



## **"Gucci Privacy Policy"**

### **Pursuant to Section 13 of the European Regulation 2016/679 ("GDPR")**

This privacy notice ("**Privacy Policy**") describes the information practices of Gucci with regard to the processing of Your personal data ("**Personal Data**") for purposes connected with Your application for the **Gucci Changemakers Scholars** program (the "**Program**"). It also describes which categories of Personal Data are held, how Personal Data might be used, with whom it might be shared and the choices and rights available to You regarding the use of the Personal Data.

**THE DATA CONTROLLER** - The data controller is Guccio Gucci S.p.A., a company duly incorporated and existing under Italian law, with registered office in Florence, Via de' Tornabuoni No. 73/R, registered in the Florence Companies' Register C.C.I.A.A. under no. 438090, Tax code No. 03031300159 and VAT No. 04294710480 ("**Gucci**").

**COLLECTED PERSONAL DATA** - Gucci collects the following Personal Data about You: (i) personal identifiers and professional information: including title, name, date of birth, age, gender, home address, information on Your professional experience and qualifications, (ii) personal data that may be contained in your essay or video that you will send to apply to and/or participate in the Program, (iii) data necessary to verify your eligibility for the Program, (iv) financial information, and (v) special categories of personal data that you might provide, such as data concerning health, data revealing racial or ethnic origin or sexual orientation (hereinafter referred to as "**Your Personal Data**")

**PURPOSES AND LEGAL BASIS FOR DATA PROCESSING** – Gucci will process Your Personal Data, through electronic and non-electronic means, to pursue precise purposes and only in the presence of a specific legal basis prescribed by the applicable privacy and data protection law. Personal Data are required by us in order to allow your application to and/or participation in the Program and if you are chosen as an awardee of the Program to allocate the award. If you do not provide some or all of Your Personal Data (as indicated in the application) it may affect our ability to process your application to the Program and therefore to allocate the award. We collect the Personal Data described above for the purposes of managing the Program and related activities. Gucci may also use your Personal Data in relation to the evaluation and selection of applicants, including, for example, setting up and conducting interviews and tests, and conducting evaluations, assessments and otherwise as needed in the Program process, including if relevant, to allocate the award.

We process your Personal Data for the purposes described above on at least one of the following legal bases:



- To allow Your application to and/or participation in the Program and be able to receive and evaluate the essay or video you develop for the Program in order to take steps at your request to be considered for and/or take part in the Program;
- the processing is necessary for compliance with a legal obligation to which Gucci is subject; or
- the processing is necessary in order to take steps at your request prior; or
- the processing is necessary for the legitimate interests pursued by the Company in selecting qualified and appropriate awardees of the Program, except if in light of particular circumstances our interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data.

The provision of Your Personal Data, including special categories of Your Personal Data, will be necessary to pursue the purposes detailed in the table above. Lack of provision of Your Personal Data (as indicated in the application) will trigger impossibility for Gucci to allow You to apply for and/or take part in the requested activities.

**SHARING AND RETENTION OF PERSONAL DATA** - As a global organisation consisting of businesses in various countries, the Company may hire for its sites, and use resources, located throughout the world. Your Personal Data may be shared with affiliated companies where it is reasonable and necessary to do so. Within the Company, Your Personal Data can be accessed by or may be disclosed internally on a need-to-know basis to persons responsible for managing or making decisions about the Program.

Your Personal Data may also be accessed by third parties who provide us with services relevant to your application to the Program.

If you are an awardee under the Program, Your Personal Data may also be shared with third parties such as your college/university and/or the bursar's office.

Gucci expects all third parties to process any Personal Data disclosed to them in accordance with applicable law and contract terms, including with respect to Personal Data confidentiality and security. Where these third parties act as a "data processor" (for example, by verifying your references at our request), they carry out their tasks on our behalf and upon our instructions for the above mentioned purposes. In this case, your Personal Data will only be disclosed to these parties to the extent necessary to provide the required services. The Company will not disclose your Personal Data to unauthorised third parties.

From time to time your Personal Data will be transferred outside your country for the purposes described in this Policy. For example, your Personal Data may be transferred, among other purposes, to conduct the review of your essay or video, the processing of your details and the provision of support services. We may share your Personal Data i) with colleagues within



Gucci (both in the country where you are applying for a position, and in other countries in which the group has operations, including countries outside EU/EEA); and (ii) with third parties as described in this Policy. Transfers outside the EU/EEA may be made pursuant to the

European Commission-approved Standard Contractual Clauses, or other legally acceptable mechanisms that ensure an adequate level of protection.

Our general approach is to retain Your Personal Data for 18 months after the end of the Program. Where permissible, we will retain your Personal Data for exercising or defending legal claims, for a period of time corresponding to the applicable statute of limitations, or legal or regulatory obligations. If you are an awardee under the Program, your Personal Data will be held to carry out all the necessary activities to allocate the award.

**YOUR RIGHTS AND CHOICES** - In compliance with Sections 15 – 21 of the GDPR and to the maximum extent allowed by the applicable law, You have certain rights in connection with Your Personal Data, in particular way: **(i)** to access Your Personal Data anytime and to receive a copy of the Personal Data held, as well as to check that it is lawfully processed by Gucci; **(ii)** to ask the correction or an updating of any incomplete or inaccurate Personal Data held by Gucci; **(iii)** to ask Gucci to delete, anonymize or remove Your Personal Data in certain circumstances. There are also certain exceptions where Gucci may refuse a request for erasure (e.g. where Personal Data is required for compliance with law or in connection with claims); **(iv)** to ask Gucci to suspend the processing of certain of Your Personal Data (e.g. if You want Gucci to establish its accuracy or the reason for processing it); **(v)** under specific conditions, to limit the processing of Your Personal Data (such as by stopping all processing, except storage); **(vi)** under specific conditions, to require Gucci to provide a copy of Your Personal Data in machine-readable format to request the transfer of certain of Your Personal Data to another party (sc. right to data portability); **(vii)** under specific conditions, to limit the processing of Your Personal Data (such as by stopping all processing, except storage); **(viii)** to lodge a complaint with a supervisory authority, in particular in the Member State in the European Union where You are habitually resident, where You work or where an alleged infringement of Data Protection law has taken place.

**CONTACT** - For any information about Your Personal Data or if You have any complaints in relation to the use of Your Personal Data or this Policy, You may contact Gucci at [privacy@gucci.com](mailto:privacy@gucci.com).