

Last update: 31 October 2019

# WHAT DOES THIS PRIVACY POLICY APPLY TO?

This Privacy Policy and the Cookie Policy apply to the personal information collected by Pirelli Tire North America Inc. or any of its affiliates (hereinafter "**Pirelli**", "**we**", "**us**" or "**our**", as appropriate) about you at our P Zero<sup>TM</sup> World store in Los Angeles, by telephone, through our websites (hereinafter the "**Websites**") or through any other means, owned or used by Pirelli, that links to this Privacy Policy (including apps, social media accounts and other services).

The Websites are not directed to children under the age of 13. If you are under the age of 13, please do not attempt to register with us at the Websites, or provide any personal information about yourself to us. If we learn that we have collected personal information from a minor, we will promptly delete that information. If you believe we have collected personal information from a minor, please contact us at the email address and phone number indicated below.

# WHAT PERSONAL INFORMATION DO WE COLLECT?

Categories of personal information collected by us are the following:

- identifiers such as name, date and place of birth, account information, social media data;
- contact details such as email address, phone number, postal address;
- vehicle and tire information such as vehicle brand and model, annual mileage, DOT Tire ID;
- profiling information such as car club membership;
- promotion information such as photos, images, captions or any other information you provide in relation to our promotional activities;
- purchase history information;
- device information such as device identifiers, settings, network information;
- any other information voluntarily provided by you.

#### HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Most of the personal information we process is collected directly from you when you browse the Websites or fill out the forms that are present within them, adhere to promotions or programmes reserved to you, at events or other initiatives and, in general, whenever you interact with us. We may also collect your personal information from other Pirelli Group companies to which you have provided it, in order to merge it with the one collected by us, as well as from our business partners and other third parties.

# FOR WHICH PURPOSES DO WE PROCESS YOUR PERSONAL INFORMATION?

We may process personal information to:

- register your tires and contact you in the event of a recall or a replacement;
- allow you to log in to the online services provided by us;
- answer your questions and fulfil your information requests;
- allow you to take part to initiatives, events or competitions organized, promoted or sponsored by us;
- merge them with the data that you have provided to other Pirelli Group companies;
- analyze your profile in order to tailor your experiences with our services and provide you more relevant advertising on and off our services;

- send you promotional, marketing or advertising and other information that may be of your interest based on your preferences and social media advertising through social media platforms such as Facebook or Instagram;
- take and handle your complaints;
- comply with legal or regulatory obligations to which we are subject;
- exercise or defend legal claims in judicial, administrative or arbitration procedures;
- carry out activities connected to the execution of extraordinary transactions.

# HOW DO WE STORE YOUR PERSONAL INFORMATION?

We securely store your personal information at our or our service providers' data centers in the European Union, adopting all reasonable necessary measures to keep it safe.

# HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We keep your personal information as long as it is necessary for the purposes for which they were collected or as long as we are required to keep them in accordance with applicable laws and regulations.

# WITH WHOM YOUR PERSONAL INFORMATION IS SHARED?

Your personal information may be shared with:

- other Pirelli Group companies;
- service providers such as marketing agencies, travel agencies, event organizers and IT providers;
- business partners, such as advertising tech providers (see our Cookie Policy);
- government authorities;
- potential buyers.

Both other Pirelli Group companies and third parties, which act as service providers, are bound by data protection obligations aimed at ensuring an adequate level of protection to your personal information. We share the following categories of information with Pirelli Group companies and service providers: identifiers, contact details, vehicle and tire information, profiling information, promotion information, purchase history information, device information and any other information voluntarily provided by you.

We may also disclose any of the categories of personal information above to courts, law enforcement agencies or governmental authorities, or authorized third parties, if and to the extent we are required or permitted to do so by law or by court orders.

Furthermore, in the event we intend to sell or transfer ownership or control of any or all of our business, operations or services to a third party, we reserve the right to disclose your personal information to a potential buyer both before and after the purchase. In the event the sale does not go through, we will require the potential purchaser to not use or disclose your personal information in any manner whatsoever and to completely erase the same.

We inform you that some of the Pirelli Group companies and the service providers to which we disclose your personal information are established outside your home country. If your information is transferred outside of your home country, we will ensure that your personal information continue to be protected in compliance with this Privacy Policy, subject to the laws applicable there.

#### YOUR RIGHTS UNDER THE DATA PROTECTION LAW

Under the data protection law, you may have the right to:

- opt-out of promotional, marketing or advertising communications we send to you by clicking the link labeled "unsubscribe" at the bottom of any email sent by us;
- opt-out of the sale of your personal information;
- ask for the access to your personal information;
- ask for the correction of incomplete, inaccurate or out-of-date personal information;
- ask for the deletion of your personal information;
- obtain information about (a) the categories of personal information we have collected about you, (b) the categories of sources from which the personal information has been collected, (c) the business or

commercial purposes for collecting your personal information, (d) the categories of recipients with whom we share your personal information, (e) the specific pieces of personal information we have collected about you, (f) the categories of personal information we have sold in the past 12 months and (g) the categories of personal information we have disclosed for "business purposes" in the past 12 months:

- if you have provided to us personal information in obtaining products or services for personal, family or household use, obtain information about the personal information we have shared, if any, with other businesses for their own direct marketing uses, including the names and addresses of such businesses;
- not to be discriminated against for exercising any of your rights.

You may exercise any of the rights above by writing an email at compliance.na@pirelli.com or making a call at 1-800-747-3554.

Given the divergent practices of organizations that offer browsers and the lack of a standard in the marketplace, we generally do not respond to DNT signals at this time.

# WHAT ABOUT THE SALE OF YOUR PERSONAL INFORMATION?

We do not and will not sell, rent or otherwise disclose your personal information collected by us to third parties. Therefore, in the past 12 months, we have not "sold" your personal information.

For tire registration made through the Websites, Federal law prohibits us from reselling tire registration information or using it for marketing purposes. We will only contact you in the event of a recall or replacement.

## WHAT ABOUT THE DISCLOSURE OF YOUR PERSONAL INFORMATION?

In the past 12 months, we have disclosed the following categories of personal information for business purposes: identifiers, contact details, vehicle and tire information, profiling information, promotion information, purchase history information, device information and any other information voluntarily provided by you.

## **HOW CAN YOU CONTACT US?**

You can contact us by phone and email. Our phone number: **1-800-747-3554** 

Our email address: compliance.na@pirelli.com

#### LINKS TO OTHER WEBSITES

The Websites may contain links to external websites. If you click on any of these links, you will be directed to a website not covered by this Privacy Policy.

#### CHANGES TO THE PRIVACY POLICY

We may review this Privacy Policy at our own discretion. Make sure to check the latest version available on the Websites regularly.