# **Privacy Policy**

Delvaux Korea (hereinafter "we/our" or "Maison Delvaux") undertakes to protect and respect your privacy (hereinafter "you/your").

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 <a href="www.delvaux.com">www.delvaux.com</a> (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:

- 1. The identity of the entity responsible for processing
- 2. How we collect your information
- 3. The information we collect
- 4. Cookies
- 5. How your information is used
- 6. The legal basis
- 7. The disclosure of your information
- 8. Your rights
- 9. The security of the information collected
- 10. The retention of your information
- 11. Third-party websites
- 12. Destruction of Personal Information
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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 Korea, a Korean company with headquarters at S&S Tower 7F, 409 Dosan-daero, Gangnam-gu, Seoul Korea (06014).

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 accept registrations or orders submitted by, and will not knowingly collect personal information from a child under the age of sixteen (16) years, or any other age limit set out by the law of his/her country of residence without proper parental consent. If you are a parent or guardian of a child using our services, please send us an email at <a href="mailto:clientserviceKR@delvaux.com">clientserviceKR@delvaux.com</a> 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. 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.

#### If you are a Consumer:

- 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.

• **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.

#### If you are a job applicant:

- Personal identification data (including surname(s), given name(s), email, phone number, date of birth, postal address, delivery address and country of residence), e.g. to review and evaluate your application when you apply via our website or a third-party site
- 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

## If you are our supplier or business partner:

- **Personal identification data** (including surname(s), given name(s), email, phone number, date of birth, postal address, and country of residence), e.g. to maintain our business relationship with you and/or your employer.
- **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.

#### 4. COOKIES

Our website uses cookies. Cookies are small text files that are saved on your device when you visit our website that help us in particular to provide you with a good experience when you browse our website and also allow us to improve it. Cookies may contain information about your use of our website or enable us to recognize you and your device the next time you visit our website.

There are various ways to configure and manage cookies: you can either deactivate Delvaux or third-party cookies using your browser settings, or you can use our cookie setting tool to manage your cookie preferences (accept/reject).

For example, the following hyperlinks tell you how to disable the use of cookies in some browsers and/or how to delete cookies:

- Chrome: https://support.google.com/chrome/answer/95647?hl=en;
- Internet Explorer: https://support.microsoft.com/...;
- Microsoft Edge: https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy;

- Mozilla Firefox: https://support.mozilla.org/en...; and https://support.mozilla.org/en...;
- Safari: https://support.apple.com/guid....

You can also deactivate and withdraw your consent for cookies deposited by Maison Delvaux using our cookie management tool.

# 5. HOW YOUR INFORMATION IS USED

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

#### If you are a Consumer:

- 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 inform you of changes to our services.
- To fight against counterfeiting and related sales of Maison Delvaux products.
- To conduct market research/data analysis and identify customer profiles.
- 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 pages on social network services 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.
- For marketing purposes (with your optional consent if necessary). To contact you in order to invite you to events, and to offer you marketing content which is appropriate, personalized, and likely to interest you.

#### If you are a job applicant:

 To review and evaluate your application when you apply via our website or a third-party site (e.g. LinkedIn).

## If you are our supplier or business partner:

• To manage contracts and relationships with our suppliers and partners.

## 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 otherwise 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

## 7.1 Entrustment

For the purposes mentioned above, we may share your information electronically immediately, and from time to time, upon receipt of information with the following entities for the following purposes, for as long as necessary to achieve the purposes described below.

Entrustee/Recipient	Purpose of Transfer	Type of PI Subject to Transfer
Delvaux Design Coordiation & Finance S.A. (Belgium, dataprivacy@delvaux.com)	storage and management of database system, maintenance of database application, provide user attribution analysis service, provide hosting service	All information collected
Kerry Logistics (Korea) Inc (Korea, contact.korea@kerrylogistics.com)	logistic, storage and delivery	All information collected
Tricor Korea Co., Ltd (Korea, info@kr.tricorglobal.com)	provide corporate accounting services	All information collected
HSBC Seoul branch (Korea, info@kr.hsbc.com)	Banking services	All information collected
NHN KCP Corp. (Korea, privacy1@kcp.co.kr)	online payment service provider	All information collected

Adyen Paris info@adyen.com)	(France,	online payment service provider	All information collected
Combell NV administration@combe	(Belgium, ell.com)	provide hosting service	All information collected

#### 7.2 Third party data provision

We may also disclose information to third parties under the following circumstances, and where required under the Personal Information Protection Act, we will seek your consent prior to such disclosure:

- 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.
- 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.

## 8. 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.
- 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.
- 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.

Please note, however, that we may retain and use certain information if required or permitted by law.

For all the aforementioned requests, please send us an email with as subject "request regarding data protection" and include your verification details, such as name, email address, phone number and date of birth, to help us prevent unauthorized access by anyone to your information or its modification or deletion. We will respond as soon as possible.

#### 9. 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. 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.

#### 10. 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 specifically described in the table below, we will retain your information to the extent necessary to fulfill the purposes of processing.

You will find below the list of purposes with the corresponding retention periods, all of which apply to customers, except for the last two items which respectively apply to our suppliers and business partners, and job applicants:

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.
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.
(For suppliers and partners) To manage contracts and relationships with our suppliers and partners.	The retention period is 10 years from the end of the contract with you.
(For job applicants) 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.

# 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), some of which are stated below, in which case we will keep your information as long as is necessary to fulfil that obligation.
  - Act on Consumer Protection in Electronic Commerce:
    - Records on your cancellation of an order, your payment for a purchased item, and our supply of a good/service: 5 years
    - Records on the handling of consumer complaints or disputes: 3 years

- Records on advertisements and labels: 6 months
- Protection of Communications Secrets Act
  - Records on your visits to our website: 3 months

#### 11. 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.

#### 12. DESTRUCTION OF PERSONAL INFORMATION

In principle, we immediately destroy your data after the purpose of collection and use of the personal information is achieved.

Once the purpose is achieved, user's personal information is moved to a separate DB (or a document box in the case of papers) and is destroyed after storage for a certain period depending on data protection reasons under our internal policy and other applicable laws and regulations (please refer to the period of retention and use of personal information). The personal information moved to a separate DB will not be used for other purpose other than the purpose of retention, unless otherwise provided by laws.

We delete personal information stored in the form of electronic file by using the technical means that make it impossible to restore the data. For personal information printed in papers, we shred it using paper shredder or incinerate it.

## 13. CHANGES TO OUR POLICY

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 in advance and, if applicable, will be brought to your attention by email.

This Policy was last updated on 3<sup>rd</sup> of May 2021. The previous versions of the privacy policy may be accessed at <a href="https://delvaux-media.imgix.net/general/20200410-Delvaux-External-Privacy-Policy-eng.pdf">https://delvaux-media.imgix.net/general/20200410-Delvaux-External-Privacy-Policy-eng.pdf</a>

#### 14. HOW TO CONTACT US

If you have any questions, comments or queries regarding this Policy, you can write to the following address: Delvaux Korea, a Korean company with headquarters S&S Tower 7F, 409 Dosan-daero, Gangnam-qu, Seoul 06014, Korea. The client service department of La Maison

Delvaux may be contacted by email at the following address: <u>clientserviceKR@delvaux.com</u> and by phone at +82-2-517-8322.