

PRIVACY POLICY
pursuant to art. 13 of the European Union Regulation 2016/679 /EU
General regulation on the protection of data

With this note, Coin S.r.l. wishes to inform users visiting the website "www.coin.it" (hereinafter the "Site") of the Policy adopted regarding Personal Data Protection, emphasising its commitment and focus on protecting the privacy of visitors to the Site.

Visitors may browse the website freely and are not obligated to register, except in certain areas of the same, in which the user can freely and expressly provide a series of personal data in order to access services for which their specific consent is required. Therefore, where visitors wish to provide their personal data to gain access to additional services, they will be expressly informed pursuant to article 13 of the EU Regulation 2016/679 - *General Data Protection Regulation*, specifying (by way of example) the purposes and methods of use of the data by Coin S.r.l., as well as the right request at any time the erasure of the data or their updating.

Privacy policy on the protection of personal data

Pursuant to and by effect of EU Regulations 2016/679 - General Data Protection Regulation (hereinafter referred to as the "Regulation"), Coin S.r.l. provides the following information.

1. Data Controller and Data Protection Officer

The Data Controller for the processing of personal data is Coin S.r.l., with registered office in Mestre (Venice), via Maderna No.11, POSTAL CODE 30174 (hereinafter referred to as "COIN"). The Data Protection Officer, for the management of the Site, is salesforce.com Italy S.r.l., Via Copernico, 36-42 20125 Milan - Italy. You may request the name of the Data Protection Officer, as well as the complete list of the Data Protection Officers by sending a request to the addresses specified in point 10.

2. Types of personal data processed

To access the Site, you do not need to sign-up. However, some sections in the Website do require you to sign-up or to use a username and password (e.g. to complete the online purchase process), or there are also certain services for which you must provide your data should (e.g. your data may be required if you wish to access the Newsletter services, contact us, share your "Wish List" with a friend, etc.).

See Appendix 1 for more information.

With reference to the browsing data within the Site, also refer to point 6 below regarding the Profiling Tools used by the Site.

3. Purpose and legal basis for the processing

The data are collected and processed for purposes strictly related to the use of the Site and its services. The purposes for which the data are used are specified in detail in each privacy policy provided by the Site in all cases of data collection. Therefore, we ask you to read the privacy policies that from time to time describe the type of data processing that will be carried out by COIN (e.g. to sign-up to the website, to subscribe to the Newsletter, etc.).

Your data will be processed in full compliance with the privacy regulation. See Appendix 2 for more information.

4. Optional provision of personal data

The provision of personal data is generally optional. Only in certain cases, failure to provide data may make it impossible to access specific services and obtain what may be requested (e.g. sign-up is necessary to proceed with the purchase of products online); failure to provide such data may therefore prevent COIN from allowing access to the services offered on the Site or to fulfil users' requests.

The data required from time to time are indicated in the data collection forms on the Site - e.g. by marking them with an asterisk (*) - and the consequences of not providing them are reported in the specific privacy policy on the pages where the data are collected.

5. Methods of data processing and scope of the communication

The data will be processed both on electronic and paper media. COIN guarantees that the personal data provided via the Site will be processed lawfully and correctly, in full compliance with the legislation in force, and will maintain the strictest confidentiality regarding the data provided during registration. All the information collected is transmitted through a secure connection so as to prevent it from being intercepted by strangers. Site security is guaranteed and certified by a leading provider of Internet security services.

The data will not be communicated or disclosed to third parties except within the limits and conditions expressly indicated in the privacy policy from time to time provided to the user and only upon the user's prior authorization (e.g. to companies that provide product shipping services). The data will be processed by personnel expressly authorized to manage the Site of the E-commerce Department. .

Exclusively for organizational and practical purposes, we have appointed a few service providers necessary for the management of the Site as external Data Protection Officers for purposes strictly connected and related to the provision of the services required, among these providers is OVS S.p.A., with registered office in Mestre (VE), via Terraglio No. 17, Data Protection Officer for the management of our information systems. A complete list of external Data Protection Officers can be requested by contacting <https://www.coincasa.it/SERVIZIOCLIENTI>

6. Links to other sites

This note is only applicable to the Coincasa Website and is not valid for any other websites that may be browsed by the user via links on the same. COIN cannot be held responsible for the personal data provided by the users to external parties or to any other websites that may be linked to this site.

7. "Profiling" and/or customisation tools

COIN does not carry out any promotional communication and/or advertising activities **without the user's prior explicit consent**.

The Site uses "cookies", both technical cookies (that is to facilitate browsing and use of the Site) and profiling cookies (that is to analyse users and their behaviour and preferences, and to send to them customized advertising).

For a detailed explanation of the cookies used on the Site and how to disable them, See Appendix 3 for more information.

8. Data Processing Location

The data processing related to the services provided by the Site are carried out at the COIN offices listed in point 1 above and are carried out by the persons in charge of the processing in the E-commerce Department. The data may also be disclosed to the persons in charge of the Information Technology Department of OVS S.p.A., appointed as external Data Protection Officer pursuant to art. 28 of the Regulation.

9. Data Storage Period

Your data will be processed for the time established in the specific privacy policies provided at the time of the collection (e.g. sign-up to the Coincard program, use of the contact service, etc.). See Appendix 4 for more information.

Concerning storage time for the data collected through the use of profiling tools (e.g. cookies), See Appendix 3 for more information.

10. Right of the interested party

By sending a message to Coin to the e-mail adressecommerce@coin.it or by using the form found on www.coincasa.it/servizio-clienti you may at any time exercise the rights (see Appendix 5 for more information.) established in articles from 15 to 22 of the Regulation, including: which data are being processed, which methods are used for the processing and for what purposes we use your data, change the data that you provided or erase them, ask us to limit the use of your data, request to receive or transfer your data without prejudice to the possibility of revoking any consent (that you may have provided). In addition, you can always oppose the processing of your data, in particular for processing performed for marketing purposes or to analyse your personal preferences.

11. Complaint

We would like to remind you that, if at any time you believe that the processing of your data violates the provisions of the Regulation, you can always file a complaint to the Data Protection Authority (www.garanteprivacy.it), or to the Guarantor of the Privacy in the country in which you usually reside, work or of the place where the alleged violation occurred.

12. Data protection officer

The Data Protection Officer can be contacted at the email address: dpo@coin.it.

13. Applicable law

This Privacy Policy is governed by the EU Regulation 679/2016 which guarantees that the processing of your personal data is carried out in full respect of fundamental rights and freedoms, as well as of the dignity of the interested party, with particular reference to confidentiality, personal identity and the right to protect personal data.

14. Amendment Clause

COIN reserves the right to review, amend or simply update, in full or in part, at its sole discretion, in any manner and/or at any time, without advance notice, this Privacy Policy, as well as the other notes and communications included in this website, also in consideration of the amendments to laws or regulations concerning the protection of personal data. The changes and updates to the Privacy Policy will be notified to users on the Home Page of the Site as soon as they are adopted and they shall be binding as soon as published on the Site in this section. Therefore, we would like to invite you to access regularly this section to check the latest and most updated version of the Privacy Policy.

The full text of the EU Regulation 2016/679 - *General Data Protection* can be browsed on the Data Protection Authority website at www.garanteprivacy.it.

APPENDIX

APPENDIX 1

Should COIN acquire information and personal data about users, it will notify the same in advance, pursuant to Art.13 of the Regulation concerning the purposes for which said data are required and of the methods applied for their use. If necessary, COIN will arrange to acquire the user's specific consent for the use of said data. By way of example, personal data such as first and last name, telephone number, e-mail address and other information may be requested and the user accepts to provide them by filling out a specific sign-up form in order to use the services made available by the Site. COIN will only use the personal data collected on-line for the purposes indicated during registration.

The data related to the connection and browsing within the Site (such as addresses in URI-Uniform Resource Identifier of the resources requested, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code listing the status of the reply provided by the server (successful, error, etc.) and other parameters related to the operating system and computer system of the user) are collected only in order to obtain statistical information in anonymous form on the use of the Site and to check its correct operation and they are deleted immediately after processing. The Data may be used to ascertain responsibility in cases of potential cyber crimes against the Site with the exclusion of these possibilities, these data will be deleted after the useful time for the provision of the services specified on the Site.

With reference to the browsing data within the Site, also refer to point 6 below regarding the Profiling Tools used by the Site.

APPENDIX 2

The processing of your data will be performed:

- according to art. 6, paragraph 1, letter b) of the Regulation to manage the use of the services requested through the Website and to reply to your requests;
- on the basis of your consent, pursuant to article 6, paragraph 1, letter a) of the Regulation, to perform marketing activities and analysis of your personal preferences.

In any case the processing will be performed in compliance with the provision established by the regulations in force – and their subsequent amendments and/or integrations - issued on the matter by the Data Protection Authority (among which *Fidelity card and consumer guarantees. The rules of the Data Protection Authority for loyalty programs of February 24, 2005* and the *Guidelines concerning promotional activity and fight against spam of July 4, 2013*, as well as the general provisions on cookies *identification of the simplified methods for the privacy policy and the acquisition of consent for the use of cookies of May 8, 2014*).

APPENDIX 3

<http://www.coincasa.it/servizi/privacy-policy>

APPENDIX 4

Your data, collected through the “*Contact Us*” section of the Site will be processed for the time necessary to manage correctly your request and subsequently deleted.

Whenever you wish to create your client account by signing-up to the Site, your data will be processed until your account will remain active. You will be able to close your account at any time and your request will be handled immediately.

The data processed in order to send you commercial notifications, special offers, news and events will be stored until you request them to be deleted.

APPENDIX 5

Articles from 15 to 22 of the Regulation bestow specific rights, including:

- *obtain confirmation that your personal data are being processed;*
- *obtain access to your personal data and to the information specified in art. 15 of the Regulation;*
- *obtain the correction of inaccurate personal data without unjustified delay or the integration of incomplete personal data;*
- *obtain the prompt erasure of your personal data;*
- *obtain the limitation of the processing of your personal data;*

- *be informed of any correction or erasure or limitation to the processing performed in respect to your personal data;*
- *receive your personal data in a manner that is structured, commonly used and automatically readable by automatic devices;*
- *oppose at any time, for reasons connected with your particular situation, the processing of your personal data.*

In particular, this is without prejudice to your right to revoke your consent for the processing of any data that you may have provided at any time and to oppose our analysis activities.

COOKIE POLICY

COOKIE POLICY EU Regulation 679/2016 *General rules on data protection*

1. What are cookies

The Website makes use of "Cookies": these are text files which are sent from a web server (which is the computer on which the Website visited is running) to the user's browser (Internet Explorer, Mozilla Firefox, Google Chrome, etc.) and memorised in the hard disk of the user's computer when they visit the Website. The cookie allows the Website to identify the user's PC by way of the information memorised therein each time that the user reconnects to the Website using the same PC.

By using cookies we can make it easier for the user to browse the Website.

The cookies do not collect information that directly identify the user. Indeed, COIN cannot track any personal information that directly identifies the user using the cookies (e.g. first name, last name) unless this is directly provided by the user. Moreover, another website cannot use a cookie sent by the Coincasa Site to access other information contained in the user's computer. Once saved in the computer, the cookie can only be read by the website that created it (and thus, in our case, by coincasa.it).

2. What type of cookies does COINCASA use?

Technical and Profiling Cookies

They are cookies used in order to guarantee navigation and thus telematic transmission of your data on the network or strictly necessary to provide services of the Site. These cookies are typically temporarily, the so-called "session cookies" and they are transferred by the Site on the user's computer during browsing but are only memorised for the duration of the browsing session. This means that when the user closes his/her browser, the cookies are erased automatically and disappear, and do not remain memorised on the computer. They are formed by random numbers generated by the server and are used to help ensure that the Website can be browsed safely and efficiently. Through the use of these cookies we can make user navigation easier within the Site, for example by remembering the data providing by the user when filling out the forms on the Site (so-called user input cookies), to remember the user after having logged-in to the Site (so-called authentication cookies), to personalise the interface of the website on the basis of the of user preferences to collect in aggregated form information regarding the number of visitors to the website and on the most visited pages (so-called cookies analytics used with partial IP anonymisation mechanisms), etc. Said cookies do not require the prior acquisition of user consent since they are fundamental to provide the service requested by the website user (as per art. 6, paragraph 1, letter b) of the Regulation).

Profiling Cookies

These are cookies used to create user profiles for example in order to send advertising messages consistent with the preferences of the user: these cookies are sent by the Site to the user's computer during navigation and they are memorised also past the duration of the navigation session, until their expiry or until deletion by the user (so-called "permanent cookies"). The use of this kind of cookies requires the explicit and informed consent of the user. We would like to point out that your consent will be requested only the first time you access the Site. Subsequently, thanks to the use of a technical cookie, we will memorise your consent to allow you to access directly to the pages of the Site when you return (without prejudice to your right to deactivate/activate cookies at any time or to delete them: in this case, at your return, the Site will request your consent again).

No other tools are used to profile users in this Website (e.g. spyware).

Moreover, should the user register on the Site and specifically at time of registration authorise his/her browsing to be monitored, the data related to the browsing session on the Site may be associated with the user's personal data.

3. Information on cookies used by coincasa.it

We are pleased to provide the following information regarding the cookies used on the Website:

- 1) The domain name from which the website server transmits the cookies is: www.coincasa.it
- 2) Purpose of the collection: the cookies are used to (i) make browsing on the website easier and quicker or perform analysis/statistical and anonymous verifications on the use of the Site (technical cookies), (ii) improve the browsing experience by suggesting the best products and best promotions based on the user's browsing history (profiling cookies).
- 3) Data collected: The following information data are stored: the URI (Uniform Resource Identifier) addresses 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 related to the user's operating system and IT environment.
The cookies (transferred by the domain www.coincasa.it) include the following information: a numeric ID code that uniquely identifies COIN and a numeric ID code that identifies the user (browsing the Site), both stored in our database; a numeric ID code that uniquely identifies the browsing session (the so-called "record") of the use in our database; a semi-random alpha-numeric session ID automatically cleared by the browser at closing (session cookie).
- 4) Cookie validity: the Website uses session cookies (or cookies that are automatically erased when the browser is closed), and permanent cookies (or cookies that are stored until they are erased by the user), which do not in any case last for more than six months.
- 5) Requirement for cookie acceptance: accepting cookies is not mandatory but some contents and functions may be blocked if they are deactivated, although it will still be possible for the user to browse the Website.
- 6) Provision of data: the information collected via cookies is confidential and is not disclosed to third parties.

Technical cookies transmitted by the site are the following:

TECHNICAL COOKIES transmitted by www.coincasa.it	
Cookie identification code	Cookie characteristics and purposes
Demandware Platform Cookies	Browsing session tracking - technical cookies
Google Analytics	Browsing session tracking - technical cookies
Google Adwords	Profiling cookies for advertising campaigns
Facebook	Profiling cookies for advertising campaigns
DoubleClick	Profiling cookies for advertising campaigns
Clicktale	Browsing session tracking - technical cookies

4. Third party cookies

This Site uses the so-called "third party cookies" (in particular Google Analytics and Social Network cookies), that is cookies that are issued and managed by parties other than COIN for their own purposes.

In order to allow you to make a free and informed choice, we provide you with the following information regarding (i) the type and identification of cookies, (ii) characteristics and purposes of cookies, as well as a link to the detailed privacy policy related to said cookies:

TECHNICAL COOKIES Issued by third parties		
Party issuing cookies	Purposes of cookies	Link to privacy policy and consent forms
Google	Google Analytics: these are cookies that by recording the user browsing with IP anonymisation allow receiving detailed	A tool to disable Google analytics on your browser: https://tools.google.com/dlpage/gaoptout/

	analyses about the browsing of users on the site.	
Twitter Inc.	Tweet button and Twitter social widgets: The "Tweet" button and Twitter social widgets are services to interact with the Twitter social network.	
Facebook, Inc.	"Like" button and Facebook social widget: The "Like" button and Facebook social widgets are services to interact with the Facebook social network.	
Google Inc.	+1 button and Google+ social widgets: The "+1" button and Google+ social widgets are services to interact with the Google+ social network.	
Google Inc.	Widget Video Youtube: Youtube is a video content service operated by Google Inc. which allows the site to integrate such video contents in its web pages.	
Google Inc.	Widget Google Maps: Google Maps is a map visualisation service operated by Google Inc. which allows the site to integrate such contents in its web pages.	

5. Deactivation/deletion of cookies through a web browser

At any time, it is possible to deactivate/activate or delete cookies using the settings of your web browser. In particular, if you prefer not to receive cookies you can set your browser to warn you when a cookie is present so that you can decide whether to accept it or not; it is also possible to automatically refuse all cookies, by activating the appropriate option in the browser. It is also possible to delete specific cookies that were already stored in the browser, or block the storage of cookies on your computer sent by specific websites, or block third-party cookies.

Each browser has its own type of cookie management, in the administration or preference panel you can change/manage the parameters and delete cookies.

To disable the use of all or some cookies it is necessary to change the settings of the browser (Firefox, Chrome, Explorer, Safari, Opera, etc.).

To do so, refer to the information in the browser User's Manual (so-called Help Page) or click on the following links:

- Internet explorer
- Chrome
- Firefox
- Safari
- Opera.

You can also manage your cookie preferences from <http://www.youronlinechoices.com>.