



## **EXTENDED PRIVACY NOTICE**

### **Regarding the processing implemented through video analysis (attendance detection device)**

Privacy notice pursuant to Art. 13 of Regulation (EU) 679/2016 and Legislative Decree 196/2003, as amended by Legislative Decree 101/2008.

Salvatore Ferragamo S.p.A., as Data Controller (hereinafter: "Ferragamo", "Data Controller" or the "Company") pursuant to Regulation (EU) 679/2016 (hereinafter: "Regulation") and Legislative Decree 196/2003 and subsequent amendments (hereinafter: "Personal Data Protection Code") considers privacy and the protection of personal data one of the main objectives of its business.

We therefore invite you to carefully read this Privacy Policy because it contains important information on the protection of your personal data.

This Privacy Notice:

- concerns personal data collected by the G2K Experience Optimization Suite device. The device installed in various areas of this store is a sensor which is capable of detecting aggregate and statistical data related to the people within its range in real time (hereinafter: "Video analysis" or "Device"). Through the use of the device technology provided by G2K Group GmbH, Ferragamo intends to improve the quality of its in-store services on the basis of the analysis of aggregate information related to the frequency of visitors.
- is available pursuant to art. 13 of the Regulation to the data subjects concerned by the processing that is carried out through the Devices placed inside stores.

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The processing of your personal data is based on the principles of lawfulness, fairness, transparency, the limitation of purpose and storage, minimization, accuracy, integrity and confidentiality, as well as the principle of accountability referred to in Art. 5 of the Regulation. Your personal data are processed in accordance with the provisions of the Regulation and the confidentiality obligations provided therein.

The processing of personal data means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

We inform you that the personal data processed by Ferragamo may consist of the images processed by the Device.

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**1. WHO WE ARE AND HOW YOU CAN CONTACT US**

The Data Controller, i.e. the entity that decides which of your personal data are processed and how, is Salvatore Ferragamo S.p.A., with registered offices at via Tornabuoni n. 2, 50123 Florence, Italy. Ferragamo has a Data Protection Officer ("DPO"), a person whose task is to support the Company in complying with privacy regulations and to monitor such compliance. The DPO is available to provide any information concerning Ferragamo's personal data processing and can be contacted at the following address: [privacy@ferragamo.com](mailto:privacy@ferragamo.com).

**2. WHAT PERSONAL DATA WE COLLECT**

The only personal information about you that the Device collects are the images collected on the premises where it is installed. The images are used for the sole purpose of collecting aggregate data about the number of times you visit the store, your gender, age range, and where you spend the most time in the store.

It should also be noted that the Device does not use technologies capable of performing facial recognition on the persons whose images are captured. Therefore, there is no processing of your biometric data, i.e. personal data such as facial image or fingerprint, obtained by a specific technical processing related to the physical, physiological or behavioural characteristics of a person that allow to uniquely identify that person.

**3. HOW WE USE YOUR PERSONAL DATA**

Your personal data will be processed in order to improve the quality of the stores' services on the basis of the analysis of aggregate information relating to the frequency of visitors.

We would like to explain how the Device operates in detail. We have structured the device to ensure maximum protection of your personal data and we process them for the shortest time possible in order to protect your privacy. The Device collects frames which contain the images of customers that are then immediately processed in a server installed in the store itself. In this way, **the images remain in the Device for a limited time (for a maximum of two seconds), after which they are processed and anonymized so that they can no longer be linked to you.**

More precisely, the Device processes the frames through a software and an algorithm that allow the images to be decoded and for us to obtain aggregate information related to the number of people in the store, their gender, age range and to identify the most trafficked areas of the store.

Subsequently, this aggregate data (which no longer contains personal information relating to uniquely identified individuals - i.e., it is no longer possible link it to individuals) is used by Ferragamo to carry out analyses aimed at improving its services. Neither Ferragamo nor the supplier that manages the Device can retrieve personal data (images of visitors) after the processing and transformation of images into aggregate data, which is carried out within the Device.

The legal basis for this processing is Article 6.1. f of the Regulation, i.e. the legitimate interest of the Company to carry out aggregate analysis relating to the behaviour and composition of its customers. In fact, the processing carried out through the Device will give Ferragamo the opportunity to evaluate the services it offers to the public, with a view of continuous improvement. In light of the fact that the Device is structured to process your images for a limited time, rendering them immediately anonymous, we have carefully considered the balance between our legitimate interest in improving our services



and the rights and freedoms of our customers, and we believe that the processing will not affect your rights and freedoms in any way.

In addition, we have very carefully assessed the impact that such processing might have on your rights by conducting a "data protection impact assessment" that the Regulation requires in such cases, pursuant to Article 35 of the Regulation.

#### **4. WITH WHOM WE SHARE YOUR PERSONAL DATA**

Since Ferragamo does not access the images collected by the Device under any circumstances, but only receives aggregate information from its supplier, the Company's personnel do not process the data collected by the Device and do not access the images.

Your personal data may be shared with the supplier of the Device, G2K Group GmbH, which may access them only in the event of technical maintenance activities. This entity acts as a data processor on behalf of Ferragamo.

#### **5. WE DO NOT TRANSFER YOUR PERSONAL DATA OUTSIDE THE EUROPEAN UNION**

None of your personal data processed through the Device will be shared with recipients located outside the European Union.

#### **6. HOW LONG WE KEEP YOUR PERSONAL DATA**

Ferragamo does not store your personal data as explained above. Your data are stored locally on a need-to-know basis in the volatile memory of the Device only for the time necessary for their anonymization. In addition, the system used by the provider does not allow the images in the Device to be stored or accessed.

#### **7. HOW WE MAY CHANGE THIS PRIVACY NOTICE**

Ferragamo reserves the right to update the content of this notice, in part or in full, also as a result of changes in applicable law. If the modifications consist of substantial changes in the processing activity or have a significant impact on customers, Ferragamo will notify its customers accordingly.

#### **8. YOUR PRIVACY RIGHTS**

Not all the rights provided by the Regulation are concretely applicable to the processing carried out by the Device. This is because we keep the images only for a maximum of two seconds, after which they are deleted. We do this because the Device itself transforms the images into anonymized data that only allow us to know how many people are in a certain area, their approximate age and sex. This means that the rights foreseen by Articles 15 and the following of the Regulation do not apply to this processing, since customers and potential customers are not identifiable after more than two seconds from when the images are captured. For this reason, the only right you can exercise is the right to object in advance to the data processing for reasons related to a particular situation that you are required to report, pursuant to art. 21 of the Regulation, to Ferragamo ([privacy@ferragamo.com](mailto:privacy@ferragamo.com)) so that we can assess whether this particular situation prevails over the legitimate interest of the Company to carry out the processing.

In any case, you always have the right to lodge a complaint with the competent supervisory authority (Garante per la protezione dei dati personali), pursuant to art. 77 of the Regulation, or to appeal to the competent judicial authority if you believe that the processing of your data is in breach of the legislation in force.

#### **9. HOW YOU CAN CONTACT US TO EXERCISE YOUR PRIVACY RIGHTS AND FOR MORE INFORMATION**



To exercise your privacy rights or for any other request for information regarding the processing of your personal data, you can write to the Data Controller at: Salvatore Ferragamo S.p.A., with registered offices at via Tornabuoni n. 2, 50123 - Florence, Italy. You can also contact Ferragamo at the following address: [privacy@ferragamo.com](mailto:privacy@ferragamo.com). The DPO is available at the following address: [privacy@ferragamo.com](mailto:privacy@ferragamo.com).

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