

1. INTRODUCTION

This Privacy Policy (the “*Privacy Policy*”), together with the Terms and Conditions, governs your relationship with International Fashion Ltd with regards to your membership to the International Fashion Ltd and Loyalty cash back\discount scheme (“*Loyalty Scheme*”).

For you to sign up and become a Member of the Loyalty Scheme CORTEFIEL, we collect and process some of your personal information.

We are aware that personal data is a sensitive topic and we are committed to respecting your privacy and processing your lawfully, fairly transparently and in accordance with your rights.

We have tried to keep the policy as simple as possible. However, if any part is unclear to you, contact us at admin@ifl.com.mt or call **+356 23719424** and we respond to your query in due time to clarify any doubt you may have.

2. DATA CONTROLLER

The Data Controller (“*the Controller*”), i.e. the entity that determines the purpose and means of the data processing, is International Fashion Ltd, a company incorporated in Malta with the offices at Level 4 in Bay Street Tourist complex. The controller is reachable **+356 23719424**.

3. INFORMATION WE COLLECT

3.1 In the administering the Loyalty Scheme, we collect the following information about you (“*Member data*”):

- (i) Title;
- (ii) Name and last Name;
- (iii) Mobile number;
- (iv) Email address;

3.2 When you make a purchase from the Outlets (women’secret Bay street, women’secret Pama and women’secret Sliema) and use your membership card the information below is collected (“*Purchase data*”):

- (v) Date, time and place of purchase
- (vi) Items purchased and the total amount of purchase.

4. PURPOSES AND LEGAL BASIS FOR COLLECTING

Member data, as described in Clause 3 above is only collected for specific, explicitly stated and legitimate purpose and it is processed according to the legal basis identified below.

Categories of Personal Data		Purpose(s) for collecting	
Member Data	Title	Address you properly to the communications to be sent to you	
	Name and Surname	Identify you as a member of the scheme	
	Mobile number	To be able to contact you to ensure the efficient running of the Loyalty Scheme including the accrual and redemption of Points, as specified in the Terms and Conditions.	
	Email address	To be able to contact you to ensure the efficient running of the Loyalty Scheme including the accrual and redemption of Points, as specified in the Terms and Conditions.	

5. RECIPEINTS OF PERSONAL DATA

5.1 Your personal data may be shared between the undertakings forming part of International Fashion Limited, pursuant to Recital 48 GDPR. International Fashion Limited has legitimate interest in transferring personal information inside the group for internal administrative purposes.

5.2 Your personal data may also be shared between the Controller and third-party companies to send information regarding Loyalty points, offers etc to you via SMS respectfully under the GDPR regulations.

5.3 Your personal data is NEVER transferred outside the European Economic Area (EEA) or to international organisations.

5.4 We do not, sell trade or otherwise transfer any personal information to third parties.

5.5 We will release your data if we are obligated to do so in order to comply with any law, regulation or court order.

6. DATA RETENTION

Personal data is not kept for a period longer than is necessary, having regard to the purposes for which they are processed.

Retention periods for each category of data are identified below.

Categories of personal data	Retention period
Member data	For the duration of the membership of the Loyalty Scheme.
Purchase data	Data is retained permanently, but it is anonymised once the data subject opts out of the Loyalty Scheme.

7. YOUR RIGHTS

7.1 As a data subject, you have extensive rights when it comes to the processing of your personal data.

Your rights are listed below and may be enforced by contacting the Controller or the Processor by email, by post or by phone using the contact details provided above.

You are guaranteed a response within 30 days month from the date of receipt of your enquiry.

If your request is particularly complex or we may need to process an extraordinary number of simulations request, our reply may take longer but will be provided no later than 2 months from the date of receipt of your enquiry. This reply will also include details explaining the reason for the delay with our response.

We will provide the information in digital format or if preferred in hard copy format.

Such Request will not incur any fee, except when:

- (i) If your our requests are manifestly unfounded or excessive, in particular because of their repetitive character. In this case we will charge a reasonable fee, taking in account the administrative cost of providing the information or communication or

taking the action requested. In this case we may also refuse to act on the request after having explained our position.

- (ii) You request the information on hard copy and posted. In that case, we will charge you the postage fees.

Should we have reasonable doubts concerning your identity when making the request above, we may require additional information, necessary to confirm your identity.

Your rights are:

7.2 ACCESS

You may obtain confirmation from us as to whether or not personal data is being processed including:

- (i) The purposes of the processing;
- (ii) The categories of personal data concerned;
- (iii) The recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
- (iv) Where possible, the envisaged period for which the personal data will be stored, or if not possible, the criteria used to determine that period.
- (v) The existence of the right to request from the Controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
- (vi) The right to lodge a complaint with the supervisory authority;
- (vii) The existence of automated decision-making, including profiling;

7.3 Rectification

In case your data is inaccurate, incomplete or out-of-date, you have the right to ask us to rectify it.

7.4 Deletion (“the right to be forgotten”)

You have the right to have your personal data erased in case:

- (i) The data is no longer necessary in relation to the purposes for which it was collected or otherwise processed;
- (ii) You have withdrawn consent to process your data and there is no other legal basis legitimating its processing;
- (iii) You have objected to the processing of your data and there is no other legal basis legitimating its processing;
- (iv) Your personal data has been unlawfully processed;
- (v) Your personal data has to be erased in order to ensure compliance with any legal obligations arising from legislation enacted within EU or any member states.

7.5 Restriction you have the right to request a restriction on the processing of your data in case:

- (i) You contest the accuracy of your personal data, for a period enabling us to verify the accuracy of such data;
- (ii) The processing of your data is unlawful, and you oppose the erasure of your personal data and request the restriction of their use instead;
- (iii) We no longer need the personal data for the purpose of processing;
- (iv) We no longer need your data, but we are required by you to retain the data for the establishment, exercise or defence legal claims;
- (v) You have objected to processing (as specified in the detail below), pending the verification whether our legitimate grounds override yours.

When you restrict processing, your personal data will, with the exception of storage, only be processed with your consent or for the establishment, exercise of legal claims or for the protection of your rights of another natural or legal person or for the reasons of important public interest of the union or of a Member State.

In case you have obtained restriction of processing as per above, we will inform you before the restriction of processing is lifted.

7.6 Data portability

You have the right to receive the personal data about yourself that you submitted to us when subscribing to the Loyalty scheme in a structured, commonly used and machine-readable format, and you have the right to transmit those data to a Controller other than International Fashion Ltd without hindrance from our end.

Where technically feasible, in exercising your right to data portability you have the right to have your personal data transmitted directly from International Fashion to another controller.

7.7 Complaint

In addition to the above, and without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with the competent supervisory authority is the Information and Data Protection Commission with headquarters at floor 2, Airways House, Triq Il-Kbira, Tas-Sliema SLM 1549, Malta.

8. SECURITY

The controller and the Processor take reasonable and appropriate administrative, technical and organisational measures to protect the confidentiality, integrity and availability of your Personal Data, whether in electronic or tangible, hard copy form.

Any breach that may involve your Personal Data will be notified to the supervisory authority within 72 hours of us becoming aware of it.

Should the breach result in a high risk of adversely affecting your rights of freedom, we will notify it to you without undue delay.

9. APLICABLE LAW

The Law applicable to the processing activities, and to this policy shall be:

- Until 25 May 2018, the Data Protection Act, Chapter 440 of the Laws of Malta and other subsidiary legislation;
- After 25 May 2018, regulation EU 2016/679("GPDR")
- Any other Maltese legislation that may be in force from time to time.