

# DOPPELGÄNGER CLUB LOYALTY PROGRAMME

Privacy Policy of the "Doppelgänger Club Loyalty Programme" membership contract prepared by International Retail Development Ltd (hereinafter, "IRD") with registered office in Via Magna Grecia 11, 00183, Rome

## INFORMATION PURSUANT TO ARTS. 13 and 14 OF EU REGULATION 2016/679.

Pursuant to articles 13 and 14 of EU Regulation n.679 of 2016 the processing of personal data acquired to allow the provision of the services offered, will be based on principles of correctness, lawfulness, transparency and protection of privacy and the rights of the interested parties.

### Data Controller and Data Protection Officer

The data controller is *International retail development Ltd*, owner of the registered trademark "DOPPELGÄNGER", *Via Magna Grecia, 11 00183 Rome*, VAT number: IT10471441005, pec: ird@pec.it. The Data Protection Officer can be reached at the email address: dpo@doppelganger.it.

### Purpose of data processing and legal basis

The treatment is aimed at:

- Provide the good and/or service requested by the interested party, manage the contracts finalized by the interested party, carry out the related administrative, accounting, tax and legal obligations, as well as process the requests forwarded by the interested party. The treatment is necessary for the execution of a contract of which the interested party is a part or for the execution of pre-contractual measures adopted at the request of the same pursuant to art. 6, par. 1, lit. b), of EU Reg. 679/2016;
- Respect and fulfill the obligations established by laws, regulations, community regulations, orders and prescriptions of the competent authorities pursuant to art. 6, par. 1, lit. c), of EU Reg. 679/2016;
- Manage any complaints and disputes, recover credits, prevent fraud and illegal activities, to exercise the rights and protect the legitimate interests of the Owner or Third Party Owners such as the right to defense in court. To detect specific customer needs, or to prepare initiatives connected to the contractual relationship and aimed at improving the services provided. The processing is necessary for the pursuit of the legitimate interest of the Data Controller pursuant to art. 6, par. 1, lit. f), of EU Reg. 679/2016;
- Carry out market research, direct sales, including by telephone, for the placement of products or services, for commercial communications or marketing activities. These activities may be performed by sending advertising, information, promotional material or invitations, using traditional methods (e.g. paper mail) or automated contact systems (e.g. SMS, e-mail). The treatments put in place for this purpose are carried out with the specific consent provided by the user, with the exception for sending commercial

communications relating to products and/or services similar to those already purchased and/or subscribed to by the interested party as provided for by art. 130 of Legislative Decree 196/2003 and subsequent Legislative Decree 101/2018, it being understood that, at any time, the interested party will have the possibility to oppose the sending of such communications.

- Carry out analyzes and processing on behavior (profiling) with the specific consent provided by the user in order to analyze or predict interests, preferences, consumption behaviour, location, to compose individual or group categories, at a statistical or of detail without prejudice to the fact that the interested party will have the possibility to oppose the treatment at any time.

### **Categories of personal data in question**

The personal data processed by *International retail development Ltd* include: common personal data, email addresses, telephone numbers, IP, logs and data on the use of the website and Doppelgänger Club App, data relating to purchases made at points of sale, through ecommerce and Doppelgänger Club App, data necessary for the management of payments based on the provisions of the contractual conditions made available to the customer.

### **Recipients and categories of recipients of data and data transfer**

For the pursuit of the purposes described, the Data Controller reserves the right to communicate the data to third parties in the event that this is required by national or European Union law, for example:

- Supervisory authorities and, in general, subjects, public or private, with functions of public law importance;
- professional studios or companies in the context of assistance and consultancy relationships;
- subjects who carry out control, revision and certification duties of the activities carried out by the Data Controller
- companies that manage marketing activities on behalf of the Owner

The personal data provided by the interested party will not be disclosed.

The data will be processed within the European Union and stored on servers located within the European Union.

### **Processing methods and data retention period**

The treatment will be carried out in an automated and/or manual form, in compliance with the provisions of art. 32 of EU Reg. 679/2016, by specifically authorized subjects and in compliance with the provisions of art. 29 of EU Reg. 679/2016.

In compliance with the principles of lawfulness, purpose limitation and data minimization, pursuant to art. 5 of EU Reg. 679/2016, personal data will be kept for the period of time necessary to achieve the purposes for which they are collected and processed. The data provided by the interested party and relating to the contractual purpose will be processed for the entire duration of the existing contractual relationship and further stored exclusively for the period envisaged for the fulfillment of legal obligations, provided that it

is not necessary to keep them further to defend or assert a right or to fulfill any further legal obligations or orders from the Authorities.

### **Provision of data**

For contractual purposes only the provision of data represents a necessary requirement, failure to provide it makes it impossible to execute the contract or the pre-contractual measures adopted at the request of the interested party. For marketing and profiling purposes, the provision of data is optional and revocable at any time.

### **Data source**

We process personal data we obtain from our customers, we also receive data from third parties such as representatives, other companies or organizations with whom we enter into agreements to support our business and operations.

### **Automated decision making**

The automated decision-making process is necessary to ensure better customer organization and management, and is necessary for the conclusion and execution of the contract between the interested party and the Data Controller. *International Retail Development Ltd* has put in place appropriate measures to protect the rights of customers and to prevent the automated decision-making process from producing significant legal effects on the person. The interested party has the right to obtain human intervention from the Data Controller, to express his or her opinion and to contest the decision.

### **Rights of the interested party**

The interested party has the right to revoke any consent given at any time without prejudice to the lawfulness of the treatment based on the consent before the revocation (art. 7 paragraph 3 of EU Reg. 679/2016).

Without prejudice to the conditions and limits established by Reg. 679/16 and by Legislative Decree 196/2003, the interested party has the right to access personal data and the information contained (art. 15 of EU Reg. 679/2016), to request rectification (art. 16 of EU Reg. 679/2016), to request cancellation (Art.17 of EU Reg. 679/2016), to obtain the limitation of treatment (art. 18 of EU Reg. 679/2016), to oppose the processing (art. 21 of EU Reg. 679/2016).

You can exercise the aforementioned rights by sending a registered letter with return receipt to the following address: *International retail development Ltd, Via Magna Grecia, 11 00183 Rome* or by writing to the email address: [dpo@doppelganger.it](mailto:dpo@doppelganger.it)

The interested party also has the right to lodge a complaint with the Guarantor (art. 77 of EU Reg. 679/2016).

### **Changes and Additional Information**

This information may be subject to changes also as a result of any regulatory changes and/or additions.

Last update on 17/04/2023