

## Important Information

.PHOENIX. (“PHOENIX.”, “we”, “our”, “us”) is a trading name of The .PHOENIX. Group Asia Pacific Limited. We respect the privacy rights of its online visitors (“you”, “your”, “yours”) and recognise the importance of protecting the information collected about them. We have adopted a corporate wide Privacy Policy that guides how we collect, store, and use the information that you provide us with. As part of our commitment to your privacy rights and security, our website has been certified by Cybertrust.

The following information is provided by .PHOENIX. to enable our online visitors to be fully informed of our Privacy Policies. By visiting PHOENIXONLINEFASHION.WEEBLY.COM, you are accepting and consenting to the practices described in this Privacy Policy and the Terms and Conditions. If you are under 16, we require that you inform a parent or guardian about .PHOENIX.’s Privacy Policy and Terms and Conditions as well as requiring their consent to the Privacy Policy and Terms and Conditions before registering or placing an order with .PHOENIX. This Privacy Policy does not apply to websites maintained by other companies or organizations to which we link and .PHOENIX. is not responsible for any personal information you submit to third parties via our website. Please ensure that you read the Privacy Policy of such other companies or organizations before submitting your details.

## Data Collection

.PHOENIX. S.r.l., as the owner of domain names including those at the address <http://www.phoenixonlinefashion.weebly.com> or in the .PHOENIX. Network (hereinafter the “Site”), uses the Site not only as a means to inform users about products belonging to the .PHOENIX. group but also as a tool for the collection of personal data. Therefore, in accordance with the provisions established in the Personal Data Protection Code, .PHOENIX. S.r.l., as Data Controller (hereinafter the “Controller”), provides the following information concerning the processing of personal data both of users who only consult the Site (traffic data) and those who freely send their information via email and/or by filling in specific forms in order to access reserved sections within the Site or to receive the Controller’s newsletter. This information is provided solely for the Site and the activities carried out by the .PHOENIX. company, also through its data processors, and does not extend to other websites which the user may be able to consult via links and/or activities offered by third parties.

### 1. Types of data processed

#### 1.1 Traffic data

The computer systems and processing programs required to run the Site, during their normal operation, log certain data whose acquisition is automatic and inevitable (whenever Internet protocols are used) and which may, in combination with other information, enable users to be identified. Such data will be used with the sole aim of obtaining statistical information regarding the use of the Site and to verify that it is operating correctly. If expressly requested, such data may be used by the Public Authority to determine responsibility in the case of computer crime against the Site and/or third parties, in compliance with the relevant procedures of the appropriate Authorities.

#### 1.2. Data provided voluntarily by individual users

Personal information provided voluntarily by individual users via email, user interaction with the Site’s features, requests for services offered by the Site, completion of specific forms to access reserved sections of the Site. The processing will in any event be limited, for both above categories, to common data.

### 2. Processing methods and purposes

Data will be processed manually or with the aid of electronic tools for the following purposes:- operations management of Site navigation and relevant access data;- management of data and Site security;- market research and statistical processing;- staff recruitment and selection. Furthermore, with the user’s voluntary and optional permission, the Controller may process information for the purpose of establishing individual or group profiles (user profiling) or for marketing purposes such as notification, via newsletters, emails or text

messages, of the Controller's products or of initiatives and events organised by the Controller and by other companies within the .PHOENIX.group, or with which said subjects are involved, including invitations to aforementioned initiatives or events. The user has the possibility of opposing this last processing purpose at any time, and request to no longer receive promotional and commercial material or information.

### 3. Data storage

Personal data collected will be stored and processed via an electronic system managed by .PHOENIX. located in the .PHOENIX. head office. The other companies within the .PHOENIX. group, duly nominated Data Processors, may be and in fact are involved in the processing of personal data related to Site management and connected services and features.

### 4. Data communication

Data will be communicated to other companies within the Hunter&Spindle group or to professionals, independent collaborators, service companies and/or third party companies that co-operate with the Controller for the pursuit of the aforementioned purposes. With the user's explicit consent, data may be transferred outside of Italian territory to other companies within the .PHOENIX. group that may be located in non-EU countries. In any event, whenever personal data is transferred to a country outside the EU the principles set out in the Personal Data Protection Code will be applied. Subjects who receive the user's personal data may process it as Data Controller, Data Processor and/or Persons in Charge of Processing according to circumstance. The complete list updated by the Data Processors is available from .PHOENIX. upon request. In no circumstance will data will be subject to diffusion.

### 5. Automatic data collection tools

The Site uses session cookies and permanent cookies. Session cookies are temporary and are eliminated automatically after every visit to the Site. "Permanent" cookies remain on the user's hard disk until they are eliminated. Cookies are used to enable full use of the Site and to track visits to the various pages/sections of the Site. Cookies are not and will not be used to obtain personal data or information relating to the user's navigation of other sites. The information collected through cookies will be used purely for statistical purposes. The user can disable cookies at any time by selecting the appropriate setting in the web browser, though this may impede some functions of, or the possibility to interact with, the Site.

### 6. Data submission

With the exception of traffic data (which is collected automatically by the system) the submission of data by the user is necessary to subscribe to the Site and to access the services and features offered by the Site and in the reserved areas. The non-submission of data will prevent the user from accessing and using said services and features. The submission of data for marketing purposes is always voluntary and optional. Any non-submission of data for such activities will have no consequence on the user's possibility to use the services and features offered by the Site.

### 7. Data subject's rights

The interested party may exercise the rights recognised in Art. 7 of the Personal Data Protection Code including, but not limited to, the right to obtain a copy of processed data, their updating, modification, integration and, in certain cases, their cancellation or block. Requests for access to data pursuant to Art. 7 of the Privacy Code can be sent to .PHOENIX. S.r.l., Via Sydney 10, 20129 Australia or via email to phoenixonlinefashion@gmail.com. Specifically, the interested party may at any time withdraw his consent given previously during the sending of promotional and informational material, including the newsletter.

### 8. Data Controller

The data controller is .PHOENIX. S.r.l., legally based in Sydney, Via Santa Cecilia 7. Any communication should be sent to the following email address: phoenixonlinefashion@gmail.com.

## Using and Sharing Data

.PHOENIX. may use your Data for the processing of orders, payments and to provide you with a personalized shopping experience. We will also use your Data to fulfill and deliver your orders and manage your account. Data that you provide may be disclosed to a credit reference or fraud prevention agency, which may keep a record of that information. Your Data may be transferred (within or outside Hong Kong) with the following parties: other trading divisions within .PHOENIX. Group Limited; our servers located in the European Union for storage and backup; where there is a legal obligation to do so, to any relevant government, judicial and regulatory body; and Third Party Service Providers as detailed below. We may also use your Data to send you marketing updates but only ever in accordance with your preferences (as detailed in the next section). We do not sell your Data to third party marketing companies. We do collate information about site traffic, sales, wish lists, and other commercial information which we may pass on to third parties but this information does not include any Data which can identify you personally. Finally, we may use your Data for our internal and demographic studies, together with non-personal data to monitor customer patterns so we can consistently improve our site design to better meet our visitors' needs. From time to time .PHOENIX. may employ third party business partners to collect Data on .PHOENIX.'s behalf and to assist .PHOENIX. with its [data hosting, email, debt collection (only if applicable) and customer ] services ("Third Party Service Providers"). In such cases, these Third Party Service Providers will be subject to confidentiality agreements and instructed by .PHOENIX. to comply fully with the .PHOENIX. Privacy Policy.

## Cookies

Our site uses cookies (very small files that are sent by us to your computer or other access device) which we can access when you visit our site in future. There are four types of cookies:

### Website functionality cookies

These cookies enable you to browse the website and use our features such as shopping baskets and wish lists

### Website analytics cookies

We use these cookies to measure and analyse how our customers use the website. This allows us to continuously improve our website and your shopping experience.

### Customer preference cookies

When browsing or shopping online, the website will remember preferences you make (for example your user name, language or location). This makes your browsing experience simpler, easier and more personal to you.

### Targeting cookies or advertising cookies

These cookies are used to deliver adverts relevant to you. In addition, they limit the number of times you see an advertisement as well as helping us measure the effectiveness of our advertising campaigns.

By using our website you agree that we can place these types of cookies on your device and access them when you visit the site in the future.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies. Information on deleting or controlling cookies is available at [www.AboutCookies.org](http://www.AboutCookies.org). Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site.

## Retention of Data

We will not keep your Data longer than is necessary for fulfilment of the purposes specified above for which they are, or are to be, used. Data provided by you is retained if the purpose for which the Data was collected still exists, it is so required by law, statute or regulation, or it is in the public interest.

## Where to Ask Questions or File Complaints

If you require more information please go to the Enquiries section of the web site and send an email to the relevant .PHOENIX. department.