

EXTENDED PRIVACY NOTICE

This privacy notice ("**Notice**") is provided in accordance with the EU General Data Protection Regulation ("**GDPR**") and of the Italian data protection code (Legislative Decree 196/2003 as amended). It describes in pursuance of Article 13 of the GDPR how the companies Flos S.p.A. ("**Flos**") and International Design Group S.p.A. ("**IDG**"), each belonging to the Design Holding Group (the "**Group**") process your personal data collected through this e-commerce website (the "**Site**").

This Notice further describes how the Design Holding Group companies may further process your personal data for certain jointly controlled marketing purposes.

In this Notice:

- "**Design Holding Group**" means each and all of the following companies Design Holding S.p.A., Flos S.p.A., International Design Group S.p.A., B&B Italia S.p.A., Louis Poulsen A/S and their respective subsidiaries as listed below. This list can be updated from time to time to the extent that new companies become part of the Group or current companies exit;
- "**us**", "**we**" or "**our**" means, as the case may be, Flos, IDG or the Design Holding Group companies.
- "**you**" or "**your**" refers to the natural or legal person, as the case may be, that purchases the Products through the Site.

This policy is comprised of two parts:

A) General Part, where you can find the following information in detail:

- 1. CONTROLLERS**
- 2. HOW YOUR PERSONAL DATA ARE PROCESSED**
- 3. WHO YOUR PERSONAL MAY BE DISCLOSED TO**
- 4. TRANSFER OF PERSONAL DATA OUTSIDE OF THE EEA**
- 5. YOUR RIGHTS**
- 6. HOW TO CONTACT THE CONTROLLERS**
- 7. HOW TO EXERCISE YOUR RIGHTS**
- 8. CHANGES TO THIS NOTICE**

B) Special Part, in which you will find **a description of the specific processing operations that may be carried out with respect to the personal data that we collect through this Site and/or when you make contacts with us on occasion of purchases made through this Site and/or because you have provided us with your data upon making inquiries or otherwise by getting in touch with us.** The Special Part is divided in paragraphs, each of them providing the description of a specific processing operation. For each processing operation you will find a summary table indicating the categories of data processed, the purposes and the legal basis for the processing, the source of the data and the retention period.

In the Special Part you will find information about the processing operations divided in the following paragraphs:

- I. PURCHASES ON THE WEBSITE**
- II. MARKETING ACTIVITIES RELATING TO SIMILAR PRODUCTS**
- III. FEDERATED MARKETING AND PROFILING ACTIVITIES**
- IV. PLUG-INS AND INTERACTIONS WITH SOCIAL NETWORKS**
- V. BROWSING DATA AND COOKIES**
- VI. WHEN YOU CONTACT THE CONTROLLERS**
- VII. COMPLY WITH LEGAL OBLIGATIONS AND EXERCISE OF RIGHTS BEFORE COMPETENT AUTHORITIES**

Protection and privacy of your personal data are a priority for us. This Notice is constantly updated. The head of this Notice shows the latest update date. We invite you to constantly check the Notice to be informed about any updates.

A) GENERAL PART

1. CONTROLLERS

Under this notice, **two different types of data controllers** are envisaged with respect to different types of processing. In particular, for the processing operations that are more strictly related to the transactions you conclude online we have identified two main **autonomous (or independent) controllers** (Flos and IDG).

On the other hand, **as a Group of companies, we may operate in a coordinated manner to make our great design products available in a meaningful and seamless way to our customer basis**. Therefore with your consent all the Group companies also work as **joint controllers** under the law, in order to make marketing propositions embracing our Group's full potential of product offerings designed on your needs.

The details of who does what follow below.

1.1. Autonomous data controllers

With regard to the data processing operations referred to in paragraphs I II III V VI VII of the Special Part below the following companies shall each act as autonomous controller pursuant to Article 4(7) GDPR:

- International Design Group S.p.A a socio unico._ with registered office at Via Alessandro Manzoni, 38 - 20121 Milano (Italy).
- Flos S.p.A., sole shareholder, with registered office at Via Angelo Faini, 2 - 25073 Bovezzo (Brescia) (Italy).

1.2. Joint controllers

The companies of the Group have entered into a joint controllership agreement pursuant to Article 26 GDPR, under which they determine together the means and purposes of the processing operations relating to **federated marketing and profiling activities** performed with your consent by using your personal data collected through this Site and/or when you make contacts with us on occasion of purchases made through this Site and/or because you have provided us with your data upon making inquiries or otherwise by getting in touch with us, including on occasions of visits to shops managed by the Group companies. **The specific operations for which the Group companies act as joint controllers are described in paragraph IV of the Special Part.**

The joint controllers members of the Group (collectively the **"Joint Controllers"**) are the following companies:

- Flos S.p.A. with registered office at Via Angelo Faini, 2 - 25073 Bovezzo (Brescia)
- International Design Group S.p.A. with registered office at Via Alessandro Manzoni, 38, 20121, Milano (Italy)
- Design Holding S.p.A., with registered office at Via Alessandro Manzoni, 38, 20121, Milano (Italy)
- B&B Italia S.p.A., with registered office at Via Durini 14, 20122, Milano (Italy)
- Louis Poulsen A/S, with registered office at Kuglegårdsvej 19-23, DK-1434, Copenhagen (Denmark)
- D Studio - Copenhagen ApS, with registered office at Kuglegårdsvej 13, DK-1434, Copenhagen (Denmark)
- The following affiliates of Flos S.p.A.

ARES SRL	• Via dell'Artigianato, 24 -20881 Bernareggio 8 (MB)
FLOS BESPOKE SRL	• Via Alcide De Gasperi, 2 - 25060 Collebeato (BS)
ANTARES ILUMINACIÓN SAU	• Calle Mallorca n. 1 - Polígono Industrial de Reva, Riba-roja de Túria - 46394 Valencia (ES)
FLOS BENELUX NV	• BDC/ESPLANADE 1 Bus 95 - 1020 Brussel (BE)
FLOS FRANCE SAS	• 20-22 Passage Dauphine - 75006- Paris (FR)
FLOS GMBH	• Obermünsterstr. 18 - 93047 Regensburg (DE)
FLOS BV	• Cruquiusweg 109 S - 1019 AG Amsterdam (NL)

FLOS SCANDINAVIA AS	Sydhavnsgade 28 - 2450 Koebenhavn (DK)
FLOS SVERIGE AB	Lützengatan 1 - 115 20 Stockholm (SW)
FLOS NORGE AS	Sjølyst Plass 4 - 0278 Oslo (NO)
FLOS UK LTD	Crown Chambers, Princes Street, Harrogate, North Yorkshire - HG1 1NJ (GB)

- The following affiliates of Louis Poulsen A/S

Luminous Designs Investment ApS	Kuglegårdsvej 19 - 1434 Copenhagen (Denmark)
Louis Poulsen Germany GmbH	Liesegangstrasse 17 D-40211 Düsseldorf - Postfach 190136 D-40111 Düsseldorf (Germany)
Louis Poulsen Sweden AB	Box 23013 S-104 35 Stockholm (Sweden)
Louis Poulsen Norway AS	Lysaker Brygge 37/39 N-1366 Lysaker (Norway)
Louis Poulsen Finland Oy	Kyllikinportti 2 FIN-00240 Helsinki (Finland)
Louis Poulsen Japan Ltd.	AXIS Building 3F Minato-ku - Tokyo Japan 106-0032
Louis Poulsen UK Limited	c/o Goodwille Limited - St James House 13 Kensington Square - London W8 5HD (United Kingdom)
Louis Poulsen Switzerland AG	Töpferstrasse 5 - CH-6004 Lucerne (Switzerland)
Louis Poulsen Holland BV	Dorpsstraat 18 - 1431 CD Aalsmeer Postbus 375 - 430 AJ Aalsmeer (Nederland)

- The following affiliates of B&B Italia S.p.A.

Arc Linea Arredamento Spa	Viale Pasubio 70, Caldogno, Italia
B&B Italia London Ltd	250 Brompton Road, Cross SW3 2AS, London (UK)
B&B Italia München GmbH	Maximilianplatz 21, Munich (Germany)
B&B Italia Paris S.à.r.l.	3 Rue du Colonel Moll, 75017 Paris (France)
B&B Italia Contract France sas	33 Rue Galilee, 75116, Paris (France)

The essence of the joint controllership agreement entered into by the companies of the Group can be consulted at the end of this privacy policy.

2. HOW YOUR PERSONAL DATA ARE PROCESSED

Your personal data are processed through computer, automated and/or manual means in compliance with the principles of lawfulness, fairness, transparency, accuracy, integrity, data minimization and purposes and storage limitation, as well as in accordance with the provisions of the GDPR and applicable legislation on the protection of personal data. Personal data are collected, elaborated, transferred and stored by using appropriate security measures (physical, logical and organisational) to protect them from possible breaches (such as destruction, loss, alteration, unauthorised disclosure or accidental or unlawful access to such personal data) and to ensure that processing is carried out only for the purposes described in this Notice.

3. WHO YOUR PERSONAL MAY BE DISCLOSED TO

When necessary for the purposes described in this Notice, your personal data may be disclosed to third parties as shown in this paragraph.

a) Design Holding Group (Joint Controllers)

Under the abovementioned joint controllership agreement your personal data can be disclosed to and shared between the companies of the Group (*i.e.* the Joint Controllers) for federated marketing and profiling purposes. Details of the mentioned processing operations are provided at paragraph III of the Special Part.

b) Calicantus S.r.l. (“Calicantus”)

Products marketed on this Site are sold on behalf of IDG by Calicantus. Therefore, Calicantus, acting as merchant of the records for IDG, will be your contractual counterparty and will be acting as IDG’s data processor. However, as Calicantus is the seller of the Flos branded products sold through this website, they will also need to keep records of transactions with you for their own administrative and accounting purposes. For these specific purposes only, they will also process your personal data as autonomous controller. Please refer to Calicantus privacy notice that can be accessed here <https://calicant.us/en/privacy-en.html>

c) Data processors

Flos, IDG and the Joint Controllers, where applicable, have appointed third parties for the provision of services relating to the Site (*e.g.* webmaster, IT consultant and system integrator, e-commerce platform, CRM marketing platform, customer care service provider). Such third parties will process your personal data on behalf and under the instructions of Flos, IDG or, where applicable, the Joint Controllers or one of them acting as agent, acting as processors pursuant to Article 28 GDPR.

These subjects have been selected among professionals who guarantee the implementation of appropriate technical and organizational measures, so that the processing is always carried out in compliance with applicable legislation and ensuring the protection of data subjects’ rights.

d) Other third parties

Your personal data might be disclosed to other third parties that would process it as autonomous controllers, such as:

- Carriers of products purchased through the Website.
- Providers of payment services or payment gateways/platforms used to purchase products through the Website (*e.g.* PayPal, credit card service providers, banks, financial intermediaries etc.).

- Third parties in the context of any mergers/acquisitions that may involve the Group, to the extent strictly necessary for the purposes of the transaction based on a legitimate interest, and in any event to the extent permitted by the applicable law.
- Professionals such as lawyers, auditors or accountants.
- Third parties such as judicial and/or administrative authorities, law enforcement agencies where necessary for the exercise or protection of rights of Flos, IDG and/or, where applicable, the Joint Controllers as well as to comply with statutory obligations.

You may request more detailed information on those subjects to whom your personal may be disclosed s by contacting us as indicated in the paragraph "How to contact the controllers".

4. TRANSFER OF PERSONAL DATA OUTSIDE THE EEA

For the purposes of the processing described in this Notice your personal data may be transferred to countries outside the European Economic Area ("EEA"), which includes all Member States of European Union, Norway, Liechtenstein, and Iceland.

If that the case, we ensure that all possible transfers outside the EEA will be made in such a way as to guarantee the full protection of your rights and freedoms. Namely, with regard to the third country to which the data is transferred, if no adequacy decision has been taken by the European Commission, the data transfers will be carried out by relying on an appropriate safeguard pursuant to Article 46 GDPR. Furthermore, a data transfer impact assessment considering the relevant legislation of the third country concerned will be always carried out in order to determine if your data would be actually protected in case of transfer outside EEA or if further security measures are necessary. Please note that Japan, the United Kingdom and Switzerland, countries in which some of the Joint Controllers are established, benefit from adequacy decisions of the EU Commission.

5. YOUR RIGHTS

In accordance with the applicable legislation, and in particular with the provisions of the GDPR, your rights in relation to the personal data that we process under this Notice are the following:

- **Access:** you can obtain information about the processing of your personal data and a copy of that personal data (art. 15 GDPR);
- **Rectification:** if you believe that your personal data is inaccurate or incomplete, you may request that such data be corrected or modified by following your instructions (art. 16 GDPR);

- **Erasure:** except as provided for by applicable laws, you have the right to request the erasure of your personal data, when: (i) the data are no longer necessary for the purposes for which they were collected and processed; (ii) you withdraw your consent to the processing if processing is based on your consent; (iii) you object to the processing for direct marketing purposes or to the processing carried out for other purposes and there are no overriding legitimate grounds to continue with the processing; (iv) your data are processed unlawfully; (v) the erasure is required by law (art. 17 GDPR); (vi) you are a child and your personal data have been collected in relation to the offer of information society services directly to you;
- **Restriction:** you may request the restriction of the processing of your personal data where: (a) you contest the accuracy of the personal data for the period necessary to verify their accuracy; (b) the processing is unlawful and you request the restriction of their use instead of erasure; (c) the controller no longer needs the personal data for the purposes of the processing, but you require them for the establishment, exercise or defence of legal claims; (d) you have objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds of the controller override yours (art. 18 GDPR);
- **Object:** on grounds relating to your particular situation, you have the right to object to processing of your personal data based on the legitimate interest of the controller (Article 6(1)(f) GDPR) and the controller will continue to process your data only if there are compelling legitimate grounds for the processing which override your interests, rights and or for the establishment, exercise or defence of legal claims. Your right to object to direct marketing purposes is absolute and can be exercised at any time in the manner indicated in the "How to contact the controllers" section. Your objection to processing carried out through automated means is also valid for processing carried out with traditional means (art. 21 GDPR);
- **Withdrawal of consent:** if the processing of your personal data is based on consent, you have the right to withdraw your consent at any time (art. 7 GDPR);
- **Data portability:** where the processing is based on consent or on a contract and is carried out by automated means, you have the right to obtain in a structured format, commonly used and machine-readable format the personal data you provided us with and, where technically feasible, to have them transmitted to another data controller.

6. HOW TO CONTACT THE CONTROLLERS

To exercise your rights, and for any query or clarification on how your personal data are processed and used pursuant to this Notice, you can contact:

a) for the processing operations for which Flos and IDG act as autonomous controllers,

Company	Contact details
International Design Group S.p.A.	E-mail: privacy@designholding.com
Flos S.p.A.	E-mail: privacy@flos.com

b) for the processing operations for which the Group companies act as joint controllers, the single point of contact identified below:

Company	Contact details
International Design Group S.p.A.	e-mail: privacy@designholding.com

7. HOW TO EXERCISE YOUR RIGHTS

In order to protect your rights and your personal data, you may at any time decide to lodge a complaint with the competent supervisory authority or to bring an action before the competent national courts.

Anyway, the controllers always invite you to contact them first for any need relating to your personal data.

8. CHANGES TO THIS NOTICE

This Notice is subject to periodic updates. To this end, we indicate the last update date at the beginning of this Notice. If you have already submitted your personal data, any change that substantially affects the processing of personal data, will be communicated to you through the appropriate channels in order to ensure that you are effectively aware of the way your data is processed, with a view to full transparency of the processing operations and full and adequate protection of your rights.

B) SPECIAL PART

As referred above, each paragraph of this Special Part describes the processing activities carried out within the Site by Flos, IDG and, where applicable, the Joint Controller. Please click on the title to access to the relevant information for each processing.

I. PURCHASES ON THE SITE

This paragraph describes how your personal data are processed when you purchase Flos branded products from the Site. Namely, you can purchase those products in two ways:

1. As a "Guest",

You are a Guest when you purchase a product from the Site without first creating an account as registered user. Please note that at the time of concluding the purchase, you will be required to read this Notice but not to provide your consent for the processing of data for marketing and profiling purposes determined by the Joint Controllers - so-called "**federated marketing activities**". This will instead be required after the conclusion of the purchase (at the "**Thank you**" page) and your personal will not be processed for marketing or profiling purposes if you do not provide your consent at this occasion, without this affecting the proper performance of the purchase. Further information about the federated marketing activities is reported in Section III below of this Special Part.

2. As a registered user

You are a registered user when you create an account on the Site. Please note that when you create the account, you will also be required to provide your consent for the processing of your data for marketing and profiling purposes established by the Joint Controllers (so-called "**federated marketing activities**"). For further information about those processing activities please check Section III below of this Special Part.

In any case, your data will be processed by IDG and Flos as autonomous controller. IDG is the company that materially directs the Product offerings under the Site and on behalf of which Calicantus S.r.l. will sell the Products to you; Flos is the manufacturer of the Products you may purchase and as such under contractual arrangements with IDG will be the company in charge of enabling precontractual and post contractual activities (such as product picking for shipment, product assistance, product replacement and other product warranty related services).

You will in any event enter into the online purchase contract for the products with Calicantus, which will process your data as autonomous controller for the purpose of performing it and for related administrative and accounting purposes. For detailed information about how Calicantus processes your personal data please check their privacy policy at <https://calicant.us/en/privacy-en.html>

Controllers	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
IDG Flos S.p.A.	Personal information (name, surname) Contact details (e-mail address, phone number)	Creation of an account on the Website <u>Legal Basis:</u> need to perform a contract - Article 6(1)(b) GDPR	Data subject	Impossibility to create an account on the Website	Data retained until the cancellation of the account* *Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority
IDG* Flos S.p.A. *Purchase agreement entered into with Calicantus.	Personal information (name, surname, tax code) Country of residence Zip code and address Contact details (e.g. phone number,	Performance of the purchase agreement <u>Legal Basis:</u> need to perform a contract - Article 6(1)(b) GDPR	Data subject	Impossibility to proceed with the purchase	10(ten) years after the purchase* *Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority

	domicile/physical address, e-mail address)				
	Invoice data				
	Payment data				

II. **MARKETING ACTIVITIES RELATING TO SIMILAR PRODUCTS**

This paragraph describes how your personal data can be processed by IDG and/or Flos for marketing purposes relating to products similar to those you have purchased. Pursuant to the applicable legislation, those processing activities do not need your consent but are based on the legitimate interest of the controller. Anyway, you always have the right to object to the processing pursuant to Article 21 GDPR.

Please note that the mentioned marketing activities can refer not just to Flos branded products but also to products of the other brands and companies of the Group, without your data being transferred to those subjects for those purposes. These activities are, indeed, different from the federated marketing activities jointly determined by the companies of the Group as Joint Controllers described in Section III below.

Controller	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
IDG Flos S.p.A.	Personal information (name, surname) E-mail address	Marketing activities (i.e. newsletter, promotional communications via e-mail) relating to products similar to those you purchases	Data subject	N/A	24 (twenty-four) months from the last purchase* *Extension possible if necessary to comply with a legal

		<u>Legal Basis:</u> legitimate interest of the controller* - Article 6(1)(f) GDPR and Article 130(4) Legislative Decree n. 196/2003 *Opt-out always granted			obligation or to defend a right before a competent authority;
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III. **FEDERATED MARKETING AND PROFILING ACTIVITIES**

This paragraph describes how your personal data can be processed by the Joint Controllers (*i.e.* the companies of the Design Holding Group listed above in Section 1 of the General Part of this privacy policy) for marketing and profiling purposes jointly determined by them under the joint controllership agreement they entered into.

With your consent, personal data processed according to this paragraph will be stored on a common database within the Group and shared among each company of the Group which may use them for engaging in marketing activities relating to products of the Group.

Furthermore, with your specific consent, your personal data may be used for profiling operations aimed at the realization of personalized marketing messages and/or product offerings based on your preferences (including activities and purchases concluded on the Website and possibly other data that we may correlate). Profiling can also be based on personal information collected through cookies, as better explained in the cookie policy which can be accessed through this Site.

Joint Controllers	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
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<p>IDG Flos S.p.A. Design Holding S.p.A. B&B Italia S.p.A Louis Poulsen A/S The Affiliated Companies listed in <u>Section 1 of the General Part of this Privacy Policy</u></p>	<p>Personal information (name, surname, tax code) Purchase history. Country of residence Zip code and address Contact details (e.g. phone number, e-mail address) Invoice data Payment data</p>	<p>Marketing activities (i.e. newsletter, promotional communications via e-mail, telephone, sms, and ordinary mail, surveys, market searches) relating to the Group's products, services and initiatives. <u>Legal Basis:</u> your consent - Article 6(1)(a) GDPR</p>	<p>Data subject</p>	<p>Impossibility to receive marketing communications concerning the Group. No consequences for the purchase or the other activities on the website</p>	<p>24 (twenty-four) months from the consent* *Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority;</p>
<p>IDG Flos S.p.A. Design Holding S.p.A. B&B Italia S.p.A</p>	<p>Personal information (name, surname, tax code) Country of residence Zip code and address</p>	<p>Profiling activities aimed at the realization of personalized marketing messages and/or offerings based on your preferences</p>	<p>Data subject</p>	<p>Impossibility to receive personalized marketing communications from the Group. No consequences for the purchase or the</p>	<p>12 (twelve) months from the consent* *Extension possible if necessary to comply with a legal obligation or to defend a right</p>

<p>Louis Poulsen A/S The Affiliated Companies listed in <u>Section 1 of the General Part of this Privacy Policy.</u></p>	<p>Contact details (e.g. phone number, e-mail address)</p> <p>Invoice data</p> <p>Payment data</p> <p>Your preferences for the Group's products</p> <p>Your previous purchases and activities on the Site</p> <p>Your belonging to specific clusters identified by age/gender/profession</p>	<p>(including activities and purchases done on the Website) and relating to products of the Group's companies</p> <p><u>Legal Basis:</u> your consent - Article 6(1)(a) GDPR</p>		<p>other activities on the website</p>	<p>before a competent authority</p>
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IV. PLUG-INS AND INTERACTIONS WITH SOCIAL NETWORKS

The Site may interactions with third parties websites (e.g. the other companies of the Group) and social networks (e.g. Facebook, Instagram, LinkedIn) through hyperlink, sharing button, social plug-in and other similar instruments.

By accessing one of the areas of the Site equipped with this type of tool, the Internet browser will connect the data subjects directly to the servers of the third-party websites in question, thus transferring their personal data to the providers of those Websites.

Depending on the specific agreements in place with the providers of such third-party websites, IDG and/or Flos may act as autonomous controller or joint controllers with respect to such data transfers. With regard to the methods of privacy protection and processing of personal data collected by the operators of third- party websites with which the interactions described above occur, please refer to the relevant websites.

V. BROWSING DATA AND COOKIES

When a user visits the Site, the controllers may collect the following browsing information:

- Technical information, including IP address,
- Information about the devices used by users, browser and operating systems, etc.
- Information about navigation on the Site, including URLs of the pages visited and activities that are performed on the page, dates and times of navigation, time spent, clickstream.

This information is collected for the proper operation, management, maintenance and improvement of the Site, as well as to ensure that users' browsing is safe and to be able to establish liability in the event of security breaches. They may also be used to allow us to obtain statistics on the use of the Website with the possibility of analyzing the data also in aggregate form and to carry out profiling activities.

Users are always free to decide whether to provide the controllers with their browsing data, for example by choosing to disable cookies through the settings of their browsers. However, refusal to provide information necessary for navigation purposes may make it impossible to carry out activities strictly related to navigation itself and, therefore, also to consult and interact with the Website.

We keep these data only for the time strictly necessary for the purposes for which they are collected.

Through the Website, navigation data is collected through the use of cookies. To learn more about how cookies work, and how to activate and deactivate them, please consult our cookie policy which is accessible through this Site.

VI. WHEN YOU CONTACT THE CONTROLLERS

In this paragraph are described processing activities carried out by Flos, IDG and/or the Joint Controllers for the purpose of dealing with your requests made when you contact us through the relevant contact channel provided through the Website.

Controllers	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
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<p>IDG</p> <p>Flos S.p.A.</p> <p>Design Holding S.p.A.</p> <p>B&B Italia S.p.A</p> <p>Louis Poulsen A/S</p> <p>The Affiliated Companies listed in <u>Section 1 of the General Part of this Privacy Policy.</u></p>	<p>Personal information (e.g. name, surname)</p> <p>Contact details (e.g. e-mail address, phone number, postal address)</p> <p>Information contained in your request and provided to the controllers</p>	<p>Deal with and provide a feedback to your requests</p> <p><u>Legal Basis:</u> consent (provided with a clear affirmative action while contacting us seeking information)</p> <p>- Article 6(1)(a) GDPR</p>	<p>Data subject</p>	<p>Impossibility to deal with your requests</p>	<p>Time necessary to deal with and provide a feedback to your requests*</p> <p>*Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority</p>
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VII. COMPLY WITH LEGAL OBLIGATIONS AND EXERCISE OF RIGHTS BEFORE COMPETENT AUTHORITIES

This paragraph describes the processing operations carried out by Flos, IDG and/or the Joint Controllers for the purpose of exercise of their rights before a competent authority or to comply with legal obligations imposed on them.

Controllers	Categories of data	Purpose and legal basis of the processing	Source of data	Consequences of not providing data	Retention period
IDG Flos S.p.A. Design Holding S.p.A. B&B Italia S.p.A Louis Poulsen A/S The Affiliated Companies listed in Section 1 of the General Part of this Privacy Policy.	Personal data collected according to the precedent paragraphs and other data that can be suitable for the specific intended purpose	Exercise and/or defence of a right before a competent authority (e.g. judicial, administrative) <u>Legal Basis:</u> legitimate interest of the controller - Article 6(1)(f) GDPR	Data subject	N/A	Time necessary for the purpose of exercise and/or defend the specific right involved* Extension possible if necessary to comply with a legal obligation or to defend a right before a competent authority
IDG Flos S.p.A.	Personal data collected according to the precedent paragraphs and	Compliance with a legal obligation	Data subject	N/A	Time necessary for the purpose of complying with the

Design Holding S.p.A. B&B Italia S.p.A Louis Poulsen A/S The Affiliated Companies listed in <u>Section 1 of the General Part of this Privacy Policy.</u>	other data that can be suitable for the specific intended purpose.	<u>Legal Basis:</u> need to comply with a legal obligation - Article 6(1)(c) GDPR			legal obligation concerned
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ESSENCE OF THE JOINT CONTROLLERSHIP AGREEMENT PURSUANT TO ART. 26 (2) GDPR

This information is provided in accordance with Art. 26 (2) ("GDPR"). It describes the essence of the Joint Controllership Agreement pursuant to Art. (26) GDPR signed by the companies that are part of the Design Holding Group.

1- The Parties

The companies that are part of the Agreement are the following:

- **Design Holding S.p.A. (VAT NUMBER IT10446470964)**, with registered office at Via Alessandro Manzoni, 38, 20121, Milano (Italy)
- **Flos S.p.A. (VAT NUMBER IT00290820174)**, with registered office at Via Angelo Faini, 2, 25073, Bovezzo (Italy)
- **B&B Italia S.p.A. (VAT NUMBER IT07122350965)**, with registered office at Via Durini, 14, 20122, Milano (Italy)
- **Louis Poulsen A/S (VAT NUMBER DK59742817)**, with registered office at Kuglegårdsvej 19 DK-1434 København K, Copenhagen (Denmark)
- **International Design Group S.p.A. (VAT NUMBER IT 10462810960)**, with registered office at Via Alessandro Manzoni 38 - 20121 Milano (Italy)
- **D Studio - Copenhagen ApS**, with registered office at Kuglegårdsvej 13, DK-1434, Copenhagen (Denmark)
- As well as the Affiliates of the above companies as listed in para. 1.2 of the privacy policy.

The Agreement is open to the adhesion by other companies that are or will in the future become part of the same group of Companies (currently Design Holding group).

2- Subject matter of the Agreement

The Parties intend to implement a wide-group marketing strategy aimed at the promotion of all DH Group Brands, which includes the processing of Personal Data relating to their Customers for marketing and profiling purposes. Accordingly, subject to the specific consent of the Data Subjects, each Party shall transfer the Personal Data of its Customers into a common database held and managed by Design Holding, which is accessible by all Parties. Personal Data included in the database can be processed for common marketing and profiling activities relating to the Brands of DH Group, either wholly or singularly.

Notwithstanding the fact that Design Holding hosts and directly manages the database, the Parties jointly determine the means and purposes of the Federated Activities and shall therefore qualify as joint data controller pursuant to Article 26 of the GDPR. The Parties define every aspect relating to the performance and implementation (either by themselves or through third parties appointed as Processors) of the Federated Activities, if necessary also through the conclusion of specific and additional written agreements detailing the personal data shared, the means, the purposes of the Federated Activities, the security measures to be adopted and the relevant technical standards.

The Parties acknowledge that, with regard to the processing activities of personal data different from the Federated Activities carried out under the Agreement each Party shall autonomously determine the purposes and means of processing. Therefore, in this respect, each Party shall qualify as autonomous Controller and it assumes separate responsibilities under applicable legislation.

3- General obligations of the Parties

The Parties will carry out the Federated Activities through computer, automatized and/or paper instruments in compliance with the principles of fairness, lawfulness, transparency, accuracy, integrity, data minimization and purpose and storage limitation, as well as in accordance with the provisions of the GDPR and the applicable data protection legislation.

The Parties guarantee the security and confidentiality of the personal data subject to the Federated Activities in light of the GDPR and applicable data protection legislation.

The Parties undertake to process the Personal Data falling under the Federated Activities only for the purposes for which they agreed and, also after the termination for any reason of the Agreement, not to use the Personal Data for different purposes, unless this is necessary for the fulfilment of legal obligations or for the protection of the Parties' rights before any competent authorities.

The Parties undertake to adopt all technical, logic and organizational security measures pursuant to Article 32 GDPR, in order to guarantee the protection of Personal Data processed under the Agreement and to ensure a level of security appropriate to the risks to the rights and freedoms of the Data Subjects.

Should this be necessary to ensure the proper carrying out of the Federated Activities, each Party shall undertake to adopt and sign with third parties - the Processors - specific contracts or other legal acts pursuant to Article 28 of the GDPR, according to Article **Error! Reference source not found.** above.

In case of a Personal Data Breach (as defined in Article 4(12) of the GDPR), or in the event that a Party has reason to suspect that such a breach may reasonably occur, it will notify the other Parties immediately and in any case within a maximum of 12 (twelve) hours from the moment in which it became aware of the breach or from the moment in which it became aware of information that would suggest the occurrence of such a breach. In this case, each Party undertakes to provide maximum cooperation and assistance in order to identify and implement all corrective measures to eliminate or in any case limit the effects of the breach as much as possible.

4- Transfer of Data outside EEA

The Parties acknowledge and agree that if the Personal Data processed under the Agreement should be transferred or processed - also through Processors or Sub-Processors - in a country located outside the European Economic Area ("**EEA**") for which no adequacy decision has been issued by the European Commission, they shall resort to one of the mechanisms provided for by Articles 46 ff GDPR. In particular, the Parties shall resort to the standard clauses for the transfer of personal data to third countries approved by the European Commission, as well as assess the actual level of protection of personal data ensured to the Data Subjects in the aforementioned country. The Parties shall take into account both the mechanisms pursuant to Articles 46 ff GDPR concretely adopted and the legislation of that third country of destination, and adopt, if necessary, additional security measures aimed at the protection of personal data, such as cryptography.

5- Rights of the Data Subjects/Single Point of Contact

The Parties have designated a single contact point of contact for the exercise of the Data Subjects rights pursuant to Articles 15-22 GDPR, this being International Design Group S.p.A., that can be contacted at the following e-mail address: privacy@designholding.com (the "Leading Party").

Notwithstanding the foregoing, Data Subjects may validly contact each of the Parties in order to enforce their rights with respect to the Federated Activities and each Party shall comply with the same procedure established by the Parties for the management of Data Subjects' requests. If necessary, the Party who first receives the request (the "Receiving Party") shall communicate it to the other Parties within 3 working days, sending them a copy, in order to collaborate actively to give timely feedback to these requests and agree on the actions to be taken in accordance with the provisions of paragraph 3 below.

All requests made by the Data Subjects to enforce their rights must be delivered in a manner that allows the verification of the identity of the relevant Data Subjects (e.g. by means of a named email address) and the identity of persons that they may appoint as their representative.

The Receiving Party shall provide the Data Subjects with information on action taken on their requests without undue delay and in any event within 1 (one) month of receipt of the request. That period may be extended by 2 (two) further months where necessary, taking into account the complexity and number of the requests. The Receiving Party shall inform the Data Subjects of any such

extension within 1 (one) month of receipt of the request, together with the reasons for the delay. Each response should be agreed upon in advance by the Parties before being provided. Where possible, the Receiving Party shall provide all feedbacks to the Data Subjects on privacy matters from dedicated e-mail account.

6- Liability

Where the Parties are involved in the same processing and where they are, pursuant to Article 82, paragraphs 2 and 3 of the GDPR, responsible for any damage caused by processing, each Party shall be held liable for the entire damage in order to ensure effective compensation of the Data Subject.

Each Party shall remain solely and exclusively liable for the damage caused by its own processing infringing the GDPR, as well as if it has acted in a manner that is different from or contrary to the requirements contained in this Agreement.