

PRIVACY AND COOKIES POLICY

OUR PRIVACY POLICY AT A GLANCE

1. WHO ARE WE?

We are VILANOVA ACCESSORIES, S.A. ("**VILANOVA**") and we are responsible for processing your personal data ("data controller"). Find out more.

2. WHAT DO WE USE YOUR PERSONAL DATA FOR?

Amongst other purposes, we will use your data (collected online or in person) to manage your registration as a user, manage your purchase of products or services, answer your questions, as well as to send you our personalised communications, if you so wish. Find out more.

3. ON WHAT GROUNDS DO WE USE YOUR PERSONAL DATA?

We may process your data on various grounds. For starters, we need to process your data for the performance of a contract you have entered into with us, namely when you register and make a purchase or use our services. There are other reasons for which we may use your data, such as being able to answer any questions you may have or being able to send you our newsletters, when you have given us your consent. Find out more.

4. TO WHOM CAN WE TRANSFER YOUR PERSONAL DATA?

We may transfer your personal data to service providers ("data processors") who provide us with assistance or support, as part of the contracts we have concluded with them. These service providers may be companies within the VNC Group or external subcontractors. Find out more.

5. YOUR RIGHTS.

You have a legal right to access, rectify or erase your personal data. According to the law, you also have other rights, such as the right to object to us using your data or the right to data portability, as we explain in detail below. Find out more.

We invite you to read our full **PRIVACY AND COOKIES POLICY** below, so you can better understand how we will process your personal data.

Our Privacy and Cookies Policy includes all the relevant information on the processing of our customers' and users' personal data, regardless of the **VILANOVA** channel (online or in-person) that you use to interact with us.

We are transparent about what we do with your personal data, so that you understand the implications of this processing and the rights you can exercise with respect to your personal data.

This is why we have produced a comprehensive Privacy and Cookies Policy, which you can consult whenever you wish. Furthermore, you will also have access to information about each processing of your personal data, as you interact with us.

1. WHO IS RESPONSIBLE FOR PROCESSING YOUR DATA?

The data controller is:

- **VILANOVA ACCESSORIES, S.A.**, with tax number 513532528, with registered office at Rua Fernão de Magalhães, no. 2, Fração C, 4400-629 Vila Nova de Gaia, and which is the owner of the "VILANOVA", "VILANOVA ALL ABOUT YOU".

2. WHY DO WE PROCESS YOUR PERSONAL DATA?

Depending on the specific purpose for which we process your data, we need to access and process the following personal data:

- your **identification** data (e.g. your name, surname, language and country from which you interact with us, contact details, etc.);
- **financial and payment** information (e.g. information about your purchases, orders, returns, etc.);
- **connection, geolocation and/or navigation** data (if you interact with us via mobile phone, for example);
- **commercial** information (for example, if you have subscribed to our newsletter);
- information on your **preferences** (when applicable).

When we ask you to provide us with your personal data, we will mark some fields as "required" as this is data that we need in order to provide you with the product or the service you are looking for. Please note that if you decide not to provide us with this data, it may not be possible to complete your registration as a user or you may not be able to make any purchases and/or request any services.

Depending on how you interact with our website, we will process your personal data for the following purposes:

Purpose	Description
<p>1. To manage your registration as a user of the Website</p>	<p>If you decide to register as a user on our Website, we need to process your data in order to identify you as a user and give you access to the various features, products and services that are available to you as a registered user. You can cancel your registered user account by contacting our Customer Support team.</p>
<p>2. For the production, fulfilment and performance of the contract of sale or of services that you have concluded with us through the Website</p>	<p>This purpose includes data processing that allows us to:</p> <ul style="list-style-type: none"> ▪ contact you regarding updates, or provide information, on the contracted features, products or services; ▪ manage payment for the products you buy, regardless of the payment method used; ▪ activate the necessary mechanisms to prevent potential fraud during the purchase process. If we consider that the operation could be fraudulent, this processing may result in the transaction being blocked; ▪ manage any post-purchase returns and manage enquiries about the availability of items and product reservations via the Website; ▪ bill you and issue receipts and invoices for purchases you make through the Website.
<p>3. To respond to requests you make through our Customer Support channels</p>	<p>We only process the personal data that actually need to manage or resolve your enquiry or request</p>
<p>4. For marketing purposes</p>	<p>This purpose includes the processing of your data as follows:</p> <ul style="list-style-type: none"> ▪ If you subscribe to our newsletter, we will process your personal data to manage your subscription. This will include sending you personalised information about our products or services by various means (such as email or SMS). Please bear in mind that, when applicable, this data processing may involve analysing your user or customer profile in order to determine your preferences and, therefore, which products and services are best suited to you, before we send you information. For example, your

	<p>shopping and browsing history (i.e. depending on the items you have uploaded), will help us make suggestions about products that we think may interest you and, if you are a registered user, we can activate the "basket recovery" feature;</p> <ul style="list-style-type: none"> ▪ Remember that you can unsubscribe from the newsletter at any time, at no cost, via the "unsubscribe" section in all our newsletters; ▪ Run promotion-related activities (for example, to organise competitions or to send your list of saved items to the email address you provide). When you take part in a promotional activity, you will authorise us to process the data you have provided in relation to that promotional activity and to communicate this by various means, including social media networks or the Website itself. Each promotional activity you participate in includes a set of terms and conditions that offer more detailed information about the processing of your personal data; ▪ To publish photographs or images that you have shared publicly on the Website or through our social media channels, provided that you have given us your express consent to do so.
<p>5. Functionality and quality analysis to improve our services</p>	<p>When you access our Website, we will be processing your browsing data for analytical and statistical purposes, i.e. to understand how users interact with our Website. This will allow us to improve the Website on an ongoing basis.</p>

3. WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR DATA?

The legal basis that allows us to process your personal data also depends on the purpose for which we process them, as explained in the following table:

<p>1. Manage your registration as a Website user</p>	<p>In order to register as a user on the Website, we need to process your personal data, otherwise we would not be able to manage your registration.</p>
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<p>2. Production, fulfilment and performance of the sales or services contract</p>	<p>We need to process your data if we are to conclude a sales contract or service provision contract with you.</p> <p>We consider that we have a legitimate interest in monitoring activity that will allow us to detect and prevent the possibility of fraud when you make a purchase. We see this type of data processing as being important for all parties involved. It is particularly important for users, as it allows us to take steps to protect them from third-party fraud.</p>
<p>3. Customer Support</p>	<p>We believe that we have a legitimate interest in processing your data when we respond to the requests or questions you submit through our various contact channels. We see this type of data processing as also being beneficial to you, as it allows us to assist you properly and respond to your requests.</p> <p>More specifically, when you contact us for the management of incidents related to your order or the product/service purchased through the Website, we process your data in order to be able to perform the various aspects of the contract.</p> <p>When your request is related to the exercise of your rights or to complain about our products or services, the fulfilment of our legal obligations requires us to process your personal data.</p>
<p>4. Marketing</p>	<p>The basis for the processing of your data for marketing purposes is the consent you give us. This could be when you agree to receive information through various channels, or when you accept the terms and conditions for participating in a promotion and for publishing your photographs on the Website or on our social media channels.</p> <p>When applicable, in order to send you personalised information, we may consider that we have a legitimate interest in defining a profile with the information we have about you (such as your browsing history, preferences or purchases) and the personal data you have provided us with, such as your age group or language. This is because we believe that processing this data will improve your user experience and match your preferences.</p>

5. Functionality and quality analysis	We consider that we have a legitimate interest in analysing the functionality of the Website, as we believe that processing this data allows us to improve your user experience and offer you a better service.
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4. HOW LONG WILL WE KEEP YOUR DATA?

The retention period will depend on the purposes for which we process your data, as explained below:

1. Manage your registration as a Website user	We will process your data for as long as you remain a registered user, i.e. until you decide to cancel your registration.
2. Performance of the sales or service contract	We will process your data for as long as necessary to manage the purchase of the products or services you have bought, including possible returns, complaints or claims associated with the purchase of the said product or service.
3. Customer Support	We will process your data for as long as necessary to fulfil your request.
4. Marketing	We will process your data until you unsubscribe from the newsletter. If you take part in promotions, we will keep your data for 6 months after the promotion ends.
5. Functionality and quality analysis	We will process your data sporadically for as long as we carry out a particular action. We may even anonymise your browsing data.

Regardless of the fact that we process your data for the time strictly necessary to fulfil the corresponding purpose, we may subsequently retain them, properly stored and protected, for as long as any liability could possibly arise from said processing. We will comply with the legislation in force at all times.

5. TO WHOM CAN WE TRANSFER YOUR DATA?

In order to fulfil the purposes indicated in this Privacy and Cookies Policy, we will need to transfer your personal data to entities within the Vila Nova Carneiro Group and to other entities that act as our service providers, namely:

- **financial** institutions;

- **fraud detection and prevention** organisations;
- **technology service** providers;
- **logistics and transport** service providers and employees;
- **customer support** service providers;
- **marketing and advertising** partners and service providers.

For reasons of service efficiency, some of the aforementioned providers may be located in territories outside the European Economic Area that may not offer a level of data protection comparable to that of the European Union. In such cases, we assure you that we transfer your data with adequate **guarantees and always ensure that your data is kept secure**. To this end, we make use of specific legal structures and forms, namely:

- Some providers are **EU US Data Privacy Framework certified**. You can find out more about this certification at:
<https://www.dataprivacyframework.gov/s/>
- In the case of other providers, we have signed **Commission-approved Standard Contractual Clauses**. You can read the contents of these clauses at:
https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en

6. WHAT ARE YOUR RIGHTS WHEN YOU SHARE YOUR DATA WITH US?

We are committed to preserving the confidentiality of your personal data and to guaranteeing that you are able to **exercise your rights**. You can exercise your rights by sending us an **email to our dedicated email address** (privacy@grupovnc.com), indicating the reason for your request and the right you wish to exercise.

In particular, regardless of the purpose or the legal basis on which we process your data, you have the right to:

- Ask us for **access** to the data we hold on you. Remember that, if you are a registered user of the Website, you can also find this information in your Customer area;
- Ask us to **rectify** the data we already have. Please note that, when you choose to provide us with your personal data by any means, you are assuring us that they are accurate and precise and you undertake to notify us of any changes or alterations. Any loss or damage caused to the Website, the person responsible for the Website or any third party as a result of inputting incorrect, inaccurate or incomplete information into the registration forms shall be the sole responsibility of the user in question. Please note that, as a general rule, you should only provide us with your own personal data, not that of third parties, unless allowed otherwise by this Privacy and Cookie Policy;
- Ask us to **erase** your data, to the extent that they are no longer necessary for the purpose for which they were collected or when we are no longer legally authorised to process them;
- Ask us to **limit** the processing of your data, which means that, in certain cases, you can ask us to temporarily suspend the processing of your data.

If you have given us your consent to process your data for any purpose, you also have the right to withdraw it at any time.

When our basis for processing your data is your **consent** or the performance of the contract, you also have the right to **request the portability of your personal data**. This means that you will have the right to receive the personal data you have provided to us in a structured, commonly used and machine-readable format, so that you can transmit them directly to another organisation.

On the other hand, when the processing of your data is based on our **legitimate interest**, you may **object** to the processing of your data, to the extent allowed by law.

Finally, we inform you that you have the right to lodge a **complaint with the competent data protection supervisory authority**, namely the Portuguese Data Protection Authority (<https://www.cnpd.pt/>) or other relevant authority in your country.

7. CHANGES TO OUR PRIVACY AND COOKIE POLICY

We will update the information contained in this Privacy and Cookie Policy whenever we deem this appropriate. When we do this, we will notify you in various ways, including via the Website (for example, via a banner or a pop-up) or via a message to your email address. In any case, we suggest that you read this Privacy and Cookie Policy from time to time, in case we make any minor changes or interactive improvements. You will always be able to find the most recent version on our Website.

8. INFORMATION ABOUT COOKIES

We use cookies and similar devices to make it easier for you to browse the Website, to understand how you interact with us and, in certain cases, to be able to show you advertising based on your browsing habits. Please read our Cookie Policy to find out more about the cookies and similar devices we use, their purpose and other useful information.

COOKIE POLICY

1. What is a Cookie?

A Cookie is a small text file that a website stores on your personal computer, phone or other device. It contains information on your browsing of that website. Cookies are necessary because they facilitate any searching, by making it more intuitive for the user.

Although this Policy uses the general term "Cookies", since these are the main method of storing information used by this Website, the browser's "Local Storage" space is also used for the same purpose as Cookies. All the information in this section also applies to this "Local Storage".

2. What are cookies used for on this site?

Cookies are an essential part of the operation of this Website. The main purpose of our cookies is to improve the user's search experience. For example, they are used to remember your preferences (language, country, etc.) during browsing and for future visits.

The information collected by Cookies also allows us to improve the Website by estimating usage patterns, adapting the Website to users' individual interests, faster searches, etc.

If we have obtained your prior consent, we may use Cookies, tags or other similar devices in order to obtain information that allows us to show you advertising, from our Website and from third party websites, on the basis of an analysis of your search habits.

3. What are cookies NOT used for on this site?

We do not store personal information such as your address, password, credit or debit card details in the cookies we use.

4. Who uses the information stored in Cookies?

The information stored in Cookies from our Website is used exclusively by us, with the exception of that in "third-party cookies". These are used and managed by external entities to provide services that are requested from us for the purpose of improving the user experience while browsing our Website. These "third-party cookies" are mainly used for obtaining statistics and ensuring the payment of transactions.

5. How can I prevent the use of cookies on this site?

If you prefer to avoid the use of Cookies on this page, taking into account the above limitations, you must first disable the use of Cookies in your browser and then delete the Cookies associated with this Website that are stored in your browser.

You can use this option to prevent the use of cookies at any time.

6. How can I disable and prevent the use of cookies?

You can restrict, block, or delete the Cookies from this Website at any time through your browser's settings. Although the settings are different for each browser, Cookies are usually configured in the "Preferences" or "Tools" menus. For more information on how to configure cookies in your browser, see the "Help" menu in the browser itself.

7. What specific cookies does this website use and for what purpose?

The table below lists the Cookies, tags and other similar devices used on this Website, together with information about each of them, their duration and their management (whether they are proprietary or third-party Cookies).

COOKIES	OBJECTIVE	DURATION	MANAGEMENT
guest-view	This stores information about orders, which is then used so that unregistered users can retrieve the status of the order.	Session	Proprietary Cookies
login_redirect	This preserves the landing page that the user would visit before being redirected to the login page.	Session	Proprietary Cookies
mage-messages	This records errors and notifications that are displayed to the user, such as the cookie consent message. The message is deleted from the cookie after being shown to the user.	1 year	Proprietary Cookies
product_data_storage recently_compared_product recently_compared_product_previous	These are used to store information on recently viewed and compared products to make browsing easier.	According to local storage rules ¹	Proprietary Cookies
form_key	This serves to guarantee the security of data provided through forms sent from the platform, by preventing Cross-Website Request Forgery (CSRF) attacks.	Session	Proprietary cookies
persistent_shopping_cart	This allows you to retrieve the basket information without logging in.	1 year	Proprietary Cookies
store	These store the session values chosen by the user, such as the store/place selected	1 Year	Proprietary Cookies
phpsessid	These are used to identify the user's http session. These are common in all web applications and are used to identify user requests during the session. No personal information is stored in this cookie.	7 days	Proprietary Cookies
Google Analytics Proprietary Cookies (__utma, __utmt, __utmb, __utmz, __utmv)	These allow the site to be monitored using the Google Analytics (GA) tool. GA is an analysis tool from Google. It is used to understand visitors' involvement with the site by collecting information and usage statistics without identifying individual visitors. The configuration of these cookies is predetermined by the service provided by Google. We suggest that you consult GA's privacy page (https://developers.google.com/analytics/d	Persistent	Third Parties

	usage) for more information about the cookies used and how to disable them. Please note that we are not responsible for the content or accuracy of third-party websites.		
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¹ Refers to files saved locally on the device used by the customer.