PRIVACY POLICY
Article 13 of the EU Regulation 2016/679 *General Data Protection Regulation (the "Regulation")*

We provide you with detailed information to understand how we process your data for managing your profile and your membership with Benefeet. If you wish, you can give your consent to receive communications about our initiatives and offers, allowing us to improve by analysing your interests. Your data will not be shared with third parties and will be processed in compliance with privacy regulations. We remind you that you can exercise your privacy rights at any time and contact our customer service.

Who is the Data Controller

Geox S.p.A. ("**Geox**"), with registered office in Biadene di Montebelluna (TV), Italy, Via Feltrina Centro no. 16, 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 or by writing to: Geox S.p.A., Customer Service, Via Feltrina Centro no. 16, 31044, Biadene di Montebelluna (TV), Italy.
The Data Protection Officer can be contacted by e-mail at dpo@geox.com.

Why we process your data

We will process your data to manage your participation in the Benefeet loyalty programme, create your personal account and allow you access to dedicated services. If you give us your consent, we may also process your data to send you commercial communications or analyse your preferences and interests and improve our offer.
Below you can find a detailed explanation of the purposes for which we collect and use your data, and the legal basis for processing it:

Purpose	Legal basis
Joining the *Benefeet* loyalty programme, which operates on the www.geox.com website and at participating shops (the list of which can be viewed at www.geox.com): this allows you to access benefits (e.g., accumulate the purchases made, use accrued vouchers, enjoy discounts, access digital challenges that allow you to receive prizes), promotions, competitions, and dedicated initiatives under the terms of the *Benefeet* rules available in shops and at www.geox.com.	Execution of the contractual relationship
To Activate your personal Geox account and allow you to access the "omnichannel" (multi-channel) services offered by Geox, to update your data and any consents you may have given, to verify your purchases made in shop or on the Geox website and your *Benefeet* status.	Execution of the contractual relationship
Access to services (e.g., the geox@home service that allows home delivery of products; dedicated after-sales service; making an appointment in the shop; request product availability managing your whishlist; etc.).	Execution of the contractual relationship
Sending **service communications** related to purchases made and the *Benefeet* programme (e.g., reminders on the value of purchases made and vouchers accrued; communications relating to unlocked and completed digital challenges; receipt of award codes; communications on the expiry dates of the period for spending relating to purchases made and use of vouchers; communications on the birthday discount and other exclusive benefits for members, etc.) and communications aiming at verifying the **degree of satisfaction** on the purchases made.	Execution of the contractual relationship

Updating (by means of newsletters, e-mail, telephone contact, instant messages, push notifications, paper mail, messages or communications of initiatives on social networks, etc.) on our products, services (e.g., purchasing methods, home delivery, etc.) or initiatives (e.g., competitions), and **sending advertising and promotional material**, including **personalised material**, and **participation in market research** - by means of e-mail or telephone contact. We may also monitor the opening and click rates of our communications.	Your consent is optional.
Analysis of your data (and those of your children, if any), **your interests and your purchasing preferences** in order to improve our commercial offer and browsing of the www.geox.com website.	Your consent is optional.
Claiming **a right** (including in court) and/or preventing and detecting any fraud or other unlawful conduct.	Geox's legitimate interest in complying with the rules of the *Benefeet* programme and preventing fraud or unlawful conduct.
Processing of data for **statistical purposes** in aggregated and anonymous form.	The legitimate interest of Geox in analysing the business activities carried out.

The required data and consents

The "***compulsory***" data marked with (*) are necessary for you to join Benefeet and guarantee you access to promotions and services reserved for members. Your data can always be updated at any time.

Your consents are all "***optional***" and will always be freely revocable.

If you choose not to give your consent, you can still join Benefeet, but we won't be able to keep you updated on our products, services, or initiatives, send you advertising/promotional material, analyse your interests and preferences, send you personalised communications, or contact you for market research purposes. You can always revoke your consents at any time by writing to privacy@geox.com or simply by accessing your personal Geox account. If you no longer wish to receive commercial communications via email, you can also use the 'unsubscribe' option available in every email.

Please note that if you wish to accumulate the purchases made and have access to the reserved *Benefeet* advantages, you will need to inform us that you are enrolled in the programme at the time of your purchases in shop (online, via your Geox account, everything is done automatically); otherwise you can still complete your purchases, but we will not be able to record and process your purchases for you to accrue the advantages.

You can update your persona details at any time by accessing your personal MyGeox account or by writing to privacy@geox.com. Please note that for security reasons, the date of birth (yours or your children's, if specified) can only be changed by writing to privacy@geox.com; your e-mail address cannot be changed, and a new registration must be done (for further information, please contact privacy@geox.com).

How we process your data

We will process your data using computer systems to allow you to access the benefits reserved to members and provided for by the Benefeet Regulations published at geox.com.

With your consent we can also analyse your purchases and enable you to receive personalised commercial communications**.**

In particular, by creating your Benefeet profile we process your data, granting you discounts/prizes, associating your spending volumes - the amount of your receipts of your purchases - to spending levels provided in the programme rules; you will access the benefits reserved for members - e.g.: receiving the birthday discount, access to exclusive benefits for members, etc.) and your personal Geox account will be created, allowing you to shop online and independently update your data and consent.

As a *Benefeet* customer, you may also be encouraged to express your degree of satisfaction on the purchases just made: you will receive an email from us inviting you to take part in our surveys, thereby allowing us to improve our products and services.

If you give us your consent, we may analyse your data in order to try to understand your tastes and preferences (e.g., by analysing which products you have bought or put in your shopping cart or wish list;

when you shop and how; which products interest you; etc.), so that we can improve and send you interesting offers, including personalised offers (e.g., if you have bought women's footwear in the past, we may send you our new Women's Catalogue, or promotions on women's products or matching products; if you have children, we may send you communications on products for children; etc.). Please note that data relating to your browsing on the www.geox.com website may be processed only if you provide your consent to the use of cookies and tracking tools when accessing the website (please read our Cookie Policy available at geox.com).
If you consent to receiving updates on our products and services (e.g. newsletter, e-mails, etc.) please note that our communications will use tracking pixel to monitor the opening and click rates in order to grant a more useful service (by recording IP address, date/time of when you open our email, if you click on our link, etc.). You can always choose the "Do not track" option in the footer of your email. You can find more information on pixel technology in our Cookie Policy on www.geox.com, section Privacy.Our analysis activities shall not be carried out in an exclusively automated manner, but shall always involve the intervention and evaluation of our personnel in charge.
If you use your "back in stock" service, we can update you by email on the availability of products requested by you.
Geox may carry out specific, non-continuous checks to verify compliance with the *Benefeet* rules, the correct use of the reserved advantages and the services used, and to protect itself against fraudulent conduct, in compliance with the applicable legislation and the corporate procedures and regulations in force.

How long we keep your data
We adopt stringent rules to ensure not only the preservation of your data, but also their deletion. 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 36 months.

In particular, your personal and membership data for the Benefeet profile are kept during the entire duration of your registration (more specifically, the *Benefeet* programme rules are renewed year by year). If you do not purchase or use your Geox account for more than 5 years, all your data and your registration shall be erased.
Unless otherwise required by law, your purchase details shall be stored for 36 months from when they were registered for the purpose of analysing your preferences or sending you advertising material and commercial communications (only if you give us your specific consent). If you withdraw your consent, your data shall only be processed for the purposes provided for by law (e.g. accounting and tax).

Who will have access to your data
Your data shall not be disclosed to the public or transferred to third parties. In order to manage your Benefeet and allow us to process your data for the purposes for which you have given us your consent, your data shall be processed by persons specifically authorised by Geox (in particular, the CRM, e-commerce, Information Technology, and shop departments), as well as by our suppliers, in their capacity as Data Processors, by **(i)** companies in charge of processing the value of purchases made and discount vouchers (e.g., as provided for in the *Benefeet* rules); **(ii)** companies analysing your purchases; **(iii)** companies in charge of providing customer support (both in relation to after-sales services and the management of "privacy requests"); **(iv)** companies in charge of processing, managing and sending newsletters and advertising and promotional material; **(v)** companies that organise and manage market research and surveys; **(vi)** companies in charge of managing our website and computer archives; **(vii)** suppliers of IT services; **(viii)** companies of the Geox Group that manage shops in Italy and abroad, or that provide logistics services; **(ix)** third party companies that manage franchised "Geox" shops. A full list can be obtained from privacy@geox.com.
Furthermore, if you give us your consent for marketing purposes, your e-mail address (or your mobile phone number) may be temporarily disclosed - in encrypted and protected form - to social networks (e.g., Facebook) which will process your data - in their capacity as joint data controllers - to the extent necessary for you to see news or advertising relating to Geox on the social network. Further information on the use of social networks and the exchange of data with Geox is available in the Cookie Policy on the geox.com website.

Transfer of your data outside the European Union
For all of the above purposes, your personal data are not generally transferred to countries outside the European Union and reside on servers located within the European Union.
Only in some cases your data may be transferred, in part and for a limited period of time.
In particular, your data may be transferred: (i) if you request services from one of our shops abroad that

require access to your data, the transfer of your data - which can be only viewed by a shop representative - shall take place on the basis of adequacy decisions approved by the European Commission (e.g., for the UK, Canada, etc.) or with your specific consent. (ii) If you take part in our surveys to verify the degree of satisfaction on your purchases, your data (only name and contacts) may be transferred to countries that are not members of the EU but scope of adequacy decisions approved by the European Commission (e.g., the UK, Canada, Argentina, Israel, etc.) or to other third countries (e.g., the United States of America) based on agreements or the adoption of contractual clauses approved by the European Commission. In any case, the data will be transferred for a limited period of time and subsequently erased. (iii) If you have given your consent to our marketing activities, your data (email or mobile number) may be temporarily communicated – in an encrypted and protected form – to social networks (e.g., Facebook) to display news or advertisements related to Geox. In these instances, the data can be transferred to countries outside the European Union (e.g., the United States) based on agreements or the adoption of contractual clauses approved by the European Commission. By writing to privacy@geox.com, you may request more information.

Your rights

By writing to 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, available also at geox.com.

Who you can contact to submit a complaint

If you believe that the processing of your personal data is in violation of the provisions of the Regulation, you may always make a complaint with the Italian Data Protection Authority (www.garanteprivacy.it), or, if different, with the Data Protection Authority of the country in which you reside or work or of the place where you believe the violation occurred.