

1. Type and source of data

Browsing data

During their normal operation, the computer systems and software procedures used to operate our Website collect certain personal data (log files). The transmission of such data is inherent to the use of internet communication protocols. This information is not collected in order to be associated with specific data subjects. However, due to its nature, this information can allow users to be identified by means of its processing and integration with data held by third parties. Such information includes the IP addresses or domain names of the computers you use to visit our Website, URIs (Uniform Resource Identifiers) of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file obtained in reply, the numerical status code of the server reply (successful, error, etc.) and other parameters concerning the user's operating system and computer environment. This data is used with the sole purpose of obtaining anonymous statistical information on the use of our Website and to guarantee its correct operation.

Personal Data voluntarily provided by the data subject

MADÉL collects and processes the Personal Data that you directly and voluntarily provide us through our Website, by phone, email or incoming text messages and/or in any MADÉL Group stores, when you: (i) place online or other remote orders or purchase products in our stores, (ii) choose to register into the MADÉL Group customer database by creating an account online or by completing our customer card to be provided with exclusive services and benefits reserved to registered members; (iii) use other functionalities available on the Website (for example: to subscribe to our newsletter, to send a request to our Client Service, to book an appointment in the store, to connect or interact with us through social networks, etc.), (iv) interact with our Client Service team and/or sales staff, and/or (v) use our services.

Depending on what you provide us with, such data may include your first and last name, title, country, date of birth, email address(es), billing address(es), delivery address(es), telephone number(s), credit card information, details of purchases, and/or any other information regarding you that you may decide to provide during the interactions with our Client Service or with sales staff.

In addition, we may also obtain information about you as a result of authentication or identity checks (for example, you will be asked to present your identity document when you pick up your purchase in-store). Madél uses this information to identify you as a customer, to process your order, to deliver products and services and/or to process payments.

If you decide to register to the Website through the social login function, please be informed that Madél will have access to the Personal Data of your social account (for example, your email address and your public profile) in accordance with the privacy settings of the applicable social media platform. For more information, please refer to the related privacy statements on the applicable social media platform; Madél does not oversee or control such social media services or user profiles on these platforms and does not establish privacy settings or rules regarding how Personal Data is used on such platforms.

If you call our Client Service team or our Client Service team contacts you with the details you have provided to us, please note that calls may be recorded for quality assurance and record-keeping purposes. In such instance, you will be informed of this before the recording starts.

Furthermore, when you voluntarily send an e-mail through our Website and/or to the addresses indicated in our Website or when you call, send an e-mail or text to our Client Service team and/or sales staff, we collect your e-mail address and/or phone number you used to contact us, so that we can reply to any request, as well as any additional Personal Data contained in your message or provided by you within the course of your interactions with us.

Combinations: We may combine passively collected data with data that you actively submit so as to, for instance, provide better service to Website visitors, customize the Website based on your preferences, compile and analyze statistics and trends, to otherwise administer and improve the Website for your use, and to personalize offers (for example, combined information may allow us to recommend products to you based on what you have liked in the past). We may combine information collected on the Website with information collected by phone, email or incoming text message or from the in-store experience in order to provide a service customized to your needs. We may also combine information we collect about you from the different devices you use to access our Website and/or information we get from third parties with Personal Data we already have about you.

Personal Data of minors

You must be at least 16 years old (or older depending on your country or state of residence) in order to provide us with Personal Data and at least 18 years old to purchase products from our Website. Madél protects the Personal Data of minors in accordance with the relevant national laws and regulations. If Madél discovers that it has collected Personal Data about a minor without the prior consent of a verifiable parent or legal guardian, it will de-activate the minor's account and try to delete the data as soon as possible.

2. Purposes and legal bases of the processing

Your Personal Data may be processed and used for the following purposes:

- (a) to provide you with products, services and information you request from us, communicate with you and manage your relationship with Madél.
- (b) to process or fulfil your online, remote and/or other purchase orders and perform all management activities connected with them (including administrative management of the contract, delivery of goods, payment processing, invoicing, management of any products exchanges and returns, management of any claims and litigation, and fraud prevention), and to comply with any applicable legal or regulatory obligations.
- (c) to send by email the newsletters and other marketing communication regarding the MADÉL Group's products, services, initiatives and events as a result of your subscription to the service.

Furthermore, if you register to the MADÉL Group customer database (e.g. as a result of your registration to the Website, or your completion of the Customer Card) your Personal Data may be processed, together with the details of your purchases online, remotely and/or in stores, for the following purposes:

- (d) to confirm your identity as a registered MADÉL Group customer and, consequently, provide you with a global customized customer care service and post-sales assistance and allow you to access exclusive services and benefits reserved for registered members (e.g. preservation of your purchase order history, simplified procedures for product repair and warranty, commercial discounts, pre-sale and other promotional events, etc.).
- (e) to offer you a personalized and tailored experience with regards to your preferences for "Madél" and the other brands, products, and services of the MADÉL Group, including by performing statistics, market research and surveys;
- (f) to contact you and/or send you (by post, telephone, e-mail and any other form of electronic communication or digital means including social networks platforms and other instant messaging applications) information and promotions, including commercial communications, newsletters, advertising, catalogues and invitations to events concerning "Madél" and the other brands, products and services of the MADÉL Group.

We collect and use your Personal Data based on one or many of the following legal basis:

- the processing is necessary in connection with any contract between Madél and you (for example, when you make a purchase);
- we have obtained your prior consent (for example, when you opt-in to receive our marketing communications). Please note that you have the right to withdraw your consent at any time, by sending an email to madel.information@gmail.com, or by using the "unsubscribe" link included in all of our commercial electronic communications, and/or by using any other appropriate procedures which may be made available to you by Madél (e.g. by logging into your online account).
- we have a legitimate interest in carrying out the processing and that legitimate interest is not overridden by your own interests, fundamental rights, or freedoms (for example, to prevent payment fraud);
- we have to process your personal data to comply with applicable laws and regulations.

3. Nature of the provision of personal data`+++++

The provision of Personal Data is optional.

However, if you wish to make a purchase order, register to the MADÉL Group customer database, receive information on MADÉL Group's products and services, and/or use any other services offered on the Website, remotely and in-stores, you need to provide us with the required Personal Data and fill in all mandatory fields of the relevant forms. If you do not provide this information, then it may delay or prevent us from processing your request, responding to your query or providing products or services to you.

4. Processing Methods

Your Personal Data will be processed by suitable electronic or automated means and computerised tools, or manually and on hard copy, exclusively for the purposes for which they have been collected and guaranteeing the security and confidentiality of any processed information through the adoption of appropriate measures to prevent the alteration, cancellation, destruction, unauthorized access or processing or actions not in accordance with the purpose of collection. Your Personal Data will be processed by the Madél internal staff committed to the confidentiality and duly authorised to do so under their respective job duties.

5. Transfer and disclosure of data

Whenever necessary and/or instrumental to the abovementioned purposes, your Personal Data may be processed on behalf of Madél by other entities engaged by Madél in the correct and regular pursuit of the described purposes, including:

- MADÉL Group companies and franchisees that operate MADÉL Group stores;
- Third party service providers, consultants, or firms providing advisory and/or consulting activities, or performing related data processing services on behalf of Madél (e.g. software and system technology service providers, risk control service providers, payment service providers, couriers, etc.).

These third parties will act on behalf of Madél as data processor and are under a contractual obligation of confidentiality of the personal information.

Madél may also disclose specific information when such disclosure appears necessary to comply with the law, a subpoena or other litigation process or to protect the interests or safety of its visitors and customers, Madél employees or others.

As Madél is part of an international network your Personal Data may be transferred abroad, even temporarily, in accordance with applicable legislation, including to locations outside the European Union, by adopting all appropriate security measures and safeguards to ensure an adequate level of data protection and security.

Your Personal Data will not be used for third-party advertising purposes or for the promotion of products, services or initiatives by entities other than the MADÉL Group, nor shall they be disclosed to unknown persons under any circumstances.

Data communication within the MADÉL group

Please also note that if you register on the MADÉL Group customer database for the purposes referred to in sections 2. letters (e)-(g), your Personal Data will be shared with all MADÉL Group stores globally to provide you with the same level of service around the world. Madél will take all appropriate and suitable security and confidentiality measures as required by applicable legislation to ensure an adequate standard of data protection.

6. Retention period

Your Personal Data will be processed and stored for: (a) as long as required to carry out the purposes for which the Personal Data were collected, (b) in accordance with the storage periods provided for by the applicable laws, or (c) until you revoke your consent to the processing/storage of your Personal Data, if applicable. After the conclusion of such period(s), and where there is no legal or business purpose for retaining your Personal Data, it will be automatically and permanently erased or made anonymous.

In particular, regarding the data processing of registered members into MADÉL Group customer database:

- Personal Data collected for the purposes of customer management to offer personalized services and advantages reserved for registered members, are kept for a period of 7 years from the date of your last interaction with the MADÉL Group; and
- Purchase details are kept for a period of 7 years from the date of purchase.

7. Data Controller and contacts

Group Data Protection Officer

e-mail: madel.information@gmail.com

If you have any requests regarding your Personal Data, any inquiries regarding this Privacy Policy, or you would like to exercise your rights, please contact the Group Data Protection Officer or the Data Controller by writing to the addresses listed above.

8. Your rights

Please note that you may exercise your rights under the applicable data protection laws at any time by contacting Madél at the addresses indicated in the previous paragraph, including the right to request information as to whether your Personal Data is being processed and as to the characteristics of the processing, the right to rectification and erasure of your Personal Data, to limitation of the data processing and/or the right to object to the processing, and/or to lodge a complaint with the competent supervisory authority or take legal action if you believe there is non-compliance with the provisions of the applicable laws.

You also have the right to withdraw your consent for the processing of your Personal Data by Madél at any time, without charge. The withdrawal of your consent will not affect the lawfulness of processing based on your consent before its withdrawal.

Madél reserves the right to amend this Privacy Policy at any time, and if we change it materially, we will post a revised version on the Website and obtain your consent if required by applicable law. The Privacy Policy currently in force is the one published on the Website.