

CROMIA CARD POLICY

Promoter:

The promoter is LA.I.PE. S.p.A., with registered office in Tolentino (MC), VAT number 00334670437, registered with the CCIAA of Macerata - no. of REA MC83342

Typology:

The Loyalty Program takes the form of a fidelity card which allows you to take advantage of a 10% discount on items purchased in CROMIA boutiques and on the website www.cromia.it with each purchase. The discount is not cumulative and therefore cannot be added to any other promotions, discounts and/or seasonal sales in progress at the boutiques or on the website www.cromia.it. (Any different conditions will be displayed at the boutiques of interest).

Title:

Loyalty program CROMIA CARD

Purpose:

Sales promotion through loyalty program.

Territorial:

The promotion is valid in all CROMIA boutiques in Italy indicated in the list and on the website www.cromia.it. For the complete list of points of sale, see ATTACHED A of this document.

Duration:

The initiative takes place according to the following terms:

- period of development: 01/01/2022 - 31/12/2027
- deadline for using the voucher: 28/02/2028

Mode:

Joining the CROMIA CARD Loyalty Program takes place through a free subscription by the Customer (Recipient). The membership request can be made by completing and signing the appropriate membership form at the CROMIA boutiques or on the website www.cromia.it. At the same time as the Customer joins the Loyalty Program, the latter will be associated with a CROMIA CARD code. The CROMIA CARD will entitle you to accumulate loyalty points and a 10% discount on purchases made at CROMIA boutiques or on the online site www.cromia.it, on items not subject to discounts, promotions and/or seasonal sales.

Recipients:

The CROMIA CARD is issued at CROMIA boutiques or through the website www.cromia.it, and is intended for adult customers who have purchased products for sale at CROMIA boutiques or on the website www.cromia.it and who have joined the Loyalty Program by completing and signing the appropriate form.

The owner of the CROMIA CARD guarantees the accuracy of all the information provided and is solely responsible for it.

The CROMIA CARD allows the Holder to participate in all promotional operations and/or all other special initiatives that will be carried out.

The CROMIA CARD remains the property of La.i.pe. S.p.A. and is released free of charge after signing the appropriate form. The complete regulation can be viewed at all CROMIA boutiques, or on the website www.cromia.it or by requesting it directly to the email address info@cromia.it.

Each customer must be the holder of only one CROMIA CARD, in fact more than one card cannot be activated for the same name.

The holder of the CROMIA CARD undertakes to promptly communicate in writing to the e-mail address info@cromia.it or directly to the boutique where the card was issued, any loss.

Until the aforementioned communication, LA.I.PE. S.p.A. declines all responsibility for any abuse and improper use of the CROMIA CARD.

In the event of loss or theft of the card, the Holder may request a new replacement one and the accumulated and active promotional points will be recovered and transferred to the new card.

The CROMIA CARD Loyalty Program promoted by LA.I.PE. S.p.A. it will also allow you to benefit from promotional operations and special initiatives such as the BIRTHDAY VOUCHER. In fact, each customer will be given, on the occasion of their birthday, a discount voucher of 20.00 (twenty) euros which can be used entirely in the month of their birthday, for purchases of products not subject to promotions, discounts and/or seasonal sales, and for total net amounts of no less than 80.00 (eighty) euros to be paid on the website www.cromia.it or at the CROMIA stores. Note: in order to use the discount, the purchase receipt net of the discount itself must not be less than 80.00 (eighty) euros.

Promotional products:

All products of any amount sold at CROMIA boutiques or on the www.cromia.it website, with the exception of those already subject to promotions, discounts and/or seasonal sales. (Any different conditions will be displayed at the boutiques of interest).

Content of the CROMIA CARD:

During the period of validity of the CROMIA CARD Loyalty Program, all Customers in possession of the CROMIA CARD who shop for any amount in one of the CROMIA boutiques or on the website www.cromia.it, presenting their CROMIA CARD at the cash desk, will have the possibility to take advantage of a 10% discount and to accumulate points (1 electronic point for every euro spent).

Accumulation of points and benefits:

With the CROMIA CARD, Customers will receive 1 electronic point for each (ONE) euro spent on products for sale in the CROMIA boutiques or on the website www.cromia.it, with the exception of all those items already subject to promotions, discounts and/or seasonal sales.

The points will be credited directly to the Holder's CROMIA CARD.

Points cannot be traded or converted to cash.

For the attribution of points, the total closure of the receipt will be taken as a reference, i.e. the amount actually paid net of rebates, discounts, coupons, vouchers and the like.

For every 300 (three hundred) points accumulated, the CROMIA CARD holder will receive an additional one

discount voucher worth 15.00 (fifteen) euros that can be used to purchase any item on sale at CROMIA boutiques or on the website www.cromia.it, not subject to a discount or promotion and in any case of a value greater than 80.00 (eighty) euros net of the CROMIA discount

CARD. Note: in order to use the discount, the purchase receipt, net of the discount, is not must be less than 80.00 (eighty) euros.

How to check your points balance:

The Customer can at any time find out their accumulated points balance by consulting their personal area on the website www.cromia.it, or by requesting it from the staff at the CROMIA boutiques or by writing to info@cromia.it.

Modification of the regulation:

LA.I.PE.. S.p.A. reserves the right to modify, even partially, or suspend, at any time, the methods and other provisions of this Loyalty Program, communicating such modifications on its website www.cromia.it and/or at the CROMIA boutiques.

Privacy:

Pursuant to art. 13 Legislative Decree 30 June 2003, n. 196 ("Privacy Code"), of the art. 13 of the European Regulation n. 679 of 2016 ("GDPR"), as well as the Recommendation n. 2 of 2001 adopted pursuant to art. 29 of Directive no. 95/46/CE, LA.I.PE S.p.A. intends to inform you and all customers who request to get hold of the CROMIA CARD, regarding the use of the personal data collected.

Data Controller and Data Processors:

The owner of the processing of personal data is La.i.pe. S.p.A. with headquarters in Tolentino in via Walter Tobagi 2, VAT number 0334670437, registration number in the Business Register of the Chamber of Commerce of Macerata MC-83342, e-mail: privacy@laipespa.com

The updated list of designated Data Processors can be provided upon request by the interested parties.

The Data Protection Officer is Avv. Gianluca Rocchetti with office in Porto Sant'Elpidio in via Siracusa 25, VAT number 01891090449 - pec: gianluca.rocchetti@ordineavvocatifermopec.it, email: rocchetti.gianluca@gmail.com, tel 0734 902540

We need your data to allow you, through the use of the CROMIA CARD, to activate or manage the CROMIA CARD, using the connected services, promotions or discounts. Your data is processed for the following purposes:

- a) carry out "loyalty building" activities, i.e. connected to the issue and management of the CROMIA CARD, which cannot be exercised anonymously, necessary for the attribution of the advantages inherent in its use, including, accumulation of points and/or promotions , discounts, etc.;
- b) update you on all our promotional and marketing initiatives, including direct ones, also by sending advertising and/or promotional material using automated tools and/or traditional methods of contact, for example via push notifications, e-mails (Newsletter) and/or by sending sms, mms (the Marketing Services).

The processing of data for the aforementioned purposes will be carried out in compliance with the Privacy Code, the GDPR and all the specific sector regulations including the provisions of the "Rules of the Guarantor for loyalty programs" of 24 February 2005 and the on the processing of personal data for online profiling" of 19 March 2015.

In compliance with the "Guidelines on promotional activity and the fight against spam" of 4 July 2013, we point out that the consent you may have given for the sending of commercial, promotional and marketing communications using automated tools will also extend to traditional methods of contact.

The data provided will mainly be processed with IT tools under the authority of the Data Controller, by subjects specifically appointed, authorized and trained for processing pursuant to article 30 of the Privacy Code and articles 28 and 29 of the GDPR. We inform you that suitable security measures are observed also pursuant to articles 5 and 32 of the GDPR to prevent data loss, illicit or incorrect use and unauthorized access.

For the purposes referred to in point a) the provision of your personal data is mandatory as failing that you will not be able to obtain and/or use the CROMIA CARD, taking advantage of the advantages connected to it and its use, among which, the accumulation of points and/or promotions, discounts, etc.

Instead, the provision of your personal data is not mandatory but optional for the purposes referred to in points b). Failure to provide data for the purposes just indicated will not allow us to provide you with the Newsletter and Marketing Services. To this end, you can freely decide whether to lend or

without your consent also for these purposes and without this inhibiting the possibility of obtaining and/or using the CROMIA CARD with the advantages connected to it.

Remember that, in any case and at any time, you can request the Data Controller to delete your data by means of a simple communication to be sent, without particular formalities, to the above addresses.

With reference to the purposes referred to in point a), the legal basis of the processing is in fact the execution of the services provided through the CROMIA CARD and requested by you (pursuant to article 6, paragraph 1, letter b of the GDPR and of the article 24, paragraph 1, letter b of the Privacy Code); instead, with reference to the purposes referred to in points b) and c) the legal basis of the processing is your freely expressed consent (pursuant to article 6, paragraph 1, letter a of the GDPR and article 23 of the Privacy Code).

Your data may be communicated, within the EU, in full compliance with the provisions of the Privacy Code and the GDPR, to the following subjects:

(i) to the financial administration and/or other public authorities, where this is required by law or at their request;

(ii) to the structures, subjects and external companies that the Data Controller uses to carry out connected activities, instrumental or consequent to the sending of the Newsletter and the provision of Marketing Services, the Profiling Activity and the release and the management of the CROMIA CARD;

(iii) to external consultants (for example, for the management of tax obligations), if not designated in writing as Data Processors.

The information collected as well as some anonymous data relating to the number and type

ATTACHED A

VENICE BOUTIQUES

San Marco Mercerie 787 - 30124 Venice

telephone: 041 5223310

email: cromia.venezia@laipespa.com

ROME BOUTIQUE

Spanish Steps 42/A - 00187 Rome

telephone: 06 6788402

e-mail: cromia.roma@laipespa.com

SENIGALLIA BOUTIQUE

Course II June 11 – 60019 Senigallia

telephone: 071 7924152

email : cromia.senigallia@laipespa.com