

# Privacy Notice

*Whirlpool EMEA S.p.A.*, a European company set up according to European laws, having its registered office at *Via Carlo Pisacane n. 1, 20016 Pero (Mi), Italia*, duly registered with the European Enterprises Register, (hereinafter “Whirlpool”, “we”, “us”, “our”), as your data controller and part of the global Whirlpool group (“Whirlpool Group”), is committed to ensuring the protection and confidentiality of your personal information (“personal data” as defined in applicable data protection law) that is submitted for the purposes indicated below. Therefore, this notice informs you about what personal information we collect, how it is processed, for which purposes, and how you may exercise your individual rights to access, update, rectify or erase such information.

## WHY AND WHEN WE COLLECT YOUR PERSONAL INFORMATION AND RELATED PROCESS

We will process Personal Data that you provide when you will register the product you purchased, as well as in the moment you will contact us for asking information or assistance or when purchasing “Whirlpool” products on the online shop, only to the extent that it is necessary to pursue the purposes set out in this notice. Where “Whirlpool” does not need to process personal information in identifiable form in order to achieve its purposes it is committed to de-identification of the personal information and removing personal identifiers for such purposes.

We will collect your Personal Data that you provide in order to open an account in your name and/or to have completed your product registration form and/or to contact you and/or for the completion of the “order form” you submit to us for product purchase.

You are not required to complete and submit the product registration form to which this notice refers, but you must be aware that, should you choose not to submit a fully completed form, we may be unable to meet your requests or to provide you with our requested services properly. This may also prevent us from sending you information which we think may be of interest or benefit to you, such as information about extended warranties for the product (s) you have purchased.

In addition, if you provide us with personal information concerning your relatives, friends or other third parties, by doing so you confirm and guarantee that you have received an appropriate consent from such third parties to the disclosure of that personal information to us for use for the purposes set out in this notice.

## WHAT WE WILL DO WHEN WE COLLECT AND PROCESS THE PERSONAL INFORMATION

Once we have received the personal information, “Whirlpool” will process it for the following purposes:

- Managing the relationship with you resulting from your product purchase, keeping records of and tracking our communications and correspondence with you, complying with any related legal requirements as well as any internal accounting, administrative and tax requirements, process and policy;
- Sharing it with other companies in the Whirlpool Group for their use for the same purposes described in this notice. A list of Whirlpool Group companies is available on request;
- Sharing it with our carefully chosen partners, upon your consent given in advance, for their use for the same purposes described in this notice. A list of partners is available on request;
- Marketing purposes, upon your consent given in advance and/or to the extent allowed under other legal grounds and justifications;
- Keeping you informed, as detailed in the next section of this notice.

## KEEPING YOU INFORMED

Where you have agreed to this, unless already allowed under other legal grounds and justifications, we may use the personal information to send you by email, SMS, MMS (and other electronic means), fax, post and telephone containing the following:

- marketing about novelties, gifts, product information or new product launches, products promotions / sales offers or online sales offers (appliances, accessories, consumables) from “Whirlpool” and (others in the Whirlpool Group), and those of selected commercial partners, the list of which is available on request, that we think may interest you;
- marketing and commercial offers and communications (e.g., newsletters) about extended warranties provided through “Whirlpool”, on products you have registered or shown an interest in. Such warranties may be provided by Domestic & General, Whirlpool’s trusted commercial partner;
- invitations to participate in product or customer service surveys;
- invitations to participate in prize draws, competitions and games, fairs, product or cooking demonstration

If you wish to unsubscribe from any marketing material that we may send you or related activity as provided above, you can easily do this by following the unsubscribe details provided in each marketing communication or alternatively by contacting us as follows: in writing to *Whirlpool EMEA S.p.A, Via Carlo Pisacane n. 1, 20016 Pero (Mi), Italia*

## WHO WILL SEE YOUR PERSONAL INFORMATION

The personal information will be collected and processed for the above purposes by our staff when they are dealing with administration, accounting, marketing and promotions, customer care, IT systems administration, management, maintenance and development, marketing, surveys and promotions, as relevant to the purposes described in this notice. Your personal information will be stored on Whirlpool Group databases as well as on databases managed through external providers, with which Whirlpool Group has signed a proper agreement. These databases are located in the European Union territory as well as in the United States of America (USA), the list of which is available on request.

Please be aware that certain personal information could also be reported to authorities and public bodies in the relevant local territories, in general for legal and tax purposes, or where it is reasonable to do so to protect "Whirlpool" business, customers, staff or suppliers. Furthermore, it may be disclosed to prospective purchasers or partners and their professional advisers, for exploring any proposed sale or transfer of the company, or its business or assets, commercial partnerships or joint venture arrangements that may arise from time to time, to the extent that anonymisation is not possible or feasible. On completion of the transaction, purchasers and partners may use the information for the same purposes as set out in this notice.

#### **WHEN THE PERSONAL INFORMATION WILL BE TRANSFERRED ABROAD**

Local privacy laws allow "Whirlpool" to transfer personal information to other countries provided that you have given your consent in advance or another legal justification exists and an adequate level of protection is assured.

You must be aware that the staff of "Whirlpool", other Whirlpool Group entities, third parties acting as our service providers on our behalf, and carefully chosen partners may also be located abroad and even out of the European Economic Area. Therefore "Whirlpool" is committed to ensuring that when this occurs, the transfer is in full accordance with European Union and local law principles and requirements, and that appropriate security measures are in place to protect the personal information in such countries/ territories.

#### **RETAINING THE PERSONAL INFORMATION**

Whirlpool"will process and keep your personal information for as long as is necessary to comply with the law or for our identified legitimate business needs and intended purposes as set out above/below.

#### **WHICH RIGHTS ARE GRANTED TO YOU**

EU privacy laws allow you to check whether "Whirlpool" holds personal information about you, and if so, to be provided with a copy of it, together with details of how and for what purposes it is processed by Whirlpool". You can also ask to have personal information we hold about you updated and/or corrected and, if allowed by applicable law, even deleted. You can also withdraw any given consent concerning the processing of your personal data at any time.

If you wish to exercise your rights as above, change your preferences about being kept informed, or to notify "Whirlpool" of any change to your details, or put any question about the use of your personal information by Whirlpool" please contact us at : in writing to *Whirlpool EMEA S.p.A, Via Carlo Pisacane n. 1, 20016 Pero (Mi), Italia*

#### **SAFE HARBOR**

Whirlpool complies with the U.S. – E.U. Safe Harbor framework and the U.S. - Swiss Safe Harbor framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of data from the European Union and Switzerland respectively. Whirlpool has certified that it adheres to the U.S – EU and Swiss – EU Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. Information regarding both the E.U. and Swiss Safe Harbor Frameworks can be found at: <http://export.gov/safeharbor>.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe at <https://feedback-form.truste.com/watchdog/request>. Please click here for fax and postal mail information. TRUSTe's Dispute Resolution process is only available in English.