

DIZZ GROUP Privacy Policy

This document applies to all personal information held by all the companies of DIZZ (in this document the entire group of DIZZ shall be referred to as “DIZZ”) as the controllers of your personal data and goes into detail on how we process your data, why we process it, with whom this data may be shared, in what situations we may share this data and all the measures we are taking to ensure that your data is safe and secure. The terms of this policy will apply for all personal information provided to DIZZ, and will continue to apply for as long as we hold your personal data in terms of the law. This policy shall also apply to any personal information collected on our social media pages and thus if you provide us with personal data on these pages, such information shall also be stored in terms of this policy.

On our website, you may also find links to other websites which are not managed or owned by DIZZ. DIZZ is not responsible for any such websites and this privacy policy shall not apply in this regard. The businesses operating these websites, may or may not have their own privacy policy and in this regard, DIZZ is in no way responsible for the way such companies manage the processing of your personal data.

DIZZ seeks to provide the best possible protection to your data given to us through our website.

Details about the data controller

The data controllers as defined under the Regulation (EU) 2016/679 which is generally referred to as the General Data Protection Regulation (hereinafter referred to as “GDPR”), are all of the below companies, which are part of the DIZZ Group of Companies:

- DIZZ FINANCE P.L.C, a company registered under the laws of Malta, having company registration number C 71189 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta
- DIZZ FRANCHISES, a company registered under the laws of Malta, having company registration number C 72974 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta
- DIZZ GROUP OF COMPANIES LIMITED, a company registered under the laws of Malta, having company registration number C 64435 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta
- DIZZ LABS LIMITED, a company registered under the laws of Malta, having company registration number C 74298 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta
- DIZZ LIMITED, a company registered under the laws of Malta, having company registration number C 26823 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta

- DIZZ MANUFACTURING LIMITED, a company registered under the laws of Malta, having company registration number C 62693 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta
- DK Fashion Co. LTD, a company registered under the laws of Malta, having company registration number C 47296 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta
- DKV & CO LIMITED, a company registered under the laws of Malta, having company registration number C 70942 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta
- D3 FASHION LIMITED, a company registered under the laws of Malta, having company registration number C 70701 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta
- DK G LIMITED, a company registered under the laws of Malta, having company registration number C 75176 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta
- D'S LTD, a company registered under the laws of Malta, having company registration number C 33852 and having registered address at Terranova Buildings, Carob Steet, Santa Venera, SVR 1700, Malta
- DK MAX LIMITED, a company registered under the laws of Malta, having company registration number C 75168 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta
- DK PASCUCCI LIMITED, a company registered under the laws of Malta, having company registration number C 58478 and having registered address at Dizz Buildings, Carob Street, Santa Venera, SVR 1700, Malta

Any personal data collected in terms of this policy by DIZZ may be shared between all the member companies of our group in terms of the law.

What is GDPR?

GDPR is a new EU regulation, which seeks to strengthen the protection given to personal data. In the highly digitized world we live in today, information has become essential. We strive to ensure that any personal data that we have in our possession, is properly processed in terms of the law and shall strive to ensure proper protection for your personal data.

What is Personal Information?

Personal data is personal information about an individual, like you. We collect such information for marketing purposes and also on our employees or potential employees when they apply for a position with us. We may also collect some personal information from our customers in relation to

marketing, our loyalty schemes or other promotions. Finally, DIZZ Finance has listed securities on the Malta Stock Exchange, and thus, the company processes personal data in relation to such listed securities which DIZZ obtains directly from the Malta Stock Exchange.

How Information is collected from you

To enable us to sell our products we would require to collect personal data from you. This may be done in the following situations:

- Loyalty Schemes– Should you subscribe to our loyalty schemes, we will process your information so that we can provide you with beneficial deals
- Submitting to our mailing list – You may subscribe to our mailing list at any time through this website or when visiting any of our outlets, so that we can send you updates and offers from our outlets.
- Applying for a position with DIZZ- You may send us a CV in relation to applying for a position with us and therefore, you will providing us with your personal data.
- Social Media- We may also collect some personal information from social media when you contact us through any of our official pages.
- Purchasing DIZZ securities- By investing in DIZZ and purchasing securities, DIZZ shall gain possession of your personal data through the Malta Stock Exchange which shall be processed in terms of the current laws and regulations.
- Promotions- DIZZ may at certain times, carry out a promotional activity on behalf any of its companies. Such activities may at certain times, require the collection of personal data of participants.

Legal Basis of Data Processing

We shall always process your data legally in terms of the current laws and regulations and in terms of the GDPR.

As an applicant to work at DIZZ, we process your information due to the fact that:

- i. You have consented to the Processing of the personal data. As soon as DIZZ determines that we no longer require your data in terms of the law or to protect our legitimate interest interest, your data shall be deleted, unless you consent to your data being kept for a further period.

As a member of our loyalty schemes, we process your information due to the fact that:

- i. You have given us your consent to subscribe to our loyalty schemes.

However, should you wish to withdraw from our loyalty schemes, we shall store your personal data in terms of DIZZ retention period due to the below:

- i. Processing is necessary to be able to protect our legitimate interest.

In relation to marketing, we process your information due to the fact that:

- i. You have consented to receiving such information. We shall never send direct marketing material to you, unless you have provided us with your consent.

If you purchase DIZZ securities, we process your information due to the fact that:

- i. Processing is necessary for the performance of our obligations;
- ii. Processing is necessary due to other obligations imposed by law;
- iii. Processing is necessary to be able to protect our legitimate interest.

If you choose to participate in any one of our promotional activities, we process your information due to the fact that:

- i. You have given us your consent to subscribe to the promotional activity.

However, should you wish to withdraw from the promotion, we may store your personal data in terms of DIZZ retention period due to the below:

- i. Processing may be required in terms of the terms and conditions you would have agreed to when subscribing to the specific promotion;
- ii. Processing is necessary to be able to protect our legitimate interest, even after the promotion is finished.

What information we collect

i) If we collect data in relation for marketing, such information shall be only limited to:

- Your email address
- Your residential address
- Your phone address
- Your IP

Such information shall be collected only for direct marketing purposes as explained below. Should you wish to subscribe to our mailing list, please send an email to marketing@dizz.com.mt

ii) We may also collect personal data if you apply for a position with us and this will include:

- Name and Surname
- Your CV and any information contained therein
- Residential address
- Date of Birth
- ID Card no
- Home and mobile telephone number

Additional information may be collected if you are accepted with DIZZ and this shall be regulated under the DIZZ internal data protection policy.

iii) Should you subscribe to our loyalty schemes, we collect the below information:

- Name and Surname
- Telephone and mobile number
- Email

iv) When purchasing DIZZ securities, we will also collect and process your personal data from the Malta Stock Exchange:

- Name and Surname
- Telephone and mobile number
- Address
- Email

v) When carrying out a promotion, the personal data that we may collect may vary from one promotion to another, however would typically include:

- Name and Surname
- Telephone and mobile number
- Address
- Email
- ID Card no

All information contained herein shall be kept in terms of DIZZ company policy and in terms of the retention policy listed below.

Special Categories of Data

The law makes a distinction between personal data and special categories of data. The latter includes personal data of a more sensitive nature, which usually cannot be processed, unless there is a special reason which allows such processing. Such information includes personal data relating to an individual's;

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic data;
- Biometric data for the purpose of uniquely identifying a natural person;
- Data concerning health;
- Data concerning a natural person's sex life or sexual orientation

We will never store or process any data which is deemed to consist of special categories of data without obtaining your prior written consentor unless authorised or required by law.

How will your personal information be Processed?

Your data is processed through our systems usually for DIZZ to be able to provide you with our products. If you have applied for a position with DIZZ, your personal information will be analysed to assess your suitability for the position you have applied to. If you have subscribed to our mailing list, your personal information shall be used so that we can send you promotions and offers as they arise in any of our outlets. If you subscribe to our loyalty scheme, we may process your data in relation to the operation of such schemes to be able to provide you with discounts. If you contact us

in any of our social media pages, we will not use any of your personal data, other than for statistical purposes, after we have answered any of your queries. If we processed your data due to promotion by DIZZ, your personal data shall be processed for the purposes specified in such a promotion.

In some cases your data may also be processed by a third party, in terms of the current data protection laws, who would be assisting DIZZ in selling our products or in our marketing function. The law further obliges us to share your data with the competent authorities in certain situations as detailed under the relevant laws and regulations.

Your Rights

Your personal data appertains to you and thus you have the right to decide what happens to your data. Below we have listed the rights that the law gives you in relation to any of the personal data provided to us.

- 1) You have the right to access your data. You have the right to ask for a copy of your personal data.
- 2) You have the right of rectification of incorrect data. If any data we have is incorrect, you have a right to ask for correction of such data.
- 3) You have the right to be forgotten and that your data is erased after the passage of time. You may request DIZZ so that any data that we have on you is deleted. As stated above, due to legal requirements, your data will be held by DIZZ for the periods stated in the data retention section and then deleted.
- 4) You have the right to restriction of procession. This can be done in the following cases:
 - i. Where you are contesting the accuracy of the data, while such a claim is being checked;
 - ii. If we process your data unlawfully
 - iii. If we no longer need your data but are keeping the data because we need it for a legal claim;

Kindly note however the if you exercise this right, it may hinder the ability of DIZZ to provide you with our products.

- 5) You have the right to data portability. Your data may be requested in a machine-readable format and you may also request that your data is transferred directly to another person.
- 6) You may object to the processing of your data. You may at any time inform us that you are objecting to the use of your data for direct marketing and after which we shall stop using your data for such purposes.
- 7) If you have provided consent for the processing of your data you have the right to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

In making your request in relation to the above, please note that:

- We will analyse your request and provide you with a reply within one month, except in extreme situations as allowed under law. In such a case we will provide information as to why your request was not acceded to within the one-month period.
- We have the right to refuse your request, if your request is not justified. In this case we shall inform you as to the reasons of why your request was refused.
- We have the right to charge a fee or refuse your request in extreme situations where your requests are manifestly repetitive or excessive.
- When you are making a request, we may request documentation to identify the person making the request.

You have the right to lodge a complaint to the data protection authority of your habitual residence if you believe that we have not complied with the requirements of the law.

Legal Protection

In terms of the local laws and regulations and the GDPR, we strive to provide the best possible protection for your personal data.

This is to ensure that:

- Your data is processed according to law;
- Your data is not processed in violation of your rights;
- Your data is obtained and stored for a specific lawful purpose;
- You are properly informed about your rights and about your data;
- The data processed is required and not excessive;
- Your information is accurate and updated;
- Your information is stored safely and securely;
- Our IT systems are properly protected from attack in order to safeguard your data;
- Your data is kept accordingly to our established time frames and not for a longer period than required;
- Your data is not transferred to jurisdictions which do not adhere to equivalent standards without the appropriate safeguards as stated under law.

Marketing

From time to time we may send marketing material to individuals subscribed to our mailing list. These will mainly consist of offers in any of our stores. We will not send any such material unless you have consented to receiving this information and you can unsubscribe at any time, after which, we will delete any relevant personal data in our systems related to the sending of marketing material to you.

You can click here to [subscribe](#) or here to [unsubscribe please send an email to marketing@dizz.com.mt](#).

Providing your information to Third Parties

To be able to provide you with our products we utilise the services of third parties to assist us. In some cases your data is transferred to such third parties, or such third parties have access to your data. These third parties can be classified in the following categories:

IT Security	Service providers who help DIZZ in ensuring that your data remains secure
IT Backups	Service providers who assist DIZZ in relation to backups for business continuity purposes so that your data is not lost
Administration	Service providers who provide software and assistance to assist us with general administration
Marketing	Service providers who assist us in relation to marketing and website

Such information shall only be shared or accessed by such third parties, if:

- We have obtained your consent before;
- Such transfer of data is necessary for our operations.
- Such a transfer of personal data is required under law or other a lawful request by a competent judicial authority.

In this regard, we shall always provide information on such transfers, unless prohibited by law.

Surveillance at our Outlets

Our outlets contain cameras as part of our group policy. Such cameras are used either for security purposes or for statistical purposes. Our cameras do not record sound.

Transfers to third countries

We shall strive to send your data only to other EU countries or other countries which ensure proper protection for your data. When transferring your data to countries which are not deemed as such, proper measures in terms of the law shall be applied to ensure the protection of your personal data. In cases where such measures cannot be achieved, personal data shall only be sent to these countries if necessary to perform our services and also subject to your prior consent.

Retention

We shall retain any personal information provided to us in terms of the law and shall delete any personal data when such a retention period lapses. In this regard, DIZZ stores your information as follows:

- i. Any personal information on prospective employees may be kept by DIZZ for 4 months to protect our legitimate interest in the event of legal action. We shall then delete any personal data in relation to your application unless you have provided consent. In such an event your personal data shall be deleted after _____
- ii. Any information in relation to our loyalty scheme customers shall be kept for 5 years the customer withdrew from DIZZ loyalty schemes.

- iii. You can also at any time object to the sending of any marketing material or simply unsubscribe from our mailing list. In such a case, we shall not send you any more marketing information and DIZZ shall also delete any personal information provided for marketing purposes.
- iv. Should you subscribe to any one of our promotions, we shall retain your data for at least five years after the conclusion of the promotion. In certain promotions, your personal data may be kept for such longer period as required depending on the specific promotion. If you have provided us with personal data for a specific promotion and you would like to enquire on how long we are keeping your data, kindly contact us as stated below.

Should in any event, we are required to keep your Personal Data for any longer period as allowed by law, your Personal Data shall be kept secure and shall be deleted when we are allowed by law to delete such Personal Data.

Security of Data

DIZZ utilises proper security systems to ensure that your data is kept in a secure and safe manner and has also invested considerable resources in this regard. Such measures may include encryption, firewalls, special software and also engaging of specialized individuals to provide your data with a proper level of security.

We cannot however provide a 100% guarantee in relation to the security of your personal data.

Cookie Policy

Cookies are text files which are placed on your computer, tablet or mobile phone when using our website, to collect standard internet log information and visitor information on our website. Our website creates cookies every time you visit it.

Cookies are used for the following:

- To analyse the traffic on our website;
- To determine which sections on our website are of most interest to visitors;
- To make improvements to our website;
- To ensure that visits to our websites are properly recorded.

Hyperlinks

Kindly note that our website contains hyperlinks to other websites. Please note that DIZZ is not responsible for the content of these other websites or their respective adherence to data protection laws and rules. DIZZ does not provide any quality controls to such websites and shall accept no responsibility for their performance, security, accuracy, content or privacy in relation to your personal data.

Changes to our Policy

Due to the fact that technology and the relevant legislation regarding data protection and data privacy changes at a rapid pace, DIZZ may at any time make changes or amendments to this privacy policy. In such a case we will amend or replace the relevant sections of this policy.

Data Requests

If you wish to make any inquiry regarding your personal data, wish to have any of your data corrected or request access to your personal data, you may contact us on the below details. Please note that we may charge a fee or refuse requests which are manifestly repetitive or excessive.

Any request must be in writing and must also include your name, address and a description of the information or correction required. We may also ask for other identification documentation. Such information is essential so that we can identify you properly.

Email: marketing@dizz.com.mt

Telephone number: 21225589

Address of DIZZ: Carob Street Santa Venera Malta SVR1700

This Policy has been updated on the 20th NOV 2018