

Directa Plus plc

Privacy Policy

This privacy policy was last updated on 18 July 2018.

1. [About this privacy policy](#)
2. [Who we are](#)
3. [Contacting us](#)
4. [Information we collect](#)
5. [How we use your personal data](#)
6. [Who we share your personal data with](#)
7. [International transfers](#)
8. [Security of your personal data](#)
9. [How long we keep your personal data](#)
10. [Access to and updating your personal data](#)
11. [Right to object](#)
12. [Your other rights](#)
13. [Exercising your rights](#)
14. [Cookies](#)
15. [Extended Notice on Cookies](#)
16. [Links](#)
17. [Complaints](#)
18. [Changes to our privacy policy](#)

ABOUT THIS PRIVACY POLICY

This privacy policy explains how Directa Plus plc, together with our subsidiary, Directa Plus S.p.A. ("**Directa Plus**", "**we**", "**our**", and "**us**") collect, use and share personal data about you.

This privacy policy covers personal data that we receive when you visit our website <http://www.directa-plus.com/> ("**Website**"), use our services and products, or communicate with us via the Website and offline as a customer, prospective customer or general business contact. It does not apply to information you might provide to us or we might collect from you as a shareholder of Directa Plus plc. If you are a shareholder, our [Shareholder Privacy Notice](#) will apply.

WHO WE ARE

Directa Plus plc (company number 04679109), an AIM listed company with its registered office at 3rd Floor, 11-12 St James's Square, London, SW1Y 4LB, United Kingdom is the parent company.

Our trading subsidiaries are:

- Directa Plus S.p.A. (fiscal code 04783370960) with its registered office at ComoNEXt Science Park, Via Cavour 2, Lomazzo 22074, (CO) Italy; and
- Directa Textile Solution S.r.l. (fiscal code 03610370136 with its registered office at ComoNEXt Science Park, Via Cavour 2, Lomazzo 22074, (CO) Italy.

Each company will collect, use and share personal data in accordance with this privacy policy. When you provide personal data to Directa Plus plc, the data controller is Directa Plus plc. When you provide personal data to Directa Plus S.p.A, the data controller is Directa Plus S.p.A.

CONTACTING US

We are not required to appoint a formal data protection officer under data protection laws. However, we have appointed a Privacy Manager who you can contact about any queries you may have in relation to this privacy policy. Our Privacy Manager is Marco Ferrari.

If you have any questions about our privacy policy or your information, or to exercise any of your rights as described in this privacy policy or under data protection laws, you can contact us:

By post:

Privacy Manager
Directa Plus plc, 3rd Floor, 11-12 St James's Square, London, SW1Y 4LB, United Kingdom

By email:

info@directa-plus.com

INFORMATION WE COLLECT

Information you voluntarily provide us

The categories of personal data you may voluntarily provide to us includes:

- first and last name;
- job title and company name;
- email address;
- phone number;
- postal address;
- other personal data contained in your communications depending on the nature of the communication.

Information we collect online

We collect, store and use information about your visits to our Website and about your computer, tablet, mobile or other device through which you access our Website. Please see the section below on "Cookies" for further details.

Sensitive personal data

We do not generally seek to collect sensitive (or special categories of) personal data. Sensitive personal data is defined by data protection laws to include personal data revealing a person's racial or ethnic origin, religious or philosophical beliefs, or data concerning health. If we do collect sensitive personal data, we will ask for your explicit consent to our proposed use of that information at the time of collection.

Children

Our Website is not intended for or directed at children under the age of 16 years and we do not knowingly collect data relating to children under this age.

HOW WE USE YOUR INFORMATION

The purpose for which we use and process your information and the legal basis on which we carry out each type of processing is explained below.

Purposes for which we will process the information	Legal Basis for the processing
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To provide you with information and/or contact requests that you request from us.	It is in our legitimate interests to respond to your queries and provide any information requested in order to generate and develop business. To ensure we offer a good and responsive service, we consider this use to be proportionate and will not be prejudicial or detrimental to you.
To carry out our obligations arising from any contracts entered into with you and to provide services and products to you.	It is necessary for us to process your personal data to fulfil our contractual obligations to you or in order to take steps at your request before entering into a contract.
To comply with our legal and regulatory obligations, e.g. tax, accounting and banking obligations.	It is necessary to comply with our legal and regulatory obligations.
To enforce the terms and conditions and any contracts entered into with you.	It is in our legitimate interests to enforce our terms and conditions of service. We consider this use to be necessary for our legitimate interests and proportionate.
To send you information regarding changes to our policies, other terms and conditions and other administrative information.	It is in our legitimate interests to ensure that any changes to our policies and other terms are communicated to you. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.
To send promotional and marketing communications, including newsletters and market research, through both automated means (SMS, MMS, email, fax) and non-automated means (ordinary mail, telephone).	We will obtain your consent to send promotional and marketing communications.
<ul style="list-style-type: none"> • To administer our Website including troubleshooting, data analysis, testing, research, statistical and survey purposes; • To improve our Website to ensure that consent is presented in the most effective manner for you and your computer, mobile device or other item of hardware through which you access our Website; and • To keep our Website safe and secure. 	For all these categories, it is in our legitimate interests to continually monitor and improve our services and your experience of our Website and to ensure network security. We consider this use to be necessary for our legitimate interests and will not be prejudicial or detrimental to you.

Where we rely on legitimate interests as a lawful basis, we will carry out a balancing test to ensure that your interests, rights and freedoms do not override our legitimate interests. If you want further information on the balancing test we have carried out, you can request this from our Privacy Manager.

Where you provide consent, you can withdraw your consent at any time and free of charge, but without affecting the lawfulness of processing based on consent before its withdrawal. You can

update your details or change your privacy preferences by contacting our Privacy Manager as provided above.

If you choose not to provide information requested, where such information is necessary for the performance of a contract, we may not be able to perform the contract we have or are trying to enter into with you.

WHO WE SHARE YOUR PERSONAL DATA WITH

We do not share your personal data with third parties except as provided in this privacy policy.

We share your information with the following parties:

- with our employees, partners or consultants;
- with our group companies;
- with our third party data processors and service providers who assist with the running of our Website and our business operations including our IT support services, website hosting and data storage/back up services;
- with our professional advisors, such as accountants, lawyers, tax advisors or other experts;
- with our members or shareholders;

Our third party processors and service providers are subject to security and confidentiality obligations and are only permitted to process your personal data for specified purposes and in accordance with our instructions.

In addition, Directa Plus may disclose information about you in the following circumstances:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if all or substantially all of Directa Plus's assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data, for example, to judicial, administrative and stock-market authorities, in order to comply with any legal or regulatory obligation;
- to enforce or apply our terms and conditions or to establish, exercise or defend the rights of Directa Plus and its affiliates.

INTERNATIONAL TRANSFERS

We do not transfer your personal data outside the UK or the European Economic Area (EEA).

SECURITY OF YOUR PERSONAL DATA

We use industry standard physical and procedural security measures to protect information from the point of collection to the point of destruction. This includes encryption, firewalls, access controls, policies and other procedures to protect information from unauthorised access.

Where data processing is carried out on our behalf by a third party, we take steps to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal data.

Despite these precautions, however, Directa Plus cannot guarantee the security of information transmitted over the Internet or that unauthorized persons will not obtain access to personal data. In

the event of a data breach, Directa Plus have put in place procedures to deal with any suspected breach and will notify you and any applicable regulator of a breach where required to do so.

HOW LONG WE KEEP YOUR PERSONAL DATA

Your personal data will not be kept for longer than is necessary for the purposes for which it was collected and processed.

The criteria we use for retaining different types of personal data, will depend on the following:

- the purpose for which the personal data was collected - for general queries, we will retain your information for as long as necessary to respond to your queries. After this period, we will not hold your personal data for longer than 12 months if we have not had any active subsequent contact with you;
- guidance from the UK Information Commissioner's Office ("**ICO**") or other applicable regulatory authority, and industry best practice recommendations;
- legal and regulatory requirements - we may need to retain personal data for up to 7 years after we cease providing services to you where necessary to comply with our legal obligations, resolve disputes or enforce our terms and conditions.

YOUR RIGHTS

ACCESS TO AND UPDATING YOUR PERSONAL DATA

You have the right to access information which we hold about you. If you so request, we shall provide you with a copy of your personal data which we are processing ("**data subject access request**"). We may refuse to comply with a subject access request if the request is manifestly unfounded or excessive or repetitive in nature.

You may also have the right to receive personal data which you have provided to us in a structured and commonly used format so that it can be transferred to another data controller ("**data portability**"). The right to data portability only applies where your personal data is processed by us with your consent or for the performance of a contract and when processing is carried out by automated means.

We want to make sure that your personal data is accurate and up to date. You have the right to have inaccurate personal data rectified, or completed if it is incomplete. You can update your details or change your privacy preferences by contacting us as provided in "*Contacting us*" above. We may refuse to comply with a request for rectification if the request is manifestly unfounded or excessive or repetitive.

RIGHT TO OBJECT

Direct marketing

You have the right to object at any time to our processing of your personal data for direct marketing purposes.

Where we process your information based on our legitimate interests

You also have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on our legitimate interests. Where you object on this ground, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

YOUR OTHER RIGHTS

You also have the following rights under data protection laws to request that we rectify your personal data which is inaccurate or incomplete.

In certain circumstances, you have the right to:

- request the erasure of your personal data erasure (“**right to be forgotten**”);
- restrict the processing of your personal data to processing in certain circumstances.

Please note that the above rights are not absolute and we may be entitled to refuse requests, wholly or partly, where exceptions under the applicable law apply. We may refuse a request for erasure, for example, where the processing is necessary to comply with a legal obligation or necessary for the establishment, exercise or defence of legal claims. We may refuse to comply with a request for restriction if the request is manifestly unfounded or excessive or repetitive in nature.

EXERCISING YOUR RIGHTS

You can exercise any of your rights as described in this privacy policy and under data protection laws by contacting us as provided in “Contacting us” above.

Save as described in this privacy policy or provided under data protection laws, there is no charge for the exercise of your legal rights. However, if your requests are manifestly unfounded or excessive, in particular because of their repetitive character, we may either: (a) charge a reasonable fee taking into account the administrative costs of providing the information or taking the action requested; or (b) refuse to act on the request.

Where we have reasonable doubts concerning the identity of the person making the request, we may request additional information necessary to confirm your identity.

COOKIES

Cookies are small text files that are sent to the user's terminal equipment (usually to the user's browser) by visited websites; they are stored in the user's terminal equipment to be then re-transmitted to the websites on the user's subsequent visits to those websites. Cookies may be distinguished into two major groups:

- i) **Technical cookies** - used exclusively with a view to carrying out the transmission of a communication on an electronic communications network, or insofar as this is strictly necessary to the provider of an information society service that has been explicitly requested by the contracting party or user to provide said service. To simplify, they allow users to navigate and fully exploit the resources offered by the Website. Technical cookies may further be divided into:
 - a) “*browsing cookies*” - which allow users to navigate and use the Website (e.g. to purchase an item online or authenticate themselves to access certain sections); and
 - b) “*functional cookies*” - which enhance the use of the Website according to a set of predetermined criteria (e.g. the language, the items selected for purchase) with a view to improving the quality of the service provided. Finally, “analytics cookies” can be equated to technical cookies from a legislative standpoint, and are used to collect information on the numbers of visitors for statistical analysis only, with no identification of the single user being performed. Analytics cookies can either be installed by the Website manager or by third-party Websites (“third-party cookies”);
- ii) **Profiling cookies** - aimed at creating user profiles and used to send ads messages in line with the preferences shown by the user during navigation. To simplify, they are used to pursue analysis research of the Data Subject's behaviour for marketing purposes. Profiling

cookies can either be installed by the Website manager or by third parties (“third-party cookies”).

On accessing the Website for the first time, the Data Subject is immediately shown a cookie consent banner containing information about the type(s) of cookies present on the Website as well as a link to this Notice and, subsequently, to the Extended Notice on Cookies below. On the Extended Notice page, the Data Subject is provided with additional information about the cookies installed by the Data Controller and by third parties, so as to be able to freely choose what cookies to enable and how.

EXTENDED NOTICE ON COOKIES

The cookies we place on your device fall into the following categories:

- i) **Browsing cookies** - these allow you to normally browse and use the Website along with the services made available by the Website itself (e.g. authenticate yourself to access certain sections and record your preferences). The collection of such data is not aimed at identifying you, and they are only stored for the amount of time necessary to pursue the purposes they were designed for, which shall not exceed 12 months.
- ii) **Functional cookies** - these allow you to use the Website based on a set of selected criteria (for example, your selected language or location), so as to improve your experience of the Website. The collection of such data is not aimed at identifying you, and they are only stored for the amount of time necessary to pursue the purposes they were designed for, which shall not exceed 12 months.
- iii) **Analytics cookies** - used for statistical purposes to gather aggregated and anonymous information on the number of visitors and the patterns of visits to the Website. The collection of said data is not aimed at identifying you, but is only intended for statistical purposes, and they are stored for the amount of time necessary to carry out the activities of statistics analysis and comparative elaboration, which shall not exceed 12 months.
- iv) **Profiling cookies** - aimed at creating user profiles and used to send targeted adverts in line with your preferences. The Website does not use profiling cookies but allows the use of third-party profiling cookies, as described below under *Third Party Cookies*.

The table below sets out further information on the cookies we use (third party cookies are set out separately below) and why:

Cookie Name(s)	Category	Purpose	More information
ASPSESSIONID#	Necessary	Preserves users' states across page requests	

Consent to use cookies

We will ask for your express consent to place cookies on your device, except where these are strictly necessary for you to be able to use our Website or to provide you with a service that you have requested. A banner will appear in the foreground when you access the Website for the first time which describes the type(s) of cookies we use and requests your consent to place cookies on your device. It is important to read this Extended Notice on cookies, so as to become acquainted with the information contained herein.

You can withdraw your consent to cookies at any time by disabling cookies as described below.

Third party cookies

We currently use the following third party cookies. Please note that we have no control over these

third party cookies, and you should check the relevant third party websites for more information about these.

Third Party Cookies	Cookie Name(s)	Purpose	More information
Google	NID	Registers a unique ID that identifies a returning user's device. The ID is used for targeted ads	Google Privacy Policy
Google Analytics	collect	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels	Google Privacy Policy
Google Analytics	_ga	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	Google Privacy Policy
Google Analytics	_gat	Used by Google Analytics to throttle request rate	Google Privacy Policy
Google Analytics	_gid	Registers a unique ID that is used to generate statistical data on how the visitor uses the website	Google Privacy Policy
Twitter	i/jot/syndication	Unclassified	Twitter Cookie Policy

How to modify / turn off cookies

You can modify your preferences and disable some or all the categories of cookies mentioned above. This can be done by managing cookies from the browser settings, as per the instructions made available by the browser's manufacturer. (Please find below the links to the dedicated pages of the most popular browsers; Directa Plus does not take responsibility for any changes that may be made by the manufacturer: Apple Safari; Google Chrome; Mozilla Firefox; Microsoft Edge; Microsoft Internet Explorer; Opera Browser).

LINKS

Our Website may, from time to time, contain links to and from third-party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and Directa Plus does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

COMPLAINTS

If you have any questions or complaints regarding our privacy policy or practices, please contact us as provided in "*Contacting Us*" above.

You have the right to make a complaint at any time with a supervisory authority, in particular in the EU

(or EEA) state where you work, normally live or where any alleged infringement of data protection laws occurred.

The supervisory authority in the UK is ICO who can be contacted at <https://ico.org.uk> or telephone on 0303 123 1113. The supervisory authority in Italy is the Italian Data Protection Authority (Garante per la protezione dei dati personali) who can be contacted at <https://www.garanteprivacy.it> or telephone on +39-06-6967 71.

CHANGES TO OUR PRIVACY POLICY

From time to time, we may change this privacy policy. The current version of this Policy will always be available from us in hard copy or on our Website. We will post a prominent notice on our Website to notify you of any significant changes to this Policy or update you by other appropriate means.