

PRIVACY POLICY REGARDING THE PROTECTION AND USE OF PERSONAL DATA BY DALBELLO

also pursuant to section 13 of Italian Legislative Decree No. 196 of 30 June 2003

Calzaturificio Dalbello srl is a company registered in Italy with registered office in Via Frattalunga 12, 31011 Asolo (TV), Italy.

The protection of personal data is a question of trust and for Dalbello the trust of Customers is a priority. That is why Dalbello respects the private and personal sphere of its Customers and complies with every applicable law relating to the processing of personal information. Dalbello hereby informs Customers of the purposes and methods of processing the personal information collected through the filling in of forms to be found on its website and requests consent to use the same for established purposes.

By reading through this privacy policy, Customers will be informed of the purposes and methods of processing the personal information collected through the website www.dalbello.it, www.dalbellosport.com. Customers may browse the website www.dalbello.it, www.dalbellosport.com in general without having to provide any personal information. At no time will it be possible to identify Customers while they are browsing the aforesaid website. Customers therefore remain anonymous.

Customers may print or save this privacy policy using normal browser functions ("File" => "Save as"), or download it in PDF format and file it. To view the PDF file you need to use the free Adobe Reader software (available on the website www.adobe.it) or other equivalent software which supports the PDF format.

1. COLLECTION AND PROCESSING OF PERSONAL DATA

1.1 Collection and processing of personal data

The specific purposes and methods of processing the personal data of Customers collected through the website www.dalbello.it, www.dalbellosport.com are listed below.

Subscribing to the newsletter: by subscribing to the newsletter Customers will accordingly receive information and news regarding Dalbello. Customers may naturally contact Dalbello, also anonymously i.e. with a pseudonym (e.g. through a free e-mail address that does not disclose their name). Dalbello stores the collected data for long periods, it being agreed that such information will in any case be used solely for the purposes set out in this privacy policy.

It should be noted that Customers will only receive the newsletter if they give their permission to it being sent and in any case can stop receiving the newsletter with no charge by making the relative request via e-mail to info@dalbello.it or by clicking on the "unsubscribe" option to be found in every newsletter. Providing the information is, however, compulsory for the purpose of subscribing to the newsletter; any refusal to provide the requested data could therefore make it impossible to subscribe to the newsletter and to receive the aforesaid information.

Consulting websites and newsletters: when Customers visit the website www.dalbello.it, www.dalbellosport.com, also by using a link in a newsletter, certain data are collected and saved. The domain name or IP address of the access computer are saved temporarily for security reasons and erased after a maximum of 7 (seven) days. Other information may also be saved, such as the date of access, the http response code and the website from which there was the readdressing to the website www.dalbello.it, www.dalbellosport.com, as well as the quantity of data (bytes) that have been transmitted. Data analysis is strictly anonymous (e.g.: 45% of newsletter readers have read the message xy). This process allows Dalbello to adapt the information contained in its offers to the interests of newsletter subscribers.

Competitions: in the event of any prize competitions, Dalbello will use Customers' personal data (e-mail address) to notify results. Customers may obtain more detailed information by looking at the conditions for taking part prepared case by case for each single competition.

1.2 Saving personal information through cookies

It is not compulsory to accept the use of cookies while browsing the website www.dalbello.it, www.dalbellosport.com. Cookies are used in the website www.dalbello.it, www.dalbellosport.com. Cookies are text files recorded on a computer medium and allow the recording of certain parameters and data communicated to the Dalbello system

through the browser used by the Customer and allow the latter's habits in using a certain website to be analysed. Many of the cookies that are used are cancelled automatically from the hard drive of the customer's computer at the end of every browsing session (hence the name "session cookie"). There are, however, cookies which remain on the hard drive. They remain there for a relatively long time (a few years) for more practical reasons. Upon every visit to the site after the first visit, the system will be able to recognise that the Customer has already been on that site and the Customer's requests and preferred data will therefore be retrieved (persistent cookies). The website www.dalbello.it, www.dalbellosport.com uses the service "Google Analytics" provided by Google Inc. ("Google"). Google uses cookies. The information obtained through cookies regarding the Customer's habits in respect of website usage (including IP address) is transferred to a Google server located in the USA, where it is stored. Google complies with the provisions of the Safe Harbor Principles relating to data protection and adheres to the Safe Harbor program of the US Department of Commerce. Google uses this information to analyse website usage by the Customer, to provide Dalbello with reports on visits to the website www.dalbello.it, www.dalbellosport.com, and for other communications related to use of the same website and to use of the Internet in general. Google transfers this information to third parties when required to do so by law or when such third parties process the aforesaid information on behalf of Google. Under no circumstances will Google associate the customer's IP address with any other information in Google's possession. Customers may refuse installation of the cookies by selecting the corresponding parameters in the specific options on their browser. It is specified, however, that in doing so Customers will be unable to use to the full certain website functions. By using this website, Customers consent to the processing of their data collected by Google with the aforementioned methods and for the aforementioned purposes.

2. EXPRESS CONSENT OF THE PERSON CONCERNED

Where expressly requested in the website, the person concerned shall give consent for the processing and communication of personal data for the purposes and with the methods described in Section 1 above. This consent is recorded in the Dalbello systems and may be revoked by Customers at any time and with immediate effect.

3. DATA PROCESSING METHODS

It is hereby specified that the collected data are organised in hardcopy files and in electronic databases; the data are processed using manual, computerised and telematic tools and procedures suitable to guarantee the security and confidentiality thereof, in any case in compliance with the minimum security measures provided for by law.

4. SCOPE OF ACCESS TO DATA – COMMUNICATION AND DISCLOSURE OF DATA

Dalbello staff and in particular marketing personnel may be acquainted with the data collected.

5. RIGHTS OF THE PERSON CONCERNED

The Customer is entitled to obtain an indication of the source of the personal data as well as the purpose and methods of processing and of the logic applied in the processing carried out with the aid of electronic tools, just as he/she is also entitled to know the details of the data controller and the data processor, the representatives of the latter and the persons or categories of persons to whom the personal data may be disclosed or who may have knowledge thereof.

The Customer is entitled to have: (a) such data updated, rectified or, when so interested, completed; (b) such data erased, transformed into an anonymous form or blocked with regard to information processed unlawfully, including information whose retention is unnecessary for the purposes for which it was collected or subsequently processed; (c) a statement to the effect that the procedures specified under letters (a) and (b) have been made known, also with regard to the content thereof, to those to whom the information has been communicated or disclosed, unless this requirement proves impossible or entails a clearly disproportionate effort compared to the protected right.

The Customer is entitled to object, in whole or in part: (a) on legitimate grounds, to the processing of the personal information that relates to him/her, even if pertinent to the purpose of the collection; (b) to the processing of personal information that relates to him/her for the purpose of sending advertising material or direct sales or for carrying out market research or for business communications.

6. DATA CONTROLLER AND DATA PROCESSOR

The data controller is **Calzaturificio Dalbello srl**, company existing and operating under Italian law with registered office in Via Frattalunga 12, 31011 Asolo (TV), Italy.

5. AMENDMENTS TO THIS PRIVACY POLICY

Dalbello may, from time to time, amend this privacy policy or change, modify or withdraw access to this website at any time with or without notice.