

FRED protects your personal data and attaches particular importance to its confidentiality and integrity. We invite you to read:

- **General information;**
- **Our personal data protection policy; and**
- **Our cookies policy.**

The information provided by FRED in these documents enables you to understand:

- The personal data we collect and process. In practice, this is the data that FRED collects from you;
- Why we collect your personal data, i.e., the purposes pursued by FRED when collecting this data.

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GENERAL INFORMATION

1. Identity and contact details of the data controller

This policy describes how FRED Paris, a public limited company (société anonyme) with share capital of EUR 15,513,375, whose registered office is located at 29 rue des Pyramides, 75001 Paris (France), registered with the Paris Trade and Companies Register (RCS) under number 582 088 159 and/or its affiliated companies, acting as joint controllers in accordance with applicable legislation (hereinafter “FRED”), collect and process personal data concerning you (hereinafter, your “Data”).

When you interact with FRED, the FRED affiliated company located in the country/region where this interaction takes place will also collect and process your Data as data controller in Australia, England,

South Korea, France, Hong Kong SAR, Japan, Macao SAR, Malaysia, Monaco, Singapore, Taiwan Region, Thailand and the United Arab Emirates.

FRED complies with applicable data protection legislation, in particular Regulation (EU) 2016/679 of 27 April 2016 (the General Data Protection Regulation or “**GDPR**”) as well as the provisions of French Law No. 78-18 of 6 January 1978 on information technology, files and freedoms. The terms used for the purposes of this policy have the meaning given to them by the GDPR.

2. Identity and contact details of the Data Protection Officer (DPO)

For any question relating to the collection and/or processing of your Data by FRED, you may contact FRED’s Data Protection Officer at the following addresses:

- By post:
FRED Paris
For the attention of the Data Protection Officer
29 rue des Pyramides
75001 Paris – France
- By email: privacy@fred.fr

CONDITIONS FOR THE COLLECTION OF PERSONAL DATA

1. Conditions for data collection

The websites www.fred.com and www.fredexhibition.com (hereinafter, the “**Site**”) and the “electronic greeting card” are operated by FRED and enable FRED to collect your Data.

FRED boutique staff may also collect Data and implement Data processing in the course of their activities. Sources for the collection of Data in FRED boutiques include, in particular, Data collection forms provided to you by FRED boutique staff for you to complete.

FRED’s customer service department may also collect and process your Data when you contact it to submit any type of request.

2. Data relating to minors

We do not knowingly collect or use Data relating to minors in accordance with applicable local legislation.

If you are not of the required minimum age, please do not submit Data without the explicit consent and involvement of your parents or your guardian.

If you believe that we have collected Data relating to a minor without such consent, please contact us at privacy@fred.fr and we will delete this information.

3. Data processed, legal bases and purposes of processing

The Data concerning you that are collected via the Site, during your visits to FRED boutiques, your participation in FRED events, your exchanges with our customer service department and through the “electronic greeting card” are mainly, depending on the services provided by FRED (as well as depending on your choices and your device settings relating to cookies and other trackers), your:

- Title;
- Surname and first name;

- Email address;
- Postal address;
- Telephone number;
- Contact preferences;
- Date of birth;
- Bank details in the context of the sale of FRED products;
- Official documents enabling verification of identity, date and place of birth and other information necessary in the context of tax-free sales, transactions subject to anti-money laundering and counter-terrorist financing obligations and compliance with applicable laws and regulations relating to international sanctions regimes and export controls;
- Purchase history;
- Preferences and areas of interest;
- Photographs, for optional services requiring them; and
- Connection data.

If you wish to communicate with FRED staff via instant messaging services, FRED cannot guarantee the confidentiality and security of your personal data or any other information exchanged through such messaging services. The companies providing such messaging services are subject to their own data protection policies. In this context, the processing of your Data remains outside FRED’s control: our Maison therefore declines any liability in connection with such use.

These Data are collected:

- Either on the basis of your consent;
- Or are necessary for the performance of your orders, on the basis of a contract;
- Or for processing made mandatory by the legal framework to which FRED is subject (such as identity and residence checks in the context of tax-free sales);
- Or for the purposes of pursuing a legitimate interest of FRED (such as developing its commercial activity or combating fraud and counterfeiting).

Accordingly, your Data are collected and/or processed in particular for the following purposes:

Purposes	Legal bases
Monitoring and optimisation of the customer relationship	
To manage your possible orders (in FRED boutiques or in the context of distance sales, whether via the Site or other distance selling means such as email or telephone) and their delivery, as well as the guarantees applicable to FRED products;	Performance of a contract.
To enable you to create a personal area “Your account” on the Site and thus purchase our products online;	Performance of a contract.

To save your contact details and Site usage preferences in order to optimise your browsing;	Your consent, if necessary. It is also in our legitimate interest to offer an exceptional online user experience (for example, securing authentication or remembering the contents of a shopping basket).
To ensure transaction security, prevent fraud and payment incidents (see our e-commerce General Terms and Conditions of Sale for more details);	Legal obligation. It is also in our legitimate interest to ensure that our transactions are secure and compliant with our obligations.
To manage invoicing and payment for your transactions, including the management of tax-free sales and transactions subject to specific obligations (for example, anti-money laundering and counter-terrorist financing);	Legal obligation.
To enable you to create, edit and send a personalised photo or video according to your preferred FRED universe	Your consent.
To use FRED's virtual try-on service;	Your consent.
To enable you to create and maintain a selection of products (wishlist) via the Site or other devices;	Performance of a contract.
To enable you to participate in competitions organised by FRED, in particular in FRED boutiques or via social networks;	Performance of a contract.
To respond to your questions submitted by various means, in particular through the "Contact us" form or the online chat service available on our Site;	It is in our legitimate interest to respond to your requests to ensure your satisfaction and maintain our relationship.
Management of FRED after-sales service;	Performance of a contract.
Management of marketing activities	
To produce statistics, segmentations and marketing analyses following your visits to FRED boutiques, your visits to the FRED Site, or the "electronic greeting card", in order to implement an appropriate relationship programme;	It is in FRED's legitimate interest to better understand its customers and offer them an appropriate relationship programme.
To send you information about our offers, products, news and events (newsletters, invitations to events organised by FRED, including private sales, and other news publications);	Your consent, if necessary.
To organise FRED private sales and other events. Accordingly, FRED uses your Data to select invitees to	Your consent, if necessary.

<p>events depending on the nature of the relationship you have with FRED and the history of the relationship (for example, participation in other sales or events, purchase history, etc.);</p>	
<p>Marketing & Profiling activities based on enriched data received from other LVMH Maisons where a client has an existing relationship</p>	
<p>What is the context of the processing? FRED is a member of the LVMH Group, which comprises many exceptional Maisons that offer high quality products and services in all sectors including Fashion & Leather Goods, Perfumes & Cosmetics, Watches & Jewellery, Wines & Spirits, Selective Retailing and Hospitality, Culture & leisure. The list of all LVMH Maisons is available at https://www.lvmh.com.</p> <p>What is the purpose of the processing? If you are customer of our Maison, you may also be a customer of other LVMH Maisons. Therefore, obtaining insights about your interests, product category preferences and shopping behaviour from other LVMH Maisons may help us to improve our existing marketing & profiling activities. The purpose is to propose you, thanks to these insights, even more tailored experiences such as personalized offers and/or services as well as marketing communications. Please note that we do not make decisions about clients based solely on automated processing of personal data, including profiling which produces legal or similar effects.</p>	
<p>Data matching & sharing We will transfer to LVMH, our parent company acting as our processor, your personal data regarding your interests, products preferences, shopping behaviour and purchases made over the last 5 years in a pseudonymous way (i.e. your name and contact details are tokenized so that LVMH has no way to identify you). No sensitive personal data are processed. Based on your consent, this data will then be matched with other pseudonymized data related to your interests, products preferences, shopping behaviour and purchases coming from other LVMH Maisons to which you have given a similar consent for the same purpose ("The Approved Maisons").</p> <p>Based on this matching, we and Approved Maisons will receive and process enriched data regarding your profile, we and each Approved Maisons acting as independent data controller.</p>	<p>Your consent.</p>

<p>No data will be shared with other LVMH Maisons to which you are not a prospect or customer and/ or to which you have not given your consent.</p> <p>You may withdraw your consent to the matching and sharing of your data at any time by contacting FRED's Data Protection Officer at the address set out in Article 2 of the general information.</p>	
<p>AI training & Data Analytics To perform the data matching, we, as controller, are using AI algorithms provided and operated by LVMH acting as our processor. These algorithms are trained regularly to maintain accuracy and avoid bias. This training activity is performed on pseudonymized data related to the interests, products preferences, shopping behaviour and purchases of all our clients and prospects. These reports will be delivered in the form of aggregated data. You may also object at any time to AI training and data analyses by contacting FRED's Data Protection Officer at the address set out in Article 2 of the general information.</p>	<p>This processing is based on our legitimate interest in maintaining the accuracy of the algorithms and avoiding bias.</p> <p>These data are also used to create statistical reports enabling the relevance of our marketing and profiling activities to be assessed, on the basis of our legitimate interest.</p>
Management of cookies and other trackers	
<p>Please refer to the cookie settings accessible at the bottom of the Site pages.</p>	
Management and protection of Heritage	
<p>To preserve the rich heritage of Maison FRED</p>	<p>It is in the legitimate interest of FRED to trace the history of the Maison by including the owners of exceptional pieces who have not objected to this historical and heritage-focused initiative.</p>
Combatting counterfeiting	
<p>To combat counterfeiting and, where applicable, implement legal proceedings or means enabling it to be brought to an end.</p>	<p>Legitimate interest in protecting our brand and distribution network.</p>

4. Recipients of the Data

Your Data are processed by FRED, as well as its subsidiaries, branches and/or affiliated companies, and their business partners in order to offer you the same quality of service, wherever you interact with FRED worldwide.

In the context of providing its services, FRED may transmit or give access to your Data, for technical, logistical or commercial reasons, to the following categories of Data recipients:

- Subsidiaries, branches and/or affiliated companies of FRED located abroad in order to offer you the same quality of service in all FRED boutiques;

- Service providers for the development, hosting and maintenance of the Site and the “electronic greeting card”;
- The service provider conducting penetration tests on the Site;
- The service provider in charge of sending news (newsletters, invitations and other publications) and other FRED communications;
- Service providers in charge of marketing analysis and segmentation;
- Service providers in charge of FRED targeted campaigns, including social media providers;
- The provider of the statistical analysis solution for cookies and trackers;
- Media agencies in charge of monitoring the performance of FRED campaigns;
- Service providers managing all FRED boutique processes (transactions, stock management, labelling and customer database management, logistics and order management);
- Business partners entrusted with organising FRED events;
- Service providers in charge of the development and maintenance of FRED’s customer relationship management platform;
- Service providers in charge of transaction management, tax-free sales, and combating payment fraud;
- Service providers in charge of after-sales services, including repairs.

In the context of managing your orders, certain FRED service providers receiving your Data may intervene as data controllers: this is notably the case for logistics delivery service providers and service providers in charge of payment and fraud management.

In this case, the processing of your Data is subject to the personal data protection policies of these service providers, which FRED may provide to you upon request or which you may obtain by contacting them directly. Similarly, the rights you have under applicable personal data protection regulations must be exercised directly with these service providers.

Finally, FRED may be required to disclose your Data to third parties where such disclosure is required by law, a regulatory provision or a requisition or court decision, or where such disclosure is necessary to ensure the protection and defence of its rights.

Outside these cases, your Data will not be transferred or made accessible to any third party, subject to any restructuring of FRED, including total or partial transfer of assets, merger, absorption, acquisition, demerger and more generally any reorganisation operation, subject to appropriate security and confidentiality measures.

5. Transfers of Data to third countries

As FRED has subsidiaries, branches and/or affiliated companies located abroad and uses processors located abroad, the recipients of your Data may be located abroad, including outside the European Economic Area (hereinafter the “EEA”).

Any transfer of Data outside the EEA, in particular to a country for which there is no adequacy decision issued by the European Commission pursuant to Article 45 of the GDPR, is carried out with appropriate safeguards in accordance with applicable personal data protection regulations.

You may obtain a copy of the appropriate safeguards by contacting FRED's Data Protection Officer at the addresses set out in Article 2 of the general information.

6. Data security and confidentiality

FRED implements technical and organisational security measures in accordance with state of the art, in particular as regards the security of its information system, to preserve the confidentiality and security of your Data and prevent them from being altered, damaged, destroyed or accessed by unauthorised third parties. In this respect, FRED ensures that its processors provide appropriate security guarantees, both technical and organisational.

7. Your rights

In accordance with applicable regulations, you have the following rights:

Withdrawal of consent: you may withdraw your consent at any time for any personal data processing based on your consent, without affecting the lawfulness of processing based on your consent before its withdrawal.

Access: you may ask us to confirm whether we process your personal data and, where applicable, inform you of the characteristics of such processing, enable you to access such data and provide you with a copy.

Rectification: you may ask us to rectify or complete inaccurate or incomplete personal data.

Erase: you may ask us to erase your personal data in the following cases: where they are no longer necessary for the purposes for which they were collected; you have withdrawn your consent; you have objected to the processing of your personal data; your personal data have been processed unlawfully; or to comply with a legal obligation. We are not required to comply with your request in particular if the processing of your personal data is necessary to comply with a legal obligation or for the establishment, exercise or defence of legal claims.

Restriction: you may ask us to restrict the processing of your personal data (i.e., to store them but not use them) where: the accuracy of your personal data is contested; the processing is unlawful but you do not want it to be erased; it is still necessary to establish, exercise or defend legal claims; to verify the existence of compelling grounds following the exercise of your right to object. We may continue to use your personal data following a request for restriction where: we have your consent; to establish, exercise or defend legal claims; or to protect the rights of another natural or legal person.

Portability: you may ask us to provide you with your personal data in a structured, commonly used and machine-readable format, or you may request that they be directly transferred to another controller, but only where the processing is based on your consent or on the performance of a contract with you, and the processing is carried out by automated means.

Digital legacy: you have the right to define instructions (general or specific) regarding the fate of your personal data after your death.

You also have the right to object:

- For reasons relating to your particular situation, to processing based on FRED's legitimate interest. If you object, we must stop such processing, unless we can demonstrate that there are compelling legitimate grounds for processing that override your interests, rights and freedoms, or if we must process the data for the establishment, exercise or defence of legal claims;

- To processing for direct marketing purposes. In this respect, you may at any time request to no longer receive communications relating to our offers, products, news and events, in particular by using the unsubscribe link provided for this purpose.

These rights may be exercised at any time by contacting FRED's Data Protection Officer at the address set out in Article 2 of the general information.

You also have the right to lodge a complaint with any competent supervisory authority.

In France, the supervisory authority is the Commission Nationale de l'Informatique et des Libertés (CNIL), 3 place de Fontenoy – TSA 80715 – 75334 Paris Cedex 07, regarding any complaint relating to the way in which FRED collects and processes your Data.

8. Retention period for your Data

FRED processes your Data for a period determined according to the purposes for which they are processed.

Data necessary for managing and optimising the relationship with our customers (for example, your purchase history, your favourite collections, a summary of your complaints) are retained for seven (7) years from the expiry date of the commercial warranty or from your last contact with FRED.

Data used by our Heritage department to preserve the richness of the heritage of Maison FRED will be retained for a period that may be longer than that applicable to customers. This retention period is communicated to the owners of exceptional pieces. The few persons concerned retain full control over their Data, including the possibility at any time to object to such retention or to request total or partial deletion of such Data.

Data relating to our prospects (i.e., if you have not made any purchase from FRED, but are interested in our news) may be retained for three (3) years from their collection or from the last contact with FRED.

If you request it, and at the latest at the end of the above periods, your Data will be deleted or anonymised, except where such retention is required by law (for example, invoices are kept for 10 years from the close of the financial year) or is of administrative interest to FRED (for example, the management of potential litigation, documentation of responses provided to your rights requests, or for evidentiary purposes, within the limits of applicable limitation periods).

COOKIES AND OTHER TRACKERS POLICY

Browsing the FRED Site and the "electronic greeting card" results in the placement of cookies.

When you visit our Site or the "electronic greeting card", and subject to your choices, FRED may install cookies on your device. Cookies include a number of Data about your browsing (for example, the date, time and number of visits, the source of arrival, preferences).

The placement of certain cookies on your device requires the prior collection of your consent. For more information and to configure your choices, please refer to the cookie settings displayed during your visit and accessible at any time at the bottom of the Site.

You also have the possibility to manage the placement of cookies using your browser settings. These settings may modify your browsing on the Internet and your conditions of access to certain services requiring the use of cookies.

AMENDMENT OF THE PERSONAL DATA PROTECTION POLICY

In the event of a substantial amendment to this policy or a particular event, FRED will inform you appropriately, for example by displaying a notice on its Site or by email.