



ACQUA DI PARMA

WEBSITE PRIVACY POLICY

Acqua di Parma respects the confidentiality and privacy of your personal data.

This aim of this privacy policy is to inform you about how we process the personal data you give us, or that we may collect through the various contacts you may have with us, as well as your rights in relation to your data. This includes, for example, personal data that we may collect from you in relation to in-store shopping or events, through our websites, via social media, apps, or other interactions with you.

This website is operated by Acqua di Parma S.r.l. is an Italian luxury lifestyle company with headquarters located at Via Giovanni Spadolini 7 Building B 20141 Milan, Italy registered in the companies register under 04215670375, VAT number 04215670375 and Diana E-Commerce Corporation S.r.l. ("Diana"), with registered office at Via San Daniele 137/139, 35038, Torreglia (PD), Italy, enrolment number in the Register of Enterprises of Padua, tax code and VAT number 05097740285, e-mail privacy@dianacorp.com, are the joint data controllers of personal data collected on the website www.acquadiparma.com in the sense of regulations applying to personal data, in particular Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and the free movement of such data (hereinafter the "GDPR").

We appreciate your interest in our products and thank you for visiting our website.

PERSONAL DATA- DEFINED

Personal data is information that can directly or indirectly identify a specific person, such as their last name, first name, age or birthdate (so we can send you special offers), customer number, order number, photo, etc. If you use Acqua di Parma's virtual try-on services, the personal data we collect includes photos, and/or facial geometry or images of you ("biometric images" or "biometric data") that you display to us via your device during the virtual try on session.

I. PERSONAL DATA COLLECTION POINTS

We may collect your personal data when you:

- create a customer account on our website, apps, or in our stores;
- order goods from our website;
- make purchases in stores;
- join our loyalty program;
- agree to receive personalized marketing communications from us by email, telephone, SMS or post, depending on your selection;
- answer surveys or satisfaction questionnaires based on your customer experience;
- mention of our products on social networks or provide feedback;
- interact with our Maison via its official page on social networks or when we suggest re-use of content that you have published on a social network;
- contact our customer service;
- send requests for information to our Maison;

- take part in an event we organize;
- browse on the Internet using cookies or similar technology or when you click on advertisements for our products;
- Participate in our virtual try-on services or events.

II. TYPES OF PERSONAL DATA COLLECTED

Acqua di Parma collects data about our website visitors directly (such as when you provide it to us), as well as indirectly (such as via website browsing, analytics and the use of website cookies (see below) to help us ensure that our website provides a positive experience for visitors.)

The direct collection of personal data from you, which is limited to that which is appropriate for the requested services, may include:

Your name;

Your contact details (e.g. email address, mailing address (such as for orders) and/or your phone number;

Your personal preferences in relation to our products or use of our website;

Information relating to your orders, their tracking and your purchase invoices;

Purchase history and any returns (online or in stores);

For our virtual try-on services, your photos and/or facial geometry or images of you that you display to us via your device or at our stores, during the virtual try on session;

Interest in our products and services:

Information you may provide to our customer service team;

Any feedback from you regarding our products (ex: possible undesirable effects or experiences in relation to our products that you report to us);

Your participation in voluntary surveys, or other promotional activities or events that we offer;

Your feedback about Acqua di Parma and our products via social media;

Your publications/mentions relating to our products on social networks;

Your payment information if you place an order via our website;

Information relating to processing any returns or exchanges.

Personal data essential to Acqua di Parma, such as how to contact you in relation to a question or where to send your purchase, is marked with an asterisk on all personal data collection forms on our website, in electronic form at some of our counters and stores, as well as off-line in paper form. If you do not fill in these compulsory fields, Acqua di Parma will likely be unable to respond to your request and/or provide you with the requested services. Other information is optional and enables us to get to know you better and improve our communications and services with respect to you.

We also collect certain personal information indirectly, in connection you're your use of our website, such as in relation to your browsing (pages visited, links clicked, etc.). Some of this information may be collected using cookies placed in your web browser when you browse our website. For more information about cookies, including your rights and preferences, please see our [Cookie Notice](#) _.

III. USE OF YOUR PERSONAL DATA

Acqua di Parma and Diana use the personal data we collect for the following types of purposes:

- enable you to create a customer account on our website, through our applications, and at our counters and in our stores;
- manage access to your customer account on the Internet or our applications;
- process and manage your online orders and their delivery, as well as any questions or returns;

- show you how the Acqua di Parma products that you select look on you, via virtual try-on sessions that you initiate with us;
- record purchases made at our counters or in our stores;
- secure online transactions, prevent fraud, payment incidents and manage debt collection (see our terms and conditions for more details) ;
- manage our loyalty program;
- manage customer relations with respect to any requests for information or complaints you may send us via our website, customer service or social network pages;
- trace and manage any questions or feedback you may send us as part of our cosmetic vigilance obligations, in relation to our products ;
- manage and optimize your customer experience by improving our knowledge of our customers and their browsing and use of our website;
- propose appropriate, tailored services, particularly when we enhance our products and services;
- conduct statistical analyses to develop management, measuring and reporting tools in order to adjust and improve our sales, marketing and product manufacturing;
- subject to your consent, send you personalized information on our offers, news and events on your chosen communication media, with the right to unsubscribe at any time;
- maintain records that will help us recommend products and services that may be of interest to you. s
- manage your participation in any events to which you have signed up;
- analyze our brand performance on social networks in order to produce statistical analysis (market research, brand influence and campaign analysis);
- promote our Maison;
- for relevant legal, regulatory or compliance purposes, and to protect our property and brand;
- analyze your preferences and habits, anticipate your needs from your consumer profile and your publications/mentions on social networks.
- personalized customer experience: we may provide you with personalized communications by means of email, postal mail, SMS or calls based on the communication preferences you have indicated and your consumer profile (where permitted)

In the latter two interactions (“analyzing your preferences and habits” & “providing you with a personalized customer experience”), when we send personalized communications or content, we may use so-called profiling techniques. For the sake of transparency within this Statement, profiling is currently defined as any kind of automated processing of personal data which consists of using that personal data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict elements relating to the preferences, interests, behavior or location of that natural person. In these circumstances, you have the right to opt-out, meaning the right to withdraw your consent by unsubscribing.

IV. WHAT LEGAL GROUNDS LEGITIMISE THE PROCESSING OF YOUR DATA?

Acqua di Parma processes your personal information:

- to perform the contract agreed between yourself and Acqua di Parma, to manage your access to your customer account, your subscription to the loyalty program and to process and track your orders;
- record purchases made at our counters or in our stores; within the framework of its legitimate interest for the purposes of marketing management (improving our product and services), securing its digital media (websites, applications, etc.), managing payments incidents and debt collection and combating fraud; or to refine our customer knowledge through our third party partners' tools and in particular to:

- o to define the personalized profile of our customers based on their interests and to provide them with relevant offers of our brand on other websites;
- o identify audiences similar to our target audience (in order to deliver our offers to audiences of people with similar profiles to our customers).
- when you have given your consent for the processing of your data, especially for the purposes of managing our personalized sales prospecting, and of your browsing data via cookies, etc.
- within the framework of compliance with our legal obligations, particularly fiscal obligations (conserving purchase invoices) and cosmetic vigilance with regard to Regulation (EU) 1223/2009 of 30 November 2009 on cosmetic products.

V. RECIPIENTS OF YOUR PERSONAL DATA

Your personal data is processed by the personnel of Acqua di Parma and Diana. We ensure that only authorized persons within Acqua di Parma and Diana have access to your personal data when this is necessary for the purpose of managing our commercial relations or meeting our legal obligations.

We may also share your personal data with;

Other entities of the LVMH Group, as well as those that may become part of the Group in the futures;
 Others Acqua di Parma entities and department shops where you buy our products in order to provide you with the same personal service all over the world;

Other Acqua di Parma subsidiaries abroad, as well as with our parent company Acqua di Parma S.r.l.;

Other third-parties, as necessary, to meet legal, regulatory or export obligations, or to respond to requests from legal authorities.

- Third parties who carry out statistics relating to our performance on social networks on our behalf;
- Third parties wishing to know your interests so that they can build up similar audiences and target prospects corresponding to your profile. In the context of this specific processing, these partners may re-use the personal data made available to them to carry out autonomous and distinct targeting for commercial prospecting purposes, for which they are responsible, and are responsible for their legal and regulatory obligations.

o Please note that in the context of re-use, these partners act as data controllers. You should therefore refer to their own privacy policies. We illustrate some examples in the table below:

- Facebook (Privacy Policy available [here](#))
- Google (Privacy policy available [here](#))
- Instagram (Privacy policy available [here](#))

subcontractors, such as:

site hosting and maintenance service providers and the providers of our electronic personal data collection solutions at counters and in stores;

payment service providers;

anti-fraud service providers;

logistic service providers;

marketing solution service providers;

sales prospecting and social network communication service providers;

customer service providers;

service providers for managing cosmetic vigilance alerts;

event organisation service providers.

Lastly, ACQUA DI PARMA may need to share your personal data with third parties to meet its legal, regulatory or treaty obligations, to respond to requests from authorized legal authorities, or in relation to customer activities.

- In the unlikely event that Acqua di Parma divests from the LVMH Group, or becomes affiliated with another group, your data may be entrusted to the target, but only upon receipt of written assurances that they will uphold a similar level of protection and surrounding restrictions relating to the data
- Third parties who assist Acqua di Parma with our customer activities, so that we can provide excellent customer service and continue to offer cosmetic products that are highly desirable to our customers.

To the extent that your data is shared with external partners, we require those partners to enter into written agreements confirming that they will uphold a comparable level of protection for your data as that provided by Acqua di Parma.

VI. CROSS-BORDER TRANSFERS OF YOUR DATA

If you live outside of the United States, you should know that as a global organization, some recipients of your personal data may be located abroad, including outside USA, and that the data privacy and security requirements in other countries including the USA may not offer the same level of protection as the requirements in your home country. Nevertheless, Acqua di Parma and Diana and its partners have implemented measures that are designed to ensure an equivalent level of protection for your data, irrespective of where it is located or stored, and in compliance with applicable regulations relating to the protection of personal data.

VII. SECURITY OF YOUR DATA

Acqua di Parma has implemented physical, technical, administrative and operational safeguards that are designed to protect your personal data from and against loss, misuse, alteration, destruction and unauthorized access. The safeguards are updated from time to time in order to ensure that your data remains adequately protected, such as in relation to new threats and risks, and to address new requirements, standards and technologies.

We require our partners and group companies to maintain a similar level of protection for your personal data as we do.

VIII. RETENTION OF YOUR DATA

Acqua di Parma and Diana retain personal data in accordance with the purposes described in this Privacy Policy and for as long as it may be required for legal or business purposes.

In general, your personal data is kept in our database:

- Data subject: Regular customer (i.e.: having a Customer profile)
Duration: 5 years from the date of the first purchase or account creation
Specificity: This period will be renewed each time you interact with Acqua di Parma (for example a purchase or an update of your profile) or your consent to continue to interact at the end of this period
- Data subject: Prospect (i.e. never purchased products from Acqua di Parma but registered for our communications)
Duration: 3 years from the date of data collection

Specificity: This period will be renewed each time you interact with Acqua di Parma (e.g. participation in an event) or your consent to continue to interact at the end of this period

- Data subject: Client 'Guest' (i.e. not having a Client account)

Duration: 5 years from the date of first purchase

Specificity: This period will be renewed each time you interact with Acqua di Parma (e.g. a purchase)

- Data subject: customer care (i.e.: complaints or information)

Duration: duration of the processing of the request plus 5 years. For exercises of rights, under GDPR, the request is kept during its treatment plus 6 years

- Data subject: cosmetovigilance

Duration: duration of the processing of the request plus 10 years in archive

- Data subject: Privileged interlocutors (e.g. agents, stylists, journalist, celebrity managers, artists) in relation to Maison Acqua di Parma Public Relations services

Duration: 10 years from the date of your first contact

Specificity: This period will be renewed each time you interact with Acqua di Parma (for example a request for information on the Acqua di Parma)

If cookies are placed on your computer, we keep them for a maximum of 6 months.

When we no longer need to use your personal data, it is deleted from our systems and our registers or made anonymous so that it can no longer be identified, subject to retention for archival purposes, claims and litigation management as well as to meet our legal and / or regulatory obligations and / or to respond to requests from authorities authorized to make the request.

IX. YOUR RIGHTS AND HOW TO EXERCISE THEM

Generally

Acqua di Parma and Diana respect the rights of individuals with respect to their personal data. All individuals have the right to know what data we hold about you, and to withdraw consent to use your data for marketing-related purposes. You also have the right to update your information on file with us, such as your email address, phone number, and marketing-related preferences. And, if you have a question about our handling of your data or believe it has been mismanaged, you always have the right to contact us. Please use the contact details provided below to do so.

Some of the individual rights vary by region. Acqua di Parma has adopted practices to ensure that we fulfill those region-specific rights for website visitors and other individuals who entrust us with personal data.

European Union, European Economic Area, and U.K. Residents

Acqua di Parma recognizes and has addressed data protection and security measures that are required on a local or regional level. This includes, for example, those required for residents of the European Union/European Economic Area under the EU General Data Protection Regulation (GDPR) 2016/679 and those required for California residents under the California Consumer Privacy Act of 2018 (AB 375, California Civil Code Title 1.81.5, Section 1798.100 et seq.).

In particular, the GDPR provides the following rights (with some exceptions):

- The right to be informed: you have the right to obtain clear, transparent and easily understandable information about how we use your personal data, and your rights. You will find all this information in this Policy;

- The right of access: you have the right to access to the personal data Acqua di Parma holds about you;
- The right of rectification: you have the right to have your personal data rectified if it is incorrect or outdated and / or completed if it is incomplete;
- The right to erasure / right to be forgotten: you have the right to have your personal data erased or deleted. Please note this is not an absolute right, as we may have legal or legitimate grounds for retaining your personal data;
- The right to object: you have the right at any time to object to the processing of your data within the limits established by GDPR or law;
- The right to withdraw consent at any time for data processing based on consent: You can withdraw your consent to our processing of your data when such processing is based on consent; and
- The right to data portability: you have the right to move, copy or transfer data from our database to another. This only applies to data that you have provided, where processing is based on a contract or your consent, and the processing is carried out by automated means.

You also have the right to contact the data protection authority of your country in order to lodge a complaint against the data protection and privacy practices of Acqua di Parma.

Please contact us at the contact details below to exercise these rights or if you have any questions or complaints regarding the processing of your personal data.

We may require proof of your identity and full details of your request before we process it.

Additional Protections / Certain Regions / U.S. Consumer Privacy Laws

On top of Acqua di Parma's overall data protection practices in the countries and regions where we operate, we have implemented additional measures in certain regions, including in relation to the U.S. consumer privacy laws that have been enacted in some states. At present, the U.S. states with consumer privacy laws include California, Colorado, Connecticut, Nevada, Virginia, and Utah. (For consumers who are residents of Colorado, Connecticut and Utah, please note that those laws take effect later in 2023. We invite you to check back for updates on Acqua di Parma's practices to fulfill consumer rights in those states after those laws enter into force.) If you live in -California, Virginia or Nevada, please see below for your state, including information about your rights and preferences in relation to your personal data. You may also contact us at DPO@acquadiparma.it for any questions or concerns or to exercise your rights.

In connection with those U.S. consumer privacy laws, you should know that Acqua di Parma does not "sell" or "share" personal information that you entrust to us, as those terms are used in the relevant U.S. state consumer privacy laws. Please see the state-specific notices for additional information and your corresponding rights.

Acqua di Parma also refers you to the general sections of this Website Privacy Policy for information about how your personal data is collected, used, and shared by us, as well as the security measures and limitations that we have put in place to safeguard your data.

Acqua di Parma does not discriminate against individuals in relation to our privacy practices, including the exercise or fulfillment of individual rights in the U.S. or elsewhere.

California and Virginia Residents

Acqua di Parma does not “sell” or “share” personal information as those terms are defined under the California and Virginia consumer privacy laws. As an added assurance to residents of those states who entrust their personal data to us, they may also sign up for a Do Not Sell My Information Log that we maintain.

Personal Information We Collect and Process

Please refer to other sections of this website privacy policy for the types of personal information that we collect and process, including how that information may be shared, how it is safeguarded, and how it is retained.

Additional Rights of California and Virginia Residents:

Subject to certain limitations, California and Virginia residents have the following additional rights. (Some of these rights also exist for all individuals with whom we interact, and in a manner consistent with other applicable data protection laws):

- The right to be informed: you have the right to obtain clear, transparent and easily understandable information about how we use your personal data, and your rights;
- The right of access: you have the right to access the personal data that Acqua di Parma holds about you;
- The right to request rectification: you have the right to have your personal data rectified if it is incorrect or outdated and / or completed if it is incomplete;
- The right to erasure / right to be forgotten: you have the right to have your personal data erased or deleted. Please note this is not an absolute right, as we may have legal or legitimate grounds for retaining your personal data;
- The right to restriction of processing: you have the right to object to, or request that we restrict, certain processing;
- The right to object to direct marketing: you can unsubscribe or opt out of our direct marketing communication at any time. You are able to do so by clicking on the “unsubscribe” link in any email or communication we send you. You are also able to request to receive non-personalized communications about our products and services;
- The right to withdraw consent at any time for data processing based on consent: You can withdraw your consent to our processing of your data when such processing is based on consent; and
- The right to data portability: you have the right to move, copy or transfer data from our database to another. This only applies to data that you have provided, where processing is based on a contract or your consent..
- The right to no discrimination in relation to the collection and processing of your personal data.

Exercising Your Rights:

Please contact us at DPO@acquadiparma.it and include “Individual Rights” in the reference line or send us a non-registered postal letter Acqua di Parma S.r.l. Via Giovanni Spadolini 7 Building B 20141 Milan, Italy. In some instances, we will need to verify your identity before honoring your privacy right request. We will verify your identity by asking you to provide personal information related to your recent interactions with us. We will honor your privacy rights within the time periods specified in those laws (generally 45 days, except in extenuating circumstances.) If you are unsatisfied with our response, you may also lodge a complaint with the Autorità Garante per la protezione dei dati personali, Piazza di Montecitorio n. 121, 00186, Rome, Italy.

If, at any time, you no longer wish to receive details of our offers, news and events, you can unsubscribe using the hypertext link provided for this purpose in each mail we send you. You can also send us a non-registered letter Acqua di Parma S.r.l. Via Giovanni Spadolini 7 Building B 20141 Milan, Italy.

To exercise your rights or for any other questions relating to the collection and processing of your data by Diana, you can contact the Diana's Data Protection Officer at privacy@dianacorp.com or a non-registered postal letter to Diana E-commerce Corporation, Via San Daniele 137/139, 35038 Torreglia (PD), Italy, including a copy of a document proving your identity.

Use of a Third-Party Verified Agent

California consumers are also permitted to use a verified agent to exercise certain rights on their behalf, subject to the requirements under the California consumer privacy laws. Acqua di Parma will naturally take steps to verify the agent's authority and permissions, which may include the collection of additional information from you. If so, that information will only be used in connection with verifying the request and not for unrelated purposes.

Use of Global Privacy Controls

Acqua di Parma also honors requests from California and Virginia residents that are submitted to us via the Global Privacy Controls feature offered through certain browsers. In accordance with those laws, we naturally will take steps to verify the request.

Additional Information

Please feel free to contact us at DPO@acquadiparma.it should you require any additional information about exercising your rights.

Nevada Residents

Acqua di Parma does not 'sell' personal information as defined under Nevada's consumer privacy law (SB 220). As an added assurance to individuals who entrust their personal data to us, they may sign up for a Do Not Sell My Information Log that we maintain. To do so, please email us at DPO@acquadiparma.it and include the reference line "Nevada Do Not Sell". We may contact you for additional information in order to process your request.

X. NOTICE ON THE PROCESSING OF SHARED DATA WITH THE LVMH GROUP

What is the context of the processing? Acqua di Parma belongs to the LVMH Group, which comprises many exceptional Maisons that offer high quality products and services in all sectors including Fashion & Leather Goods, Perfumes & Cosmetics, Watches & Jewelry, Wines & Spirits, Selective Retailing and Hospitality, Culture & leisure. The list of all LVMH Maisons is available at <https://www.lvmh.com>. If you are customer of our Maison, you may also be a customer of other LVMH Maisons. What is the purpose of the processing?

We endeavor to improve your experience by proposing personalized offers and services and customized marketing communications that correspond to your interests. This relies on knowing your preferences and interests. How is the processing conducted? If you consent we will share the purchases you have made with us during the last 3 years with LVMH, our parent company, in a pseudonymous way (which means that your name and your contact details will not be sent to LVMH). Your purchases will be analyzed and matched with purchases made from other Maisons of the LVMH Group where you have given a similar consent. Each Maison that has your consent will receive back from LVMH generalized information concerning your purchasing habits and preferences.

Who is the Data Controller? Acqua di Parma will remain the sole data controller which means that it is the company that is responsible for the information that you provide to it. LVMH acts as our data processor, or service provider, and will not use your data for any purpose other than the one described above. For example, LVMH will not use your data for its own purposes, will not contact you for marketing purposes based on the data we provide, and will not share information about you with Maisons of the LVMH Group to which you are not a customer and/or to whom you have not given consent.

XI. COLLECTION OF PERSONAL DATA FROM MINORS

Acqua di Parma complies with federal and applicable state requirements relating to the collection of personal information from minors for marketing-related purposes. This website is not intended for minors under the age of 13. Should we unintentionally collect information from a minor via this site, it will be irreversibly deleted once that error is identified.

XII. CONTACT US

For all questions relating to the collection and processing of your data by Acqua di Parma, you can contact Acqua di Parma's Data Protection Officer at DPO@acquadiparma.it or send a non-registered postal letter to Acqua di Parma S.r.l. Via Giovanni Spadolini 7 Building B 20141 Milan, Italy. For all questions relating to the collection and processing of your data by Diana, you can contact Diana's Data Protection Officer at privacy@dianacorp.com or a non-registered postal letter to Diana E-commerce Corporation, Via San Daniele 137/139, 35038 Torreglia (PD), Italy, including a copy of a document proving your identity.

UPDATES TO THIS PRIVACY POLICY

Acqua di Parma may update this Privacy Policy from time to time, such as in connection with new laws, requirements and regulator expectations as well as changes to our business. If we do, the protections and standards associated with your data will, at a minimum, be equivalent to those described here, and will never fall below those standards.

Updated December 2022