

Privacy policy pursuant to Regulation (EU) 2016/679 (GDPR) and national legislation in force in Italy (D.Lgs.196/03)

1. General information

illycaffè S.p.A. (hereinafter also referred to as the "Company" or "illycaffè") hereby informs you that it will process your personal data that you have provided in the form or after for the purposes listed in the following paragraphs. illycaffè may only require and process data which are instrumental to achieve the aims of this privacy policy.

2. Purposes and legal basis

illycaffè may process data for the following purposes

- A.** to **inform you of the availability of the product**; the processing is based on the following legal basis: consent;
- B.** to fulfill an **obligation established by law**, by a **regulation** or by **EU legislation** (for this purposes the legal basis is the fulfillment of legal obligations) and for **legitimate interests** such as to assert or defend the rights of the Company (for this purposes the legal basis is the pursuit of legitimate interests).

3. Mandatory provision of the provision

Provision of data for the purposes under point 2(A) of the privacy policy is optional. However, should you not provide the data, it will be impossible to follow up on the request and inform you of the availability of the product.

The consent for the purposes under point 2(A) of this information is always optional, but the lack of consent will make it impossible to follow up the request and inform it then on the availability of the product. Provision of data for the purposes under point 2(B) of this privacy policy are necessary and failure to provide them could make impossible to follow up on the request and inform you of the availability of the product.

4. Data addressee categories

The data collected and processed cannot be communicated by illycaffè for the purposes under point 2(A) of this privacy policy. For the purposes of point 2(B) of this privacy policy, illycaffè may disclose data to lawyers, solicitors, public authorities, the judiciary, the police, the post office (as the address is visible for the sending of any written material). illycaffè will only disclose data which are essential to achieve each of the aims of the privacy policy.

The data may be disclosed on behalf of illycaffè, each for own role, to all subjects delegated by illycaffè (legal staff, also external to the Company, marketing staff also external to the Company, staff in charge of the website also external to the Company, advisors also external to the Company – such as legal advisors, IT experts that may also perform the role of system administrators, quality service staff and staff in charge of the administration of the website – IT staff that may also perform the role of system administrators, mailing and enveloping staff also external to the Company, trainees, staff of internal and external Data Processors) and internal and external Data Processors (such as enveloping and mailing companies, marketing companies, IT outsourcers and more in general consultants performing instrumental activities such as legal and communication advisors). The list of Data Processors is always available by contacting the Data Controller.

5. Data retention

Data will be retained by illycaffè 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 the purposes described in point 2(A) of this policy, the data can be retained until the fulfillment of the request; in any case, all data may be retained for a period necessary to assert or defend a company right according to Italian and European regulations.

6. Data Controller and Data Protection Officer

The Data Controller is illycaffè S.p.A., having its registered office in via Flavia 110, Trieste, phone number +39.040.3890.111, fax number +39.040.3890.490, e-mail: infoprivacy@illy.com. There is also a Data Protection Officer available at the email address dpo@illy.com and at the addresses of the Company.

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 exercising 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 Italian Data Protection Authority, whose references can be found on the website www.garanteprivacy.it.

9. Processing procedures

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 retained and processed by illycaffè in compliance with its confidentiality requirements and with the applicable local provisions in the different states in which illycaffè has its offices (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 illycaffè exclusively to achieve the aims set forth in this privacy policy. Data will be filed at illycaffè S.p.A. offices and at the appointed data processors (as well as third parties who receive data as specified in point 4 of this privacy policy). Data will be entered in databases, including IT databases.

This privacy policy is updated as at 09/30/2020. 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 (e-mail dpo@illy.com).