

Privacy Policy

Delvaux Design Coordination and Finance SA and/or its subsidiaries (hereinafter "we/our" or "Maison Delvaux"), undertake to protect and respect your privacy (hereinafter "you/your"). To obtain the name and address of the subsidiaries that are responsible locally for processing your data, [click here](#).

This Privacy Policy (the "Policy") is intended to clarify how we process the personal data of our customers, prospects, job applicants, partners and suppliers, which we collect, or which you provide to us (for example by visiting our website www.delvaux.com (the "website"), purchasing online products from us, filling in a form you receive in a physical store during your visit). Please read the following carefully to understand how we will use your information.

Please note that when using this website you may be subject to additional Terms and Conditions, such as General Terms and Conditions of Sale which may supplement this Policy.

Our Policy informs you about:

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1. The identity of the entity responsible for processing your information

The entity responsible for processing your personal data is Delvaux Design Coordination et Finance S.A, a company incorporated under Belgian law with registered office at 7, Boulevard Louis Schmidt, 1040 Brussels, Belgium, registered with the Crossroads Bank for Enterprises under number BE 0448.178.305.

If you have any questions or requests regarding our Policy or the way we process your data in general, please contact us via section 14 below.

We do not knowingly collect personal information from children who is 13-16 years old without proper parental consent. If you are a parent or guardian of a child using our services, please send us an email at dataprivacy@delvaux.com to view the information provided by the child and require that it be deleted. We will promptly address the issue.

2. How we collect your information

Depending on the nature of the relationship you have with Maison Delvaux, we may collect your personal information, directly or indirectly, in various ways when you:

- Fill in a form (paper or electronic) received in a physical store .
- Visit our website, online applications or open our emails (e.g. through cookies or similar technologies).
- Interact with our sales advisers on each visit to a physical store of Maison Delvaux.
- Contact us directly by email, phone, post, message (instant messaging applications), via our website, web form, or by any other means.
- Interact with any of our online checkouts.

Purchase online products from us. We may collect information on third-party sites (e.g. Facebook, Instagram, etc.) when, for example, you give us an opinion or comment about our products and services.

1. Finally, we also collect information we receive from other sources. We are indeed working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services) who may share information with us.

3. What information do we collect

We collect and process the following data about you when you access, interact, or operate with the website and/or services and products.

- **Personal identification data** (including surname(s), given name(s), email, phone number, date of birth, postal address, delivery address, country of residence, and optionally your passport number as part of a tax-free procedure), e.g. when you fill in a form in a physical store; when you purchase a product on our website; to verify your email address to help prevent spam, fraud, and abuse; to send you information about Maison Delvaux products and services that can enhance your use of the service; to communicate with you.
- **Technical information (electronic data)**, including the IP address used to connect your computer to the internet, the type and version of the browser, the time-zone setting, the browser plugins' type and versions, the operating system and platform, the device ID, etc. on each visit to our website e.g. to keep our website secure and prevent of fraud; to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, and for statistical and survey purposes.

- **Preferences regarding our collections or other luxury brands**, as well as your interests and lifestyle during your visits to our physical store based on our interactions and meetings with you e.g. to provide you with information about other services and products which we offer and which may be of interest to you.
- **Image** when you visit our physical stores equipped with video surveillance systems (CCTV) to protect you and Maison Delvaux's physical stores.
- **Information related to payment orders** (such as name and other details identifying the customer, destination country of the payment transaction, amount and currency of the payment transaction; International Bank Account Number ("IBAN") when such bank account has an IBAN code, or the bank account code as corresponds in each case) e.g. to verify and execute financial transactions related to your payments.
- **Employment-related personal information** (such as employment responsibilities, name, location of employment) to review and evaluate your application when you apply via our website or a third-party site (e.g. LinkedIn). **Ordinary information** about you based on messages you post on third-party sites, or via comments/reviews, or when you contact us by email, post, telephone or any other communication channels e.g. to answer all your inquiries/questions
- And any other information about you that needs to be processed according to the General Terms and Conditions of Sale.

4. Cookies

Our website uses cookies. They help us in particular to provide you with a good experience when you browse our website and also allow us to improve it. For more information about cookies and why we use them, please refer to our [Cookie Policy](#).

5. How your information is used

In accordance with the legal basis explained in section 6 below, we use your information as follows:

- To process your purchases, online and offline, and manage your relationship with Maison Delvaux in order to improve the management of our relationship with you and keep track of your purchases, particularly for after-sales service issues.
- To provide you with information about other services and products which we offer and which may be of interest to you.
- To verify and execute financial transactions related to your payments.
- To answer all your inquiries/questions when you intentionally communicate with our sales consultants via instant messaging applications (e.g. WhatsApp, WeChat, Line, KakaoTalk or similar).
- To review and evaluate your application when you apply via our website or a third-party site (e.g. LinkedIn).
- To inform you of changes to our services.

- To fight against counterfeiting and related sales of Maison Delvaux products.
- For marketing purposes: to contact you, with your consent if necessary, in order to invite you to events, and to offer you marketing content which is appropriate, personalised, and likely to interest you.
- To conduct market research/data analysis and identify customer profiles.
- To manage contracts and relationships with our suppliers and partners.
- For security purposes: we process your data and images (from our surveillance cameras) to protect you and Maison Delvaux and its physical stores.
- To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, and for statistical and survey purposes.
- To improve our website and social networks to ensure that content is presented in the most efficient way for you and your computer/device.
- As part of our efforts to keep our website secure and prevent of fraud.
- To measure or understand the efficacy of the advertising and marketing campaigns we offer, and to provide you with relevant advertising.
- To deliver our products. We use your personal data to take and handle your orders online and deliver the products.

6. The legal basis

Your information is collected and processed on the following legal basis:

- Where it is necessary for the pursuit of our legitimate interests, provided that your fundamental rights and freedoms are not affected (e.g. we use your information to establish your preferences in order better to customise our product offerings, prevent fraud and secure our website).
- Where it is necessary to perform our contractual obligations towards you including the repair of a bag, to complete your payment transaction for a product, to contact you as necessary in connection with a contract with you (the delivery of a product).
- Where it is necessary to fulfil our legal or regulatory obligations to which we are subject (e.g. we collect your bank account information for identity verification, or as part of our billing obligations;).
- Where you have given your consent for collection and processing, e.g. if you have given your express consent for this purpose, we are likely to use your

contact data (email, phone, postal address) to send you marketing materials.

7. The disclosure of your information

For the purposes mentioned above, we may share your information with:

- our affiliated companies in the group;
- our commercial partners (e.g. for delivering packages); banks and insurers;
- our professional advisers;
- our IT service providers;
- our providers of marketing services;
- providers of online payment services;
- providers of analysis and search engines which help us improve and optimise our website, such as Google Analytics.
- Fraud detection agencies and other third parties who operate and maintain fraud detection registers.
- Third party service providers related to the operation and maintenance of the information systems processing your personal data (these providers only have access to the personal data necessary to carry out their missions).
- The courts and tribunals of the judicial order in the event of a dispute involving you;
- Law enforcement authorities in the event of a finding or a suspicion of the occurrence of an offence involving you in accordance with or as required by applicable law.

We will also disclose information to third parties under the following circumstances:

- In the event of the purchase or sale of a business or assets, we reserve the right to disclose your personal information to the vendor or purchaser of the business or assets.
- During such transactions, if Maison Delvaux or all of its assets were to be purchased by a third party, the information concerning its customers would be part of the assets transferred.
- Where we are required to disclose or share your information in order to comply with a legal obligation or to protect the rights, property or security of Maison Delvaux, of our customers or of others. This includes the sharing of information with public authorities (including the judicial authorities and the police) in the event of, for example, a cyber incident.
- Where necessary to achieve one of the purposes described in section 5 of this Policy.

8. The transfer of your information

We may transfer your information outside the European Economic Area (EEA), including to Canada, the United States, Japan, Korea, Hong Kong, Macau, Singapore where necessary (i) to achieve any of the purposes set out in Section 5 and/or (ii) to disclose your information to a third party in accordance with Section 7 of this Policy.

If your information is transferred outside the EEA, we will ensure that it is protected via the following guarantees:

- The laws of the country to which your information is transferred must ensure an appropriate level of data protection (Article 45 of the GDPR); or
- The transfer must be governed by data protection provisions approved by the European Commission (Article 46.2 of the GDPR) or be subject to the EU-US Privacy Shield.

If you would like to learn more about the transfer of your data and/or the safeguards in place (including how to obtain a copy), do not hesitate to contact us via the channels given in section 14 below.

9. Your rights

You have certain rights regarding the information we hold about you. You can exercise these rights by contacting us (see details regarding contacts below):

- You have the right to access the information we hold about you – in fact, we want you to be aware of the information we hold about you, and we want to allow you to verify whether we process your information in accordance with the applicable legislation relating to data protection.
- You have the right, under certain circumstances, to request restrictions on, or the termination of, the processing of your information. Where processing is restricted, we will continue to store your data, but we will no longer use it.
- You have the right to request correction of your information if it is inaccurate or incomplete.
- You have the right, under certain circumstances, to request the deletion of your information from our systems.
- You have the right to lodge a complaint with the national data protection authority about how we handle or process your information.
- If our processing of your personal data is specifically based on your consent, you have the right to withdraw that consent at any time. This includes your

right to withdraw your consent for use of your data for direct marketing purposes;

- You have the right, under certain circumstances, to receive your data in a structured, commonly-used, machine-readable and interoperable format so that you can reuse it for your own purposes in different services. For example, if you want to work with another service provider, you can move your data easily and securely to your new service provider.

You also have the right to object to certain types of processing, including processing for direct marketing purposes.

Please note, however, that we may retain and use certain information for legal or administrative purposes (e.g. maintaining accounts).

For all the aforementioned requests, please send us an email with as subject "request regarding data protection" and include a copy of your identity card or other proof of your identity (e.g. a driver's licence) to help us prevent unauthorised access by anyone to your information or its modification or deletion. We will respond as soon as possible. If we require more than one month from receipt to respond to your request, we will keep you informed.

10. The security of the information collected

We have implemented a number of security measures on our website with the aim of preventing unauthorised disclosure of, or access to, information collected and/or received. We have strived to create a secure and reliable website. Please note however that the confidentiality of any communication or other material transmitted to us or which we transmit to third parties via our website or by email cannot be guaranteed. We accept no responsibility for the security of the information transmitted using these methods.

All information you provide to us is stored on secure servers in the EEA. When you receive (or choose) a password that allows you to access certain parts of our website, you are responsible for maintaining the confidentiality of that password. We ask you not to share your passwords.

11. The retention of your information

The information we collect is stored in accordance with the applicable data protection legislation. We ensure that your personal data are kept for no longer than is necessary for the purposes for which they are processed as set out in this Policy.

Unless described in the table below, when determining the relevant retention periods, we will take into account factors including: our contractual obligations and rights in relation to the information involved; legal obligation(s) under applicable law to retain data for a certain period of time; statute of limitations under applicable law(s); our justifiable reasons for processing where we have carried out balancing tests; and guidelines issued by relevant data protection authorities.

You will find below the list of purposes with the corresponding retention periods:

| Processing activities | Retention period |
|---|---|
| Management of pre-contractual relations with potential customers (prospects). | The retention period is 3 years from the last action/reaction on the part of the person concerned. |
| To process your purchases (online and offline) and manage your relationship with Maison Delvaux to improve the management of our relationship with you and keep track of your purchases, especially for after-sales service issues. | The retention period is 10 years from your last purchase. |
| To verify and execute financial transactions related to your payments. | The retention period is 10 years from your last purchase. |
| To answer all your inquiries/questions when you intentionally communicate with our sales consultants via instant messaging applications (e.g. WhatsApp, WeChat, Line, KakaoTalk or similar). | The retention period is 3 years from your last purchase. |
| To review and evaluate your application when you apply via our website or a third-party site (e.g. LinkedIn). | The retention period is 6 months from submission of your application. |
| For marketing purposes | The retention period is 5 years from the last action/reaction on the part of the person concerned. |
| To conduct market research/data analysis and identify customer profiles. | The retention period is from 3 to 10 years depending on the initial purpose for which the data was collected. |
| To manage contracts and relationships with our suppliers and partners. | The retention period is 10 years from the end of the contract with you. |

Except if:

- the processing of your data is necessary in the context of actual or potential litigation (e.g. we need this information to establish or defend rights), in which case we will keep your data until the end of such a dispute; and/or
- retention is necessary to enable us to comply with any legal or regulatory obligations (e.g. for tax purposes), in which case we will keep your information as long as is necessary to fulfil that obligation.

12. Third-party websites

Our website may, from time to time, include links to or from the websites of our networks of partners, advertisers or subsidiaries. If you follow a link to one of these websites and/or applications, be aware that such websites and/or applications have their own privacy policies over which we have no control. They are therefore not the subject of this Policy and we decline all responsible for those policies. Please check such policies before sending any information to such websites and/or applications.

13. Consent for the collection and use of your information - changes to our Policy

By using our website, or by completing the form distributed in our shops, you acknowledge to having read the terms of this Policy and agree to the collection and use of your information as indicated above.

We may change this Policy at any time, in particular to reflect any (potential) legislative or regulatory changes. All changes we make to our Policy will be posted on our webpage and, if applicable, will be brought to your attention by email.

Continued use of our website following the publication of these changes this Policy implies your acceptance of these changes.

This Policy was last updated on 3 April 2020

14. How to contact us

If you have any questions, comments or queries regarding this Policy, you can write to the following address: Delvaux Design Coordination et Finance S.A., attention of the head of the legal department, 7, Boulevard Louis Schmidt, 1040 Brussels, Belgium; or by email to dataprivacy@delvaux.com.