

Berluti

Paris

PRIVACY POLICY

Last updated on 19th May 2025.

This Privacy Policy ("Policy") describes how BERLUTI LLC, 1 East 57th Street, 10022, New York, NY, United States of America, ("BERLUTI" "we", "our", or "us") collects, uses, shares, retain, or otherwise processes personal information on the www.berluti.com website, or any other website operated by BERLUTI, stores, and other locations where the Policy is located or referenced (collectively, "Site") online or offline, and how we treat such information. The Policy also informs individuals, including customers, job applicants, and website visitors ("you") about your rights regarding your personal information, and how to exercise these choices.

This Privacy Notice is also not a contract and does not create any legal rights or obligations not otherwise provided by law. Nonetheless, we urge you to read this Policy carefully.

Some of our BERLUTI stores or e-commerce web sites selling our BERLUTI branded products are operated by distributors (i.e., independent entrepreneurs). This Policy does not apply to either our distributors or their web sites or mobile applications. To find out how they use their customers' personal information, please see their own confidentiality policies.

This Policy comprises the following sections below.

The data protection officer of BERLUTI may be contacted at contact@berluti.com.

1. WE COLLECT PERSONAL INFORMATION FROM AND ABOUT YOU

Berluti collects information when you interact with our Site, including when you: (1) visit and use our website, (2) call, text, or message us via live chat or visit us, (3) when you email or submit forms online, or (4) when we are otherwise in communication with or providing goods or services to you.

Certain of the information we collect may be considered "Personal Information," which, for the purposes of this Policy means information that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked, directly or indirectly, with a natural person or household, such as a name, e-mail address, postal address, payment information, and/or telephone number, and subject to exceptions under applicable law, which may include information that is publicly available. Information that is aggregated or de-identified and maintained in a form that cannot be reasonably used to infer information about, or otherwise be linked to, a particular individual or household, is not considered Personal Information.

The Personal Information we collect depends on how you interact with us. The Personal Information that we collect about you may include:

- Identifiers – such as your name, address, telephone number, or e-mail address.
- Account information – such as your email address, password, name, and contact information in order to provide you with an account.
- Payment information – such as your credit card number, billing, and shipping address when you buy our merchandise.
- Demographic information – such as your gender, birthday, zip or postal code. We also may collect information that could identify you and relates to your hobbies, interests, and shopping behaviors.
- Commercial information – such as your personal clothing preferences and behavior; your size and your style; your purchases (in-store and online) including services and requests.
- Internet and network information – such as your browsing history (berluti.com, social network pages, partner web sites); the information that you provide or publish in a public space, on our social network pages or on our Site, for instance product reviews, or any information that you disclose via our interactive chat tool.
- Location – such as your precise information from your device if you use our mobile application to provide you with the products and services you have requested. We might also ascertain with what frequency you use the application and where you downloaded it. We also receive Personal Information to help detect and prevent consumer fraud. We do not use such information for marketing, analytics, or otherwise to draw inferences about you.
- Video surveillance footage – such as your images in our stores in order to detect and address security and safety incidents, shoplifting, other potentially illegal activities, and adequate staffing considerations. If you enter our store, your images may be collected for these purposes.
- Communications, including audio and electronic, from you – such as messages that you post in a public space or submit to our customer service unit including your comments and ratings of BERLUTI's services; photos of your product for repair, events that you take part in, and other information when you contact us.

- Sensitive Personal Information – we do not collect Personal Information that falls under the sub-category of “Sensitive Personal Information” as defined by certain laws.

2. WE COLLECT PERSONAL INFORMATION IN DIFFERENT WAYS

We collect Personal Information from you directly, when you use our Site, and from third parties:

Under the following circumstances:

- Creation and management of your account;
- Registration for our newsletter and for promotional messages;
- Purchases;
- Browsing over the Internet;
- Surveys;
- User content;
- Use of digital applications;
- Requests for information;
- Participation in an event.

Via the following points of contact:

- Browsing of Berluti.com;
- Contact with our online advisers;
- Contact with our in-store salespersons and advisers;
- Contact with us during an event that we organize;
- Contact with our customer service unit;
- Forms that you fill in, whether in-store or online;
- Digital applications that you use;
- BERLUTI pages on the social networks that you access and comment on / like;
- Advertisements in online media that you click on;
- Advertisements in search engines that you click on;

3. WE USE PERSONAL INFORMATION FOR DIFFERENT PURPOSES

We use Personal Information to provide Berluti products and services.

We use Personal Information to provide our Site, products, features, and services to our users and customers, such as for customer support and to manage our relationship with you.

We use Personal Information to personalize your experience on our Site.

We use Personal Information to tailor and personalize your experience on our Site. For example, we may use your Personal Information to better understand how users engage with our Site and our products and customize your experience and to help ensure that our marketing activities fit your needs and interests.

We use Personal information to process your order and communicate with you.

We use your Personal Information to process your order and ship time. We may use your Personal Information to send you information you request, such as delivery or payment information, the product you have purchased, or to help you resolve a problem or question.

We use Personal Information for security and legal purposes.

We use Personal Information to protect our company, our customers, and our business partners. For example, we and our service providers use Personal information to prevent, detect, and investigate actual or suspected fraud, abuse, illegal use, unauthorized or illegal activities and activities or other misuse of our Platform. Suspected fraud or violations of our Terms of Purchase, including through proxy or spoofing, may result in denial of purchase and/or legal action. We may also use your Personal Information as part of legal proceedings, to respond to legal process requests, and to comply with court orders, governmental requests, and applicable legal requirements.

We use Personal Information for advertising and marketing purposes.

We may use your Personal Information to contact you about new products and special offers we think you'll find valuable, to serve you with interest-based or targeted advertising, or to subscribe you to the newsletter, at your request. These might be third party offers or products we think you might find interesting. We and our partners may engage in interest-based advertising using Personal Information gathered across multiple websites, devices, or other platforms. We may call you, or send you emails or text messages

as permitted by law. We may also use other means as they are developed. If you use our mobile applications, we may send you push notifications about new products or special offers.

We use Personal Information to communicate with you about your account or our relationship.

If you consent to having an account with Berluti, we may contact you about changes to our Platform, service updates, feedback, this Policy, or our Platform terms.

We use Personal Information for other purposes.

We use Personal Information in other ways. For example, we use Personal Information to maintain transaction and business records and will do so for as long as is necessary to fulfill the business purpose for which the Personal Information was collected. In some situations, we may seek your permission, if required, to use your Personal Information.

4. WE SHARE PERSONAL INFORMATION WITH THIRD PARTIES

We may share Personal Information with third parties who perform services on our behalf.

We may share Personal Information with vendors and others that perform services on our behalf, such as services related to payment processing, shipping and deliveries, sending you emails and other communications on our behalf, fraud detection and prevention, and assisting with events and promotions. For example, we may share Personal Information with third parties tasked with delivering Berluti products to you.

We may share Personal Information with our parent and affiliated companies.

We are a member of the LVMH Group, consisting of LVMH Moët Hennessy Louis Vuitton SE (“LVMH”) and its affiliated Maisons. A full list of the Maisons affiliated with the LVMH Group is available [here](#). We may disclose Personal Information to Berluti Headquarters in France (our parent entity), LVMH, and affiliated Maisons when they are acting as joint-controllers or processors according to our instructions and on our behalf, to provide you with the same level of service worldwide or in other circumstances as permitted or required by law.

We may share Personal Information with third parties for analytics or marketing purposes.

As permitted by law, we may share Personal Information with third parties who assist us in the organization of our events. We may also share Personal Information with third-party advertising partners to better understand how our Site is used, to track your use of our Site, and serve you with advertising tailored to your interests. For example, we make information collected via cookies and similar technologies on our Site available to third-party advertising partners to provide you with relevant ads and content and to manage, improve, and measure our advertising campaigns. Personal Information disclosed to third parties for these purposes includes basic identification information, device information and other unique identifiers, your activity on our website such as pages viewed and certain interactions with our chat functions and videos, and commercial data. Under certain laws, including the California Consumer Privacy Act of 2008 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”) (collectively, “the CCPA Regulations”), this may be considered a “sale” or “sharing” of Personal Information for targeted advertising purposes. If you are a resident of California, you may have a right to opt out of the sharing of Personal Information with Berluti.

We may share your Personal Information with potential buyers or with any successor to all or part of our business.

We may share your Personal Information with actual or potential buyers (and their agents and advisors) in connection with any actual or proposed purchase, merger, acquisition, reorganization, financing, receivership, or sale of company assets or transition of services to another provider, so long as we inform the potential buyer or successor that it must use your Personal information only for the purposes disclosed in this Privacy Policy. We also may share your Personal Information if we are merged or all or part of our business or assets are transferred, assigned, or sold. Your Personal information would be disclosed to our buyer or successor or assigned in these circumstances, who can then use and disclose your Personal Information for substantially the same purpose as set out in this Policy.

Other parties.

We may share your Personal Information if we think it’s necessary to comply with the law or to protect ourselves, as permitted by law. For example, we will share your Personal Information to respond to a court order or subpoena or otherwise ordered to disclose the Personal Information by a judicial, legislative, administrative, or other governmental body. We may share your Personal Information when we are investigating potential fraud or to prevent illegal uses of our Site or violations of our Site’s Terms of Purchase. We may share your Personal Information if we believe we need to defend or assert a legal claim against a third party.

5. RETENTION OF PERSONAL INFORMATION

We retain your Personal Information for as long as reasonably necessary to fulfill the purposes for which it was collected, unless otherwise required or permitted by law. We might, for example, keep your Personal Information longer to comply with legal, tax, accounting and recordkeeping obligations, administer applicable returns, or where required to assert or defend against legal claims, until the end of the applicable retention period or until such claims have been settled. We use certain criteria to determine how long to retain your Personal Information:

- Our relationship with you.
- Any legal requirements related to the Personal Information.
- Your requests to us regarding your Personal Information.
- Technical considerations related to development and safety purposes.

6. SECURITY

We employ standard security measures.

Our goal is to provide you with a pleasurable and safe experience when you interact with us. Even though we maintain technical and organizational measures designed to safeguard Personal Information under our control, we encourage you to use caution with any data you provide in the Internet.

Upon creating your “*My Berluti Space*” account, you shall be prompted to choose a password that is personal to you. It is your responsibility to protect your password. To the maximum extent allowed under applicable law, you agree that Berluti will not be liable or responsible if any information about you is intercepted, accessed, or used by an unintended recipient. Please immediately notify us using the contact information in the “Contact Us to Exercise Your Personal Rights” section below if you have reason to believe that the security of your communications or Personal Information has been compromised.

7. YOU HAVE RIGHTS REGARDING YOUR PERSONAL INFORMATION

Depending on your state of residency and subject to certain legal limitations and exceptions, you may be able to exercise some or all of the following rights, which are provided to California residents under the CCPA Regulations, or rights afforded to you by other laws:

- **Right to Know:** The right to confirm whether we are processing Personal Information about you and to obtain certain personalized details about the Personal Information we have collected about you, including:
 - The categories of Personal Information collected;
 - The categories of sources of the Personal Information;
 - The purposes for which the Personal Information were collected;
 - The categories of Personal Information disclosed to third parties (if any), and the categories of recipients to whom this Personal Information was disclosed;
 - The categories of Personal Information shared for targeted advertising purposes (if any), and the categories of recipients to whom the personal information were disclosed for these purposes; and
 - The categories of Personal Information sold (if any) and the categories of third parties to whom the Personal Information was sold.
- **Right to Access & Portability:** The right to obtain access to the Personal Information we have collected about you and, where required by law, the right to obtain a copy of the Personal Information in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another entity without hindrance.
- **Right to Correction:** The right to correct inaccuracies in your Personal Information, taking into account the nature of the Personal Information and the purposes of the processing of the Personal Information.
- **Right to Control Over Sensitive Personal Information:** Certain Personal Information, such as biometric information or precise geolocation information, is considered to be Sensitive Personal Information under the CCPA Regulations. Under the CCPA Regulations, you have the right to opt out of the processing of Sensitive Personal Information in many circumstances or to limit the use of Sensitive Personal Information processing. If you are resident of other states, you may have the right to consent to processing of Sensitive Personal Information.

We do not collect or process any Sensitive Personal Information without your consent or use Sensitive Personal Information for any purpose. As a result, we do not and are not required to provide you with a right to limit the use of your Sensitive Personal Information.

- **Right to Deletion:** The right to have us delete Personal Information we maintain about you. If you are a resident of the State of California under the age of 18, you may also request and obtain removal of user-generated content you have posted on our platform (though note that such as request does not ensure complete or comprehensive removal of all

user-generated content, particularly where user-generated content has been republished or reposted by another user of third party).

- **Right to opt out of the “sale” or “sharing” of Personal Information:** Berluti does not knowingly “sell” Personal Information for direct monetary compensation. However, the meaning of “sale” under the CCPA Regulations is broad and may include certain transfers of information to third parties through the use of cookies or other tracking technology (or collectively, “cookies”). We use these cookies to personalize your online experience, for statistical analysis and for marketing and advertising purposes, including to offer you advertisements that target your specific interests, to track your use of our Platform, and to analyze the performance of our advertising campaigns. Personal Information disclosed to third parties, such as marketing and advertising networks and social platforms, may be deemed a “sale” or “sharing” under the CCPA Regulations. Under the CCPA Regulations, you have the right to opt out of the “sale” of Personal Information or the “sharing” of Personal Information for targeted advertising purposes. Accordingly, you have the right to reject all cookies except functional cookies (rejecting all cookies will opt you out of all “sales” and “sharing” for targeted advertising purposes). If you visit us from a different device or browser, or clear cookies, you may need to re-select your preferences. Please note that even if you opt out of the “sale” or “sharing” of your Personal Information, Berluti or our service providers may track your use of our website. You may opt out of the sale of your Personal Information by clicking on our “Do Not Sell or Share My Personal Information” link on our website homepage.
- **Opt-Out Preference Signals (Do Not Track).** Opt-out preference signals provide consumers with an easy-to-use method to notify businesses that they do not want their Personal Information shared with other third parties for advertising or marketing purposes unrelated to the purpose for which the Personal Information was collected. We process opt-out preference signals that meet the following requirements: (1) the signal is in a format commonly used and recognized by us, such as an HTTP header field and (2) the platform, technology, or mechanism that sends the signal must make clear that the signal is meant to have the effect of opting you out of sharing your Personal Information. We currently respond to the Global Privacy Control (“GPC”) signal.
- **Automated Decision-Making.** We do not conduct automated processing of Personal Information for the purposes of evaluating, analyzing, or predicting an individual’s personal aspects in furtherance of decisions that produce legal or similarly significant effects. As a result, we do not provide a right to exercise control over such forms of automated decision-making.
- **Right to Request a List of Third Parties.** Depending on your state of residency, you may have the right to request third parties with whom your data has been sent.

Rights of California-resident job applicants. Berluti processes job applicant Personal Information for purposes including but not limited to the application process and, as applicable, employment onboarding services such as benefits administration, health and safety, and other business-related purposes. We may also use job applicant Personal Information for legal and regulatory compliance purposes. How we treat this Personal Information is in compliance with this Policy. As a California resident job applicant, you have the same rights regarding your Personal Information as California-resident consumers, subject to exceptions enumerated by law.

8. CONTACT US TO EXERCISE YOUR PRIVACY RIGHTS

Should you wish to exercise an aforementioned privacy right, you may contact us through any of the following methods:

- By calling our Customer Service Unit at +1 877 895 0006
- By sending an e-mail to our data protection officer at contact@berluti.com; or
- By using the contact form available on <https://www.berluti.com/en-us/contact-us/>;
- To unsubscribe from our newsletter, you may access the dedicated section of your “My Berluti Space” personal space, or use the unsubscribe link featuring in each e-mail newsletter that is sent to you.

We will verify your identity using at least two data points you have previously provided to us, which may include your email address and phone number. We will verify your request by comparing the information you provide with information already provided to us and take additional steps to mitigate the risk of fraud. Please reply with the requested information to verify your request. For right to know, correction, and deletion requests, unless otherwise required, we will first acknowledge your request within 10 days after receipt of your request. Unless otherwise required by law, we will then provide a substantive response to your request with 45 calendar days after receipt of your request or up to 90 days if we require more time to respond and inform you of the reason and extension period in writing.

You are allowed to authorize an agent to submit a request on your behalf so long as you provide the authorized agent with written permission to make the request and your authorized agent is able to verify his or her identity with us. You and your authorized agent are the only people able to make a verified request related to your Personal Information. In order to verify the authorized agent’s authority, we generally require evidence of either (i) a valid power of attorney or (ii) a signed letter containing your name and contact information, the name and contact information of the authorized agent, and a statement of authorization for the request. Depending

on the evidence provided and your state of residency, we may still need to separately reach out to you to confirm the authorized agent has permission to act on your behalf and to verify your identity in connection with the request.

Please contact us through the methods provided above should you need access to this Policy due to a disability.

9. OUR PLATFORM AND CHILDREN

Our Platform is meant for adults.

Our Platform is meant for adults. We do not knowingly collect Personal Information from children under the age of 18 on our website, and we do not knowingly sell or share Personal Information of children under the age of 18. If you are a parent or legal guardian and think your child has given us information, you may contact us, as identified in the "Contact Us to Exercise Your Personal Rights" section above.

10. SEND TO A FRIEND FUNCTIONALITY AND GATHERING OF THIRD PARTIES' PERSONAL INFORMATION

- Our Site gives you the possibility to send information about our goods or services that you believe is interesting to your friends...or even to send them our products or services themselves;
- To send a product data sheet: we shall ask you to provide the e-mail address of your friend for the purpose of transferring the information. We shall only gather this data for the purposes of sending them the e-mail. We shall neither keep nor store the data of the sender and/or of the recipient;
- To send a BERLUTI product to a friend or relative: we shall ask you to provide the e-mail address and the family name, first name and delivery address of your friend/relative in order to send the product to them. This data shall only be used to that end.
- In all these cases, you must guarantee that the person involved is already informed of the fact that you plan to disclose their Personal Information to us.

11. CHANGES TO OUR POLICY

BERLUTI may modify its Policy from time to time. If we make any material changes, we will notify you by revising the date at the top of the Policy or as otherwise required by law.

12. CONTACT US IF YOU HAVE MORE QUESTIONS

If you have any questions or concerns about this Policy or how we process your Personal Information, please contact us using the contact information listed above.