

## GENERAL DATA PROTECTION REGULATION (GDPR)

This Privacy Policy is applied to all visits to the Chiba Clothing website at the url [www.chibaclothing.com](http://www.chibaclothing.com), including independently of purchases made of the items available on sale.

The website is managed by Chiba Clothing, which directly manages sales and in general, all transactions made through the website (for example, management of orders, sales, product delivery, management of returns, after-sales activities, etc.)

This Privacy Policy is regulated by Dutch law and specifically, by the Data Protection Code (legislative decree no. 196 of 30 June 2003) which regulates the processing of personal data - including if held outside The Netherlands - made by anyone residing or with registered offices in The Netherlands. The Code guarantees that personal data will be processed in compliance with the basic rights, freedoms and dignity of the data subject, especially with regard to confidentiality and the right to have this personal information protected.

### CONTROLLER FOR THE DATA COLLECTED AND PROCESSED THROUGH THE WEBSITE

With reference to the processing of data collected and processed through the website, we would like to inform you that:

Chiba Clothing (also referred to as "TRADEMARK OWNER") is the independent data controller for users browsing the website, including browsing data, and data collected for marketing and profiling purposes. Chiba Clothing is the controller of the data processing connected and related to sales made through the online store on the website and the relevant support activities, before and after sales.

### PRIVACY POLICY PROVIDED BY THE TRADEMARK OWNER IN THE CAPACITY OF INDEPENDENT CONTROLLER

#### 1. Data Controller references

The Data Controller is Chiba Clothing with registered offices at Zilverparkkade 4, 8232WJ Lelystad, The Netherlands. For any information about the controller and for a list of the persons responsible for processing your data, you can contact the Customer Service or send a request to the TRADEMARK OWNER at the address of the registered offices as provided above, or by email at [info@chibaclothing.com](mailto:info@chibaclothing.com)

#### 2. Type and purpose of the processing carried out on the website and of which the TRADEMARK OWNER is independent controller

Different types of data are collected and processed through the website for different purposes and using a variety of methods. More precisely:

- (a) personal browsing data, processed for the purpose of correct website operation as well as for marketing aims. To this regard, please read the "Cookie" specification on this page;
- (b) personal data provided voluntarily by the user (e.g. email address, personal details, password, as provided when completing the registration form), or otherwise lawfully acquired, to meet the requests of the user and offer the services, assistance and information requested;
- (c) with the user's express consent, the TRADEMARK OWNER may process the personal data of said user for the purposes of marketing, i.e., to send the user, including by newsletter, email, sms and mms, information and updates on products, sales, promotional offers, events and other initiatives promoted by Chiba Clothing.
- (d) with the user's express consent, the TRADEMARK OWNER may also process the personal data of said user for the purposes of studying consumer habits and choices.

### 3. TRADEMARK OWNER'S processing methods for personal data

The personal data collected through the website by the TRADEMARK OWNER are processed with mainly computerised and electronic methods and means, implementing the security measures so as to reduce to a minimum all risks of destruction or loss - including accidental - of the data themselves, against unauthorised access or processing without consent or in a manner that does not comply with the purpose for which they were collected, as stated in this Privacy Policy.

However, these measures, due to the very nature of online transmission, may not limit or exclude all risks of unauthorised access or dispersion of data. For this purpose we recommend making regular checks to ensure that your computer is equipped with suitable software devices to protect the data transmission network, for both incoming and outgoing data (such as updated antivirus programs) and that your ISP has implemented suitable measure for the safety of data transmission (such as firewalls and spam filters).

### 4. Mandatory or optional nature of data provision

With the exception of browsing data, the provision and collection of which are regulated in the "Cookie" section of this page, the provision of personal data collected through the website, both to deal with users' requests and questions and for the purposes of marketing and to analyse consumer habits and preferences, is free and optional. Failure to provide data will not limit use of the website, although it may make it impossible to deal with information or other requests or to send information material, updates, newsletters and invitations to Chiba Clothing events.

### 5. Area of personal data communication

The TRADEMARK OWNER communicates the personal data of website users solely within the limits permitted by law and in line with the information provided here below.

Personal data will be processed and made known, as well as to employees and consultants of the TRADEMARK OWNER and companies within the same group, by companies that provide specific technical and organisational services to the TRADEMARK OWNER connected to the website and for the management of marketing and communication activities (including, for example, the company Chiba B.V., which manages the website, among other things) in their capacity as appointed data processors. Data may also be communicated to police or legal authorities, in conformity with the law or subsequent to formal request by those subjects.

Personal data will not be disclosed and will only be transferred abroad to guarantee levels of protection and safeguarding according to law.

### 6. Rights according to the user by the privacy law

The user has the right to obtain from the TRADEMARK OWNER, confirmation of the existence or otherwise of personal data concerning them, even if not yet registered, and the communication of said data in an intelligible form. The user also has the right to obtain information as to the origin of their personal data; the purpose and method used to process them; the logic applied in case of processing carried out using electronic means; the identification details of the data controller and data processors; the subjects or categories of subjects to which personal data may be communicated or which may become aware of said data in their capacity, for example as data processing managers or persons so appointed.

The user also has the right to request the updating or correction, or when concerned, the integration of their personal data, or the deletion, anonymization or blocking of any personal data processed unlawfully, including any data which do not need to be stored with regard to the purposes for which they were collected or subsequently processed; certification that the above operations have been made

known, including with regard to content, to those to whom the data have been communicated, with the exception of those cases in which notification proves impossible or requires the use of means clearly disproportionate to the right being protected.

The user is entitled to fully or partially object, for legitimate reasons, to the processing of personal data, even if pertinent to the purpose of collection, to the processing of personal data for the purpose of sending advertising or direct marketing material, or to carry out market research or commercial communication. This right can also be exercised with specific regard to one or more methods of sending marketing messages.

The above mentioned rights can be exercised by contacting the Customer Service or sending a request to the TRADEMARK OWNER at the address of the registered offices as provided above, or by email at [info@chibaclimbing.com](mailto:info@chibaclimbing.com)

PRIVACY POLICY STATEMENT PROVIDED BY THE TRADEMARK OWNER AND BY CHIBA CLOTHING IN THE CAPACITY AS JOINT DATA CONTROLLERS

#### 1. Reference to the Joint Data Controllers and appointed Processors

With reference to data connected to sales made through the online store of the website and related activities, the companies

Chiba Clothing with registered offices at Zilverparkkade 4, 8232WJ Lelystad, The Netherlands

For any information work jointly in the capacity as joint data controllers (also referred to as “Joint controllers”).

#### 2. Type and purpose of processing by the Joint controllers

The Joint controllers directly collect personal data from the users as part of the online registration on the website, of sending purchase order forms through the website for the conclusion of e-commerce transactions and interaction with the users for functional activities for the purposes of sales, as well as for any before- or after-sales assistance required.

#### 3. Processing methods for personal data

The personal data collected through the website during activities that are inherent and instrumental to the sale of products and all that is related thereto are processed with mainly computerised and electronic methods and means, implementing the security measures so as to reduce to a minimum all risks of destruction or loss - including accidental - of the data themselves, against unauthorised access or processing without consent or in a manner that does not comply with the purpose for which they were collected, as stated in this Privacy Policy.

However, these measures, due to the very nature of online transmission, may not limit or exclude all risks of unauthorised access or dispersion of data. For this purpose we recommend making regular checks to ensure that your computer is equipped with suitable software devices to protect the data transmission network, for both incoming and outgoing data (such as updated antivirus programs) and that your ISP has implemented suitable measure for the safety of data transmission (such as firewalls and spam filters).

#### 4. Mandatory or optional nature of data provision

The provision of your personal data, specifically, personal details, email address, postal address and telephone number, are required to conclude the purchase agreement for products through the website. Some of said data may be essential to the supply of other services provided via the website and related to sales or to meet legal requirements.

Any refusal to provide certain items of information required for this purpose may make it impossible to

complete the purchasing contract for items on the website or to provide other services connected to this - such as assistance (Customer Service), the use of Wish Lists or even to meet with legal requirements. Failure to provide data may therefore constitute, according to cases, legitimate, justifiable grounds for not performing the sales contract for items purchased through the website or providing the services connected to this.

Communication of data other than information that is mandatory to meet with legal or contract obligations, such as for the provision of certain services requested is optional and failure to provide said data will not result in any consequences for the use of the website or its services, or the purchase of products from the online store.

According to cases and when necessary, the obligatory or optional nature of communicating data will be shown each time with an asterisk (\*) being placed on information that must be provided, i.e., the data that is necessary for the provision of services and to the purchase of items from the website. Failure to provide optional personal data will not involve any obligation or disadvantage.

#### 5. Area of personal data communication

Personal data may be made available to third-party companies that perform specific services for the Joint controllers, in the capacity of Data Processors (such as, for example, logistics and IT services) and or communicated to other recipients of data collected by the Joint controllers - the names of which will be specified each time - which process data autonomously, solely to perform sales contracts for items purchased from the website (such as the credit institute executing the remote e-payment services via credit/debit card) and only when this purpose is incompatible with the aims for which the data were collected and then processed, and in any case, always compliant with the law.

Data will not be communicated, given, or in any way transferred to other subjects without prior notification of same being given to users and with the consent of same, when this is required by law.

Data will not be disclosed in any way and will only be transferred abroad to guarantee levels of protection and safeguarding according to law.

#### 6. Rights according to the user by the privacy law

The user has the right to obtain from the Joint controllers confirmation of the existence or otherwise of personal data concerning them, even if not yet registered, and the communication of said data in an intelligible form. The user also has the right to obtain information as to the origin of their personal data; the purpose and method used to process them; the logic applied in case of processing carried out using electronic means; the identification details of the Joint controllers and data processors; the subjects or categories of subjects to which personal data may be communicated or which may become aware of said data in their capacity, for example as data processing managers or persons so appointed.

Users will always have the right to obtain from the Joint controllers:

- a. the update, correction or, where interested, the integration of their personal data;
- b. the deletion, anonymization or blocking of any personal data processed unlawfully, including any data which do not need to be stored with regard to the purposes for which they were collected or subsequently processed;
- c. certification that the above operations have been made known, including with regard to content, to those to whom the data have been communicated, with the exception of those cases in which notification proves impossible or requires the use of means clearly disproportionate to the right being protected.
- The user is entitled to fully or partially object, for legitimate reasons, to the processing of personal data, even if pertinent to the purpose of collection, to the processing of personal data.

- The abovementioned rights can be exercised by contacting the Customer Service or sending a request to [info@chibaclimbing.com](mailto:info@chibaclimbing.com)

Amendments and upgrades to the website Privacy Policy

The Joint controllers may amend or simply update, completely or partially, this website Privacy Policy, also in consideration of amendments to laws or regulations governing this area and protecting your rights. Amendments and updates to the website Privacy Policy will be made known to users as soon as they are implemented and will become binding as soon as they are published on the website in this section.

THIS GENERAL DATA PROTECTION REGULATION WAS UPDATED ON 03-05-2018