

**Bros Manifatture S.r.l.**

Via Guido Rossa, 1

63025 Montegiorgio (FM)

**Bros USA Corporation**

169 East Flager Street,

Suite 1022 Miami, FL 33131

**Bros Manifatture Asia Limited**

Suite 2301, 23rd Floor, Chinachem

Hollywood Centre, 1-13 Hollywood Road

Central, Hong Kong S.A.R

## **LEGAL NOTICE AND PRIVACY POLICY**

**[www.brosway.com](http://www.brosway.com)**

**[www.brosmanifatture.it](http://www.brosmanifatture.it)**

**[www.brostrap.com](http://www.brostrap.com)**

**[www.pianegonda.com](http://www.pianegonda.com)**

**[www.sagapo.it](http://www.sagapo.it)**

**[www.rosato.it](http://www.rosato.it)**

**[www.dhiva.it](http://www.dhiva.it)**

**[www.shopinbros.com](http://www.shopinbros.com)**

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## ➤ **INTRODUCTION**

The purpose of this Legal Notice and Privacy Policy is to enable Users to verify in full transparency the activities in relation to the processing of their personal data on the web and to also realise the importance of having availed themselves of a corporation that is attentive to the protection of Users' rights and accustomed to proper compliance with legal provisions. It should be noted that the text given below complies with the most recent European Directives incorporated in the Save Italy Decree 2012, as well as with applicable privacy legislation in the countries in which Bros Manifatture S.r.l., Bros USA Corporation and Bros Asia Limited (hereinafter referred to as 'Brosway Group') offer their website services.

Brosway Group hereby declares that the business Data Controller and owner of the domains and websites is *Bros Manifatture S.r.l.*.

*Bros Manifatture S.r.l.* hereby provides the rules for a proper and authorised use of photos, images, text and any other document published to users who connect to the Websites [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com) and to corporate pages on social networks.

Moreover, in this context, the term Corporate Data refers to:

- Any type of information that is acquired, known, processed, communicated and extracted in the pages of its Websites [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com).
- Information from links from other websites is not included.

This Legal Notice is subdivided in several sections identifying the current areas of regulation defined by this Company, as listed below:

- Introduction
- Protection of Trademark and Intellectual Property Rights

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- Types of Data Processed
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  - 3) Online Purchases
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- Right to Be Forgotten
- Rights Of Data Subjects
- Conclusion

Brosway Group acknowledges the importance of protecting their customers' personal data (e.g. identification and financial data including credit card numbers), and the data of the users of their Website/s. For this reason, Brosway Group adopts specific security policies and measures to comply with applicable regulations concerning personal data protection and to protect their personal data.

It is important to emphasize that our Company may review and integrate the text listed below when necessary; in this respect, and for the purposes of transparency towards Users, the number of the version in use (*currently corresponding to V 3/2016*) is shown on the cover of this document.

The Legal Notes include a description of Users' web browsing rights, regulated by the Privacy Code and subsequent laws, thereby bringing together in a single session current types of protection towards the subjects involved.

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## ➤ **PROTECTION OF TRADEMARK AND INTELLECTUAL PROPERTY RIGHTS**

With this Policy, Brosway Group declares that *Bros Manifatture S.r.l.* not only represents the name of the company controlling Corporate and Customer Data, but also the proprietor of the trademarks BROS, ASTUCCIFICIO DHIVA, BROSWAY, ROSATO, S'AGAPO, PIANEGONDA included in the Websites [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com).

Legal protection is hereby extended to the domain on the basis of the recognition received by the legislator with the new Industrial Property Code (Legislative Decree 30/2005). Indeed, the new legislative provision allows one's domain name to be protected from any act of counterfeiting and usurpation performed by third parties, providing for both ordinary legal proceedings and judicial protection. In particular, Article 133 of the CPI (Industrial Property Code) allows judicial authority to order the injunction against the use of an illegally registered domain, or its provisional transfer, if subject to the provision of a suitable security by the beneficiary of the measure.

In light of the above, the website and its contents are the exclusive property of the Company, which reserves the right to grant third parties any right of use. It is prohibited to totally or even partially copy, download or reproduce the content published on this Website, unless one of the above mentioned operations has been expressly authorised. The User is therefore only allowed to view the site and engage in acts of temporary reproduction with no independent economic significance, which shall be considered transient or incidental and form an essential part of the viewing of [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com) and social network corporate pages, their content and all other browsing operations performed solely for legitimate use. Copyright protection shall be exclusively extended to this Website and social network corporate pages.

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With regard to the regulation of **links**, it should be specified that currently on Websites [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com) and social network corporate pages there are no links to other websites. Should there be external links in the future, Brosway Group shall neither control nor conduct monitoring operations of such websites and their contents and will therefore not be held responsible for the content of those sites or their policies, also concerning privacy and the processing of personal data during browsing operations.

The undersigned considers '**surface linking**' legitimate, that is the link transferring visitors to the home page of another website; conversely, '**deep linking**' and '**framing**' are not authorised, since they are potential objects of responsibility for copyright infringement and unfair competition respectively.

### ➤ **TRANSPARENCY AND COMPLETENESS OF INFORMATION**

*Bros Manifatture S.r.l.* ensures transparency and complete, thorough communication performed in respect of all those with whom the Company interacts. The information complies with the norms of clarity and accuracy set out in the regime of transparency towards Customers, and in full respect of the principles provided for in consumer protection. The Website is currently available in English and Italian.

### ➤ **CONFIDENTIALITY OF INFORMATION**

*Bros Manifatture S.r.l.* attaches great importance to the confidentiality and security of data, through the development of specific internal control programmes and well-defined policies. The security measures apply to both print and electronic publications.

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## ➤ **PRIVACY POLICY**

This Privacy Policy, in compliance with Article 13 of Legislative Decree No. 196 of 30 June 2003 (Personal Data Protection Code) and with applicable privacy regulations in the countries in which Brosway Group offers its website services, describes the processing of personal data provided by or collected on the sites on which this Policy is published, as well as the protection of personal data of users who are registered or unregistered on the Website. This Policy also illustrates the manner in which Brosway Group uses customer personal data collected for the purpose of marketing in their stores - incorporating any privacy policy distributed in such circumstances - or during events.

This Policy applies only to Websites [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com) and social network corporate pages, and not to other websites, which users may consult through links. This Policy is also in accordance with Recommendation No. 2/2001 issued by the Article 29 Working Party set up under Directive 95/46/EC, adopted by EU Data Protection Authorities on 17 May 2001 to identify the minimum requirements for the on-line collection of personal information, and, in particular, the methods, time-scale and nature of the information that the data controller must provide to users when they connect to web pages, regardless of the purposes of the connection, in compliance with European directives and the Italian Law in terms of data security. Moreover, the information contained in the Website also complies with other legislative provisions and it has been updated in accordance with Law No. 88 of 7 July 2009 as the implementation of the Community Law 2008 concerning fiscal policies.

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## ➤ **THE CONCEPT OF CUSTOMER DATA**

Within the context of this Policy, the term *customer data* refers to information voluntarily provided by users/customers or potential users/customers in the specific forms on Websites [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com) and/or directly in stores on the occasion of the issuing of Fidelity Cards and/or the registration of personal data in the Brosway Group computer systems. This data also includes some identification information regarding ordinary e-mail addresses and having legal value, mobile telephone numbers and home address necessary for the acquisition of Customer interest. With regard to the type of information acquired, it refers only to the data released freely by the user-customer on Websites [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com) and/or directly in stores on the occasion of the release of Fidelity Cards and/or the registration of personal data in the Brosway Group computer systems; data differing from that published online shall not be processed or stored.

## ➤ **DATA CONTROLLER**

For the purposes of the principles of transparency and fairness set out in the Privacy Code, the data controller is *Bros Manifatture S.r.l.*, whose full data is listed on the home page. The domain is also owned by and properly registered to the data controller.

## ➤ **INTERNATIONAL TRANSFER OF PERSONAL DATA**

If customers choose to register to Brosway Group's customer database, the Group shall collect customers' personal data in their country, e.g. data related to their visits to our stores, in order to subsequently transfer and store them, in compliance with applicable law in another country where the servers of the companies of our group are located. The data will be transferred for the purposes described in this Policy (e.g. to provide the services requested, or to offer personalized services in all our stores across the world).

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The legislation in relation to privacy and personal data protection applicable in such countries may not be equivalent to that of the customers' country of residence. The companies of the Brosway Group shall take measures to ensure that customer data is securely processed, in accordance with the principles of fairness, necessity and proportionality, and in compliance with this Policy, regardless of the country to which the data may be transferred.

To the extent permitted in the countries of the customers, using Websites [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com) or providing us with data for the purposes referred to in this Policy, customers fully understand and clearly accept the transfer of their personal data abroad in the framework of regular commercial operations conducted by the companies of the Group, including the collection, storage and processing of such data in the United States of America and Asia. These policies represent the rules of conduct regarding personal data processing for all the companies in Brosway Group, and they therefore regulate and allow data to be transferred to and from said companies residing in different geographical areas, in respect of compliance with the guarantees set out in the rules on privacy (the principle of Binding Corporate Rules).

### ➤ **PLACE OF DATA PROCESSING**

Data processing concerning the services of Websites [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com) takes place in the registered office in Via Guido Rossa, 1 - 63833 Montegiorgio (FM) and is performed by the data controller and the company in charge of updating information. For the sake of transparency, please note that the domain is hosted by an external provider in charge of its functioning and security and, in the event of any breach, it is subject to the responsibilities dictated by the relevant industry standards.



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## ➤ **TYPES OF DATA PROCESSED**

### **1) WEB BROWSING DATA**

**This section specifies the data that Bros Manifatture S.r.l. may collect during simple web browsing, without logging in as a registered user, and their processing methods.**

The computer systems and software procedures used for running this Website acquire, during regular operations, some personal data implicitly transmitted in Internet communication protocols. This category includes IP addresses or domain names of computers used by users who connect to the Website, URI (Uniform Resource Identifier) addresses of the requested resources, the numerical code indicating the status of the response given by the server (e.g. successful, error) and other parameters regarding the operating system and users' IT environment. This data may be used to ascertain responsibility in the event of hypothetical IT crimes jeopardising website security.

#### **A - COOKIES**

In compliance with the provision of the Privacy Protection Authority of 14 June 2014, this Website uses technical cookies, namely browsing cookies, performance cookies, and functionality cookies. No user personal data is in this connection acquired by the Website. We do not use cookies to transmit personal information, or use persistent cookies of any kind, or even systems for tracking users. The use of session cookies, which are not persistently stored on users' computers and disappear when the browser is closed, is strictly limited to the transmission of session identifiers (consisting of random numbers generated by the server) required to enable a secure and efficient browsing of the Website.

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Cookie settings are managed by the Web Master appointed by the company and domains [www.brosmanifatture.it](http://www.brosmanifatture.it); [www.brostrap.com](http://www.brostrap.com); [www.sagapo.it](http://www.sagapo.it); [www.brosway.com](http://www.brosway.com); [www.rosato.it](http://www.rosato.it); [www.pianegonda.com](http://www.pianegonda.com); [www.dhiva.it](http://www.dhiva.it); [www.shopinbros.com](http://www.shopinbros.com) reside at the server farm of an external provider.

This site also includes GOOGLE ANALYTICS cookies.

Google Analytics is a free tool for web analysis provided by Google, which sends cookies to your device. The information generated by your use of the Website, including your IP address, is transmitted to Google and stored in its servers. Google uses this information to assess your use of the Website, prepare reports on website activity for website operators and provide other services relating to website activity and internet usage. Google may also transfer this information to third parties, if required by law, or if third parties process this data on behalf of Google. Google will not associate your IP address with any other data held by Google.

Below is a list of the cookies used by Google Analytics:

| Cookie Name | Duration   |
|-------------|------------|
| _utmz       | Session    |
| _utmv       | 0 minutes  |
| _utmb       | 30 minutes |
| _utma       | 2 years    |
| _utmz       | 6 months   |

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## **2) DATA VOLUNTARILY PROVIDED BY USERS IN STORES AND/OR CONTACTS AND REGISTRATION TO INFORMATION SERVICES AND REGISTRATION OF THE ACCOUNT**

**This section specifies the data that Brosway Group can collect when customers voluntarily provide their data in Brosway Group stores, or contact and/or ask to receive commercial communications and how their data is processed.**

By registering to Brosway Group Websites, e-mail services or stores to receive ads and commercial communications, customers provide their contact details and identification data. Personal data required to complete the registration procedure is limited, but is essential in order to receive the communications mentioned above. Customers can also decide to receive marketing communications when they create their account.

Customers are requested to ensure the accuracy of the data they have inserted and, should there be any changes in the personal data provided to us, they are invited to promptly write to us at the e-mail address [info\\_privacy@brosmanifatture.it](mailto:info_privacy@brosmanifatture.it). In this way, Brosway Group will be able to maintain the personal data of their customers up-to-date.

Should customers contact us with specific requests concerning the Websites, including technical assistance for browsing problems and the use of the online store, creating a personal account on the Website to use or facilitate the use of certain services available on the Website, Brosway Group may receive some personal data (mainly contact details and identification data or information that is strictly related to their requests). In this case, customers' personal data shall be used by Brosway Group to handle requests, solely for the purpose of dealing with such requests, and may communicate data to service providers in order to handle the requests, according to the subject matter concerned.

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Brosway Group may contact customers by phone, e-mail, mail, SMS or any other suitable means for the purposes mentioned above.

Customers' personal data will be stored and used, mainly through automated processing, to keep customers informed via email about Brosway Group's events and products, services, promotions, as well as cultural and/or social events organised or sponsored by *Bros Manifatture S.r.l.* or the other companies in the group.

Customers may communicate at any time that they do not want their contact details to be used for the marketing purposes mentioned above; to this end, they can simply write to: [info\\_privacy@brosmanifatture.it](mailto:info_privacy@brosmanifatture.it).

### **3) ONLINE PURCHASES**

**This section describes the data that *Bros Manifatture S.r.l.* may collect during the use of the online store by users who have logged into the Website as registered users, and the modes of use of such data.**

The personal data collected in order to manage, administer and process their online purchases on the Website [www.shopinbros.com](http://www.shopinbros.com) is controlled by *Bros Manifatture S.r.l.*, identified as the seller of the product in the General Conditions of Sale applicable to the local section of the Website used by customers for online purchases (the 'Seller'). The Seller may be required to process customers' personal data in accordance with the regulations on personal data protection applicable in the country where the company is located. However, unless the Seller is required to comply with different regulations, the Seller undertakes to process customers' personal data in accordance with the principles set out in this Policy.

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For any other processing purposes described in this Policy, *Bros Manifatture S.r.l.* shall remain the data controller.

When customers use the online store, they provide the Seller with their address, phone number and email address, as well as identification and payment details, such as credit card details. In some countries, local regulations may force the Seller to collect further information, such as a copy of an identity document. In this case, customers will be informed of the need to disclose such information in order to proceed with the purchase. Failure or refusal to provide all the information required will lead to the cancellation of the pending order or the inability of the system to process customers' requests.

The User hereby acknowledges that some of the data requested during registration is essential to complete the registration process and that failure or refusal to provide the data will not enable the Seller to comply with customers' requests. Essential data is clearly indicated on the Website. Customers may choose not to provide optional data to the Seller and continue to use and make purchases on the Website.

Customers must ensure that their data is correct and inform us of any change to their personal data.

Data will not be used for purposes other than those hereinafter indicated: (i) to provide and manage online operations required to dispatch the order; (ii) to verify that the information provided for the transaction is complete, valid, correct and not fraudulent; (iii) to process the order and deliver the products; (iv) to provide customer support; (v) to contact the User, also via e-mail, for any issue concerning the management of the order or subsequent requests related to the order; (vi) to comply with the legal obligations arising from tax and accounting regulations and from any other applicable legislation with which the Seller is required to comply or to comply with the measures legitimately issued by the competent authorities.

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Customers' personal data will be stored in secure databases on our servers or on the servers of our trusted suppliers - such as hosting service providers - who are responsible for the processing and data will be processed mainly using automated procedures.

Customers' personal data shall be processed by the Seller's authorized staff managing online orders and mainly by Digital, E-commerce and Computer Systems services.

### ➤ **OPTIONAL PROVISION OF PERSONAL DATA**

Apart from that specified for browsing data, Users are free to provide their personal data filling in the appropriate form in the CONTACTS section of the website to request information or other communications. For the sake of completeness, it should be mentioned that in some cases not covered by the ordinary management of this site, the Authorities may request information pursuant to Article 156 of Legislative Decree 196/2003, in order to monitor personal data processing; in these cases, reply is obligatory under penalty of an administrative sanction.

### ➤ **RIGHT TO BE FORGOTTEN**

The Company respects the Users' right to be forgotten, that is the right to obtain the cancellation of their data without delay.

### ➤ **RIGHTS OF DATA SUBJECTS**

Each subject has the right to obtain at any time confirmation of the existence of their data and to know its content and origin, verify its accuracy or request its integration, updating or correction pursuant to Article 7 of Legislative Decree 196/2003; Users are also entitled to revoke any consent previously granted for informational or marketing purposes. Pursuant to the same Article, Users have the right to request the cancellation, transformation into anonymous form or blocking of data processed in violation of the law and oppose for legitimate reasons its treatment.

|                                |                             |                                       |
|--------------------------------|-----------------------------|---------------------------------------|
| <b>Bros Manifatture S.r.l.</b> | <b>Bros USA Corporation</b> | <b>Bros Manifatture Asia Limited</b>  |
| Via Guido Rossa, 1             | 169 East Flager Street,     | Suite 2301, 23rd Floor, Chinachem     |
| 63025 Montegiorgio (FM)        | Suite 1022 Miami, FL 33131  | Hollywood Centre, 1-13 Hollywood Road |
|                                |                             | Central, Hong Kong S.A.R              |

➤ **CONCLUSION**

For the sake of transparency towards Users, please note that this Policy may be subject to periodic review, in order to protect the right of all subjects to proper management of their data.

***BROS MANIFATTURE S.R.L. ....***

***BROS USA CORPORATION.....***

***BROS ASIA LIMITED .....***

***BROS MANIFATTURE (BEIJING) TRADING CO. LTD.....***