

## Privacy notices ([www.geox.com](http://www.geox.com))

### Index:

- **Privacy Policy**
- **Cookie Policy**
- **Your privacy rights**
- **Purchasing policy**
- **Customer Service policy**
- **"Feedback" policy**
- **Geox@home policy** (for the Countries where the service is operating)

## PRIVACY POLICY EMEA EU Regulation 2016/679 *General Data Protection Regulation*

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 a set of personal data to access certain services (e.g. to register for the Geox Benefeet program, sign up for the newsletter or request information, etc.). When we ask you to provide your personal data to access these additional services, we will always inform you in accordance with EU Regulation 2016/679 *General Data Protection Regulation* (the “**Regulation**”) about the purposes and methods of use of the data as well as your right to request the deletion or updating of the data at any time.

In accordance with the Regulation, we are providing you with the following information.

### 1. 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](mailto:privacy@geox.com), is the company that processes your personal data..

- Co-Data Controllers with Geox - limited to the purposes of sales, invoicing, and delivery of products - are the Geox group companies that sell in the User's country, specifically: **Geox Retail S.r.l.**, via Feltrina Centro 16, 33144 Montebelluna, VAT No. IT05563231009;
- **Geox Holland B.V.**, Claudius Prinsenlaan 144, 4818 CP Breda, The Netherlands, Vat No. L808308415B01 and its branches;
- **Geox Poland S.r.o.**, ul. Postępu 12, 02-676 Warsaw, The District Court of the Capital City of Warsaw in Warsaw, XII Business Division of the National Court Register, KRS no. 188703, NIP 527 26 61 853, REGON 143330459, VAT No. PL 5272661853;
- **Geox Hungary KFT**, 1085 Budapest, Kálvin tér 12. II., Hungary, VAT No. HU1177325;
- **Geox Suisse SA**, Via Balestra 27, Mail Box 5718, 6900 Lugano, Switzerland, VAT No. CH 546564.

You may request further information by writing to [privacy@geox.com](mailto:privacy@geox.com).

When we refer to “**Geox**” below, we are referring to Geox S.p.A. and the companies of the Geox group (except where specified otherwise).

### 2. 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 no. 16, 31044, Biadene di Montebelluna (TV), Italy.

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

### 3. The data processed

Registration is not required in order to access the Website. However, there are sections of the Website that require registration or the use of a username and password (e.g., to sign up for the Geox Benefeet program, or to complete the online purchasing process), or services for which you need to provide your details (e.g., to access newsletter services, to contact us, etc.).

Generally, the provision of personal data is optional, but failure to provide the requested data may prevent Geox from granting access to the Site's services. The data required from time to time are indicated in the data collection forms on the Website with an asterisk (\*).

Data relating to the connection and navigation within the Website (such as the URI-Uniform Resource Identifiers of the resources requested, time of the request, method used in submitting the request to the server, size of the file obtained in response, the numeric code indicating the status of the response provided by the server (successful, error, etc.) and other parameters regarding the user's operating system and IT environment) are collected only for the purpose of extracting anonymous statistical information on the use of the Website and to check its correct operation. Such data is immediately deleted following the processing. The data may be used to ascertain liability in the event of possible computer crimes that harm the Website: excluding such cases, the data shall be deleted once the time needed to provide the services illustrated on the Website has passed.

With reference to data relating to navigation within the Website, see also point 8 below concerning the Profiling Tools used by the Website.

#### **4. Why we process your data**

Data are collected and processed for purposes strictly related to the use of the Website, its services and the purchase of products online. The purposes for which the data are used are detailed in the specific policy statements provided by the Website whenever there is data collection. We would ask that you read the policy statements which in each case explain the characteristics of the data processing that will be performed (e.g. for registration for the newsletter service, to access your profile, for Geox products sold online). Your data shall be processed in full compliance with privacy legislation.

#### **5. How we process your data**

Data may be processed in both electronic and paper form (e.g. for the handling of purchases on the Website). Geox guarantees that the personal data provided through the Website will be processed lawfully and properly, in full compliance with applicable legislation, and that the data provided during registration kept strictly confidentially. We implement security measures to ensure the security of the Website and all information collected is transmitted through a secure connection to prevent interception by outsiders.

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

Any data provided by users shall be processed for the length of time specified in the specific policy statements provided at the time of data collection.

With regard to the retention times for data collected through the use of profiling tools (e.g. cookies), please see point 7 below and our Cookie Policy.

The data shall not be communicated or disseminated to third parties except within the limits and conditions expressly indicated in the policy statements provided in each case (i.e. product shipping data may be communicated to couriers).

#### **7. Links to other websites**

This information is provided only for the website [www.geox.com](http://www.geox.com) and not for any other websites that a user may access through a link. Geox cannot be held liable for personal data provided by users to external parties or any websites linked to this Website.

#### **8. "Tracking" and/or targeting tools**

Geox shall not transmit any communications of a promotional and/or advertising nature **without the user's prior express consent**.

The Website uses cookies and other tracking instruments, which may be technical (i.e. to facilitate navigation and use of the Website) and/or profiling (i.e. to analyze users and their behaviors and preferences, and provide them with personalized advertising).

For a detailed explanation of tracking instruments used by this Website and how to deactivate them, please read our [Cookie Policy](#).

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

The data processing connected with the services provided by the Website are carried out: (i) at the headquarters of Geox S.p.A. (indicated above), (ii) by companies providing services related to the management of the Website, appointed as external data processors. A complete list of external data processors appointed by Geox can be obtained by contacting [privacy@geox.com](mailto:privacy@geox.com).

At Geox, your data will be processed by specifically authorised individuals (specifically those from the Web and Information Technology Department).

#### **10. Transfer of your data outside the European Union**

The Data collected through the Website are generally not transferred abroad, as the processing is carried out through providers that use servers located in the European Union (or European Economic Area). Nonetheless, in some cases, to enable us to properly manage the Website or upon consent from the User, your personal data may be subject to transfer to countries outside the European Union/European Economic Area (e.g. the data collected through certain cookies and social network tracking instruments, including from Facebook or Instagram).

Based on the privacy regulations applicable, specific consent to the transfer is not necessary when the transfer is made to a country that guarantees an adequate level of protection (e.g., with UK or USA, Article 45 of the Regulation) or based on the adoption of appropriate safeguards (Articles 46 and 47 of the Regulation), and, specifically, based on the adoption of binding rules for the group of companies or the adoption of contractual clauses approved by the European Commission: transfer of data collected through the Website (e.g. through cookies/tracking instruments) is governed by those contractual clauses (e.g. <https://www.facebook.com/help/566994660333381?ref=dp>).

To receive more information on the transfer of data and the safeguards set out for their protection, as well as on the means for obtaining that data or the place where they have been made available, send a simple request to [privacy@geox.com](mailto:privacy@geox.com).

#### **11. 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.

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

If you believe that the processing of your data violates the provisions of the Regulation, you may always make a complaint 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, work or, finally, of the place where you believe the violation occurred.

#### **13. Applicable law**

This Privacy Policy is governed by EU Regulation 2016/679 and Italian law. The Regulation ensures that the processing of personal data is carried out in accordance with the fundamental rights and freedoms and the dignity of data subjects, with particular reference to confidentiality, personal identity and their personal data protection rights.

#### **14. Revision clause**

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, without notice, including to take account of changes to the law or regulations regarding the protection of personal data. Users will be notified of changes and updates to the Privacy Policy by publishing them on the homepage of the Website; they will be binding as soon as published and communicated. Please access this section regularly for publication of the most recent and updated Privacy Policy or check your e-mail.

\*

### **COOKIE POLICY**

#### **EU Regulation 2016/679, General Data Protection Regulation**

The information below relates both to the use of “cookies” and to other tracking tools that may be used (except where otherwise indicated). For practicality, we will use the term “**cookie**” to refer to all the different tracking technologies, save where expressly indicated 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](#) of the Site.

Pursuant to Article 13 of Regulation EU 2016/679 General Data Protection Regulation (the “**Regulation**”) and Directive 58/2002, as amended, Geox S.p.A., as the Data Controller (“Geox” or the “Company”), provides the following information.

## **1. What is a cookie**

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, Instagram, tiktok) 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 (or tracking tools) the Website uses**

### *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 or to remember that the user has visited the Site).

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, Twitter, etc.. These buttons allow users who are browsing the Website to reach and, in some case, to interact with social networks with a “click”. For more information, see **paragraph 8**.

### **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 authorise.

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).

**Note: 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, TikTok, etc. – 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 exchanged (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) or autonomous data controllers - 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>Meta (e.g. Facebook, Instagram)</b>	<p>The joint 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> (by selecting your language at the bottom of the page).</p> <p>Instead, Meta is the autonomous data controller for the processing of user data carried out subsequently. As data controller, Meta 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).</p> <p>The Website uses cookies and tracking instruments from Meta (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 Meta.</p> <p>Details on how Meta processes the data, the related legal basis of processing and how you can exercise the privacy rights granted by the Regulation against Meta are available at <a href="https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&amp;entry=0">https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&amp;entry=0</a>.</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>
<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 B at the following link: <a href="#">Pinterest Business</a></p> <p>More information on the processing carried out by Pinterest is available at: <a href="#">Privacy Policy   Pinterest Policy</a> (by selecting your language in the footer of the page)</p> <p>The Pinterest Data Protection Officer can be contacted at the following link: <a href="#">Contact form of the data protection officer   Pinterest Help</a> (by selecting your language in the footer of the page)</p>
<b>Tik Tok</b>	<p>TikTok Technology Limited (an Irish company) and TikTok Information Technologies UK Limited (a UK company) are the joint data controllers.</p> <p>The Site uses TikTok tracking tools (e.g. pixels) to (i) display customised promotional and advertising content to users, (ii) provide statistical reports on advertising campaigns and users' browsing of the Site, (iii) improve the publication of content on the Site.</p> <p>For these purposes, data relating to the user's navigation within the Site and collected through tracking tools are shared with TikTok.</p> <p>More information on the processing carried out by TikTok is available at: <a href="#">Data Protection Policy   TikTok</a></p> <p>The TikTok Data Protection Officer can be contacted at the following link: <a href="#">Contact the Data Protection Officer (tiktok.com)</a></p>

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. 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.

## 7. Transfer of data outside the European Union

The Data collected through the Website are generally not transferred abroad, as the processing is carried out through providers that use servers located in the European Union (or European Economic Area).

Data collected using cookies and other tracking instruments – specifically of Social Networks – can be transferred outside the European Union (e.g.: the data collected using the Facebook tracking instruments are subject to transfer). Based on the privacy regulations applicable, specific consent to the transfer is not necessary when the transfer is made to a country that guarantees an adequate level of protection (Article 45 of the Regulation) or based on the adoption of appropriate safeguards (Articles 46 and 47 of the Regulation), and, specifically, based on the adoption of binding rules for the group of companies or the adoption of contractual clauses approved by the European Commission: transfer of data collected through cookies/tracking instruments is governed by those contractual clauses (es. <https://www.facebook.com/help/566994660333381?ref=dp>).

To receive more information on the transfer of data and the safeguards set out for their protection, as well as on the means for obtaining that data or the place where they have been made available, send a simple request to [privacy@geox.com](mailto:privacy@geox.com).

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

In this section, you can find information that is periodically updated by Cookiebot, the cookie and other tracking tool management platform used by Geox. You can also find information about your consent (if any). Finally, in the table below, 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

### *EU Regulation 2016/679, General Data Protection Regulation*



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 defense 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)).

\*

**GEOX.COM**  
**GUEST PURCHASE POLICY**  
**EU Regulation 2016/679 General Data Protection Regulation**

In accordance with Article 13 of the EU Regulation 2016/679 *General Data Protection Regulation* (the “Regulation”)

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

Geox S.p.A. and the Geox group company that is responsible for the sale and delivery of “Geox” brand products in your country (i.e., companies subject directly or indirectly to the management and control of Geox S.p.A. to which we delegate sales, delivery and invoicing functions) are the co-Data Controllers, (hereinafter “Geox”).

### **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 email at [privacy@geox.com](mailto:privacy@geox.com) or by writing to us at: 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 are providing us with by completing the purchase process on the website [www.geox.com](http://www.geox.com) are necessary to: 1) complete the sale of the selected products and to execute the contract entered into; 2) fulfil tax and accounting obligations relating to your purchase (e.g., in relation to tax and accounting matters; 3) handle any after sales services (e.g., customer service) and to check the availability of products (back in stock).

Processing is based on the entry into the conclusion of a contractual relationship with you and the fulfilment of the related legal obligations (Article 6, paragraph 1, letters b) and c) of the Regulation).

### **About data and necessary consent**

Please provide all requested data marked as “mandatory” as they are necessary to manage your purchases; in the event of failure to provide the data or if the data are incomplete, your purchase cannot be completed. Failure to complete the data marked as “optional” will not have any consequences.

Your consent is not required for the indicated purposes.

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

Your data will be processed primarily electronically to manage your purchases; you will receive update emails on the status of your order management. If you use the 'back in stock' service, we will inform you when the products you requested are available again.

Data will be processed in accordance with applicable legislation and, in any case, in such a way as to guarantee the security and confidentiality, and prevent the unauthorised disclosure or use, of the data, as well as to prevent its alteration or destruction.

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

Your data will be processed for as long as it is necessary to manage and complete your purchases, and thereafter in compliance with tax and accounting obligations; subsequently the data will be deleted or rendered anonymous.

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

Your data will not be disseminated. In order to manage your purchases, your data may become known (limited to their respective area of responsibility) to persons authorised to process Geox data, and to companies that Geox entrusts to manage the sales, payment and delivery of products.

Depending on the case, these subjects shall be appointed as external Data Processors. A complete list can be requested from [privacy@geox.com](mailto:privacy@geox.com).

### **Transfer of data outside of the European Union**

For all of the above mentioned purposes, your personal data are not generally transferred to Countries outside of the European Union and reside on servers located in the Union. Only in some cases your data may be transferred, in part and for a limited period of time.

### **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 a complaint**

If you believe that the processing of your data violates the provisions of the Regulation, you can always submit a complaint 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, work, or ultimately in the place where you believe the violation occurred.



All\_2\_Geox\_compan  
ies.pdf

\*

<p><b>GEOX.COM</b> <b>Customer Service</b> <b>Regolamento UE 2016/679 Regolamento generale sulla protezione dei dati</b></p>
--

In accordance with Article 13 of the EU Regulation 2016/679 *General Data Protection Regulation* (the “Regulation”).

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

Geox S.p.A. (“**Geox**”), with registered office at via Feltrina Centro 16, Biadene di Montebelluna (TV), Italy, [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 no. 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 us with by completing the “Contacts” form or using the other contact services via e-mail or telephone [www.geox.com](http://www.geox.com) (e.g., e-mail, telephone, chat, etc.) are necessary for us to respond to your query or request for information and to improve the services and products offered to our clients.

### **About data and necessary consent**

Please provide all required data marked as “*mandatory*” because this is needed to send your request and allow us to handle it properly. Failure to complete the data marked “*optional*” will have no consequences. Your consent is required. Data processing will be based on the handling of your query or request for information and on our legitimate interest to improve our services and products (Article 6, paragraph 1, letters b) and f) of the Regulation).

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

Your data will be processed primarily electronically in order to manage your request, be able to contact you and improve our services.

Data will be processed in accordance with applicable legislation and, in any case, in such a way as to guarantee the security and confidentiality, and prevent the unauthorised disclosure or use, of the data, as well as to prevent the alteration or destruction of the data.

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

Your information will be processed for the time it takes to properly handle your request and will be subsequently stored to enable us to improve our service; the data will then be deleted or stored anonymously or in aggregate form. For further information, you may write to [privacy@geox.com](mailto:privacy@geox.com).

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

Your data will not be disseminated and they may become known to persons authorised to process Geox data, in order to handle your query/request, and, in its capacity as Data Processor, to (i) the company responsible for managing our “customer service” and (ii) our providers of services serving the purpose of website management. The names of the external data processors can be obtained from [privacy@geox.com](mailto:privacy@geox.com).

Depending on your request, your data may also be communicated to and processed by the company handling the sale and delivery of “Geox” branded products in your country, which will process your data - in its capacity

as independent data controller - for the same purposes and in the same manner as specified in this notice (e.g. your data may be communicated to the Geox shop that you have contacted in order to complete the management of your requests/queries).

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

For the purposes mentioned above, your personal data are generally not transferred to countries outside the European Union and reside on servers located within the Union. Only if necessary to properly manage your requests, your data may be communicated to the Geox group company that handles the sale and delivery of products in your country. The companies of the Geox group are bound by specific agreements, and the transfer will occur in compliance with measures approved by the European Commission. By writing to [privacy@geox.com](mailto:privacy@geox.com), you can request more information.

### **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 a complaint**

If you believe that the processing of your data violates the provisions of the Regulation, you may always submit a complaint 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, work, or ultimately in the place where you believe the violation occurred.

\*

<b>GEOX.COM</b> <b>“Feedback”</b>
--------------------------------------

*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 the Benefeet or account registration policy.*

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 unauthorized 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 [Benefeet 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 rights](#) 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.

\*

<b>GEOX@HOME PRIVACY POLICY</b> <b>pursuant to Article 13 of EU Regulation 2016/679 of 27 April 2016</b> <b><i>General Data Protection Regulation</i></b>
---

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

\*\*\*

**NB:** for the text of the Benefect, Newsletter and Geox Account policy, see the relevant documents.



