

# **BERLUTI CHINA PRIVACY POLICY (Standard Version)**

*Last updated date: 17 Nov.2023*

This BERLUTI China Privacy Policy (this “**Policy**”) applies to the Sites operated by BERLUTI (SHANGHAI) COMPANY LIMITED (“**BERLUTI**” or “**we**”), the products and services offered by BERLUTI to users (“**you**”) through our offline stores, as well as all activities related to BERLUTI’s products and services (e.g., online membership registration; online purchases and after-sales; participation in brand events; pushing products and event information; and sending event invitations).

BERLUTI respects your concerns about the confidentiality of the information that you disclose to us. We have therefore drawn up this Policy in a bid to foster transparency, in order to inform you about how we collect and use your personal information, the measures we take to protect your personal information, and the ways and means by which you can exercise your rights. Also, we may modify and update this Policy from time to time as required by the updates of applicable laws and regulations or changes in our business.

We recommend you carefully read and fully understand the contents of this Policy before you accept our products and services or access the Sites.

This Policy is composed of the following sections:

- 1. OVERVIEW**
- 2. HOW WE COLLECT YOUR PERSONAL INFORMATION**
- 3. FOR WHAT PURPOSES YOUR PERSONAL INFORMATION IS PROCESSED**
- 4. HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR**
- 5. HOW WE SHARE, ENGAGE THIRD PARTY TO PROCESSING, TRANSFER, DISCLOSE, OR TRANSFER YOUR PERSONAL INFORMATION TO OTHER COUNTRIES**
- 6. HOW WE PROTECT YOUR PERSONAL INFORMATION**
- 7. YOUR RIGHTS**
- 8. HOW TO CONTACT US**
- 9. INFORMATION ABOUT THE MANAGEMENT OF COOKIES AND TRACKERS**
- 10. PROTECTION OF PERSONAL INFORMATION OF MINORS**
- 11. CHANGES TO THIS POLICY**

## 12. DEFINITIONS

### 1. OVERVIEW

You may from time to time have to disclose personal information to BERLUTI, for instance, when placing orders for BERLUTI products or registering for our newsletters. BERLUTI may also collect information concerning your browsing of the Sites under terms that are described in greater detail in the section “Information about the management of Cookies and trackers” below.

Any personal information that you disclose to BERLUTI in order to use products and services is covered by the provisions of the applicable personal information protection laws and regulations. We are fully aware of the importance of your personal information and will comply with all applicable laws and regulations regarding the protection of personal information in order to protect the security of your personal information.

### 2. HOW WE COLLECT YOUR PERSONAL INFORMATION

The provision of our products and/or services relies on your relevant personal information. If you choose to use a service, you are required to provide, or allow us to collect your personal information in connection with such service. We only collect your Sensitive Personal Information where it is specific and necessary. We will process your Sensitive Personal Information in strict accordance with applicable laws and regulations. Sensitive Personal Information is marked **in bold and underlined** to draw your attention.

We provide various types of services to you and collect or receive personal information from you under the following circumstances:

#### 2.1. Creation and management of your My Berluti account:

You can create and manage a My Berluti account via BERLUTI’s WeChat Official Account, BERLUTI Mini Programs, offline stores or customer service:

- (1) When you create a My Berluti account via our WeChat Official Account, we may obtain your WeChat account credentials (such as WeChat Union ID, WeChat Open ID, nickname and avatar) and collect your name, gender (title), mobile

phone number and country/region via the online form you fill in. You may choose to provide your detailed address, email address and date of birth to let us improve your account information and provide you with more personalized services.

- (2) When you create a My Berluti account via BERLUTI Mini Programs, we may obtain your WeChat account credentials (such as WeChat Union ID, nickname and avatar) and collect your name, gender (title), mobile phone number and country/region via the online form you fill in. You may choose to provide your place of residence (province, city), date of birth, email address, detailed address and postal code to let us improve your account information and provide you with more personalized services.
- (3) When you create a My Berluti account via our offline stores or customer service, we will collect your name and gender (title) via a physical form that you fill out, and you may choose to provide your date of birth, province, postal address, email address, mobile phone number and landline number; or we may push an online form to you after you add the WeCom accounts of our salespersons and advisors and obtain your WeChat account credentials (such as WeChat Union ID, nickname and avatar), and collect your name, gender (title) and mobile phone number via the online form you fill out. You may choose to provide your place of residence (province, city), date of birth, email address, detailed address and postal code to let us improve your account information and provide you with more personalized services.

You can also choose whether to subscribe to our newsletters or receive promotional messages from us when you sign up for a My Berluti account.

## 2.2. Shopping

We may collect the following information to process your order, deliver products and services and update your shopping status and records:

- (1) when you shop on BERLUTI Mini Programs, we will collect your WeChat account credentials (such as WeChat Union ID, nickname and avatar), **your order details (including date, order status, product and price information)** and delivery information (including recipient's name, address and contact information). If you choose to pick up the products at our offline stores, we will

also collect the offline store information and pick up time chosen by you. After obtaining your consent, we may send you notifications of payment and delivery of the order after you place the order via the Sites, which you may choose whether to receive such notification on the relevant page.

- (2) when you shop at offline stores, we will collect the personal information required for fulfilling your order, including **the product you purchased, your order number, the amount paid and the method of payment**. If you choose to have your products delivered via courier service, we will collect and share with the courier service provider the recipient's name, shipping address and mobile phone number provided by you to ensure the safe delivery of your order. If you request the return of a product you have purchased, we may collect your **bank account number and credit card account number** to complete the refund process.

### 2.3. Display of products and services

When you browse and use BERLUTI official website, WeChat Official Account or BERLUTI Mini Programs, we may collect the information on your use of our services, including your IP address, type of browser, **browsing history**, frequency of your use of the Sites, and information about the URL from which you access the Sites, in order to show you information about the pages of the products and services you need. If you search nearby stores on BERLUTI official website, we will collect your **location information** based on your authorization, to provide you with relevant information on nearby stores.

### 2.4. Interaction with our official accounts on social media platforms

When you interact with BERLUTI official accounts on social media platforms (Weibo, Xiaohongshu, Douyin, WeChat video channel, WeChat Official Account), we may collect your account credentials on social media platforms such as username, nickname and avatar, gender (title), city or region, **browsing history**, frequency of your use of social media platforms, information about the URLs from which you access social media platforms, and contents you publicly shared in your interactions with us on social media platforms.

### 2.5. Participation in brand events

When you participate in our online promotional or other brand events on social media platforms, we may ask you to provide your username, avatar and nickname on social media platforms, and recipient name, address and mobile phone number for the purpose of providing or delivering products or services to you in online brand events.

When you participate in our offline brand events (e.g. shows, craft demonstrations, new arrivals events), we may ask you to provide your My Berluti account details to identify your membership if you have previously registered for a My Berluti account, or provide your name and mobile phone number if you have not registered for a My Berluti account to provide you with our reservation service of offline events. We may also collect information related to your participation in our events, including events you participate in and the date of your participation.

## 2.6. Customer service and contact

You can use our customer service to solve any problems you may encounter before or after your purchase, including contact with us offline, contact with our online advisors and contact with us during an event that we organize. If you contact our customer service team, we may collect your name or contact details to verify your My Berluti account information; we may ask you for your order information and records of exchanges with our customer service team to ensure that we handle and respond to your queries about our products and services; we may also collect the queries or feedback you submit to us to process your request accordingly. In addition, in the course of your contact with us, we may be informed of your personal preferences, clothing sizes and styles, your comments and ratings on BERLUTI's services and other information provided by you voluntarily for the purposes of providing more personalized services and maintaining customer relationship.

## 2.7. Repair and after-sales

When you use our repair and after-sales service, we may record information of such repair or after-sales service, and provide you with status information and notification after the acceptance of repair or after-sales service according to the WeChat account, mobile phone number or email address provided by you.

## 2.8. Customer satisfaction survey

When you provide your comments on our products and services via the link to an online customer satisfaction survey we send you, we will collect your comments and the time of your comments in order to improve our services.

## 2.9. Issuance of electronic invoices

If you apply for an electronic invoice, we will collect your invoice title, taxpayer identification number and mobile phone number provided by you.

## 2.10. Tax Refund Application

If you are entitled to a tax refund, we will, upon your request, collect your **travel pass**, date of your entry, purchase information and time of purchase.

## 2.11. Third-party platform

When you join our membership via BERLUTI JD and TMALL Flagship Store, we may obtain your personal information with your authorization, including third-party platform account information (i.e. JD account ID, Taobao account ID), nickname and mobile phone number from such third-party platforms. Such information will be used to provide exclusive membership benefits and services to you. We may send you the latest brand and store news through channels such as SMS, Wangwang, exclusive customer service, and light store messages. During your membership period, we may collect and calculate your membership points and membership level information in order to provide you with membership services. You may also choose to provide your city or region, date of birth, name, gender and email address to let us improve your membership account information and provide you with more personalized services.

When you shop online through our flagship stores on the third-party platforms such as JD and Tmall, the third-party platforms will share your necessary personal information with us for the purpose of completing the purchase order settlement, payment and

delivery. Such information may include your **purchase order details (including date, order status, product, price information)**, your third-party platform account information (including account ID, nickname, mobile phone number, and email address), and shipping information (including recipient's name, shipping address and contact information). Due to the policies and technical limitations of the third-party platforms or customers' settings for placing their orders, the partial personal information we obtain (such as your phone number and delivery information) may be encrypted or de-identified.

### **3. FOR WHAT PURPOSES YOUR PERSONAL INFORMATION IS PROCESSED**

BERLUTI processes your personal information only to the extent that is strictly necessary for the following purposes:

- (1) To create and manage your My Berluti account;
- (2) To process your orders for BERLUTI products or services and provide BERLUTI products or services to you;
- (3) To provide after-sales services such as quality assurance and claims and other customer services to you;
- (4) To enable you to locate stores, make appointments, and access repair status information, personalization and other services, on the Sites.
- (5) To prepare and hold online and offline brand events;
- (6) To manage the opinions from customers on our products, services or contents and improve the customer experience;
- (7) Subject to your prior consent, to provide you with information about our brand events, products and/or services and other marketing information. Should you wish not to receive such information from us, you may follow the unsubscribe instructions given in the messages that we send you (such as "unsubscribe" at the bottom of the email), or contact us according to the contact methods provided in section 8 hereunder.
- (8) To conduct customer satisfaction survey;
- (9) To manage potential customers;
- (10) To manage payment defaults and disputes;
- (11) To combat fraud and protect our sales network;

- (12) To use the de-identified transaction data for statistics and to analyze and understand customers' purchase preferences and tendencies and to improve our products and services;
- (13) To process your personal information as required by applicable laws and regulations or competent regulators.

#### **4. HOW LONG WE RETAIN YOUR PERSONAL INFORMATION**

As long as you use our products and/or services, your personal information will be retained for a period necessary to achieve the purposes described in this Policy and as required or permitted by law. After such retention period has expired, your personal information will be deleted or anonymized as required by applicable laws.

After you delete or we assist you in deleting your information, such information may not be immediately removed from our system due to applicable legal requirements and/or security technology restrictions, in which case we will store them safely and restrict any further processing of them until they can be removed or anonymized.

#### **5. HOW WE SHARE, ENGAGE THIRD PARTY TO PROCESS, TRANSFER, DISCLOSE, OR TRANSFER YOUR PERSONAL INFORMATION TO OTHER COUNTRIES**

##### 5.1. Sharing with third parties

For the purposes described in this Policy, we may share your personal information with the following third parties to the extent necessary to provide products and services to you:

- BERLUTI's affiliates: In order to manage your My Berluti account, provide BERLUTI products and services to you, we may share your account information and order information with BERLUTI Paris, subject to applicable laws and regulations. You can check the basic information about the BERLUTI Paris that processes your personal information, the purposes of processing and the types of personal information involved by clicking on the **list of BERLUTI's affiliates**. We



may update and adjust the list as actual changes occur in response to new service requests and adjustments to entities and business functions.

- Payment service provider: In order to fulfil your order, we need to provide your order number and order amount to WeChat and Alipay as our payment service providers for them to confirm your payment order and complete the payment;
- Courier service provider: In order to deliver the BERLUTI products your ordered, we need to share with SF Express the recipient’s name, shipping address and mobile phone number provided by you to provide the courier service for you;
- Governmental authorities, regulatory authorities, law enforcement authorities and judicial authorities to comply with our statutory obligations.

When you use our Sites, we will access software development kits (SDKs) provided by third parties in order to provide better services and to ensure the implementation of BERLUTI related functions the safe and stable operation of the applications. Please refer to the following list for our use of the third-party SDKs:

<b>SDK Name</b>	<b>SDK Provider</b>	<b>Purpose of processing and description of scenario</b>	<b>Type of Personal Information</b>	<b>SDK Privacy Policy Link</b>
Sensors SDK	Sensors Data Science and Technology (Beijing) Co., Ltd.	Wechat mini-programs monitoring, data statistics and analysis	IP address, browser information (name, version) and device information (model, manufacturer, brand)	<a href="https://sensorsdata.cn/compliance/privacy.html">https://sensorsdata.cn/compliance/privacy.html</a>

## 5.2. Entrusted Processing

For the purposes described in this Policy, we may engage third-party service providers to assist us in providing relevant operation and service support, in which process such third-party service providers may process your personal information to help us to provide the functions of our products and/or services, including:

- The service provider that assists us with customer relationship management and customer service;
- The service provider that assists us in organizing events;
- The warehousing service provider;
- The IT service provider;
- The risk control service provider that secures transactions on the Sites and assists in preventing fraud and identity theft; and
- The digital and e-commerce service provider.

### 5.3. Transfer of your personal information

If BERLUTI is merged or otherwise involved in a merger, division, liquidation or bankruptcy, we may transfer your personal information in connection with such transaction. Before transferring your personal information, we will send you appropriate notice to inform you of the name and contact information of the recipient and ensure that your personal information will be protected in a way that is consistent with this Policy. In case the recipient changes the purpose and method of processing, we will require such data recipient to obtain your consent again.

### 5.4. Disclosure of your personal information

We may disclose personal information about you only with your separate consent, or to the extent permitted by applicable laws and regulations or where compulsorily required by government competent authorities.

### 5.5. Cross-border transfer of your personal information

In order to manage our global business, offer you global services and improve our service level, we may use the facilities located abroad to process, store or backup certain personal information we have collected about you (client's ID, title, name, mobile

phone number, country/region, place of residence, detailed address, date of birthday and email address), only to the extent necessary and subject to compliance with applicable laws. However, this does not change our commitments in this Policy to safeguard your personal information.

You can check the basic information about the BERLUTI Paris that processes your personal information, the purposes of processing, the types of personal information involved and the ways to exercise your rights as a personal information subject by clicking on the **list of BERLUTI's affiliates**, as well as the range of other BERLUTI affiliates that may have access to your relevant personal information. We may update and adjust the list as actual changes occur in response to new service requests and adjustments to entities and business functions. You can make a request to BERLUTI Paris via [privacy@berluti.com](mailto:privacy@berluti.com) to exercise your rights in relation to your personal information.

The Sites may contain links to other third-party websites. You may also choose to disclose your personal information to our partners, advertisers and affiliates by following a link to and from their websites. Please note that these websites have their own privacy policies, which you will be subject to when you provide personal information to such third-party websites and their processing of your personal information.

## **6. HOW WE PROTECT YOUR PERSONAL INFORMATION**

BERLUTI endeavours to take all effective and necessary measures to preserve the confidentiality and the security of the personal information that it processes and to prevent it from being distorted, damaged, destroyed or accessed by unauthorised third parties. We have implemented technical and organisational security measures that comply with the highest standards of the industry, covering our information systems in particular. In the event of a security incident such as the leakage of personal information, we will take remedial measures to prevent the expansion of the security incident and fulfil the relevant reporting and notification obligations in accordance with the law.

However, BERLUTI has no control over all the risks linked to the operation of the Internet and hereby draws your attention to the existence of potential risks inherent in

its use and its operation. By using our Sites, you confirm that you understand and agree to assume these risks.

We consider the protection and the security of our information systems to be of the greatest importance. We have accordingly implemented a number of tools to detect any security breaches. These tools may result in incidental access to your personal information by our security teams. This information shall be collected and processed for the sole purposes of the management of any vulnerabilities, in keeping with the applicable information protection regulations.

## **7. YOUR RIGHTS**

We are highly aware of the importance of protecting your personal information and of your rights over the same. Please find below a summary of your rights over the personal information that we hold about you under applicable laws and regulations:

### **7.1. Right of access and modification**

If you have registered for a My Berluti account at BERLUTI official website, you may access or modify your name, gender (title), country/region, region code, email address, mobile phone number and regular size by signing into the “My Berluti Account” and clicking the “Account Settings”. If you have registered for a My Berluti account via BERLUTI WeChat Official Account, you may access or modify your name, gender (title), country/region, detailed address, email address, mobile phone number and date of birth in the “User Profile” section by clicking the “Join Loyalty Program” in the “My Berluti” section and signing into your account.

If you would like to access or modify other personal information generated when you purchase our products or use the Sites, you may contact us through the points of contact provided in section 8 of this Policy hereunder.

### **7.2. Right to obtain a copy of your personal information**

You have the right to obtain a copy of your personal information. If you request a copy of the personal information that we have collected about you, you may contact us at

any time. To the extent in compliance with applicable laws and technically feasible, we will provide a copy of your personal information to you upon your request. You may contact us in the same manner as set out above.

### 7.3. Right to withdraw consent

If you wish to withdraw your consent to the use of your personal information, you may contact us in the same manner as set out above. If you withdraw your consent to the use of personal information, you may not be able to use relevant products or services normally. Your decision to withdraw consent will not affect the processing of personal information previously carried out based on your consent.

### 7.4. Right to restrict or object processing

You have the right to restrict or object our processing of your personal information. If you restrict or object to the processing of personal information, you may not be able to use relevant products or services normally. We will offer the way for you to restrict or object the processing as required by applicable laws. You may contact us in the same manner as set out above.

### 7.5. Unsubscribe notifications and messages

If you choose not to receive any notifications or marketing or promotional messages from us, you can contact us in the same manner as set out above or use the unsubscribe link featuring in each email newsletter that is sent to you or follow the instructions on mobile SMS to unsubscribe from our communications. If you indicate that you no longer wish to receive such messages, we will no longer contact you for such purposes. We will make every reasonable effort to meet your requirements in a timely manner.

### 7.6. Object to personalized recommendations

We might send personalized contents to you based on profiling of your personal information. You may request that we cease sending personalized contents by contacting us in the same manner as set out above. To turn off personalized

recommendations on the third-party platforms used by BERLUTI, please refer to the privacy settings in those third-party platforms.

#### 7.7. Right of deletion

You have the right to request that your personal information be deleted if: (a) we violate laws or regulations in collecting or using your personal information; (b) we collect your personal information without legal basis or you withdraw your consent; (c) we collect or use your personal information in breach of any agreement with you; (d) you deregister your account; or (e) we no longer provide products or services for you.

Please note that if the personal information you request us to delete is necessary for provision of certain services, we may be unable to continue to provide these services to you. This will not, however, prevent us from providing other services that are not related to that personal information. Unless we have to retain certain data due to legal reasons, we will only store and process such personal information to the extent required by laws and regulations.

#### 7.8. Right of deregistration

If you would like to deregister your account, please contact us in the same manner as set out above and we will take reasonable steps to deregister your account. After the account is deregistered, we will cease to provide you with the products or services offered based on your account and, upon your request, delete or anonymize your personal information, unless otherwise required by laws and regulations.

#### 7.9. Rights of the close relative of the deceased user

If you are a close relative of a deceased BERLUTI user, you may, for your own legitimate and justified interests, contact us through the points of contact described in section 8 of this Policy to access, copy, correct, delete the personal information we hold about the deceased user, unless otherwise instructed by the deceased user before death.

In order to adequately protect the personal information rights and interests of the deceased user, we will inform you of the specific application process and requirements

when you contact us through the methods as set out above. You will be requested to provide us with relevant materials and information in accordance with such process and requirements.

## **8. HOW TO CONTACT US**

Should you have any questions about this Policy or the way in which we process your personal information, or should you wish to exercise any of the abovementioned rights, please contact us:

- (1) By calling us at 0086-21-61333590; or
- (2) By sending an e-mail to our data protection officer at [contact.cn@berluti.com](mailto:contact.cn@berluti.com); or
- (3) You may also send us a letter by post to 4107B, 41/F, Plaza 66 Tower 1, 1266 Nanjing West Road, Jing'an District, Shanghai, China.

We will respond to your request within the time period permitted by applicable laws and regulations after we receive your request and complete the verification of your identity.

Please note that we may ask you for evidence of your identity as well as the full details of your request prior to dealing with it.

If you want to cease receiving newsletters or other marketing messages from BERLUTI, you may use the unsubscribe link featuring in each e-mail newsletter or mobile SMS that is sent to you or send us request via the points of contact listed above.

## **9. INFORMATION ABOUT THE MANAGEMENT OF COOKIES AND TRACKERS**

### 9.1. What is a cookie?

A cookie is a text file that may be stored by your browser software in a dedicated space of the hard drive of your Terminal\* in the course of your use of an online service. A cookie file enables its issuer to identify the terminal in which it is stored, throughout the period of validity or of registration of the cookie.

*\* the term Terminal means the hardware (computer, tablet, smartphone, etc.) that you use to access or display a website, a mobile application, any advertising content, etc.*

## 9.2. The Cookies that we issue on the Sites

When you connect to the Sites, depending on your choices, we may install various cookies in your Terminal that enable us to recognise the browser that you use on your Terminal throughout the period of validity of the cookie involved.

The cookies that we issue are designed:

- 1) To help us draw up statistics and determine the extent of the traffic and use of the various elements comprising the Sites (sections and content viewed, browsing patterns), to enable us to improve the interest and usability of our services, as well as the visibility of the content that we publish;
- 2) To enable or facilitate your browsing of the Sites, or to provide you with the online communication services that you request during your browsing, and thus:
- 3) To adapt the presentation of the Sites to your Terminal's display preferences (language used, display resolution, operating system used, etc.) during your visits to the Sites, depending on the viewing or reading hardware and software incorporated into your Terminal;
- 4) To store information concerning any forms that you may have filled in on the Sites (e.g. registration or access to your account, if applicable) or concerning any products, services or information that you may have chosen on the Sites (e.g. a service that you subscribed to, the content of a shopping cart, a wish list, etc., if applicable);
- 5) To enable you to access the private and personal spaces of the Sites, such as your account, thanks to identifiers or data that you may have entrusted to us beforehand;
- 6) To implement security measures, for instance when you are asked to connect once again to a given content or service after a certain time lapse.

## 9.3. The Cookies issued by third parties on the Sites



The issuing and the use of cookies by third parties are subject to the data protection policies of these third parties. We shall inform you about the purpose of the cookies that we know of and the ways in which you may take certain decisions with regard to these cookies.

(1) Cookie issued by third-party applications incorporated into the Sites:

The Sites may comprise various software applications provided by third parties that enable you to share content from the Sites with other people or to let these other people know about something you saw on the Sites or give them your opinion concerning any of the content of the Sites. This is the case for instance of the “Share” and “Like” buttons provided by social networks.

A social network that provides such a software button may identify you due to this button, even if you do not click on this button while browsing the Sites. This type of software button may enable the social network involved to track your browsing of the Sites, merely by virtue of the fact that you have an open session with the social network in question on your Terminal at the time when you are browsing the Sites.

We don't have any control over the process used by the social networks to collect information about your browsing of the Sites linked to the personal information that they hold about you. Please see the privacy policies of the social networks in order to become acquainted with the purposes for which they may collect data about your browsing using these software buttons, e.g. advertising. These privacy policies must for instance enable you to exercise your rights before these social networks, for instance by configuring your accounts with each of them.

(2) Cookies issued on the Sites by third parties:

The Sites may contain cookies issued by third parties (advertising agencies, traffic measurement companies, etc.) enabling the latter to collect information about the browsing of any terminals that access the Sites, throughout the period of validity of these cookies, and in particular in order to assess the effectiveness of our paid referencing campaigns with the search engines.

#### 9.4. Your choices regarding the storage of cookies

You have several options when it comes to managing cookies. Any configuration that you perform may however modify your experience of browsing the Internet and your access to certain services that require the use of cookies.

You may choose at any point in time to express and modify your preferences in terms of cookies, using the means described below.

The choices offered by your browser software: you may configure your browser software to allow cookies to be stored on your Terminal, or on the contrary, to ensure that they are rejected by your Terminal, either systematically, or depending on their issuer. You may also configure your browser software to prompt you to accept or reject individual cookies before they are stored on your Terminal. For more information, please see section 9.4 (3) below entitled “*How to set your preferences depending on your browser*”.

##### (1) Consenting to the storage of cookies

The storage of a cookie on a terminal is essentially subordinated to the will of the user of the Terminal. The user may freely modify at any point in time through the choices that are provided to them by their browser application concerning cookies, or via a cookies administration software application. Should you have accepted, in your browser software, the storage of cookies in your Terminal, the cookies that are incorporated into the pages and content that you view may be stored temporarily in a dedicated space on your Terminal. They may only be read by their issuer.

##### (2) Rejecting cookies

Should you reject the storage of cookies in your Terminal, or should you delete the cookies that are stored there, you shall no longer benefit from a number of functionalities that are necessary to browse some of the spaces of the Sites. This would for instance apply should you subsequently attempt to access our content or services that require you to identify yourself. This would also be the case should we or our service providers not be able to recognise the type of browser used by your Terminal,

its language and display parameters or the country from which your Terminal appears to be connected to the Internet, for purposes of technological compatibility.

We hereby disclaim liability for the consequences of the improper operation of our services resulting from our inability to store or to read the cookies needed for their operation and that you shall have rejected or deleted.

### (3) How to set your preferences depending on your browser

The configuration of each browser is different. It is in general described in your browser's help menu. We therefore recommend that you access and read it in order to find out how to set your preferences in terms of cookies.

If your Terminal is used by several persons and has several browsers, we cannot guarantee with certainty that the services and advertisements destined for your Terminal do indeed correspond to your own use of this Terminal as opposed to another user of this Terminal.

Whether you share the use of your Terminal with other people and/or how to configure the cookies parameters of your browser is purely your decision and you are fully responsible for the same.

## **10. PROTECTION OF PERSONAL INFORMATION OF MINORS**

We value and are committed to protecting the privacy of minors and have no intention of collecting their personal information. For the personal information of minors under 14 years old ("children" or "child"), we will further strictly follow the requirements of laws and regulations for collection, storage, use, disclosure.

In general, we will not actively collect or process the personal information of children without the consent of their parents or guardians. However, due to technical limitations, in certain cases, such as when providing online services, we are unable to identify the age of the users. If you are a child, you should use our Sites only under the supervision and guidance of your parent or other guardians, and may not send any personal information about yourself to us. If you are willing and have to use our products and/or

services, we request you to have your parent or other guardians carefully read this Policy, and you shall use our Sites, products and/or services or provide us with personal information only after you obtain the consent of your parent or guardian.

If you are aware that we have collected any personal information of a child, you may contact us through the points of contact provided in section 8 hereof to exercise your rights as a parent or guardian.

## **11. CHANGES TO THIS POLICY**

BERLUTI may modify this Policy from time to time. If we make material changes to this Policy, we will ensure that you are informed of these changes by posting the updated privacy policy on the Sites, a special announcement on the Sites or sending a personal notification, for instance in our newsletters, and other conspicuous ways, and we will include the date of the latest update in this Policy.

The amended Privacy Policy will apply between us if you continue to use the products or services provided by us, regardless of whether we have sent you a specific notice about the amendment. Please check the Sites periodically or contact us through the points of contact described in section 8 above for updates on our Privacy Policy.

## **12. DEFINITIONS**

**BERLUTI** means BERLUTI (SHANGHAI) COMPANY LIMITED, with its correspondence address at 4107B, 41/F, Plaza 66 Tower 1, 1266 Nanjing West Road, Jing'an District, Shanghai, China.

**BERLUTI Paris** means Berluti SA, which can be contacted at [privacy@berluti.com](mailto:privacy@berluti.com).

**Sites** means the website and applications operated by BERLUTI, including but not limited to BERLUTI official website, WeChat Official Account and BERLUTI Mini Programs, JD Flagship Store, TMALL Flagship Store and other websites and Internet application services operated by BERLUTI.

**BERLUTI Mini Programs** means the mini programs operated by BERLUTI, including but not limited to “My Berluti Loyalty” WeChat Mini Program, “Berluti Wechat Store” Wechat Mini Program, “Live Iconic” Wechat Mini Program, “pop-up shop” mini programs and other mini programs that may be developed and operated on other third-party platforms.

**Sensitive Personal Information** means the personal information that is likely to result in damage to the personal dignity of any natural person or damage to his or her personal or property safety once disclosed or illegally used.