

Personal Information Management Policies of Richemont Korea Ltd trading as Delvaux.

Richemont Korea Ltd trading as Delvaux (hereinafter “**Delvaux**”) hereby establishes and discloses the following personal information management policies for the protection of personal information of data subjects and a prompt and smooth management of any grievances thereon in accordance with the Personal Information Protection Act (the “**Act**”).

Article 1 (Purposes of Managing Personal Information)

Delvaux shall manage personal information for the following purposes. The personal information being managed shall not be used for any purpose other than those described in the following, and in the event of any change to such purposes, Delvaux shall take required actions such as separately obtaining the consent to such change or posting the revised policies on the website pursuant to the Act:

① Management of membership to the website

Delvaux shall manage personal information for the verification of the intent of an applicant to become a member, identification and authentication of an individual for the provision of membership services, retention and management of membership eligibility, verification of individual identity according to the execution of the limited verification of identities system, prevention of improper usage of services, verification of the consent of the legal representative when managing the personal information of a minor under the age of 14, various types of notifications, management of grievances, improving contents of the website and provision of customized web-based service to members, etc.

② Provision of goods or services, dealing with enquiries and requests, and management of accounts and records

Delvaux shall manage personal information to manage and fulfil purchase orders, sending of agreements and invoices, delivery of contents, delivery of customized services, identity and age authentication, payment or settlement of fees, and collection of debts, dealing with customers' requests and enquiries, and management of our accounts and records etc. Delvaux shall manage personal information to send service-related communications, including announcements and administrative messages such as order confirmation and to manage and fulfil repair orders and to provide after service care.

③ Management of grievances and legal compliance

Delvaux shall manage personal information for the verification of the identity of a person who filed a complaint; identification of the matter being complained of; contact and notification for inquiry of facts; and notification of the result of the grievance management, etc.

Delvaux shall manage personal information for prevention of fraud and other prohibited or illegal activities and as part of our efforts to keep our website and platforms secure.

④ Customer management, market research and marketing

Delvaux shall manage personal information:

- to deal with your enquiries and requests;
- for the purposes of sending you newsletters and marketing communications, direct marketing and advertisements in the business areas in which it operates and of providing information related to products, services or events, etc. through online display ads or using communication channels you have provided, including email addresses, mobile numbers, telephone numbers, social media platform ID and postal addresses;
- to conduct customer satisfaction survey and market research based on your purchases via your account or guest checkout so that we can continuously improve the service we provide to our customers; and
- to understand how our website and platforms are used so that we can continuously improve our platforms, services and other offerings.

⑤ Provision of integrated services

Delvaux provides the services, as integrated services of ① to ④ above, from all channels, including websites, mobile applications, boutiques and/or client relations center. Under the membership service, once a customer registers with Delvaux whether on the website or mobile applications, or with a boutique or client relations center, the customer can access services offered online, offline and client relations center. For example, a customer creating an online account would be able to receive both online and offline services. Where Delvaux invites customers to join its care program to receive international extended warranty, the customers can also receive membership services.

※ In commercial activities, we assume that a customer have the appropriate capacity for civil conduct. We understand the importance of safeguarding the personal information of minors. The Platforms are not directed at any minor who we know to be under the age of 14, nor do we collect any personal information from any minor who we know to be under the age of 14. We may collect your birthday information to verify your age. If you are under the age of 14, you should not use the Platform and should not submit any personal information to us. In case we find that you are under the age of 14 but you submit your personal information to us, we will terminate services to you (including account cancelation) and delete such personal information as soon as possible.

Article 2 (Personal Information Items Under Management)

Delvaux manages the following items of personal information.

① Information that may be collected from the website

- Purpose of collection: Management of membership to the website, access to call agents, reservation of visit and subscription to newsletter, deal with customers' enquiries and requests, and provision of membership services

1. Account creation/Membership registration
 - Mandatory: *first name, last name, e-mail, password, phone number*
 - Optional: *date of birth, gender, country/region*
 2. Enquiry (Contact us)
 - Mandatory: *first name, last name, e-mail, subject (product information, care instructions, find a boutique, online order, press, any other question), message (open)*
 - Optional: *country/region*
 3. Newsletter subscription
 - Mandatory: *title, first name, last name, e-mail, phone number*
 - Optional: *country/region*
- ② Information that may be received through customer cards at offline boutiques
- Purpose of collection: management of membership, provision of goods or services, dealing with enquiries and requests, management of claims and legal compliance, customer management and marketing, and provision of membership services
 - Mandatory: *title, name, preferred language, country*
 - Optional: *company, e-mail, address (home/business), house number, street name, postal code, city, mobile, telephone, date of birth, date of birth partner, wedding date.*
- ③ Information that may be collected from the Client Relations Center
- Purpose of collection: Customer registration, receiving calls from customers, quotation of price for repairs, and answering inquiries on products and boutiques, telephone sale, and for security, training or development purposes, and provision of membership services.
 - Mandatory: *first name, last name, e-mail, subject (product information, care instructions, find a boutique, online order, press, any other question), message (open)*
 - Optional: *country/region*
- ④ Information that may be collected when you purchase products in boutiques, online or by phone
- Purpose of collection: completion of transactions, delivery of goods or services, dealing with enquiries and requests, and providing customer services (including customer care, after-sale and repair services), and provision of membership services
 - Mandatory: *first name, last name, e-mail, subject (product information, care instructions, find a boutique, online order, press, any other question), message (open), address (shipping and billing), payment method, phone number*
 - Optional: *company name, VAT number, State.*
- ⑤ Information that may be collected through customers' access to and use of the website: Delvaux operates a computer system whereby Delvaux collects IP address (where available), ~~MAC~~ MAC address, service usage records, visit records, improper usage records and other information collected by automatic tracking technologies, such as Cookies. Cookies are text files, containing

small amounts of information, which are downloaded to your computer or mobile device when you visit a website or mobile application.

There are two broad categories of cookies:

- **First party cookies**, served directly by Delvaux to your computer or mobile device. They are used only by Delvaux to recognise your computer or mobile device when it revisits our Platform.
- **Third party cookies**, which are served by a third-party service provider on our Platform and can be used by the service provider to recognise your computer or mobile device when it visits other platforms. Third party cookies are most commonly used for platform analytics or advertising purposes.

Cookies can remain on your computer or mobile device for different periods of time. Delvaux uses both 'session cookies' and 'permanent cookies'. Session cookies exist only while your browser is open and are deleted automatically once you close your browser. Permanent cookies survive after your browser is closed and can be used to recognise your computer or mobile device when you open your browser and browse the internet again.

What cookies does Delvaux use?

The Platform serves only the following types of cookies to your computer or mobile device:

<i>Type of Cookie</i>	<i>Purpose</i>
Cookies necessary for essential purposes	These cookies are essential to provide you with services available through this Platform and to use some of its features, such as access to secure areas. Without these cookies, services you have asked for, like transactional pages and secure login accounts, would not be possible.
Functional Cookies	These cookies serve a variety of purposes related to the presentation, performance and functionality of this Platform. Their overall purpose, however, is to enhance visitors' experience and enjoyment of this Platform. For example, some of these cookies enable visitors to specify language, product or other platform preferences.
Performance Cookies	These cookies are used to collect information about how visitors use our Platform. The information gathered does not identify any individual visitor and is aggregated. It includes the number of visitors to our Platform, the platforms

	<p>that referred them to our Platform and the pages that they visited on our Platform.</p> <p>We use this information to help run our Platform more efficiently, to gather broad demographic information and to monitor the level of activity on our Platform.</p>
Advertising Cookies	<p>When you visit our Platform or click on advertisements or promotional areas on the Platform these cookies are used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help to evaluate the effectiveness of advertising and promotion.</p> <p>They are usually placed by advertising networks with our permission. They remember that you have visited a platform and this information is shared with other organisations such as advertisers.</p>
Social Cookies	<p>These cookies enable users to share pages and content through third party social media and other platforms. The companies that serve these cookies may also use your information to serve targeted advertising on other platforms.</p>

1. Purpose of collection: analysis of the frequency of customers' visit and use of the website; implementation of targeted marketing (for example, to ensure that the adverts you see online are more relevant to you and your interests); provision of customized or personalized service (for example, to remember your language and/or product preferences); analysis of preference or interests of customers; and upgrade and improvement of the website and its contents; and provision of membership services; internal reporting
2. Rejection of cookies: Customers may choose not to store cookies by selecting the relevant option under the web browser. Customer may require Delvaux to obtain a prior consent before Delvaux collects cookies from the customer's browser and may also refuse to provide any cookies to Delvaux. However, please note that if you choose to refuse cookies you may not be able to use the full functionality of our Platform.
 - (a) Setting in the web browser
 - Microsoft Edge: Select "Settings" menu at the top right side of the browser. > "Cookies and data stored" > "Manage and delete cookies and site data"
 - Chrome: Select "Settings" menu at the top right side of the browser. > "Show advanced settings" > In the "Privacy" section, click "Content settings". > Cookies
 - (b) A customers may contact the personal information protection officer or the department specified above for exercising veto power on behavior information.

We use this information to better understand how visitors use our website and for internal reporting purposes. We will anonymise and not identify individuals through such information without your consent, and share the anonymized information with

advertisers, sponsors or other business.

- ⑥ Information collected through our mobile applications or when you interact with us over social media or other digital platforms
- Purpose of collection: answering customers' queries on goods and services, making boutique appointments and providing information, customer management and marketing, analyzing preferences or interests of customers and update the contents, and location services etc.
 - Optional: *social handle*

Article 3 (Management and Retention Period of Personal Information)

- ① Delvaux shall manage and retain personal information within the legal retention and use period of personal information or within the retention and use period of personal information consented to by the data subject at the time of collecting personal information.
- ② The period of managing and retaining personal information for the purposes set out in Article 1 is as follows.
1. For the registration and management of membership to the website, Delvaux shall manage and retain personal information until the earlier of (i) the achievement of the purpose of retention of personal information and (ii) 2 months following the withdrawal of membership from the website of business operator or organization; provided, however, in the case of an occurrence of any of the following events, until the end or resolution of such event:
 - 1) Any pending investigation or probe following any violation of relevant laws, and
 - 2) Any remaining debts or claims which arose from using the website.
 2. For the provision of goods or services, Delvaux shall manage and retain personal information until the completion of the supply of such goods or services, and the completion of the payment or settlement of fees, or until the objective of personal information management is achieved; provided, however, that the personal information necessary for accounting treatment of Delvaux or reflected in the books and records material to the business of Delvaux shall be maintained for 10 years pursuant to the Commercial Code of Korea.
 3. For management of grievances and legal compliance, Delvaux shall manage and retain personal information until the service or follow-up service of customers' grievances and complaints is completed.
 4. For customer management and marketing, the personal information will be managed and retained until the earlier of (i) the time it is withdrawn by the customer and (ii) the time the purpose of collecting the personal information has been achieved.
 5. For the provision of integrated services, Delvaux shall manage and retain personal

information until the earlier of (i) the achievement of the purpose of retention of personal information and (ii) 2 months following the withdrawal of your consent.

6. 6.. Notwithstanding the foregoing, Delvaux may retain customers' personal information for a longer time period as required by applicable laws or government orders.
 - Records on the contract or subscription withdrawal, etc.: Stored for 5 years
 - Records on the payment and supply of goods, etc.: Stored for 5 years
 - Records on the consumer complaints or dispute settlement: Stored for 3 years
 - Login information: 3 months
- ③ In the interest of protecting the personal information of customers who have been inactive for one (1) year or longer (the “**Inactive Customers**”), Delvaux shall separately store and manage the personal information of Inactive Customers from the personal information of other users.
 1. Inactive Customers shall be determined based on factors such as login dates and customer service representative contact dates, and shall mean customers who have not used our services for a period of time as designated by the relevant laws and regulations.
 2. Delvaux shall provide users with prior notice one (1) month before they are classified as Inactive Customers and their information is separately stored and managed.
 3. The separately stored and managed personal information of Inactive Customers shall be maintained for a certain period of time pursuant to the relevant laws and regulations, and shall be used unless demanded by applicable laws. Any personal information not destroyed shall be provided upon the user's request to resume use of the services.

Article 4 (Consignment/Delegation of Management of Personal Information to Overseas Affiliates for Processing)

- ① Delvaux shall manage the personal information of data subjects within the extent set forth in Article 1 (Purposes of Managing Personal Information). In order to better service customers and properly gather, process and manage customer data, Delvaux may delegate the management and processing of such personal information to its overseas affiliates listed in paragraph ⑥ below in accordance with the Act, including under the consent of the data subject, or when required by special provisions of other laws. Delvaux has entered into an agreement for delegation of personal information processing services with such entities.
- ② The date/time and method of transfer: transfer of personal information is carried out from time to time during the provision period of the services via electronic transfer using VPN.
- ③ The purposes of delegating the management and processing of the personal information include providing technical and IT system, storage and support for client data, conduct analysis and research based on transactions (including analysis of purchase preferences), arranging logistics and product delivery, providing customer services and all other sale, customer card and after-sale services, handling customer's requests and complaints, and providing customer communication services (including sending e-newsletter and marketing communications on behalf of Delvaux).

- ④ Items of personal information to be transferred are specified in Article 2 above.
- ⑤ Retention period of personal information performed for consignment work will be in accordance with Article 3.
- ⑥ Delvaux shall ensure that all persons and affiliates receiving such personal information shall make best efforts to make sure that the information of data subjects is safely retained according to the Act and relevant laws. Delvaux will delegate the personal information processing and management services to the following overseas affiliates:

Name of affiliate	Location and country	Person in charge of information management and services to be entrusted
Delvaux Design Coordination & Finance S.A.	Boulevard Louis Schmidt 7, 1040 Brussels, Belgium.	CRM Manager, nicolas.prieur@delvaux.com , +32 2 737 72 94
Richemont International SA	Route des Biches 10, 1752, Villars-sur-Glâne, Switzerland	CRM Manager, nicolas.prieur@delvaux.com , +32 2 737 72 94

- ⑦ At the time of entering into consignment/delegation agreements, Delvaux specifies in the agreements etc. the matters relating to prohibition of processing personal information beyond the purpose of performing the consigned duties, technical and administrative protection measures, restriction on re-consignment, management and supervision of the consignee, compensation for damages and etc., and supervises a safe management of personal information by the consignee in accordance with the Act.
- ⑧ In the event of any change to the contents or nature of the consigned duties or any change of the consignee, Delvaux shall disclose without delay such change through this personal information management policy.

Article 5 (Consignment/Delegation of Management of Personal Information)

- ① Delvaux does not consign its duties of managing personal information to any third party other than its overseas affiliates for data processing as provided in Article 4 above.
- ② In the event of any change in the consigned duties or consignees, Delvaux shall disclose such change through this personal information management policy without delay.

Article 6 (Rights and Obligations of Data Subject and Method of Exercise)

- ① The data subject may exercise any of the following rights related to personal information protection against Delvaux at any time.

1. Right to demand a view of his/her personal information;
2. Right to demand correction in case of an error
3. Right to demand deletion; and
4. Right to demand cessation of management of his/her personal information.

However, Delvaux may refuse the request for cessation of management if special provisions in the statute are provided.

- ② Any of the rights set forth in paragraph ① may be exercised against Delvaux through a written instrument, e-mail, FAX and etc. in accordance with the Appendix Form No. 8 of the Enforcement Rules of the Personal Information Protection Act, in which case Delvaux shall take relevant actions immediately. Any request pertaining to personal information or cessation of services provided by Delvaux is to be sent via e-mail at clientservicekr@delvaux.com or by mail to the following address:

Delvaux Korea
15F, State Tower
Toegye-ro 100
Jung-gu
Seoul, Korea
7F, S&S Tower

When data subject exercising the rights set forth in paragraph ①, Delvaux shall verify whether the person is himself/herself or his/her legitimate legal representative.

You are requested to notify Delvaux of any change to your personal information in order to keep your information up-to-date, and if you do not wish to receive e-mail services provided by Delvaux, you may choose to stop receiving such services at any time following the instructions specified at the bottom of the e-mail.

- ③ In the case that Delvaux is demanded by the data subject to correct or delete any error etc. in personal information, Delvaux shall not use or provide the relevant personal information until such correction or deletion is complete.
- ④ Any of the rights set forth in paragraph ① may be exercised through agents such as a legal representative or a delegated person of the data subject, in which case the power of attorney should be submitted in accordance with the Appendix Form No. 11 of the Enforcement Rules of the Personal Information Protection Act.

Article 7 (Destruction of Personal Information)

- ① If personal information becomes no longer needed such as by the elapse of the retention period, achievement of the purpose of managing personal information and etc., Delvaux shall destroy the

relevant personal information immediately.

- ② If Delvaux is required by law to keep preserving personal information even though the retention period consented to by the data subject expired or the purpose of managing personal information is achieved, the relevant personal information shall be migrated to a separate database or be kept at a different place.
- ③ Personal information is destructed based on the following procedure and method:
 1. Destruction procedure
Delvaux selects the personal information which is required to be destroyed and destroys it under the approval by the personal information protection officer in Delvaux.
 2. Method of destruction
Delvaux destroys personal information recorded and stored in the form of electronic files in a way that it cannot be re-generated, and personal information recorded and stored in the form of paper by shredding using shredding machines or by incineration.

Article 8 (Measures to Secure Safety of Personal Information)

Delvaux has put in place the following measures in order to secure the safety of personal information.

- ① Administrative measures: Establishment and execution of internal plan for management, regular staff training, and etc.
- ② Technical measures: Management of access authority to the personal information management system, installation of the access control system, encryption of authentic identification numbers, and installation of security programs
- ③ Physical measures: Restriction of access to the computer room, the data storage room, and etc.

Article 9 (Personal Information Protection Officer)

- ① Delvaux has appointed the following person as the personal information protection officer in order to take overall responsibility of the matters relating to the management of personal information and process complaints raised by data subjects and remedy any damage.

▶ Personal information protection officer

Name : SK Seo

Title : Data Protection Officer

Contact No. : <Phone> (02) 3440-5652 <E-mail> DPO_KR@richemont.com

<FAX> (02) 6016-9860

▶ Department charged with protection of personal information

Name of Department : Delvaux, Merchandising Assistant Manager

Person in charge : Clara Yeo (여승현)

Contact No. : <Phone> (02)517-8330 <E-mail> clara.yeo@delvaux.com

- ② A data subject may contact the personal information protection officer or the department specified above for any inquiry on personal information protection, complaints, remedies and etc. Delvaux is committed to answering and acting upon any inquiry from you immediately.

Article 10 (Installation and Operation of CCTV)

Delvaux has installed and is operating CCTV as follows.

- ① Basis and purpose of the installation of CCTV: Safety of facilities, prevention of fire and theft at the boutiques of Delvaux.
- ② Number of CCTV, location, and scope of recording: 85 devices are installed in major facilities including the boutiques covering the entire space of major facilities
- ③ Manager in charge: Security Team / Responsible department; and persons with access to the image data: managers and vice managers of each boutique
- ④ Duration of recording, period of storage, place of storage and method of management
 - Duration: 24 hours a day
 - Period of Storage: 35 days from recording
 - Place of storage and method of management: Stored and managed in the control rooms for CCTV at each boutique
- ⑤ Method and place of viewing image data: To be requested to the manager in charge (Security Team)
- ⑥ Request for a view of image data by a data subject: Application for the confirmation of the existence of image data of an individual and the view of such image data should be filed. The view will be allowed only if the data subject him/herself is recorded in the image or it is necessary without doubt for the protection of the life, body, and properties of the data subject.
- ⑦ Technical, administrative, and physical measures for the protection of image data: Establishment of internal management plan, access control and access authority restriction, application of technologies enabling safe storage and transmission of image data, retention of management records, preventative actions against alteration and counterfeit, preparation for facility for retention, and installation of locking mechanism, etc.

Article 11 (Remediation of infringement of rights and interests)

- ① In case for personal information infringement, data subject can apply for dispute resolution or consultation with the Korea Internet & Security Agency (KISA) and Personal Information Infringement Report Center. Additionally, please contact the institution below for complaints of other personal information infringement.
 1. Personal Information Dispute Mediation Committee : 1833-6972 (www.kopico.go.kr)
 2. Personal Information Infringement Report Center : 118 (privacy.kisa.or.kr)

3. Supreme Prosecutors' Office : 1301 (www.spo.go.kr)
 4. Korean National Police Agency : 182 (ecrm.cyber.go.kr)
- ② Delvaux are working to ensure self-determination of personal information and provide consultation and remedy for damage caused by personal information infringement. If you need to report or consult, please contact our personal information protection officer or the personnel and department charged with protection of personal information stated above in section ① of Article 9 (Personal Information Protection Officer) above.

Article 12 (Amendment to Personal Information Management Policies)

- ① The personal information management policies herein shall take effect as of 1st of August 2023.
- ② Previous personal information management policies can be found by clicking the links below:
 - [2020](#)
 - [2021](#)