

PRIVACY POLICY FOR PARTICIPATION IN HUGO BOSS EXPERIENCE

HUGO BOSS AG, Holy-Allee 3, 72555 Metzingen, Germany (hereinafter "**HUGO BOSS**" or "**we**") operates the customer loyalty programme HUGO BOSS EXPERIENCE (hereinafter "**Customer Loyalty Programme**").

In the following privacy policy, we provide you with information in accordance with applicable data protection laws, including Art. 13 and 14 [General Data Protection Regulation](#) (hereinafter "**GDPR**") and other applicable data privacy laws about the data controller processing your personal data, the data controller's data protection officer (**Section A**) and about your rights you may have with respect to the processing of your personal data (**Section B**). You also receive information in the following about the processing of your personal data (**Section C**) in connection with the Customer Loyalty Programme. Insofar as data privacy laws other than the GDPR are applicable in individual cases, references to GDPR provisions shall (also) be understood accordingly as references to the provisions in these data privacy laws.

The brick-and-mortar retail stores, including Outlets, in Canada, Mexico and Brazil, also in the European Union (hereinafter "**EU**") (hereinafter "**Retail Stores**") operated by HUGO BOSS or companies affiliated to HUGO BOSS provide the services of the Customer Loyalty Programme. A list as amended of the currently participating HUGO BOSS Retail Stores can be accessed using the HUGO BOSS Store Locator on the HUGO BOSS website (<https://www.hugoboss.com/de/stores>, hereinafter "**Website**"). The HUGO BOSS Online Store available via the Website, the HUGO BOSS application for mobile devices (hereinafter "**App**") and the application for the "Order from Store" service in Retail Stores but excluding Outlets (hereinafter "Online Store") also provide the services of the Customer Loyalty Programme. The Retail Stores and the Online Store are jointly hereinafter referred to as "**Participating Stores**".

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A. INFORMATION ABOUT THE DATA CONTROLLER

I. Name and contact details of the data controller

The data controller for the Customer Loyalty Programme is:

HUGO BOSS AG
Holy-Allee 3, 72555 Metzingen, Germany
Telephone: +49 7123 94-0
Fax: +49 7123 94-80259
E-mail: info@hugoboss.com

II. Contact details of the data controller's Data Protection Officer

Our Data Protection Officer can be contacted as follows:

HUGO BOSS AG
Data Protection Officer
Holy-Allee 3, 72555 Metzingen, Germany
Telephone: +49 7123 94-80999
Fax: +49 7123 94-880999
E-mail: privacy@hugoboss.com

B. INFORMATION ABOUT THE RIGHTS OF DATA SUBJECTS

As a data subject you can exercise the following rights with respect to the processing of your personal data, provided that the relevant conditions are met:

- I. Right of access (Art. 15 GDPR)
- II. Right to rectification (Art. 16 GDPR)
- III. Right to erasure ("right to be forgotten") (Art. 17 GDPR)
- IV. Right to restriction of processing (Art. 18 GDPR)
- V. Right to data portability (Art. 20 GDPR)
- VI. Right to object (Art. 21 GDPR)

Under the conditions provided in Art. 21 No.1 GDPR you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on Art. 6 (1) (e) or (f) GDPR, including profiling based on those provisions. Under the conditions provided in Art. 21 No.2 GDPR you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You can find detailed information regarding the legal basis of processing in **Section C** of this Privacy Policy.

- VII. Right to withdraw consent (Art. 7 (3) GDPR)
- VIII. Right to lodge a complaint with the supervisory authority (Art. 77 (1) GDPR)

You may contact our Data Protection Officer (**Section A.II.**) for the purpose of exercising your rights.

C. INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

In connection with Customer Loyalty Programme different personal data are processed for different purposes. You will find information below regarding the purposes and means of the processing of personal data. A further use of your data for secondary purposes beyond the scope specified below does not take place.

Automated decision-making within the meaning of Art. 22 GDPR does not take place.

I. Details on the personal data we process

Categories of personal data that are processed	Personal data included in the categories	Obligation to provide the data	Storage Duration
Personal master data that we collect during registration for the Customer Loyalty Programme (" Personal Master Data ").	Last name, first name, e-mail address, country of residence, a password, when registering online. We also record the relevant Participating Store at which you register for the Customer Loyalty Programme.	There is a contractual obligation to provide some Data. Not providing these Data means that you cannot participate in the Customer Loyalty Programme.	We store this information as long as you are registered for the Customer Loyalty Programme.
Data which we receive from a login partner when you register for the Customer Loyalty Programme via login partnership (" Login Partner Data ").	Last name, first name, e-mail address, your password, country of residence, unique customer ID of Login Partner	There is a contractual obligation to provide this Data when you register via a Login Partner. Not providing these Data means that you cannot participate in the Customer Loyalty Programme via a Login Partner.	We store this information as long as you are registered for the Customer Loyalty Programme.

Categories of personal data that are processed	Personal data included in the categories	Obligation to provide the data	Storage Duration
<p>Signature information (digital or paper based) that we collect during the registration process for the Customer Loyalty Programme in our Retail Stores ("Signature Data").</p>	<p>Your signature on the digital or paper based registration form.</p>	<p>There is a contractual obligation to provide this Data.</p> <p>Not providing these Data means that you cannot participate in the Customer Loyalty Programme via a Login Partner.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p>
<p>Protocol data that accrue for technical reasons when the registration for the Customer Loyalty Programme is confirmed in the double opt-in procedure ("Registration Protocol Data").</p>	<p>Date and time of confirmation of the registration in double opt-in procedure and IP address of the device used for the confirmation.</p>	<p>There is a contractual obligation to provide these Data.</p> <p>Not providing these Data means that you cannot participate in the Customer Loyalty Programme.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p>
<p>Voluntary information that the participant provides when registering for the Customer Loyalty Programme in the My HUGO BOSS customer account or when placing orders in our Online Store ("Participant Data").</p>	<p>Salutation, telephone number, mobile phone number, date of birth and/or postal address that we store as your invoice address, information on your preferred communication channels and on your personal preferences (e.g. preferred HUGO BOSS brands, interests, styles etc.), sizes, body measurements, your wish list with HUGO BOSS products that you have</p>	<p>There is no obligation to provide the data.</p> <p>Not providing these data means that we cannot personalize the benefits of the Customer Loyalty Programme.</p> <p>If your preferred communication channels are</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p>

Categories of personal data that are processed	Personal data included in the categories	Obligation to provide the data	Storage Duration
	selected in your My HUGO BOSS customer account, delivery addresses you have saved in your My HUGO BOSS customer account or have used when placing orders in the Online Store.	not provided, we cannot contact you via these communication channels.	
Identifier Data, which will be shared with selected Partners (" Marketing Identifier ").	E-mail address, mobile phone number, name combined with postal address or date of birth.	There is no obligation to provide the data. Not providing this data means that we cannot display personalized advertisement on third-party websites, social media platforms or other platforms.	We store this information as long as you are registered for the Customer Loyalty Programme.
Protocol data that accrue for technical reasons when subscribing to push notifications (" Push Notification Protocol Data ").	Date and time of subscription, push-token, device ID	There is no obligation to provide the data. Not providing this data means that you cannot subscribe to push notifications.	We store this data for as long as you subscribe to push notifications. In addition, we store this data as an exception beyond this if and as long as we are subject to statutory retention or documentation obligations for such data or to the extent this is necessary for evidence purposes.

Categories of personal data that are processed	Personal data included in the categories	Obligation to provide the data	Storage Duration
<p>Protocol data that are generated technically when subscribing or unsubscribing to the Newsletter ("Subscription and Unsubscription Data").</p>	<p>Date and time of subscription, confirmation in double opt-in process when you subscribe on our Website via the separate web application form for newsletter subscription, as well as the IP address of the terminal device used for confirmation, date and time of any unsubscription from the Newsletter.</p>	<p>There is no statutory or contractual obligation to provide the data.</p> <p>It is necessary that you give your confirmation in double opt-in process to receive the Newsletter when subscribing via the separate web application.</p> <p>Not providing this Data means that you cannot subscribe to the Newsletter.</p>	<p>We store this information as long as you have subscribed to the newsletter.</p> <p>In addition, we store this data as an exception beyond this if and as long as we are subject to statutory retention or documentation obligations for such data or to the extent this is necessary for evidence purposes.</p>
<p>Information about your purchases ("Transaction Data") if you identify yourself when making a purchase in a Retail Store as participant in HUGO BOSS EXPERIENCE or identify yourself in the Online Store as a participant by entering your access data.</p> <p>This Data is received from the Participating Stores.</p>	<p>Information about the articles purchased (article description, article number, quantity, size, if applicable body measurements, colour, price, currency, order number), on the type of transaction (purchase, exchange, return etc.) on the location (Online Store or country, city and store for Retail Stores) and the time of the relevant purchase.</p>	<p>There is a contractual obligation to provide this Data.</p> <p>Not providing this Data (not identifying yourself when making a purchase) means that we cannot record your Transaction data.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p>
<p>Information that you provide us with in your inquiries made to customer service by telephone, chat or online contact form</p>	<p>Information that you provide us with in your inquiries made to customer service by telephone, chat or online contact form, e.g.</p>	<p>There is no obligation to provide the data.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p>

Categories of personal data that are processed	Personal data included in the categories	Obligation to provide the data	Storage Duration
("Customer Service Inquiry Data").	subject of and background to your inquiry.	Not providing these data means that we cannot edit your inquiry.	
<p>Voluntary information that you provide when having shopping advice provided by our sales staff and personal shopping assistants, e.g. in Retail Stores, via telephone, chat or online contact form ("Shopping Advice Data").</p> <p>These Data are received from the Participating Stores and autonomously generated.</p>	<p>Preferred wearing occasions; job field/sector; special dates or events; hobbies and interest; holiday and travel information; favourite drinks or food; Information about inquiries made to customer service by telephone, chat or online contact form and shopping advice discussions with employees of Retail Stores (in particular date, time and subject of your inquiry); specification of the personal shopping assistant and his/her personal product recommendations for you.</p>	<p>There is no obligation to provide the data.</p> <p>Not providing these data means that we cannot personalize the benefits of the Customer Loyalty Programme.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p>
<p>Data in usage profiles that we create by analysing the usage behaviour of participants in the Customer Loyalty Programme ("Usage Profile Data").</p> <p>These Data are autonomously generated.</p>	<p>Data about the use of the website, in particular page visits, visit frequency and time spent on the pages visited, information about the articles you have looked at or placed in your shopping cart or have put on the wish list in your My HUGO BOSS customer account. Data about communication channel and frequency of communication.</p>	<p>There is no obligation to provide the data.</p> <p>Not providing these data means that we cannot personalize the benefits of the Customer Loyalty Programme.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p>

Categories of personal data that are processed	Personal data included in the categories	Obligation to provide the data	Storage Duration
<p>Provided you have subscribed to the newsletter, protocol data that accrue for technical reasons via the Hypertext Transfer Protocol (HTTP) when the newsletter is accessed ("Newsletter HTTP Data").</p>	<p>IP address, date and time of access.</p>	<p>There is no statutory or contractual obligation to provide the data.</p> <p>This Data are automatically processed when the personalized newsletter is accessed.</p>	<p>Data are stored in server log files in a form allowing the identification of data subject for a maximum period of 7 days, unless any security related event occurs (e.g. a DDoS attack).</p> <p>If there is a security related event, server log files are stored until the security relevant event has been eliminated and clarified in full.</p>
<p>Provided you have subscribed to the newsletter, data in usage profiles that we create by analysing the newsletter usage behaviour using pseudonyms ("Newsletter Usage Profile Data").</p> <p>These Data are autonomously generated.</p>	<p>Data about the use of the newsletter, in particular page visits, visit frequency, click behaviour in accessed newsletters.</p>	<p>There is no statutory or contractual obligation to provide the data.</p> <p>This Data are automatically processed when the newsletter is accessed.</p>	<p>We only store this data as long as you have subscribed the newsletter. We delete such data as soon as you have unsubscribed the newsletter.</p>
<p>Provided you have subscribed to the newsletter, data that are stored in one of our customer databases via tracking technologies when you access the newsletter ("Newsletter Profile Tracking Data").</p>	<p>Unique ID for (re-)identifying Participants of the Customer Loyalty Program.</p>	<p>There is no statutory or contractual obligation to provide the data. Not providing this data means that we cannot personalise marketing content.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p>

Categories of personal data that are processed	Personal data included in the categories	Obligation to provide the data	Storage Duration
<p>Information about the type and scope of the Customer Loyalty Programmes services used by you and your reactions to our marketing in the Participating Stores provided you have consented to receive marketing ("Reaction Behaviour Data").</p> <p>These Data are autonomously generated.</p>	<p>Data about the type and scope of your reaction to our marketing and the use of the Customer Loyalty Programme services.</p>	<p>There is no obligation to provide the data.</p> <p>Not providing these data (not identifying yourself when making a purchase, not consenting to receive marketing) means that we cannot personalize the benefits of the Customer Loyalty Programme.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p>
<p>Allocation to participant segments that we create by analysing Personal Master Data, Login Partner Data, Participant Data, Transaction Data, Customer Service Inquiry Data, Shopping Advice Data, Usage Profile Data and Reaction Behaviour Data and if applicable Newsletter Usage Profile Data ("Segment Data").</p> <p>These Data are autonomously generated.</p>	<p>Data about affinity to HUGO BOSS brands, their products or content, e.g. determining the store at which the participant uses most often for purchases or is closest where the participant lives.</p>	<p>There is no obligation to provide the data.</p> <p>Not providing these data means that we cannot personalize the benefits of the Customer Loyalty Programme.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p>

II. Additional information regarding Storage Duration

In addition to the specified information regarding the Storage Duration given above, all personal data will be erased undue delay when the personal data are no longer necessary in relation to the purpose for which they were collected or otherwise processed. Beyond the specified storage durations we store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.

III. Details on the processing of the personal data

Tracking technologies are used on our Website and within the App for these purposes if you have consented to these. Additional information can be received on Website/ within App where you can also manage your consent at any time.

IV. Processing of personal data on the basis of statutory legislation

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests
Provision of web applications in the Online Store and the digital or paper based registration form in the Retail Stores in which you can provide us with your data to register for the Customer Loyalty Programme.	Personal Master Data, Login Partner Data, Registration Protocol Data, Participant Data if these have already been provided in the registration form.	Art. 6 No.1 (b) GDPR, Performance of a contract. Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is to simplify the registration procedure and to collect accurate and valid data.
Operation of a customer database in which we maintain and update your Data.	Personal Master Data, Login Partner Data, Participant Data	Art. 6 No.1 (b) GDPR, Performance of a contract. Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is the operation of organised customer

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests
		databases as the basis for optimum maintenance of customer data. Besides administration of tracking technologies.
<p>Unification of customer profile by matching data provided in different sources e.g. transaction history, your preferences and/or tracking data provided you have consented to these when accessing the website or app. We use the data collected and generated in your Unified Profile (unified customer profile that combines all information about you) to create data models, some of which are self-learning, using data science (algorithms and analytics). These data models help us improve the logic of our analytics activities and give us more insight into your interactions, preferences and needs with respect to our products, services and communications content. The data collected and generated in this way from your Unified Profile is compared with other similar consumer profiles and categories, e.g., to predict your individual preferences, to target you with the appropriate marketing information at the right moment and via the right channel.</p>	<p>Personal Master Data, Login Partner Data, Participant Data, Marketing Identifier, Transaction Data, Usage Profile Data, Reaction Behaviour Data, Segment Data, marketing tracking-technology data provided, Newsletter Usage Profile Data provided you have subscribed to the newsletter, Newsletter Profile Tracking Data.</p>	<p>Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is to create personalized content and recommendations that fit. Ensure communication that makes active HUGO BOSS EXPERIENCE membership and interaction with our brand more likely.</p>
<p>Archiving Signature Data, Registration Protocol Data and Push Notification Protocol Data for evidence purposes and for the establishment, exercise or defence of any legal claims.</p>	<p>Personal Master Data, Login Partner Data, Signature Data, Registration Protocol Data, Push Notification Protocol Data, Participant Data.</p>	<p>Art. 6 No.1 (b) GDPR, Performance of a contract. Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is the establishment, exercise or defence of legal claims.</p>

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests
<p>Updating of postal and e-mail addresses. In order to ensure the accuracy of address data we validate the postal and e-mail address data. We automatically correct any obvious errors in the postal address provided, e.g. digit typing errors in the postal code. We contact you personally in cases, which are unclear.</p>	<p>Personal Master Data, Participant Data.</p>	<p>Art. 6 No.1 (b) GDPR. Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is ensuring the accuracy of the data.</p>
<p>Provision of the functions of the My HUGO BOSS customer account and a convenient ordering process in the Online Store:</p> <p>In your MY HUGO BOSS customer account you can conveniently maintain the Personal Master Data, Participant Data, your communication and data sharing settings, preferences and your wish list provided by you. We use your data regarding your preferences, your Transaction Data and your Reaction Behaviour Data to personalize your My HUGO BOSS customer account.</p> <p>If you are logged in to your My HUGO BOSS customer account, the sizes stored in your customer account will automatically be preselected for your online purchases to make shopping in the Online Store as easy and pleasant as possible for you. Information requested during the checkout process (e.g. invoice address) are autocompleted with the data stored in the customer database to make the ordering process even easier for you.</p> <p>Based on your Transaction Data we provide you in your My HUGO BOSS customer account with an overview of your purchases to date.</p>	<p>Personal Master Data, Login Partner Data, Participant Data, Transaction Data, Usage Profile Data, Reaction Behaviour Data, Segment Data.</p>	<p>Art. 6 No.1 (b) GDPR, Performance of a contract.</p>
<p>Anonymisation of the data for an anonymised analysis of the store information for the development and improvement of the content and functions of the Customer Loyalty Programme.</p>	<p>All personal data specified in Section C in anonymised form.</p>	<p>Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is the development and improvement of the Customer Loyalty Programme.</p>

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests
<p>Data transfer to the Retail Stores to provide the benefits of the Customer Loyalty Programme described in detail in the Terms and Conditions for participation in the Customer Loyalty Programme as well as to our Customer Care department.</p>	<p>Personal Master Data, Login Partner Data, Participant Data, Transaction Data.</p>	<p>Art. 6 No.1 (b) GDPR, Performance of a contract.</p> <p>Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is to provide the benefits of the Customer Loyalty Programme to the customer also in other countries than the respective residence country.</p>
<p>Provided you have subscribed to the newsletter, creation of anonymised reports analysing and determining newsletter strategy.</p>	<p>Personal Master Data, Segment Data</p>	<p>Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is to improve the content of the Newsletter.</p>
<p>When you are contacting HUGO BOSS Store via chat we review if you are a registered customer and then match your contact details. So we can see if and what potentially transactional history or contact details. By using this information, we can deliver a better service for the customer. Next to this in case of an order We can react faster to perform the checkout, as we already have the contact information.</p>	<p>Phone number (identity check works by checking if the phone number already exists in the database). In case of YES, the salutation, first name, last name, phone number and the consumer ID will be displayed in the outreach dashboard of the store</p>	<p>Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is to ease the process for both sides and improve the service and service times.</p>
<p>When you are using the HUGO BOSS "Remote Selling" service, it is only offered to registered customers; we use your data for conclusion and performance of purchase contract including the delivery from store service.</p>	<p>Personal Master Data, Participant Data</p>	<p>Art. 6 No.1 (b) GDPR, Performance of a contract</p>

V. Processing of personal data on the basis of your consent

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests
<p>Offering personalized shopping advice in the Retail Stores via customer telephone service or via chat based on the information stored in our customer database.</p>	<p>Personal Master Data, Login Partner Data, Registration Protocol Data, Participant Data, Transaction Data, Customer Service Inquiry Data, Shopping Advice Data, Reaction Behaviour Data, Segment Data.</p>	<p>Art. 6 No.1 (a) GDPR, Consent.</p>
<p>Sending of information material on the components of the Customer Loyalty Programme and of relevant, personalized marketing for our own offers (e.g. information about HUGO BOSS, product information, newsletters, customer survey and exclusive offers or invitations to take part in competitions, events and (local) promotions of HUGO BOSS or the Participating Stores) to the communication channels selected by you (in particular e-mail, mail, telephone, SMS/MMS and/or messenger messages.).</p> <p>You can select or change the communication channels either at any time in your My HUGO BOSS customer account or during the respective opening hours in Retail Stores.</p> <p>We also send you reminder e-mails if you have not completed orders in the Online Store or articles are still on your wish list in your My HUGO BOSS customer account.</p>	<p>Personal Master Data, Login Partner Data, Participant Data, marketing tracking-technology data provided, Usage Profile Data, Newsletter Usage Profile Data provided you have subscribed to the newsletter, Transaction Data, Reaction Behaviour Data, Segment Data.</p>	<p>Art. 6 No.1 (a) GDPR, Consent.</p>
<p>Analysis of usage behaviour of newsletter subscribers in our newsletter and on the Website as well as creation of usage profiles using pseudonyms and subscriber segments for the purposes of personalising and designing the newsletter as well as online marketing activities such as displaying</p>	<p>Personal Master Data, Login Partner Data, Newsletter HTTP Data, Newsletter Usage Profile Data, Newsletter Profile Tracking</p>	<p>Art. 6 No.1 (a) GDPR, Consent</p>

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests
advertising on third-party websites, social media platforms and other platforms.	Data, Usage Profile Data, marketing tracking-technology data, Segment Data.	
Display push notifications with marketing content, sales content, information about your product wishlist or order information provided you have consented to the receipt of App push messages within the App or via the settings in your mobile device.	Push Notification Protocol Data (device token and device platform), App, Personal Master Data, Login Partner Data, marketing tracking-technology data, Usage Profile Data, Transaction Data, Reaction Behaviour Data, Segment Data.	Art. 6 No.1 (a) GDPR, Consent via the communication settings in our app or via the settings in your mobile device.
If you register in a participating Retail Store and your place of residence is in the registration country, we transfer your Personal Master Data, Participant Data, Transaction Data, Segment Data and your preferred communication channels for the purpose of marketing materials being sent to you by the participating Retail Store provided you have consented to receive marketing materials. The marketing materials in particular contain information about local promotions taking place in the relevant participating Retail Store.	Personal Master Data, Login Partner Data, Participant Data, Transaction Data, Segment Data.	Art. 6 No.1 (a) GDPR, Consent.
Personalized analysis of affinity of participants in the Customer Loyalty Programme to HUGO BOSS products and personalisation and design of marketing content in line with user preferences. We use different analysis methods for this which allow us to personalize marketing content optimally and tailor this to your individual personal interest which we derive from all the information stored in our customer databases. In this way we create a customer-specific optimised marketing and communication strategy for each participant. We want to ensure with this personalisation of marketing	Personal Master Data, Login Partner Data, Participant Data, Transaction Data, Shopping Advice Data, marketing tracking-technology data, Usage Profile Data, Reaction Behaviour Data and Segment Data based on these.	Art. 6 No.1 (a) GDPR, Consent.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests
<p>content that you primarily receive information which we consider to be particularly interesting for you.</p>		
<p>Display of personalized advertising on third-party websites, social media platforms or other platforms.</p> <p>For the purpose of (re-)targeting, and to increase the marketing relevance and therefore the click and conversion rate (e.g. order rate), the behaviour of users of our Website or App as well as the interactivity with one of our displayed personalized advertisements on third-party websites, social media or other platforms is recorded and analysed. Users are marked in a pseudonymously form so that they can be recognised again.</p> <p>Tracking technologies are used on our Website and within the App for these purposes if you have consented to these. Additional information can be received on Website/ within App where you can also manage your consent at any time.</p> <p>Please note, even if you do not consent to tracking technologies for the purpose of personalized advertisement you will still receive advertisement displays of HUGO BOSS which are not personalized.</p>	<p>Usage Profile Data and Segment Data based on these, marketing tracking-technology data.</p>	<p>Art. 6 No.1 (a) GDPR, Consent.</p>
<p>Display of personalized advertising on third-party websites, social media platforms or other platforms to increase the marketing relevance and therefore the click and conversion rate (e.g. order rate). For this purpose, your data will be securely shared with selected partners provided you have consented to the data sharing. Third-party websites, social media platforms or other platforms will synchronize their database, match your profile if applicable and display personalized advertisement of HUGO BOSS.</p>	<p>Marketing Identifier, unique ID based on Marketing Identifier, Segment Data</p>	<p>Art. 6 No.1 (a) GDPR, Consent.</p>

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests
<p>You can manage your consent for this data sharing at any time within your My HUGO BOSS customer account.</p> <p>Please note, even if you do not consent to this data sharing for the purpose of personalized advertisement you will still receive advertisement displays of HUGO BOSS which are not personalized.</p>		
<p>Display of personalized information on, e.g. equivalent or thematically related HUGO BOSS products and content which we derive from the page content you have accessed and all the information stored in our customer databases in order to tailor your website visit and to create marketing content in transactional emails according to your respective personal interests in the best possible way.</p> <p>This includes tracking the response behaviour to the personalized ads (e.g. click and purchase behaviour).</p>	<p>Personal Master Data, Social Login Data, Participant Data, Transaction Data, marketing tracking-technology data, Usage Profile Data, Reaction Behaviour Data and Segment Data based on these.</p>	<p>Art. 6 No.1 (a) GDPR, Consent.</p>

The purposes in this Section C. V. are not necessary for the operation of the Customer Loyalty Programme (accessory purposes), but allow and facilitate us to provide you a better attention. In this case, you grant us your consent to process your data for accessory purposes by signing or accepting the consent text for registration via paper-based datasheet, the consent text for registration via website or the consent for updating the communication channels for advertising purposes after electronic registration (My HUGO BOSS Customer Account in the “My Communication” tab). If you do not sign or accept one of the abovementioned documents, we’ll not process your personal data for accessory purposes.

VI. Personalized offers – Partners

If you wish to receive personalized offers we process your personal data (last name, first name, e-mail address, mobile phone number, postal address) on the legal basis Art. 6 para. 1 s. 1 lit. a GDPR; Art. 46 para. 2 lit. c, para. 5 GDPR; Art. 49 para. 1 lit. a GDPR. We do this for advertisement and personalization purposes with our partners Meta Platforms Ireland Limited, 4 Grand Canal Square, Grand Canal Harbour, Dublin, D02, Ireland and Google Ireland Limited, Google Building Gordon House, 4 Barrow St, Dublin, D04 E5W5, Ireland.

Data recipients are Google LLC, Alphabet Inc., Meta Platforms Inc. and Adobe Inc. situated in the European Union. Data transfer to the US is possible, where the level of data protection may not be comparable to that of the EU area. The transfer will be legitimised by Standard Data Protection Clauses pursuant to Art. 46 para. 2 lit. c, Abs. 5 GDPR. Furthermore, additional measures have been implemented. If you consent to the use of this service, the transfer will be also legitimised pursuant to Art. 49 para. 1 lit. a GDPR.

VII. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations

Internally, your data will be passed on to the following recipients within the HUGO BOSS Group for the above-mentioned purposes: HUGO BOSS Customer care, IT and HUGO BOSS Retail Stores (<https://www.hugoboss.com/de/stores>).

We may also transfer personal data to third countries that do not currently ensure a level of data protection equivalent to that of the EU or Switzerland. We compensate for the lower level of protection through appropriate contracts, especially the recognized standard contractual clauses, insofar as the recipient is not already subject to a legally recognized set of rules for ensuring data protection and we cannot rely on a legal exception. An exception may apply namely in the case of legal proceedings abroad, but also in cases of overriding public interests or if the performance of a contract requires such disclosure, if you have consented or if it is a matter of data made generally available by you, the processing of which you have not objected to.

Categories of Recipients	Recipient's location
Hosting provider, E-mail service provider, IT service provider, IT service provider (intragroup), SMS provider, Survey agencies*, Archiving service provider, Campaign service provider*, Postal services provider, , Newsletter service provider, Digital Member Card service provider, Registration service provider, Marketing Service Provider*, Customer Profile Management Service Provider, Analytics service provider, Customer Database Service Provider, Customer Registration Provider	EU, European Economic Area
E-Mail Service Provider, Communication Service Provider	UK
Marketing Service Provider	Israel
Customer Database Service Provider	US
Customer Data Platform Service Provider	US
Campaign Service Provider	UK
SMS provider	EU
Customer Profile Management Service Provider	US
Hugo Boss Partner	EU

Additional requirement under FLPPD

For the transfers indicated with an asterisk (*) we require your consent. If you do not express your rejection of said transfers within 5 business days of the date on which this Privacy Policy/Privacy Notice has been made available to you, we will understand that you have given us your consent. If you would like to reject please send an e-mail to privacy@hugoboss.com.

Moreover, we may transfer your personal data, without your consent, in the cases established in the article 37 of the FLPPD.

D. PROTECTION OF YOUR PERSONAL DATA (SECURITY OF PROCESSING)

HUGO BOSS has implemented various technical and organizational measures to ensure an appropriate level of data security while processing your personal data. HUGO BOSS is officially certified according IEC/ISO 27001 with regard to the protection of customer data.

To ensure confidentiality, integrity and availability of your personal data, HUGO BOSS has implemented f. e. the following technical and organizational measures (non-exhaustive list):

- Encryption of personal data
- Pseudonymisation of personal data
- Consistent application of the “need-to-know-principle” (access to your personal data is strictly limited to personnel who require access to provide the requested products and services)
- HUGO BOSS personnel and service providers are subject to an obligation of confidentiality
- Implementation of numerous precautionary measures to protect your personal data against unauthorized access, loss, alteration
- Contracting service providers of HUGO BOSS are contractually obliged to ensure the same appropriate level of security.

All technical and organizational measures implemented by HUGO BOSS shall always reflect the “state of the art”.

E. EFFECTIVE DATE AND AMENDMENT OF THIS PRIVACY POLICY

This Privacy Policy is effective immediately. It may be necessary to amend this Privacy Policy due to technical developments and/or changes to statutory or regulatory requirements.

Last updated: 18.09.2024