

# PRIVACY AND COOKIES POLICY

At Gen Nee, we take your privacy and trust very seriously. This privacy and cookies policy ("Privacy Policy") is intended to outline how any personal data collected from you via [www.gen-nee.com](http://www.gen-nee.com) (the "Website") or in one of our stores, will be protected, used, stored and processed by us to communicate with you and to deliver you excellent service.

Your privacy is at our heart and we see this as fundamental to having a trusting and intimate relationship with each of our clients.

Please select from the different sections of this Privacy Policy to understand our practices, your rights and our promise to safeguard your information.

## **ABOUT GEN NEE**

Gen Nee Limited ("Gen Nee", "our", "we", or "us"), is located at 71 - 75 Shelton Street, Covent Garden, WC2H 9JQ, London, GBR (Company Registered Number: 10298580). Gen Nee Srl is located at Viale Isonzo, 14, 46100 Mantova, Italy (VAT n: 02647280201

This Privacy Policy does not apply to websites that you may be able to access via links on the Website and/or activities offered by third parties. Please ensure you review any relevant policies on any third party websites before proceeding. Gen Nee is not responsible for the collection or use of your personal information from these third party websites.

## **WHAT PERSONAL INFORMATION DO WE COLLECT FROM YOU AND HOW?**

We collect and process the following types of information about you:

### **1. Information we collect about you:**

- when you sign up to our newsletter or updates;
- when you enter competitions and prize draws;
- when you register with the Website, by phone or by email, or provide personal information which you complete, or which we complete at your request in-store via a store card;
- when you place an order on our Website;
- if you ask us to keep in touch with you;
- if you ask us to receive personalised online content such as targeted advertising;
- if you complete a survey or send us feedback about our products, Websites or stores; or
- if you contact or correspond with us (for example, by phone, email or otherwise) to find out more about a product or our after sale care and support services, to report a problem with the Website or a product or for any other reason.

The personal information you give us may include your first and surname, title, gender, birthdate (day and month), email address, phone number, address, financial information (such as credit or debit card details), as well as shipping address, billing address, and any other information that you consider necessary to provide us with.

The information collected from you via our Website will be matched with personal information you may have given us in our stores. This is to help us ensure that the data we hold about you is kept accurate and up to date.

## **2. Information we receive from other sources about you**

We work closely with third parties, for example, business partners, sub-contractors for technical, payment and delivery services, advertising networks, analytics providers and search information providers. If we receive information about you from them, we will always seek assurances that they are providing information to us in accordance with data protection laws and that they are transparent with you that they may share your data with us. We may use this information to update our records about you to keep them accurate.

### **WHY DO WE USE YOUR DATA?**

We may use and share **non-personal data** we receive or collect from you without restrictions.

Gen Nee may use the above personal data held about you for the following purposes (purposes for which we need your consent are marked \*):

- to carry out obligations arising from any contracts entered between you and us and to provide you with information, products and services that you request from us, i.e. to process and complete your orders and to process your payments;
- to remind you of products you have placed in your basket on the Website, but have not purchased\*;
- to help us identify you and accounts you hold with us;
- to manage and improve the Website and the services we provide through the Website;
- to tailor our Website content to your needs and preferences\*;
- to manage the security of the Website and data collected via the Website;
- to provide other services requested by you, as described when we collect the data;
- to prevent, detect, and investigate fraud, security breaches, violations of law, and other misuse of the Website;
- to address any enquiries, correspondence, concerns or complaints you have raised;
- for our internal operations, including data analysis, testing, research, statistical purposes and troubleshooting;
- to notify you about changes to any element of the Website;
- to provide you with information about other products and services we offer that are similar to those that you have already purchased or enquired about. We will only contact you by email with such information if you have consented to this.\*;
- to measure and understand the effectiveness of advertising we provide to you and others;
- to deliver relevant advertising to you, for example, newsletters\*; and
- to make suggestions and recommendations to you about other products or services that may be of interest to you\*.

We may also use your personal data when carrying out automated decision-making and profiling for the purpose of identifying what information or advertising you might like to see from us, for example, by creating individual or group profiles\*. Where you have consented, we may also share your information with members of the Gen Nee and concession stores for marketing purposes\*.

**We will combine the information we collect, with information provided to us by other members of the Gen Nee and concession stores. We will use this information and the matched information for the purposes set out in this Privacy Policy.**

#### **WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR DATA?**

For some of the uses of your personal data (as described above) there is a legal basis under applicable data protection laws for us to use such personal data without your consent (these uses are not marked with \*).

This includes, for example, where it is necessary for us to use the information in order to perform a contract with you or take steps at your request prior to entering into a contract with you, such as to process your order, provide after care and support services to you or manage the online account facility that we provide to you. It also includes circumstances (such as we have described below) where we have a legitimate interest to use your data, provided that proper care is taken in relation to your rights and interests:

- to ensure that we organise our database efficiently and understand how our clients may make purchases in different parts of the world;
- to carry out research and analysis of your data (including purchase information) as this helps us understand our clients better, who they are and how they interact with Gen Nee;
- to improve and ensure the security of the Website (for example, for statistical, testing and analytical purposes, troubleshooting); and
- to ensure that you know about any changes to the Website or the terms of this Privacy Policy.

Where we have a legal basis to use your information without consent (as we've described above), this Privacy Policy fulfils our duty to process personal data fairly and lawfully and in a manner that you would expect given the nature of our relationship with you, by giving you appropriate notice and explanation of the way in which your personal data will be used.

Where consent is required for our use of your personal information, by ticking the appropriate consent box or otherwise communicating your consent (for example, by email, providing non mandatory information, verbally in-store or on a store card), you consent to our use of that personal information for the purposes covered by the specific consent that you have given. For example, we will only process your personal information for marketing purposes if we have your consent to do so.

#### **MARKETING NEWSLETTERS AND KEEPING IN TOUCH WITH YOU**

We will, if you have given us your consent, provide you with information about products, services, events, sales and marketing from Gen Nee (including personalised online content and advertising through Gen Nee websites, social media platforms or our online partners).

We will ask whether you would like us to send you marketing messages when you tick the relevant boxes when you check out, sign up for newsletters or updates, or if you register with us via the Website, by phone, by email or the store personal information card. You will have the opportunity to clearly set out how you wish to hear from us. If you are registered, you can also manage your preferences by updating / changing your privacy settings of your account. You can unsubscribe at any time.

We will **not** share your personal information with businesses outside the Gen Nee, without your explicit prior consent, for them to contact you for marketing purposes (except if they are contacting you on behalf of Gen Nee).

### **HOW DO WE STORE AND PROTECT YOUR DATA?**

Data we collect from you is transferred to, processed and stored by Global Payments (GPUK LLP), with its registered office at 51, De Montfort Street, Leicester, LE1 7BB.

We endeavour to protect your data by storing it on secure servers and by using technical and organisational security measures to safeguard your personal data and to reduce the risk of loss, misuse, and unauthorised access, disclosure, and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centres, and information access controls. Please understand, however, that no system is perfect or can guarantee that unauthorised access or theft will not occur.

Where we have given you (or where you have chosen) a password which enables you to access restricted areas of the Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Transmission of information via the Internet is not completely secure. We will do our best to protect your personal information but we cannot guarantee the security of data transmitted via the Website; any transmission is therefore at your own risk. Once we have received your personal information, we will use strict procedures and security features (as mentioned above) to try and prevent unauthorised access.

### **WHO WILL WE SHARE YOUR PERSONAL DATA WITH?**

Your data may be stored in a database that we, as well as other members of Gen Nee, can access. We do this to help us organise our databases efficiently and understand how our clients may make purchases in different parts of the world. We will remain your point of contact.

We may also share your data with the following categories of selected third parties in accordance with this Privacy Policy:

- service providers (for example, IT services), business partners, suppliers and sub-contractors for the performance of any contract we enter into with you (such as, but not limited to, Website operations, payment services, shipments, fraud investigations, bill collection, and affiliate and rewards programs);
- analytics and search engine providers that assist us in the improvement and optimisation of the Website;
- law enforcement or regulatory agencies, or authorised third parties, in response to a verified request relating to a criminal investigation or alleged illegal activity or any other activity through the Website that may expose us and/or the user or any third party to legal risks or liability; and
- other business entities, should we plan to merge with or be acquired by that business entity. Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your data.

These third parties who may receive your data will process that data for the purposes specified above and in accordance with applicable law. Gen Nee will retain a list of the third parties with whom data is shared, which will be available upon request.

### **WHY DO WE RETAIN YOUR DATA AND HOW CAN YOU ACCESS IT?**

We will not store your personal data for longer than we need to use it in accordance with this notice. Unless we let you know otherwise (or you request we erase your personal data), we will keep your personal data as you remain a client with us or continue to wish to keep in touch with us.

Even if you request that we erase your data, we may still need to keep it (please see below) or may keep it in a form that doesn't identify you. If you have not agreed that we may use your data for marketing purposes, we will keep your data for 6 years after you have made a purchase from us.

## **WHAT ARE YOUR RIGHTS?**

You have the following rights with regard to your personal information:

- **Access.** You have the right to access data we hold about you. We will need you to prove your identity before we release any personal data to you.
- **Rectification or erasure.** You have the right to request that we rectify or delete any personal data that we hold about you (unless we have the legal right or obligation to retain it).
- **Restriction.** You have the right to restrict your use of personal information if the data is inaccurate, our use of the information is unlawful or if we no longer need to use the data for the purposes for which we hold it.
- **Change of preferences.** You can change your data processing preferences at any time. For example, if you have given your consent to direct marketing, but have changed your mind, you can opt out of receiving marketing communications by contacting us using the details provided below or clicking the "unsubscribe" link in any communication you receive.
- **Automated decision making.** If you have any questions in respect of our automated decision-making processes or the accuracy of them, please let us know, or to change your preferences, please see above.
- **Data portability.** You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal data which you have provided to us and (b) if we are processing that data on the basis of your consent (such as your marketing preference information) or to perform a contract with you (such as to manage your online account).
- **Complaints.** If for any reason you are not happy with the way that we have handled your personal data, please contact us. If you are still not happy, you have the right to make a complaint to the Information Commissioner's Office. To exercise any of the rights mentioned above, please write to us at clara@gen-nee.com.

If you ask us to stop processing your personal information in a certain way or erase your personal information, and this type of processing or information is needed to facilitate your use of the Website or is required to enable us to provide you with a service (such as to manage your online account), you may not be able to use the Website or the service as you did before.

This does not include your right to object to direct marketing which can be exercised at any time without restriction. Please allow at least 3 working days for your request to be actioned.

The rights mentioned above do not extend to **non-personal data**.

## **HOW YOU CAN PROTECT YOUR CHILD'S INFORMATION**

We do not knowingly collect information from children under the age of 16. If you become aware that your child or any child under your care has provided us with information without your consent, please contact us at clara@gen-nee.com.

## **WHAT ARE COOKIES? WHY DO WE USE THEM?**

We use certain tools, such as cookies, to collect data about your visit to the Website such as device ID or unique identifier, device type, computer and connection information, statistics on page views, traffic to and from the Website, referring URL, Internet Protocol (“IP”) address and standard web log information.

A cookie is a small text file that is used to store information on your browser or your computer's hard drive when you visit a website, such as the Website. A cookie does not contain information that identifies a person, but it allows for the linking of your computer to the information provided by you on the Website (such as, for example, linking your IP address and other information about your experience on the Website to your preferences expressed while choosing services and purchasing products offered through the Website).

Cookies are disseminated by servers and no one may gain access to information contained therein. The information stored in cookies is gathered directly and automatically by the Website and is processed in an aggregate and anonymous manner.

The use of cookies and other automatic data collection tools is necessary for the proper functioning of the Website and its services. However, you can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. If you block all cookies (including essential cookies), Jimmy Choo cannot ensure that all web pages of the Website will be displayed and/or that certain services will be supplied.

Gen Nee uses the following types of cookies:

- **STRICTLY NECESSARY COOKIES:** These cookies are essential in order to enable you to browse the Website. Without these cookies, services offered by the Website (such as use of the shopping bag or access to your order history) cannot be provided.
- **ANALYTICAL COOKIES:** These cookies are used to measure and analyse how the visitors use the Website (for example site traffic, total sales through the Website, the pages visitors go to most often and pages from which the visitors get error messages) in order to continuously improve the Website and the shopping experiences offered through the Website. All information collected by these cookies is in an anonymous form (even if passed onto third parties) and are not used to identify you.
- **FUNCTIONALITY COOKIES:** These cookies are not necessary for the functioning of the Website but allow the Website to remember the choices and/or the preferences (such as your username, language or the region you are located) in order to offer you some advanced, simplified and personalised features.
- **TARGETING AND ADVERTISING COOKIES:** Targeting and advertising cookies may be used to deliver personalised advertisements that are more relevant to you and your interests. These cookies may collect quite detailed information about your browsing habits through the Website, such as products you have clicked on or put in your shopping bag. These cookies allow us to personalise any direct marketing communication (i.e. email) or to limit the number of times you see an advertisement or to help us to measure the effectiveness of our advertising campaigns. They also may enable us (or third-party advertising services we work with) to track the actions of users online over time and across different websites or platforms to measure statistics of our marketing efforts, and to deliver electronic advertisements that may be more relevant to individual consumers and that will improve the overall consumer

experience. We do not currently respond to web browser "do not track" signals or other mechanisms that provide a method to opt out of the collection of information across the networks of websites and online services in which we participate. If we do so in the future, we will describe how we do so in this Privacy Policy.

• **THIRD PARTY COOKIES AND SOCIAL MEDIA ACCESS:** Please note that if you share content from the Website through third party websites (i.e. social networking websites) you may be sent cookies from these websites. This occurs where you choose to log in to our Website using your social media profile information. Your activity on our Website then becomes subject to the privacy policies of those other social media websites/services. Gen Nee does not control the setting of such cookies and encourages you to refer to the relevant social media provider's websites for more information about their cookies and how to manage them. You should also look at the privacy policies of those websites and how they handle information to which they gain access as a result of your decision to log into our Website using your social media profile information.

For more detailed information about cookies and how they can be managed and deleted, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### **HOW WE CAN MAKE CHANGES TO THIS POLICY**

We will notify you of changes to this Privacy Policy by posting the amended terms on the Website.

If you do not agree to the new terms of this Privacy Policy, you should stop using the Website, and if you are a registered user, you may cancel your account with us within the thirty (30) day period by contacting us at [clara@gen-nee.com](mailto:clara@gen-nee.com). Your account will be closed and you will not be bound by the new terms. You may also ask us to delete your information (as mentioned above). Otherwise, continued use of the Website after the effective date of changes constitutes acceptance of the new terms of this Privacy Policy.

#### **WOULD YOU LIKE TO KNOW MORE?**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to [clara@gen-nee.com](mailto:clara@gen-nee.com).

This Privacy Policy was updated on 30th January 2018.