the alleged breach has occurred.

The Data Controller

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**NB:** for the text of the Benefeet, see the relevant document.