

Personal Data Protection Notice

In effect from 21 June 2026

The website **www.lorikacover.com** and the digital services connected to it, including any marketplaces, software applications, custom configuration tools, virtual simulation, 3D modeling and online sales services, are operated by **LORIKA Società a Responsabilità Limitata** (LORIKA S.r.l.), with registered office in Rome, Piazza Annibaliano 18, postal code 00198, Tax Code and VAT Number 18506711003, PEC (certified email) lorikasrl@legalmail.it, acting as data controller.

This notice describes how LORIKA S.R.L. collects and processes the personal data of users of the website, the platform and any related digital services, in accordance with EU Regulation 2016/679 (the “GDPR”) and Legislative Decree 196/2003, as amended by Legislative Decree 101/2018 (the “Privacy Code”).

1. Introduction: how we use your personal data

LORIKA S.R.L. processes users’ personal data to enable browsing of the website, registration on the platform, the configuration and customization of products, order management, the sale of products or services, customer support, the sending of operational communications and, where consent is required, the sending of promotional communications and newsletters.

LORIKA S.R.L. may also process certain data to improve the user experience, optimize its digital services, develop technological features, prevent fraud or misuse of the platform, and comply with legal obligations.

Processing is carried out in compliance with the principles of lawfulness, fairness, transparency, data minimization, accuracy, storage limitation, integrity and confidentiality.

2. What personal data we collect

LORIKA S.R.L. may collect and process the following categories of personal data.

a) Data provided directly by the user

This category includes:

- first and last name;
- email address;
- phone number;
- shipping and billing address;
- data necessary to create an account;

- login credentials, where applicable;
- data relating to orders, purchases and product preferences;
- information entered by the user in contact, support or information request forms;
- any data voluntarily provided as part of customized requests or configuration services;
- any images, measurements, technical parameters or functional information that the user chooses to upload or provide for the customization of products or accessories.

b) Data relating to purchases and payments

In the case of an online purchase, LORIKA S.R.L. may process data relating to orders, purchased products, amounts, invoicing and shipping.

Data relating to payment instruments, such as credit cards or other electronic payment methods, is normally processed by third-party providers specialized in payment services. LORIKA S.R.L. does not retain complete payment card data, except as strictly necessary and permitted by applicable law.

c) Technical and browsing data

While browsing the website or using the platform, certain technical data may be automatically collected, including:

- IP address;
- device identifiers;
- browser type and operating system;
- information about the device used;
- pages visited;
- date and time of access;
- referring URL;
- interactions with the website or platform;
- data relating to the shopping cart, saved configurations or viewed products;
- data collected through cookies or similar technologies.

This data is used to ensure the proper functioning of the website, improve digital services, ensure the security of the platform and, where consent is required, carry out statistical, marketing or profiling activities.

d) Data relating to customization, 3D modeling or virtual try-on services

Where the platform provides customization tools, virtual simulation, 3D modeling, augmented reality or virtual try-on, LORIKA S.R.L. may process the data necessary to provide such services.

Such data may include, depending on the features actually available:

- images or scans uploaded by the user;
- technical data relating to the device or item to be customized;
- aesthetic and functional preferences;
- product configurations;
- parameters necessary for production or prototyping.

LORIKA S.R.L. will process such data only to the extent necessary to provide the requested service, unless the user has given separate consent.

3. For what purposes we process personal data

3.1 Contractual and pre-contractual purposes

LORIKA S.R.L. processes personal data in order to provide its products and services, and in particular to:

- enable browsing and use of the website;
- enable registration and management of the user account;
- handle requests for information or quotes;
- enable the configuration, customization or simulation of products;
- manage orders, purchases, payments, invoicing and shipping;
- provide customer support and after-sales services;
- manage returns, complaints, warranties and operational communications;
- enable the use of proprietary software applications, marketplaces or digital services.

The legal basis for processing is the performance of a contract or pre-contractual measures requested by the user.

Providing this data is necessary for the supply of the requested services. Without it, LORIKA S.R.L. may be unable to provide the product or service.

3.2 Legal purposes

LORIKA S.R.L. processes personal data in order to comply with obligations under laws, regulations, and tax, accounting, administrative or civil law provisions, or requests from competent authorities.

The legal basis for processing is compliance with a legal obligation.

3.3 Marketing purposes

With the user's consent, LORIKA S.R.L. may process personal data in order to:

- send newsletters;
- send commercial and promotional communications;
- inform the user about new products, services, events, initiatives or platform updates;
- offer dedicated promotions;
- carry out customer engagement activities.

Communications may be sent by email, SMS, telephone, messaging, social networks or other digital channels, depending on the data provided and the consent given by the user.

Consent is optional and may be withdrawn at any time.

3.4 Soft spam to existing customers

Pursuant to Article 130, paragraph 4, of the Privacy Code, where the user has already purchased products or services from LORIKA S.R.L., the company may send commercial communications by email relating to products or services similar to those already purchased, unless the user objects.

The user may object at any time by following the instructions contained in each communication or by writing to the contacts indicated in this notice.

3.5 Profiling, personalization and analysis of preferences

Where consent is required, LORIKA S.R.L. may process personal data, browsing data, purchasing preferences, viewed products, saved configurations and interactions with the platform in order to:

- offer content and products more consistent with the user's interests;
- improve the browsing experience;
- personalize commercial communications;
- analyze aesthetic, functional or purchasing preferences;
- optimize digital services and configuration tools.

The legal basis for processing is the user's consent or, where permitted, the company's legitimate interest, appropriately balanced against the rights and freedoms of the data subject.

3.6 Legitimate interest purposes

LORIKA S.R.L. may also process personal data to pursue its own legitimate interests, including:

- ensuring the security of the website and the platform;
- preventing fraud, abuse or unauthorized access;

- improving the quality of services and correcting any malfunctions;
- carrying out statistical analyses on an aggregated or anonymized basis;
- protecting its rights in judicial or extrajudicial proceedings;
- managing corporate, organizational or financial operations;
- carrying out technical activities necessary for the development, testing and maintenance of digital services.

The user may object to processing based on legitimate interest in the cases and manner provided for under the GDPR.

4. How data is processed

Personal data is processed using manual, computerized and electronic means, according to logics strictly related to the purposes set out above.

LORIKA S.R.L. adopts appropriate technical and organizational measures to protect personal data from unauthorized access, loss, destruction, disclosure, alteration or misuse.

Access to data is granted only to authorized and trained personnel, or to appointed external providers acting, where necessary, as data processors.

5. Who personal data may be shared with

Personal data may be shared with:

- providers of IT, hosting, cloud, maintenance and software development services;
- payment providers;
- couriers and logistics operators;
- tax, accounting, legal and administrative consultants;
- providers of marketing, newsletter, CRM and analytics services;
- parties supporting LORIKA S.R.L. in the management of the website, the platform, the marketplace or the applications;
- public, judicial or administrative authorities, where required by law;
- any technical or production partners necessary for the manufacturing of customized products;
- any buyers, investors or parties involved in corporate transactions, within the limits permitted by law.

Depending on the case, these parties will process the data as independent data controllers, data processors, or persons authorized to process data.

The updated list of data processors may be requested by writing to the contacts indicated in this notice.

By way of example and not exhaustively, as of the date of this notice the main data processors include:

- Shopify International Ltd. (e-commerce platform and hosting);
- Stripe / PayPal (payment processing);
- Google LLC (Google Analytics for traffic statistics);
- Meta Platforms Ireland Ltd. (tracking pixel and advertising, subject to user consent);
- Couriers and logistics operators (shipping and delivery of orders).

6. Transfer of data outside the European Economic Area

Personal data is processed predominantly within the European Economic Area.

Should data need to be transferred, for technical or organizational reasons, to countries located outside the European Economic Area, LORIKA S.R.L. will ensure that the transfer takes place in compliance with Articles 44 et seq. of the GDPR, by means of European Commission adequacy decisions, standard contractual clauses or other appropriate safeguards provided for under applicable law.

7. Data retention period

Personal data is retained for the time strictly necessary to achieve the purposes for which it was collected.

In particular:

- data relating to accounts, orders, purchases and services will be retained for the time necessary to manage the contractual relationship and, subsequently, for 10 (ten) years from the termination of the relationship, in accordance with civil law obligations (Article 2946 of the Italian Civil Code) and tax obligations (Article 7, paragraph 4, of Presidential Decree 605/1973 and Article 22 of Presidential Decree 600/1973);
- data processed for legal purposes will be retained for the period provided for under the specific applicable regulations (for example: 10 years for tax and accounting obligations; 5 years for obligations under anti-money laundering legislation);
- data processed for marketing purposes will be retained until consent is withdrawn and, in any event, for a period not exceeding 24 (twenty-four) months from the last meaningful contact or interaction with the Services;
- data processed for profiling purposes will be retained until consent is withdrawn and, in any event, for a period not exceeding 12 (twelve) months, in accordance with the guidance of the Italian Data Protection Authority;

- technical and browsing data will be retained for the periods indicated in the cookie policy or in the technical systems used;
- data relating to support requests will be retained for the time necessary to handle the request and protect the company's rights.

Upon expiry of the retention periods, the data will be deleted, anonymized or aggregated.

8. Rights of the data subject

The user may exercise, at any time, the rights provided for under Articles 15-22 of the GDPR, including:

- the right of access to personal data;
- the right to rectification;
- the right to erasure;
- the right to restriction of processing;
- the right to object;
- the right to data portability;
- the right to withdraw consent given;
- the right to lodge a complaint with the Data Protection Authority.

Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

The user also has the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning them or similarly significantly affects them (Article 22 GDPR).

To exercise their rights, the user may send a request via:

LORIKA S.R.L.

Dedicated privacy email: privacy@lorikacover.com

PEC: lorikasrl@legalmail.it

Registered office: Piazza Annibaliano 18, 00198 Rome (RM), Italy

The Controller undertakes to respond to data subjects' requests without undue delay and, in any event, within 30 (thirty) days of receiving the request, extendable by a further 60 (sixty) days in cases of particular complexity, as provided for under Article 12(3) of the GDPR.

The user also has the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali) (www.garanteprivacy.it), Piazza Venezia 11,

00187 Rome, fax (+39) 06.69677.3785, email: protocollo@gdpd.it, PEC: protocollo@pec.gdpd.it.

9. Data controller

The data controller is:

LORIKA Società a Responsabilità Limitata

Registered office: Piazza Annibaliano 18, 00198 Rome

Tax Code and VAT Number: 18506711003

PEC: lorikasrl@legalmail.it

10. Data Protection Officer (DPO)

As of the date of this notice, LORIKA S.R.L. is not required to appoint a Data Protection Officer (DPO) under Article 37 of the GDPR, as the conditions provided for under that provision (large-scale processing of special categories of data or regular and systematic large-scale monitoring) do not apply. Should a DPO be appointed in the future, the relevant contact details will be published in this notice.

11. Cookies and similar technologies

The website may use cookies and similar technologies to ensure the proper functioning of its pages, improve the browsing experience, analyze traffic and, with consent, display personalized content or communications.

Cookies may be:

- **technical cookies**, necessary for the operation of the website and the requested services;
- **analytics cookies**, used to collect statistical information on the use of the website;
- **marketing and profiling cookies**, used to offer content, promotions or advertisements consistent with the user's interests.

The user can manage their preferences through the cookie banner or the settings available on the website.

For detailed information on the cookies used by the Site, their purposes, and how to accept, refuse or withdraw consent, the user is invited to consult the Cookie Policy available on the website <https://lorikacover.com/>. In any event, the user may change their preferences at any time through the cookie management panel accessible from the website's footer.

12. Changes to this notice

LORIKA S.R.L. may update this notice to reflect regulatory, technical, organizational changes or changes relating to the services offered.

The updated version will be published on the website and, where necessary, communicated to users in an appropriate manner.

13. Minors

The Services are not intended for individuals under the age of 18. LORIKA S.R.L. does not knowingly collect personal data of minors. Should LORIKA S.R.L. become aware that it has collected personal data of a minor without parental or guardian consent, it will promptly delete such data.

For any reports in this regard, please write to privacy@lorikacover.com.