

## Privacy policy for Euro Food Brands Ltd. pursuant to Regulation (EU) 2016/679 (GDPR) and national legislation in force

### 1. General information

Euro Food Brands Ltd (hereinafter also referred to as the "Company" or "EFB") hereby informs you (according to you to register to the site and 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 the Company 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 point 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 shop.illy.com. 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 without register.

Please note that your will indicate only your data and/or data of the firm/company/institution represented by you.

### 2. Purposes

EFB may process data for the following purposes:

- 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 up and the consent will also be provided, as indicated above, to illycaffè S.p.A., to illycaffè France s.a.s., to illy caffè North America Inc., to illycaffè Shanghai Co. Ltd.);
- B. where you shall purchase, to **fulfill obligations arising from the purchase contract**, and therefore also for administrative-accounting purposes and for the order management. About the credit card information is you also refer to the contents of the payment section of the site;
- C. to be compliant with the requirements pursuant to the **legislation** in force, **regulations** or **EU regulations** and for **legitimate interests** such as to assert or defend the rights of the Company.

For the purposes described in point 2 letter B and C of this information, the processing can be carried out without the consent of data subjects. Therefore, this consent is not required.

### 3. Mandatory nature of the provision

- A. The provision of data on the registration form marked as mandatory (those marked in bold) is necessary for the purposes specified in point 2 letter 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 illycaffè products. The indication of the product to purchase and the method of payment is necessary to purchase the product (and then again for purposes specified in point 2 letter 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 point 3 letter F of this information. About 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 EFB) for the purposes specified in point 2 letter 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 (point 2 letter 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 point 3 letter F of this information. About data relating to VAT and company name will also see to point 3 letter E of this information. As far as credit card information see to point 3 letter 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 (see also refer to point 3 letter E of this information).
- 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 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 EFB (subject to which to send the goods or holder of the gift) that he will communicate data to EFB, so EFB can treat them (through persons in charge and data processors specified they must have knowledge to perform the tasks assigned by EFB) in order to send the material to the address and also informing him that EFB will give specific information about processing of data, putting him still aware immediately on that EFB 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 EFB and their processing (therefore also consenting to the recording in databases EFB) by EFB for the purposes specified above in this section. User data will then be known even by those who receive the goods.

#### **4. Data recipient categories**

The data will not be disclosed to third parties by EFB for the purposes specified in point 2 letter A of this information. The data may be communicated by EFB 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 Great Britain 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 Great Britain and abroad (by communicating only the data that are necessary for the pursuit of these purposes) by EFB 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 EFB, each for own role, to all subjects delegated by EFB (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, public relations staff, legal department staff, members of Board and Statutory Auditors, internal auditor, trainees, freelancers and consultants-employees also external to the Company acting under the direct responsibility of the Company, such as It technicians, quality control consultants, legal consultants and auditors, staff of internal and external Data processors) and to internal and external Data processors (companies-professional studies who perform instrumental activities of EFB 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). The list of Data Processors is always available by contacting the Data Controller.

#### **5. Data retention**

Data will be retained by EFB for the entire period necessary for the pursuit of the purposes contained in this information. The data retention period is as follows:

- for legal obligations, regulations and community regulations, data may be retained for the periods imposed by these regulatory sources;
- for contractual purposes until the end of the relationship and even after the end of it for the period determined by British and European regulations, including in tax matters;
- for the purposes described in point 2 letter A of this policy, the data can be retained until the withdrawal of consent or request for cancellation;

in any case, all data may be retained for a period necessary to assert or defend a company right according to British and European regulations.

#### **6. Data Controller**

The Data Controller is the undersigned company Euro Food Brands Ltd a company duly incorporated and validly existing under the laws of England & Wales, whose registered office is at The Pinnacle, 170 Midsummer Boulevard, Milton Keynes, MK9 1FE, Ph: +44 1604 821234 Fax: +44 1604 845667, e-mail [sales@eurofoodbrands.co.uk](mailto:sales@eurofoodbrands.co.uk).

#### **7. Rights**

We inform you that the GDPR provides the possibility for the data subject to ask the Data Controller (at the above addresses) to access personal data and to correct or cancel them or limit their processing or to oppose their processing, in addition to the right to data portability, as well as other rights contained in Chapter 3 of the GDPR including the revocation of consent, where provided: the withdrawal of consent does not affect the lawfulness of the processing based on consent given before revocation.

#### **8. Complaints**

The data subject can always lodge a complaint with the British Supervisory Authority whose references can be found on the website <https://ico.org.uk/>.

#### **9. Legal Basis**

The legal basis the legal basis consists of legal obligations British and European laws) as well as the legitimate interests of the Data Controller in the customer-supplier relationship. Furthermore, for the purposes for which consent is provided, the legal basis is the consent itself.

#### **10. Processing procedures**

Data may be processed on paper, manually, with IT and electronic means (therefore, EFB may file data both on paper and IT support). EFB has implemented safety measures to prevent any data loss, illegal use of data, misuse or unauthorised access. Data will be retained and processed by EFB in compliance with its confidentiality requirements and with the applicable local provisions (i.e. in compliance with the principles of fairness, lawfulness, transparency, and protection of the confidentiality and the rights of those concerned) strictly in line with the aims set forth in this privacy policy. Data will be processed by EFB exclusively to achieve the aims described in this privacy policy. Data will be filed at EFB offices and at the appointed data processors (as well as third parties who receive data as independent data controllers as described in point 4 of this privacy policy). 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. also by signing the appropriate Contractual Clauses indicated by the Data Protection Authority; the data are only a copy of those contained in the European servers and the copy of the same is always available at illycaffè S.p.A..

**N.B.** The consent can only be given by persons over 16 years, if the subject is under 16, he cannot use what is provided for in the purposes for which consent is required (e.g. receiving commercial communication, profiling, ...).

This privacy policy is updated as at 14/02/2019. 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 Data Controller (email [dpo@illy.com](mailto:dpo@illy.com)).