

Privacy and Cookie policy

This Privacy policy (the “**Policy**”) provides you with information about how DFS Group Limited collect your personal data, and about the cookies which are used by DFS Group Limited on websites belonging to DFS.

1. Identity and contact details of the data controller

This Policy outlines the way in which the company DFS Italia SRL, a limited liability company whose registered office is at SESTIERE CASTELLO, 6073, 30122, Venice, Italy (hereinafter, “**DFS Italia**”) and DFS Group registered office is at 15/F, One Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong, and its affiliates as joint controllers (“**DFS**”), collect and process the personal data which concerns you (hereinafter, your “**Data**”).

The provisions of the Regulation (EU) 2016/679 of April 27, 2016 (the General Data Protection Regulation or “**GDPR**”) apply to the processing of your Data by DFS. Terms used for the purposes of this Policy have the meanings given to them by the GDPR..

2. Identity and contact details of the Data protection officer (DPO)

DFS has appointed an internal Data Protection Officer.

If you have any questions relating to the collection and/or processing of your Data by DFS, please contact the data protection officer at the following address : dpo@dfs.com

3. Data collection

We collect personal information about you from various sources. For example, we collect and obtain information:

- Directly from you

We collect personal information you provide, such as when you make a purchase, register for an account or create a profile, sign up for one of our program(s), contact us, respond to a survey, book a reservation, make an appointment for in-store or virtual services, register for an event, interact with us in store (including in-store digital experiences) or via the DFS Customer Service, participate in a sweepstakes, contest, or other similar campaign or promotion, respond to a survey, apply for a job, or sign up to receive emails, text messages, and/or postal mailings.

Your Data is notably obtained from:

- DFS CIRCLE sign up and upgrade;
- Book an experience;
- Concierge and alteration services;
- Reservation and purchase of products,
- Product delivery;
- Click & Collect services;
- Refund tax services;
- Gift cards

- Loan of equipment
- in our stores : The staff in DFS stores may also collect your Data and carry out Data processing within the framework of their activities.

- Using cookies and other automatic data collection technologies

- via online through the website <https://www.dfs.com/>,

- via any mobile app or digital platform (including the DFS WeChat Mini Program or any other digital platform operated by us or on our behalf from time to time) we may make available (together, the "DFS Platform(s)")

When you visit our the website <https://www.dfs.com/> (hereinafter, the "Website"), use one of our mobile app or digital platform (including the DFS WeChat Mini Program or any other digital platform operated by us or on our behalf from time to time) we may make available (together, the "DFS Platform(s)"), open or click on emails we send you, or interact with our advertisements, we or third parties we work with automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and other data collection tools. For more information, please see Section 6 "Cookies" below.

- Through in-store and other offline technologies

In some cases, we record customer service calls for quality assurance. We also use Closed Circuit Television or CCTV in our stores for safety, security, fraud, loss prevention, and operational purposes. In addition, some of our stores utilize technology that transmits a Bluetooth signal to and/or works with your mobile device running DFS Website and/or DFS Platforms (eg the beacon). If you have enabled the beacon on your mobile device, we collect device information and other unique identifiers and Location Data when you visit our stores.

- From our third-party partners

We obtain information from third parties that we have partnered with, such as brands, application providers, third-party websites and other third parties we choose to collaborate or work with.

- From social media platforms and networks

If you interact with us on social media or use features, such as plugins, widgets, or other tools made available by social media platforms or networks (including Instagram, Facebook, Twitter, Google, YouTube, and Pinterest) in connection with our Website or DFS platforms, we collect information that you share with us, or that the social media platforms share with us. For more information about the privacy practices of those social media platforms, please review the privacy policies and settings of the social media platforms and networks that you use.

- From Other Sources

For example, we may obtain information about you from other sources, such as data analytics providers, marketing or advertising service providers, fraud prevention service providers, vendors that provide services on our behalf, or publicly available sources. We also create information based on our analysis of the information we have collected from you.

-Children Data

Protecting the safety and privacy of children is very important to DFS. We do not knowingly collect or use the Data of minors under the age of majority in accordance with local legislations in force.

If you are under the minimum age requirement, please do not submit any Data without the express consent and participation of your parent or guardian.

If you believe that we have collected Data about a minor without such consent, please contact us at dpo@dfs.com and we will delete this information.

4. Processed Data that we collect

The Data which relates to you and which is collected by DFS is mainly:

- First name and last name;
- Civil status;
- National ID;
- Country of residence;
- Company name;
- Email address;
- Mailing address;
- Mobile and telephone numbers;
- Contact preferences;
- Date of birth;
- Bank details in the context of sales;
- Purchase and reservation history;
- Preferences and interests;
- IP address;
- Cookies and trackers;
- Login data
- Chat conversations.

Where you provide us with any personal data relating to any other person (such as any person you nominate to complete your purchase and collect products from our stores on your behalf) you warrant and undertake that you have obtained and will maintain that person's consent to the collection and use of that person's personal data by us in accordance with this Policy and that you have explained to that person that their personal data must be processed by us in order to complete the purchase.

5. For which purpose do we collect your personal data, on which legal basis and for how long ?

Your Data is either:

- collected based on your consent; or
- required for the completion of your orders according to a contract; or
- collected for the purpose of pursuing a legitimate interest of DFS (e.g. the development of our commercial activity or to prevent fraud and counterfeiting)
- collected to fulfil DFS legal requirements.

You have no obligation to provide any information requested by us. However, if you choose to withhold requested information, we may not be able to provide you with any goods and services that depend on the collection of this information (particularly where our collection of this information is required by law).

Your Data is therefore collected and/or processed notably for the following purposes:

Purposes	Personal data collected	Legal basis	Retention period
... to enable you to create a “DFS CIRCLE” account and thus be part of the DFS membership program	Title First name Last name Email address Mailing address Mobile number Date of birth (optional)	Performance of a contract	As long as your account remains active, on the condition that you do not close it (for more information, please see the DFS CIRCLE terms and conditions). If your account remains inactive for a period of five (5) years, DFS will contact you to determine whether you wish to maintain it or not. Otherwise your account will be closed and your Data erased
... to manage your orders and to access to your order history on our Website	Title First name Last name Email address Mailing address Transaction data Mobile number Order history	Performance of a contract	As long as your account remains active, on condition that you do not close it
... to manage tax refunds of your transactions in the stores	Title First name Last name ID card Company name (if provided) Mailing address Purchase and reservation history	Performance of a contract	Six (6) months, unless there are specific, documented and approved purposes to retain cardholder data for longer
... to manage the invoicing and payment of your transactions in the stores	Title First name Last name Company name (if provided) Email address Purchase and reservation history	Performance of a contract	Invoices are kept for 10 years after the purchase
... to manage the delivery of your purchases. The data is collected by DFS and sent to the delivery company to process the delivery. For more information on this processing please consult delivery company privacy policy.	Title First name Last name Email address Mailing address Mobile number	Performance of a contract	The delivery form is kept five (5) years in archive
... to manage your online reservation, (on our Website or via other applications)	Title First name Last name Email address Mailing address Mobile number	Performance of a contract	Until the purchase is made or up to 30 days

	Contact or reservation references Chat conversations		
... to allow you to create a wish list via the Website or via other applications	Title First name Last name Email address Mobile number	Performance of a contract	This data will be kept for a maximum of 30 days
... to answer your questions sent via the "Contact us" form available on our Website	Title First name Last name Email Mobile number (optional) Country Request content DFS CIRCLE account number (optional)	It is in our legitimate interest to respond to your requests to ensure your satisfaction and to maintain our relationship.	Time required to process the request
... to send you information on our offers, products, latest news and events (newsletters, invitations to events organised by DFS , including private sales and other news publications)	Title First name Last name Email address Mailing address Mobile number	Your consent, where required.	Five (5) years from their collection or your last purchase or until you unsubscribe
... to carry out statistics, segmentations, marketing analysis, clienteling and profiling following your visits to the stores, your visits to our Website, or your use of applications , in order to send you personalized messages / contents and to implement an adapted relational program	Cookies and trackers Login data History of Purchases Interests	Your consent, where required It is also in our legitimate interest to understand better our customers and to contact them more efficiently	Duration of the analysis or five (5) years from their collection or your last purchase or until you unsubscribe
... to manage, optimise and personalize customer relations (notably within the framework of the management of complaints and the after-sales service)	Title First name Last name Mailing address Request Chat conversations	Performance of a contract	Time required to process the request
... to organize DFS private sales and other events: your Data may then be processed in order to fulfill DFS's legitimate interest in promoting its products and activities	Title First name Last name Email adress Mailing address Mobile number DFS CIRCLE number Purchase and reservation History	Your consent, where required	The Data will be kept for a period of five (5) years from the date of collection or from the date of your last contact with DFS Before the expiry of this period, DFS may contact you again to find out whether you

			wish to continue to receive communications relating to our offers, products, news and events
... to allow you to pay in cash above a specific amount	First name Last name Number of your ID card or copy of your ID for payments above a specific amount	Legal obligation	The Data will be kept five (5) years in archive
... to lend you equipment (wheelchairs, pushchairs, sound guide box, magnifying glass)	First name Last name Borrowed equipment Credit Card information	Performance of a contract	The form is destroyed after the return of the material In the event of non-return, it will be retained until all means of appeal have been exhausted or until full recovery has been made
... to allow you to book a tour or an experience	Title First name Last name Email address Mailing address Transaction data Mobile number Order history	Performance of a contract	Time required to carry out the service and manage any possible complaints
... to allow you to benefit from concierge and alteration services	Title First name Last name Email address Any information provided by you and collected with your consent	Performance of a contract	The Data will be kept for a period of five (5) years from the date of collection or from the date of your last contact with DFS
... to allow you to use the free wifi	First name Last name Email address Logs	Performance of a contract Legal obligation	The Data will be kept for one (1) year
... to save your details and usage preferences for our Website in order to optimize your navigation	Cookies and trackers Login data	Your consent, where required It is also in our legitimate interest to offer a better user experience on our Website.	Until you withdraw your consent and no later than 13 months
... to manage retargeting tools and suggest targeted advertising	Cookies and trackers	Your consent, where required	Until you withdraw your consent and no later than 13 months

... to meet our contractual obligations to our landlord and airport authorities	Data requested by these third parties	Performance of a contract Legal obligation	The Data will be kept following our contractual and legal obligations
... to ensure the security of online transactions, prevent fraud and payment incidents (see our e-commerce General Terms and Conditions for more details)	Identification details Billing informations (transaction details and credit card number)	Legal obligations It is also in our legitimate interest to make sure that our transactions are secure	Your data will be erased within a year after the order
... to comply with local requirements and to manage requests from public or judicial authorities and communications with the authorities	Data requested by authorities	Legal obligations	The Data will be kept for the duration of the procedures before the authority concerned.
... to administer and protect our business and the DFS Platform, including system maintenance, support, reporting and hosting of data, detection of intellectual property infringement or misuse of the DFS Platform	Data necessary for the investigation	It is our legitimate interest to protect our business and the DFS platform	The Data will be kept for the duration of the investigation
... to comply with the law on safety, security, health safety	Depending on the obligation, Title First name Last name etc.	Legal obligations It is also in our legitimate interest to ensure your safety	The Data will be kept following our legal obligations

In the particular case where you wish to communicate with DFS staff through third-party instant messaging services, DFS cannot guarantee the confidentiality and security of your Data or any other information exchanged through such messaging services. Companies offering this type of messaging services are themselves responsible for processing of your Data and comply with their own data protection and confidentiality policies. In this specific context, the processing of your Data by third-party messaging services remains outside DFS's control: DFS therefore declines any responsibility in the context of this use.

6. Cookies

Browsing on the Website results in the deposit of cookies, with your consent where required.

Cookies are stored on your device when you have browsed the DFS's Websites. Cookies are small text files which are likely to be stored in a dedicated space on the hard drive of your device (computer, tablet, smart phone, etc.) when you consult an on-line service using your browser .

The deposit of certain cookies on your device requires that you give your prior consent. Thus, as soon as you arrive on our Website, an information banner indicates that we are using this technology and that by clicking on "Accept cookies", you agree to the deposit of these cookies on your device.

The cookies used on our Website are categorised, as follows:

“Strictly necessary” cookies: DFS uses Cookies that are “strictly necessary” for the functionality of the Website’s platforms. These cookies are essential to enable users to visit the Website and fulfil express requests from the user (e.g., cookies that allow you to hold items in your cart while you shop online or cookies that temporarily store the contents of an online form).

The legal basis for this processing is our legitimate interest. A deactivation of this type of Cookies would reduce all or part of the functions of the Website.

“Statistic” or “Performance” cookies: Analytics Cookies gather general information on how users use a website, e.g. which pages they visit most frequently and whether they receive any error messages from websites. The data collected with these Cookies will not be merged with any other information on the visitors of the Website. All information collected through such cookies exclusively serves the purpose to comprehend and improve the functionality and services of the Website.

For doing so, DFS uses cookies such as:

Cookie	Third party	Privacy policy
_gid; ; _gscs; _gscbrs; _gscu; _gat ; _utma; _gat_UA; _utmz ; _ga; _shopify_sa_p; _gclxxx; __utmz	Google Inc.	https://support.google.com/analytics/answer/6004245?hl=en
S_cc	Adobe	https://www.adobe.com/fr/privacy/policy.html
Curalate.com	Bazaarvoice	https://www.bazaarvoice.com/fr/legal/politique-de-confidentialite/
Inspectlet.com	Inspectlet	https://www.inspectlet.com/terms-of-service#privacy
_s; _shopify_fs; _shopify_sa_t ; _y; _shopify_s;	Shopify	https://www.shopify.fr/legal/confidentialite
dtLatC; dtPC	Dynatrace	https://www.dynatrace.com/support/help/how-to-use-dynatrace/data-privacy-and-security/data-privacy/
AKA_A2	Akamai	https://www.akamai.com/fr/fr/privacy-policies/
x-ms-routing-name; GRIDSUMID; UDMP_SERVER_SIGN; gs_tc	Gridsum	https://www.gridsum.com/
B	Yahoo	https://legal.yahoo.com/us/en/yahoo/privacy/index.html
VISITOR_INFO1_LIVE	Youtube	https://www.youtube.com/intl/ALL_fr/howyoutube works/our-commitments/protecting-user-data/

“Functional” cookies: these cookies allow the Website to remember choices you make and your preferences (for example, cookies that allow you to register/sign-up for events, products and/or services, or cookies that allow you to set the language or the currency).

DFS uses the following cookies:

Cookie	Third party	Privacy policy
rxVisitor	NA	
_pk_id*	Matomo	https://fr.matomo.org/privacy-policy/

_zm_id; _gd; _ga; _gat; _zm_lev; _gid; _zm_p; _pk_id	Zmags	https://www.creatorbyzmags.com/privacy-policy
__utmc; __utmb; __utma; __utmz; _utmt;	Jrni	https://www.jrni.com/privacy
XB	Yahoo	https://legal.yahoo.com/us/en/yahoo/privacy/index.html
YSC	Youtube	https://www.youtube.com/intl/ALL_fr/howyoutube works/our-commitments/protecting-user-data/
Liveagent	Liveagent	https://www.liveagent.com/security-privacy-policy/

These cookies are kept for a maximum of thirteen (13) months. This period is not extended by your new visits.

“Advertising” cookies: Targeting and advertising cookies are used to better customize advertisements to your interests. They limit the number of times the same advertisement is shown to you, evaluate the efficacy of an advertising campaign, and analyse how the viewing of a certain advertisement influences the behavior of individual users. Such Cookies are usually placed by advertising networks with the consent of the respective website operator. They register a user’s visit of the website and either pass such information on to other entities, e.g. advertising companies, or directly adapt advertisements accordingly so that, based on your browsing behaviour, you will be shown exactly such advertisements as may potentially interest you.

DFS uses the following cookies for advertising:

Cookie	Third party	Privacy policy
test_cookie; IDE;NID; _gat	Google Inc.	https://policies.google.com/privacy
VISITOR_INFO1_LIVE; YSC; GPS; CONSENT	YouTube	https://www.youtube.com/intl/ALL_fr/howyoutubeworks/our-commitments/protecting-user-data/
Fr; _fbp	Facebook	https://fr-fr.facebook.com/policy.php
Demdex; AMCV_	Adobe	https://www.adobe.com/fr/privacy.html
recommender.scarabresearch	Scarab Research	https://www.scarabresearch.com/
B	Yahoo	https://policies.yahoo.com/ie/fr/yahoo/privacy/index.htm?redirect=no
webdissector	Gridsum	http://www.dissectorgridsum.com/products/2019-08-28/7.html
sessionID; CMBMP	Ipinyou	http://www.ipinyou.com/index.php/danyemian/145.html?admin_id=1&t=1579400606
uid	Turn	

Facebook Pixel: We utilize “Facebook Pixel” of Facebook Ireland Ltd. The Facebook pixel enables us to group the visitors to our website into specific target groups to have relevant advertisements (“ads”) displayed to you on Facebook. We do not have access to the data collected (e.g. IP addresses, information on the web browser, location of the website, buttons you clicked on, Pixel IDs and other features), we may only use it to display certain ads.

If you have a Facebook account and are logged in, your visit to this Website will be associated with your Facebook user account.

We also use Facebook's remarketing feature "Custom Audiences". This feature enables the display of interest-based ads ("Facebook Ads") to users of our website that are visiting Facebook or other websites that use this function. We pursue the interest of displaying ads to you that are relevant to your interests to provide you with a more interesting experience on our website.

Your browser automatically establishes a direct connection with the Facebook server to exchange the relevant data. We have no control over the extent and further processing of the data collected by Facebook using this tool and therefore we provide the information available to us: the integration of Facebook Custom Audiences provides Facebook with the information that you visited the relevant web page or clicked on one of our ads. In case you are logged into a "Facebook" service, Facebook can associate your visit with your account. Even if you do not have a Facebook account or are not logged in, there is a possibility that the provider ascertains your IP address and other identifiers and stores them.

If you have given your consent, we might pass your telephone number or e-mail address to Facebook to be able to display ads that are relevant to your interests.

Find out more about how the Facebook pixel is used for advertisement campaigns at <https://fr-fr.facebook.com/business/help/742478679120153id=1205376682832142>.

Find more information on Facebook's data policy at <https://www.facebook.com/policy.php>.

DFS processes your personal data for the purposes of advertising, market research and demand-oriented offers designed by us and Facebook.

The legal basis for this processing is your consent given when you click on the cookie banner displayed when accessing our Website.

If you are logged in to Facebook, you can adjust your Facebook ads settings at https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen.

You can manage your consent to the use of cookies and trackers via the cookie consent management tool chosen by DFS. This tool allows you to manage your consent for each category of cookie or tracker.

[Click here](#) to express your consent to cookies and tracking devices.

7. Data recipients

Your Data will be processed by DFS and its business partners. We may share or transfer your Data as follows:

- **within the DFS Group**, namely with the following departments :

- Concierge and alteration services;
- DFS Communication Department for the management of your requests and questions, and for sending you newsletters;
- DFS Security Department for managing the cybersecurity of the Website;
- DFS Legal and Internal Control Departments for the management of any possible fraudulent acts or legal actions.

- **with agents, contractors, third party service providers** (such as those providing delivery, recruitment, administrative, telecommunications, computer services and other services in connection with the managing, processing and storage of your Personal Data) who will process your data on our behalf and following our instructions based on specific arrangements;
- **with brands** whose products are sold on DFS Platforms or in our stores;
- **with regulatory authorities, airport authorities, landlords and concession partners, and customs and tax authorities;**
- if we or any member of the DFS Group is acquired or decides to sell or reorganize any relevant part of our business, to any actual or proposed acquirer, assignee, transferee or successor who agrees to assume our obligations to you under this Policy, including at the negotiation stage;
- **with financial institutions**, card or other payment instrument issuers, credit providers or debt collection agencies; or
- in order to comply with applicable laws or regulations (whether of your jurisdiction or elsewhere) or to protect our rights or property; in order to comply with a court order, subpoena or other legal process; in response to a request by a government authority, law enforcement agency or similar body (whether situated in your jurisdiction or elsewhere); or where we believe it is necessary to comply with applicable laws or regulations.

Except for these cases, your Data will not be transferred or made accessible to any third parties, subject to any restructuring of DFS, including a total or partial asset transfer, merger, absorption, acquisition, demerger and in general any reorganisation operation, subject to appropriate security and confidentiality measures.

8. Data transfers to third countries

You consent to the processing and storage of your Personal Data in locations other than the location from which you access the DFS Platform.

Since DFS is an international group and works with data processors located abroad, the recipients of your Data may also be located abroad, in countries/regions where runs its activities such as Singapore, the People's Republic of China (PRC), Hong-Kong, and Japan (this list is not exhaustive).

In order to provide better services, DFS stores around the world will be able to check my DFS CIRCLE account information and purchase records when I go to the store to make a purchase.

Any transfer of Data will be governed by appropriate guarantees, notably contractual safeguards, in accordance with the regulations applying to the protection of personal data. DFS has taken all reasonable steps to ensure the security and confidentiality of your Data when it is accessed or stored in locations other than the one from which you access the DFS Platforms.

9. Your rights

In accordance with the regulations in force, you have the following rights:

- **Information:** you can ask DFS to be informed about the collection and use of your personal data as well as the ground for such processing.

- **Withdrawal of consent:** you can withdraw at any time your consent for of any processing of personal data based on your consent, without affecting the lawfulness of processing based on your consent before its withdrawal.
- **Access:** you can ask us to confirm whether we process your personal data and, as the case may be, inform you of the characteristics of such processing, allow you to access such data and give you a copy of it.
- **Rectification:** you can ask us to rectify or complete inaccurate or incomplete personal data. Taking into account the purposes of the processing, you also have the right to provide a supplementary declaration, if necessary, to ensure the integration of incomplete data.
- **Erasure:** you can ask us to erase your personal data in the following cases: when it is no longer necessary for the purposes of which it was collected; you have withdrawn your consent and there is no other legal basis on which your data are processed; you objected to the processing of your personal data and DFS has no compelling legitimate grounds to refuse it; your personal data has been processed unlawfully; or to comply with a legal obligation. We are not required to comply with your request notably if the processing of your personal data is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims.
- **Objection:** (including to marketing) you can request not to receive direct marketing communications from DFS and for DFS not to disclose your Data to others for direct marketing purposes
- **Restriction of processing:** you can ask to restrict the processing of you personal data in certain circumstances:
 - you contest the accuracy of your personal data, for the period necessary for the data controller to verify the accuracy (thus the processing is temporarily suspended);
 - the data has been unlawfully processed and you oppose to erasure and request restriction instead;
 - although the data controller no longer needs it for the purposes of processing, your personal data is necessary to establish, exercise or defend a legal claim;
 - you object to the processing under Article 21(1), pending the verification whether the legitimate grounds of the controller override those of the data subject.
- **Portability:** You can request the transfer of your personal data. As part of such a request, you may request that your personal data be either returned to you or transferred to another data controller in structured, commonly used and machine readable formats.

These rights may be exercised at any time by contacting DFS's Data Protection Officer at the addresses given in Article 2 of this Privacy and cookie Policy, or by following the relevant instructions on our marketing communications or following the instructions as set out in certain service-specific guidance.

Your request to exercise your rights will be processed as soon as possible and a reply will be given to you within 30 days at the latest (except for New-Zealand residents, see section above), except in the case of complex requests.

Please note that fees can be charged in some cases, and DFS' DPO will inform you whether or not these fees apply.

10. Right to lodge a complaint

You may contact any competent supervisory authority, such as the one in the State of your habitual residence, place of work or of an alleged infringement of the legislation with any claims concerning the way in which DFS collects and processes your Data.

You may also contact us at the details above if you have a complaint about how we have handled your information. We will investigate your complaint and will use reasonable endeavours to respond to you in writing as soon as possible. If we fail to respond to your complaint within a reasonable time or if you are dissatisfied with the response that you receive from us, you may have the right to make a complaint to the Garante per la Protezione dei dati personali.

The complaints to the Garante per la Protezione dei Dati Personali can be lodged via:

- registered mail with return receipt addressed to the headquarter of the Autorità Garante per la Protezione dei Dati Personali (currently: Piazza di Montecitorio, 121, 00186 Rome);
- email: garante@gpdp.it, or protocollo@pec.gpdp.it

11. Changes to this policy

In the event of a change to this policy, DFS will inform you of the update of its Privacy policy, by mentioning it on the Privacy policy page of its Website and/or by email. By continuing to access or use the DFS Website and/or DFS Platforms, make requests to reserve products, or place orders for or purchase our products after an updated Policy is posted, you are agreeing to the revised Policy.