

DATA PROTECTION POLICY

Information on the processing of personal data provided pursuant to and in accordance with article 13 of Legislative Decree no. 196 of 30 June 2003

In compliance with Legislative Decree no. 196 of 30 June 2003 (Italian Data Protection Act) as amended, please find forthwith the information duly provided regarding the processing of the personal data you have supplied us with. This information is not to be held valid for other websites you may consult via links present on websites belonging to the Data Controller, who may not be considered in any way responsible for the websites of third parties. This information is also provided pursuant to art. 13 of Legislative Decree no. 196/2003 - Italian Data Protection Act. It is also inspired by Recommendation no. 2/2001, which the European data protection authorities, gathered together in the Group set up under art. 29 of Directive no. 95/46/E (<http://www.garanteprivacy.it/garante/document?ID=432175>) C, adopted on 17 May 2001 to identify a number of minimum requisites for the collection of personal data on-line, and specifically, the means, times and nature of the information the

data controllers must provide to users when they visit web pages, regardless of the reason for their visit, and by the provisions of Directive no. 2002/58/CE, as updated by Directive 2009/136/E (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:337:0011:0036:it:PDF>) C, regarding cookies.

1. THE DATA CONTROLLER , pursuant to article 28

(<http://www.garanteprivacy.it/web/guest/home/docweb/-/docweb-display/docweb/1311248#articolo28>) of the Italian Data Protection Act, is Moleskine spa - Viale Stelvio, 66 - 20159 Milan, in the person of the legal representative pro-tempore.

THE DATA SUPERVISOR , pursuant to article 29

(<http://www.garanteprivacy.it/garante/doc.jsp?ID=1311248#articolo29>) of the Italian Data Protection Act, is Alkemy SpA – via San Gregorio 34, milano (IT), in the person of the legal representative pro-tempore

WHERE DATA ARE PROCESSED

Data are processed at the headquarters of the Data Controller and at the premises of identified third parties, for example for maintenance and hosting.

2. TYPE OF DATA PROCESSED

Identifying personal data.

Personal data, any information regarding a physical person that has been or may be identified, directly or indirectly, by means of reference to any other information, including a personal identification number (such as for example name, surname, date of birth, address, e-mail address, telephone number, etc....).

Identifying data, personal data that allow for the direct identification of the party concerned.

Data on website use ;

The IT systems and software procedures used for the functioning of this website acquire, during normal usage, some personal data, the transmission of which is implicit in the use of internet communication protocols. This information is not collected for association with identified interests, but given its very nature, users could be identified by means of this information when processed and associated with data held by third parties. This category of data includes IP addresses or domain names belonging to computers used by the users that access the website, addresses in URI (Uniform Resource Identifier) notation 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 response, the numerical code indicating the status of the response given by the server (successful, error, etc.) and other parameters regarding the operating system and the IT environment of the user.

Data provided voluntarily by the user

When users explicitly and voluntarily choose to send an e-mail message to the addresses indicated on this website and/or fill out data collection forms, this involves the subsequent acquisition of the sender's e-mail address, necessary to respond to the requests, as well as any other personal data entered for the services provided by the Data Controller.

Cookies

See the cookies policy here [\(/rto/customercare/docs/cookies\)](/rto/customercare/docs/cookies)

3. PURPOSES OF DATA PROCESSING

Personal data voluntarily provided by completing data collection forms and/or sending e-mails will be processed for the following purposes:

A) data processing regarding:

- the use of this website;

- contact/request;

- collection of data to subscribe to services offered by the Data Controller;

- administrative and accounting activities in general. For the application of the regulations governing personal data protection, data processing for administrative and accounting purposes is related to the carrying out of organisational, administrative, financial and accounting activities, regardless of the nature of the data processed. Specifically, internal organisational activities, activities necessary to comply with contractual and pre-contractual obligations and information activities are carried out for these purposes.

B) The personal data provided will be used, with the holder's consent and so long as the holder does not withdraw said consent, for direct marketing activities, market research or other sample research and direct sales activities, to receive - via automated means such as e-mail, fax, MMS (Multimedia Messaging Service) or SMS (Short Message Service) or other means, as well as by phone through the operator or traditional mail - information material to identify customer satisfaction levels, promotional, commercial and advertising materials or information on events and activities on the part of Moleskine spa.

C) The personal data provided will be used, with the holder's consent and so long as the holder does not withdraw said consent, for profiling activities, i.e. to draw up user profiles and analyse consumer choices and habits in order to improve our commercial offer and services.

4. MEANS OF DATA PROCESSING AND STORAGE

Data will be processed by automated and manual means, using techniques and tools designed to guarantee maximum security and confidentiality, by subjects specifically appointed for the purpose in compliance with the provisions of articles 31 et seq. of Legislative Decree no. 196/03. Data will be stored for a period

no longer than the time necessary for the purposes for which the data have been collected and subsequently stored.

5. SCOPE OF COMMUNICATION AND TRANSMISSION

Moleskine spa , also within the European Union, in compliance with and subject to the limits established by art. 42 of Legislative Decree no. 196/2003. These data may be transmitted to third parties belonging to the following categories:

- subjects that provide services for the management of the information system used by Moleskine spa and telecommunications networks (including e-mail, hosting of the website and management of the mailing list data);
- studios or companies that provide assistance and consulting services;
- the authorities in charge of compliance with legal obligations and/or measures established by public bodies, upon request:

The subjects belonging to the above categories carry out the function of Data Supervisors, or operate completely independently as Data Controllers. The list of Supervisors is updated constantly and is available at the headquarters of Moleskine spa - Viale Stelvio, 66 - 20159 Milan, or by writing to privacy@thetowner.com (privacy@thetowner.com)

6. PROVISION AND WITHHOLDING OF PERSONA DATA

Apart from the terms specified for website use data, users are free to provide or withhold their personal data. For the purposes stated at point A), provision of data is optional but necessary. Refusal to provide the data required as specified under point A) will make it impossible for users to receive a number of services closely connected with said data and for which said data is instrumental, such as obtaining items ordered or responses requested, or other services provided by the Data Controller. Provision of data and consent for the use thereof for the purposes stated under points B) and C) is optional. Refusal to give consent for the purposes illustrated under points B) and C) will have no negative impact on the purposes referred to under point A).

7. RIGHTS OF THE INTERESTED PARTIES

You may exercise your rights as set forth in articles 7, 8, 9 and 10 of Legislative Decree no. 196 of 30 June 2003 by contacting the Data Controller or Data Supervisor or our head office, or by sending an e-mail to: privacy@thetowner.com (privacy@thetowner.com) You are entitled, at any time, to obtain confirmation of the existence or absence of data and details on the content and origin thereof; you may also check said data are correct or request that they be added to, updated or rectified (article 7 of the Italian Data Protection Act (<http://www.garanteprivacy.it/garante/doc.jsp?ID=1311248#articolo7>)). Pursuant to the aforementioned article, you are also entitled to request the cancellation, anonymisation or blocking of data processed in breach of the law, or refuse consent, in any case and for legitimate reasons, for the processing of said data. In the event you contact the Data Controller, please provide your e-mail address, name, postal address and/or telephone numbers so we can deal with your request correctly.

If you no longer wish to receive automated direct marketing messages (e-mail, SMS, MMS, fax), all you have to do is send an e-mail, at any time, to privacy@thetowner.com (privacy@thetowner.com), with " cancellation from automated mailing list" in the subject line, or use our automatic cancellation systems contemplated for e-mail only, and we will refrain from disturbing you further.

If you no longer wish to receive traditional direct marketing messages (telephone calls through the operator, postal messages), all you have to do is send an e-mail, at any time, to privacy@thetowner.com (privacy@thetowner.com), with " cancellation from traditional mailing list" in the subject line, and we will refrain from disturbing you further.

If you no longer wish to receive any direct marketing messages, all you have to do is send an e-mail, at any time, to privacy@thetowner.com (privacy@thetowner.com), with " cancellation from direct marketing list" in the subject line, and we will refrain from disturbing you further.

8. CHANGES TO DATA PROTECTION INFORMATION

The Data Controller reserves the right, at any time and at his sole discretion, to change, update, add to or remove parts of this data protection information. Interested parts must periodically check for any changes. In order to facilitate this process, an indication of the date on which any updates are made will be provided on the information. By using the website after the changes have been published, users undertake to accept said changes.

9. SOCIAL NETWORK PLUG-INS

Our web pages may contain Social Network plug-ins (e.g. FaceBook.com, managed by Facebook Inc., 1601 S. California Ave, Palo Alto, CA 94304, USA ("Facebook")). If you access one of our web pages with one of these plug-ins, the web browser will connect directly to the social network in question, and the plug-in will be viewed on the screen thanks to this connection with the browser. Before using such plug-ins, we invite you to consult the data protection policy of the social network in question, available on its official web pages.

Date of update: 05.02.2015