

DARE

PERSONAL DATA PROTECTION POLICY

Last update: August 2023

PERSONAL DATA PROTECTION POLICY

The purpose of this policy relating to personal data protection (hereinafter the “**Policy**”) is to inform the website <https://www.lvmhdare.com> (hereinafter “**Website**”) users (hereinafter “**You**”), on the terms and conditions under which LVMH Moët Hennessy-Louis Vuitton SE, a European company having its registered office at 22, avenue Montaigne, 75008 PARIS, France, registered with the Paris Trade and Companies Register under the number 775 670 417 (hereinafter “**LVMH**” or “**We**”) processes Your personal data (hereinafter “**Personal Data**” or the “**Data**”) when You register and navigate on it.

LVMH attaches the greatest importance and the greatest care to the protection of Personal Data.

Note: LVMH may modify the terms of this Personal Data Protection Policy, in particular in the event of the implementation of a new processing of Personal Data. You should connect to this page regularly to ensure that You agree to these modifications. You will be informed of these changes either by a special mention on our Website, or by an e-mail notification.

1. What is a “Personal Data”?

Personal Data means any information or set of information allowing You to be identified, directly (e.g. surname, first name, e-mail address, home address, image(s) etc.) or indirectly (e.g. by means of pseudonymized data such as a unique identification number, etc.). Some unique identifiers may also be entered as Personal Data such as your computer's IP address.

2. Which company is the data controller responsible for Your Personal Data protection?

A data controller is an organization which determines the purposes and means of the processing of Your Personal Data and which is responsible towards You for compliance with the applicable laws and regulations on Personal Data protection.

With regard to the management of the Website, LVMH is the data controller. LVMH has appointed a Data Protection Officer (DPO) who will be Your contact for any questions relating to Data processing. He will be reachable:

- * by using the contact form accessible at <https://www.lvmh.fr/contact/> by selecting “personal data”,
- * by postal mail to the following address: LVMH Data Protection Officer, 24-32, rue Jean Goujon, 75008 Paris, France.

3. How do We collect and why do We use the Personal Data?

3.1 How do We collect Personal Data?

We collect Personal Data directly from You when You use Our Website by completing the various forms on it.

3.2 Which Personal Data do We collect?

LVMH collects several types of Personal Data concerning You, in particular Your first name, last name, e-mail, Your employer name, email, employment Maison, country of work, city of work, job title, in order to allow You to create an online account. Additional information may be provided but the fields that must be completed are accompanied with a “*”.

We may collect additional information as phone number, LinkedIn profile, description of skills, and requests to join sub-themes or groups.

Should You participate to any physical events related to Open Innovation or the DARE program, additional information may be required in order to organize such event.

3.3 Why do We use Your Personal Data?

Your Personal Data is collected on the basis of Your consent (article 6, 1., a) of the GDPR) in order to communicate with You by email or Newsletters in cases such as opening of registrations, updates regarding the Challenges (as defined in the T&C) or news regarding Open Innovation or the DARE program.

We may need to process Personal Data on the basis of our legitimate interest (Article 6, 1., f) of the GDPR) in order to:

- * guarantee the defense of our interests in the event of litigation or legal action,
- * manage the cybersecurity of the Website,
- * prevent any fraudulent behavior in order to ensure the security of our assets and content, and
- * organise physical events related to Open Innovation or the DARE program.

3.4 Who has access to the Data and to whom are we likely to transmit it?

3.4.1. Accessibility within LVMH

The Data is only accessible to LVMH staff members who need to know it in the performance of their duties.

In this regard, Personal Data is processed by the following departments of LVMH:

- * LVMH Open Innovation with regard to the management of the Website for LVMH;
- * LVMH Security Department regarding the management of the cybersecurity of the Website; and/or
- * LVMH Legal and Anti-Fraud Departments regarding the management of fraudulent acts or legal actions, if applicable.

3.4.2. Accessibility by third parties

Certain Data may also be made accessible to third parties, namely:

- (i) our subcontractors and service providers which may intervene for technical and logistical reasons (carriers, hosting, security and Website maintenance providers, fraud management providers, technical service providers in charge of sending emails, anti-spam and anti-bot service providers);

- (ii) the communication agency(ies) involved if any;
- (iii) any authority, any jurisdiction or any other third party when such communication is required by law, a regulatory provision or a court decision, or if this communication is necessary to ensure the protection and defense of Your rights.
- (iv) On demand, LVMH Maison’s in regard to the management of their Talents who use the Website;
- (v) DARE program participants who also have an account on the Website.

3.6 Data processing outside the European Economic Area (“EEA”)?

The Data is processed in the European Union.

We may use certain service providers located abroad or who themselves use subcontractors located abroad, including outside the EEA in countries whose Personal Data protection regulations differ from those applicable within the EEA.

Any transfer of Your Data outside the EEA will be carried out subject to appropriate safeguards which will comply with the applicable regulations on the protection of personal data. We will provide You with a copy of the applicable warranties upon request.

3.7 How long do We keep the Data?

The Data is kept for the duration necessary for the purposes described in article 3.3 of this Policy for which it was collected and, in any case, will be destroyed or anonymized at the end of this period.

Please refer to the table below for more details on the retention periods for Your Data.

Table similar to the one below:

Purpose	Category of Personal Data	Retention period
Your participation to the DARE program	First name, Last name, employer, employer’s country, email, job title, and idea shared and projects participation	One year after You have left the Group at the latest.
Organisation of physical events related to Open Innovation or the DARE program	First name, Last name, employer, employer’s country, email, job title, phone number, and any other information necessary to organize the event and eventually plan the travel (visa etc.)	15 days after the end of the event at the latest.
To communicate with You by email or Newsletters	E-mail	Until You remove Your consent to such email or Newsletters, or You leave the Group.
Website Security	Technical data of the device You are using (IP address, device type, browser ID, etc.)	Six (6) months, then the Data will be destroyed or anonymized.

Finally, we may also be required to keep Personal Data when the law requires us to do so or in order to assert the rights we have under the law.

4. What are Your data subject rights?

4.1 Access, rectification and portability

In accordance with the regulations in force, You have a right of access to Your Data. You also have the option of requesting the modification of Your Personal Data that is inaccurate and, depending on the purpose of the processing, of requesting that incomplete Personal Data be completed.

In order to comply with Your request, We may ask You to provide Us with proof of identity or to provide Us with additional information or proof. We will endeavour to respond to Your request as soon as possible.

You may, within the limits provided by law, exercise Your right to the portability of Your Data allowing You to recover, in an interoperable format, the Personal Data that You have communicated to us.

4.2 Right to erasure of Data and limitation of Data processing

You can request the erasure of Your Personal Data in the following cases:

- * You consider that the processing of Your Personal Data that We carry out is no longer necessary for the achievement of the purposes referred to in this Policy.
- * You consider that the processing is unlawful or contest the accuracy of the Data that We process concerning You, or
- * You have withdrawn your consent to the processing of Your Data.

You may, within the limits provided for by law, request the limitation of the processing of Your Data.

Please note that despite the exercise of Your right to erasure of Data or restriction of processing, We may retain some of Your Personal Data when required by law or in order to exercise or ensure the defense of Our rights.

4.3 Right to anticipate the management of Your Personal Data after Your death

For France and when mandatory local provisions provide for it, You can determine how You want Us to process Your Personal Data after Your death.

4.3 Process for exercising Your data subject rights with regard to Your Data

You can exercise Your Data protection rights as follows:

- * by using the contact form accessible at <https://www.lvmh.fr/contact/> by selecting "Personal data".
- * by post to the following address: LVMH Data Protection Officer, 24-32, rue Jean Goujon, 75008 Paris, France.

When the processing of your Data is based on your consent, You can withdraw it at any time, without justification. This right can be exercised by modifying your options relating to subscriptions to our newsletters by clicking on the link provided for this purpose in each e-mail that We send to You.

5. How is the security of Personal Data ensured?

LVMH implements technical and organizational measures that comply with applicable French and European legal and regulatory requirements, which ensure the security and confidentiality of Your Personal Data.

LVMH requires its service providers and subcontractors, under the terms of written commitments, to present guarantees and implement sufficient security measures to ensure the protection of the Personal Data that they have undertaken to process, in accordance with the requirements of the applicable regulations on the protection of Personal Data.

However, LVMH does not control all the risks associated with the operation of the Internet and draws your attention to the existence of risks inherent in the use of any internet website.

6. Cookies

We use purely technical cookies to ensure the proper functioning of the Website. To maintain the user's session and to manage responsive design.

7. Third Party Websites

The Website may contain links to websites belonging to third parties (such as, for example, the websites of LVMH Group subsidiaries) that We do not control and which are governed by their own privacy and personal data protection policies. This Data Protection Policy does not apply to these third-party sites. We invite You to consult the privacy and personal data protection policies of these third-party sites that You visit to find out how they process your Data. LVMH declines all responsibility for the use of the Data by these third parties.

8. How can you contact us if you have any questions or complaints?

For any questions regarding this Policy or in the event of a request or complaint relating to your Personal Data, You can contact Us as follows:

* by using the contact form accessible at <https://www.lvmh.fr/contact/> by selecting "Personal data".

* by post to the following address: LVMH Data Protection Officer, 24-32, rue Jean Goujon, 75008 Paris, France.

In the event of a complaint about the way We process Your Data, You also have the right to contact the Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place de Fontenoy – TSA 80715 – 75334 PARIS CEDEX 07, Tel. : 01 53 73 22 22, www.cnil.fr.