

**Privacy Policy statement for illycaffè S.p.A.** (for Italy, Spain, Holland, Germany, Austria) in accordance with provision of the Italian Privacy Law (art. 13 of Italian D.Lgs. 196/03), art. 5 of "Ley Orgánica 15/1999 del 13 diciembre de Protección de Datos de Carácter Personal", art. 19 of "Bundesdatenschutzgesetz-German Federal Data Protection Act", art. 33 of "Wbp- Dutch Data Protection Act", § 24 of Datenschutzgesetz 2000.

illycaffè S.p.A. (hereinafter also referred to as the "Company", "illycaffè") hereby informs you (according to you to register to the shop and defining you also as "user" or "data subject") the purposes and procedures of data processing (provided by you and/or as a result of processing by the Company) of which will be hold. If you purchase and register as a legal representative of a firm/company/organization, per user or data subject shall be considered the firm /company/organization represented by you (which will be the subject recorded and will purchase) and your data will be processed by illycaffè only to identify you as the legal representative and for the purposes specified in point 2 letter A, B, C, considering the consent to the processing of data provided (through you) by the firm/company/organization that you represent.

In addition, the consent for the purposes specified in section 2 letter A of this information, will be considered provided also by you in registering in the site your name as the legal representative of the firm/company/organization represented by you. Please see this information, also remembering to look over privacy policy of the shop. Registration allows you to not have to retype all the data every time (but only a few) and give the consents required. Please note that you are also free not to register (not so consenting to its processing) and still buy our products going into the section of this site where you can buy as guest.

Please note that your will indicate only your data (except as specified below in point 4 letter F of this information) and/or data of the firm/company/institution represented by you. For the purposes specified in point 2 letter B of this information, if the purchase and registration are made by the firm/company/organization represented by you, addresses the object of the activities listed in point 2 letter B of this information will be the addresses of the firm/company/organization represented by you.

1. The data will be processed and stored by illycaffè in accordance with D.Lgs. 196/03 and the relevant legal requirements (in compliance with the principles of fairness, lawfulness, transparency, and protection of the confidentiality and the rights of those concerned). Data will be filed at illycaffè S.p.A. offices (in Europe) and at the appointed data processors by illycaffè as well as third parties, specified by category in that information, who receive data as independent data controllers). Data will be entered in databases, including IT databases. We remind you that only for technical assistance needs data may be sent to companies outside the European community who are specifically designated as data processors by committing to comply with all the requirements of European legislation.
2. Data may be processed on paper, manually, with IT and electronic means (therefore, illycaffè may file data both on paper and IT support). illycaffè has implemented safety measures to prevent any data loss, illegal use of data, misuse or unauthorised access. Data will be processed by illycaffè strictly in line with the purposes set forth in this privacy policy:
  - A. in order to allow the registration to the shop recognize you as a user registered and manage the recording (without the consent for such purposes you will not sign and the consent will also be provided, as indicated above, to illycaffè France s.a.s., to illy caffè North America Inc. and to illycaffè Shanghai Co.Ltd.);
  - B. where you shall purchase, in order to fulfill obligations arising from the purchase contract, and therefore also for administrative-accounting purposes and for the order management. As regards the credit card information is you also refer to the contents of the payment section of the site;
  - C. to comply with the requirements pursuant to the legislation in force, regulations or EU regulations and to assert or defend its rights in the relevant jurisdiction.

For the purposes described in point 2 lett. B and C of this information, the processing can be carried out without the consent of data subjects pursuant to art. 24, point a), b), f), of the D.Lgs. 196/03, art. 6 of the "Ley Orgánica 15/1999 del 13 diciembre de Protección de Datos de Carácter Personal", art. 4 of "Bundesdatenschutzgesetz-German Federal Data Protection Act", article 23 of "Wbp- Dutch Data Protection Act", §7 of Datenschutzgesetzes 2000. Therefore, this consent is not required.

3. The data will not be disclosed to third parties by illycaffè for the purposes specified in point 2 letter A of this information. The data may be communicated by illycaffè for the purposes specified in point 2 letter B of this information (communicating only data that are necessary for the pursuit of these purposes) both in Italy and abroad to: banks for payments, carriers and forwarding agents, post offices, distributors, companies (including foreign) that contracts could be sold as provided in the contract of purchase (in which case it will be, with the assignment of the contract, including the transfer of data relating to the contract and its implementation and management), lawyers and legal consultants, companies audit where no appointed as data processor. For the purposes specified in point 2 letter B and C of this information, data may be communicated in Italy and abroad (by communicating only the data that are necessary for the pursuit of these purposes) by illycaffè to judicial authorities, tax police and public security and public bodies if there is an obligation to this disclosure, also to law firms and legal advisers and to post offices (being able to see the address for sending any written notices). The data may be disclosed on behalf of illycaffè to all parties appointed as persons in charge of the processing by illycaffè, if necessary for the performance of the tasks assigned to them by the Company, only carrying out on the data the operations necessary for the performance of the said tasks (administrative staff, transport and correspondence staff, including external to the Company, marketing staff and site management staff also external to the Company, IT technicians and IT staff that can also carry out tasks of system administrators, public relations staff, legal department staff, members of Board and Statutory Auditors, internal auditor, interns, freelancers and consultants-employees also external to the Company acting under the direct responsibility of the Company, such as IT technicians that can also carry out tasks of system administrators, quality control consultants, legal consultants and auditors) and any data processor external to the Company (companies-professional studies who perform instrumental activities of illycaffè S.p.A. such as marketing activities, shipping and enveloping or call center activities, audit of accounts and management public relationships, including information technology outsourcing company based in other states) and internal to the company (for example, the data processor specified in

paragraph 7 of this information) always appointed by illycaffè. External data processors will process data either directly or through their providers which are in charge of data processing on behalf of illycaffè, performing the same tasks as data processors as well as the administration/maintenance of processors/servers of external data processors hosting illycaffè data. Data processors and providers in charge of processing will retain data insofar it is necessary to perform the tasks assigned by illycaffè by only performing the actions needed to implement such tasks.

4. Provision of data to illycaffè

- A. The provision of data on the registration form marked as mandatory (those marked in bold) is necessary for the purposes specified in section 2 lett. B of this information and therefore the refusal to provide it in whole or in part may make it impossible for the Company to execute the contract and then buying products illycaffè. The indication of the product to purchase and the method of payment is necessary in order to purchase the product (and then again for purposes specified in section 2 lett. B of this information) and the lack of information will make it impossible to buy the product. As far as shipping information if different from billing you see to section 4 lett. F of this information. With regard to other data contained in the optional fields see also as shown below. Where not otherwise specified in this information data in optional fields can optionally be provided and the failure does not lead to any result other than that not to use such information (which may still be useful for the purpose in object).
- B. The provision of data (tax code or VAT number, personal details and address, billing information and purchase, other data that may be necessary in pursuance of legal obligations and legislation or regulations to enforce or exercise a right of illycaffè in court) for the purposes specified in section 2 lett. C of this information is necessary and failure makes it impossible to register and/or to follow up the purchase contract.
- C. The provision of data specified as mandatory (those marked in bold) in the registration form in order of registration (section 2 lett. A of this information) is optional but the absence of data will make it impossible to register the same. As far as shipping information if different from billing you see to section 4 lett. F of this information. With regard to data relating to VAT and company name will also see to section 4 lett. E of this information. As far as credit card information see to section 4 lett. D of this information. As for other data not marked in bold in the registration form and any other data provided, the provision is optional and failure to provide not lead to any result but to disregard such data that may be useful in some cases to better manage the order.
- D. As far as credit card information, your provision is optional and failure to make it impossible to pay by credit card.
- E. The provision of requested data in case of invoice request (such as that of the VAT and the company name) is optional, but failure to make it impossible to invoice with the data given, if required.
- F. The provision of data relating to alternative addresses to which to send the goods and/or a gift is optional but the missing data in bold will make it impossible to ship the material to the address indicated. Please note that for these particular activities, the user agrees on its own responsibility to obtain the consent of the subject of which indicates the data, send the goods to him address or indicate him as holder of the gift. In addition, User engages for these activities to inform the subject of which he communicates data to illycaffè (subject to which to send the goods or holder of the gift) that he will communicate data to illycaffè, so illycaffè can treat them (through persons in charge and data processors specified they must have knowledge to perform the tasks assigned by illycaffè) in order to send the material to the address and also informing him that illycaffè will give specific information about processing of data, putting him still aware immediately on that illycaffè may disclose data to carriers and shippers, and that provision of data is optional and failure to make it impossible to ship the goods to the address and/or to indicate the subject as a holder of the gift. You agree to obtain consent (where due) to communicate the data to illycaffè and their processing (therefore also consenting to the recording in databases illycaffè) by illycaffè for the purposes specified above in this section. User data will then be known even by those who receive the goods.

5. The data will be conserved for a period appropriate to the purposes for which they are used and compliant with the relevant legal requirements.

6. The Data Controller is the undersigned company illycaffè S.p.A. located in Via Flavia 110 in Trieste, telephone +39 040 3890 111, fax +39 040 3890 490, email [infoprivacy@illy.com](mailto:infoprivacy@illy.com).

7. The Data Processor, whom you may contact for everything relating to the use of the data, and especially to exercise the rights contained in art. 7 of D.Lgs. 196/03, in articles 15 and 16 of "Ley Orgánica 15/1999 del 13 diciembre de Protección de Datos de Carácter Personal", in art. 20 of "Bundesdatenschutzgesetz-German Federal Data Protection Act", in articles 35 and 36 del "Wbp- Dutch Data Protection Act", § 27 and § 28 of Datenschutzgesetz 2000 within the times and by the procedures envisaged by the law, and to obtain the full, up-to-date list of the other Data Processors, is the Corporate Human Resources, Organization, Processes and IT Director, who can be contacted for the purposes of this role at the addresses of illycaffè S.p.A. (written communications or enquiries must be addressed "to the Data Processors, the Corporate Human Resources, Organization, Processes and IT Director", specifying the subject of "privacy"). Any changes to the Data Processor identified above or this privacy policy statement may be published on the privacy policy of the website [www.illy.com](http://www.illy.com). You are therefore encouraged to visit this site, while information may also still be requested by the procedures envisaged by art. 9 of D.Lgs. 196/03..

8. You are also informed that art. 7 of D.Lgs. 196/03 assigns specific rights to the subjects whose personal data are used. The text of art. 7 of D.Lgs. 196/03 is thus provided below:

- 1. *A data subject shall have the right to obtain confirmation as to whether or not personal data concerning him exist, regardless of their being already recorded, and communication of such data in intelligible form.*
- 2. *A data subject shall have the right to be informed*
  - a) *of the source of the personal data;*
  - b) *of the purposes and methods of the processing;*
  - c) *of the logic applied to the processing, if the latter is carried out with the help of electronic means;*
  - d) *of the identification data concerning data controller, data processors and the representative designated as per Section 5(2);*

- e) *of the entities or categories of entity to whom or which the personal data may be communicated and who or which may get to know said data in their capacity as designated representative(s) in the State's territory, data processor(s) or person(s) in charge of the processing.*
- 3. *A data subject shall have the right to obtain*
  - a) *updating, rectification or, where interested therein, integration of the data;*
  - b) *erasure, anonymization or blocking of data that have been processed unlawfully, including data whose retention is unnecessary for the purposes for which they have been collected or subsequently processed;*
  - c) *certification to the effect that the operations as per letters a) and b) have been notified, as also related to their contents, to the entities to whom or which the data were communicated or disseminated, unless this requirement proves impossible or involves a manifestly disproportionate effort compared with the right that is to be protected.*
- 4. *A data subject shall have the right to object, in whole or in part,*
  - a) *on legitimate grounds, to the processing of personal data concerning him/her, even though they are relevant to the purpose of the collection;*
  - b) *to the processing of personal data concerning him/her, where it is carried out for the purpose of sending advertising materials or direct selling or else for the performance of market or commercial communication surveys.*

Information updated as at 28/03/2017. Such update is carried out inside of policy of constant review of the informative ones. The versions of the previous policy statements are available writing to [infoprivacy@illy.com](mailto:infoprivacy@illy.com).