

## PRIVACY POLICY FOR PARTICIPATION IN HUGO BOSS EXPERIENCE THAILAND

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**”) as well as the Personal Data Protection Act B.E. 2562 of Thailand (hereinafter “**PDPA**”) 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.

HUGO BOSS, as data controller of the Customer Loyalty Programme, is globally represented by affiliated companies of HUGO BOSS. The brick-and-mortar retail stores in the European Union (hereinafter “**EU**”), Switzerland, Norway, Thailand, Singapore, Malaysia and Australia (hereinafter “**Brick-and-Mortar Retail Stores**” and individually to as “**Brick-and-Mortar Retail Store**”) operated by HUGO BOSS, companies affiliated to HUGO BOSS or other companies within the consolidation scope of HUGO BOSS AG provide the services of the Customer Loyalty Programme. A list as amended of the current Brick-and-Mortar Retail Stores can be accessed using the HUGO BOSS Store Locator on the HUGO BOSS website ([www.hugoboss.com](http://www.hugoboss.com), hereinafter “**HUGO BOSS Website**”).

To make it more convenient for you, HUGO BOSS is represented in Thailand by HUGO BOSS Thailand Limited, with its address at No. 179/60-62 Bangkok City Tower 13th Floor, South Sathorn Road, Thungmahamek Sub-district, Sathorn District, Bangkok Metropolis 10120.

Also, the online store which can be accessed via **HUGO BOSS Website** (hereinafter “**Online Store**”) provides the services of the Customer Loyalty Programme. The Brick-and-Mortar Retail Stores and the Online Store are jointly hereinafter referred to as “**Participating Stores**”.

You may register for the Customer Loyalty Programme by (1) signing a digital registration form in the Brick-and-Mortar Retail Stores, (2) online on HUGO BOSS Website, or (3) online on HUGO BOSS’s official account on social media, including our official accounts in LINE and other social media platforms used by HUGO BOSS from time to time (hereinafter “**HUGO BOSS’s Social Media Platform**”), by creating a “My Account” (hereinafter “**My Account**”).

You can receive further information about the processing of personal data on HUGO BOSS Website.

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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  
Email: [info@hugoboss.com](mailto: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  
Email: [privacy@hugoboss.com](mailto: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 as well as Art. 30 PDPA)
- II. Right to rectification (Art. 16 GDPR as well as Art. 36 PDPA)
- III. Right to erasure (“right to be forgotten”) (Art. 17 GDPR as well as Art. 33 PDPA)
- IV. Right to restriction of processing (Art. 18 GDPR as well as Art. 34 PDPA)
- V. Right to data portability (Art. 20 GDPR as well as Art. 31 PDPA)
- VI. Right to object (Art. 21 GDPR as well as Art. 32 PDPA)

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 as well as Art. 19 PDPA)<sup>1</sup>

Please be aware that withdrawing your consent may prevent us from continuing to provide you with the services and benefits of the Customer Loyalty Programme.

- VIII. Right to lodge a complaint with the supervisory authority (Art. 77 GDPR as well as Art. 73 PDPA)

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

Subject to any exceptions under applicable laws, you may have similar or additional rights, including the right to make inquiries or complaints to us in respect of your personal data.

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<sup>1</sup> We understand that there are any potential adverse consequences of such withdrawal. Please confirm. However, if there are any adverse consequences, the data controllers are required to inform the data subjects of these consequences under the PDPA.

## C. Information about the processing of personal data

In connection with the 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.

Automated decision-making within the meaning of Art. 22 of the 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 the registration for the Customer Loyalty Programme (“ <b>Personal Master Data</b> ”).	<p>Salutation, first name, last name, mobile phone number, email address, country or region of residence, a password, a unique member ID.</p> <p>Registration via HUGO BOSS’s Social Media Platform: your third-party platform user information (such as country or region, profile info, user identifier on LINE).</p> <p>We also record the relevant Participating Store at which you register for the Customer Loyalty Programme.</p>	<p>There is a contractual obligation to provide these data. The required data is marked with an asterix (*).</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>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.</p>
Signature information (digital based) that we collect during the registration process for the Customer Loyalty Programme in the Brick-and-Mortar Retail Stores (“ <b>Signature Data</b> ”).	Your signature on the digital registration form.	<p>There is a contractual obligation to provide this data.</p> <p>Not providing this 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>We store this 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.</p>

Categories of personal data that are processed	Personal data included in the categories	Obligation to provide the data	Storage Duration
<p>Protocol data that accrue for technical reasons during the registration for the Customer Loyalty Programme (<b>“Registration Protocol Data”</b>).</p>	<p>Date and time of the registration 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>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.</p>
<p>Voluntary information that you provide during the registration for and/or the participation in the Customer Loyalty Programme (<b>“Participant Data”</b>).</p>	<p>Telephone number, date of birth, postal 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 selected in your My Account on HUGO BOSS Website, billing address and delivery address(es) you have saved in your My Account on HUGO BOSS Website or have used when placing orders in the Online Store.</p>	<p>There is no obligation to provide these 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 not provided, we cannot contact you via these communication channels.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p> <p>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.</p>
<p>Information about your purchases (<b>“Transaction Data”</b>) if you identify yourself when making a purchase in a Brick-and-Mortar Retail Store as a participant in the Customer Loyalty Programme or identify yourself in the Online Store as a participant by entering your access data.</p> <p>These 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/ region, city of the Brick-and-Mortar Retail Store), the date and time of the relevant purchase and invoice information (if any; if you need to receive electronic invoices, we need to collect</p>	<p>There is a contractual obligation to provide these Data.</p> <p>Not providing these 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>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.</p>

	<p>your email address) .</p> <p>Applicable for the Online Store: consignee's first name, last name, mobile phone number, email address, billing address, delivery address, payment information (payment time, payment amount, payment channels), order information (order number, creation date and time, completion date and time, order status), invoice information (if any).</p>		
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Categories of personal data that are processed	Personal data included in the categories	Obligation to provide the data	Storage Duration
<p>Information that you provide us with in your inquiries made to customer service by telephone, chat, email, online contact form and/or text via HUGO BOSS's Social Media Platform ("<b>Customer Service Inquiry Data</b>").</p>	<p>Information that you provide us with in your inquiries made to customer service by telephone, chat, email, online contact form and/or text via HUGO BOSS's Social Media Platform, including but not limited to your salutation, last name, first name, and contact details (country or region, your mobile phone number, email address, postal address, etc.), message/consultation content (e.g. subject of and background to your inquiry) and other information (if any) that you voluntarily provide.</p>	<p>There is no obligation to provide these data.</p> <p>Not providing these data means that we cannot edit your inquiry.</p>	<p>We store this information as long as you are registered for the Customer Loyalty Programme.</p> <p>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.</p>

<p>Shopping advice provided by our sales staff and personal shopping assistants (<b>“Shopping Advice Data”</b>).</p> <p>These data are received from the Participating Stores and HUGO BOSS Website and autonomously generated.</p>	<p>Information about inquiries made to customer service by telephone, chat, email, online contact form, text via HUGO BOSS’s Social Media Platform and/or shopping advice discussions with employees of the Brick-and-Mortar 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 these 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>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.</p>
<p>Data in usage profiles that we create by analysing the usage behaviour of participants in the Customer Loyalty Programme on HUGO BOSS Website (<b>“Online Usage Profile Data”</b>).</p> <p>These data are autonomously generated.</p>	<p>Data about the use of HUGO BOSS 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 Account on HUGO BOSS Website.</p>	<p>There is no obligation to provide these 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>Protocol data that accrue via the Hypertext Transfer Protocol (HTTP) for technical reasons when HUGO BOSS’s Social Media Platform is accessed (<b>“HTTP Data”</b>).</p>	<p>Data and time of the visit.</p>	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide these data.</p> <p>Not providing these data means that we cannot provide the requested website content.</p>	<p>Data are stored in server log files in a form allowing the identification of data subject for a maximum period of [*] 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>Information about the type and scope of the services of the Customer Loyalty Programmes used by you and your reactions to our marketing in the Participating Stores and HUGO BOSS’s Social Media Platform provided you have consented to receive marketing (<b>“Reaction Behaviour Data”</b>).</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 services of the Customer Loyalty Programme.</p>	<p>There is no obligation to provide these 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, Participant Data, Transaction Data, Customer Service Inquiry Data, Shopping Advice Data, Online Usage Profile Data and Reaction Behaviour Data ("<b>Segment Data</b>").</p> <p>These data are autonomously generated.</p>	<p>Data about affinity to HUGO BOSS brands, HUGO BOSS 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 these 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>Only applicable for the Online Store: Information that you provide us with as part of the payment process for ordered products or, insofar as the purchase contract is set aside, for the purposes of refunding ("Payment Data").</p>	<p>Information regarding the selected payment method and information to be provided for the respective means of payment, as applicable. We may receive information from the Online Store Payment Service Provider regarding confirmation or cancellation of your payment, as applicable.</p>	<p>Provision of these data is required for the conclusion or setting aside of the purchase contract.</p> <p>If these data is/are not provided, you will not be able to purchase HUGO BOSS products from the Online Store.</p>	<p>These data will be stored until your order has been processed completely, i.e. until the products are delivered.</p> <p>We will also store this information for evidential purposes in relation to the possible assertion, exercise or defence of legal claims for a transitional period of three years starting with the end of the calendar year in which you provided us with the data and, in the event of any legal disputes, until their conclusion.</p> <p>We also store this information insofar as statutory retention obligations exist, in particular under tax law.</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 without undue delay when the personal data are no longer necessary in relation to the purpose for which they were collected or otherwise processed. In order to comply with the Computer-Related Crime Act B.E. 2550 of Thailand we will store the respective data in accordance with the regulations therein.

### III. Details on the processing of the personal data

#### 1. 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 on HUGO BOSS Website, the Online Store, HUGO BOSS's Social Media Platform and the digital registration form in the Brick-and-Mortar Retail Stores in which you can provide us with your data to register for the Customer Loyalty Programme.	Personal Master Data, Signature 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 Personal Master Data and Participant Data.	Personal Master 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 an organised customer database as the basis for optimum maintenance of customer data.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests
Archiving Signature Data for evidence purposes and for the establishment, exercise or defence of any legal claims.	Personal Master Data, Signature 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 establishment, exercise or defence of legal claims.
Updating of postal address, mobile phone number and email address.	Participant Data.	Art. 6 No.1 (c) GDPR, Art. 5 No.1 (d) GDPR. Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is ensuring the accuracy of the data.
In your My Account, you can conveniently maintain the Personal Master Data and Participant Data.  Based on your Transaction Data, we provide you in your My Account with an overview of your purchases to date.	Personal Master Data, Participant Data, Transaction Data, Segment Data.	Art. 6 No.1 (b) GDPR.

<p>Provision of the functions of My Account and a convenient ordering process in the Online Store:</p> <p>In your MY Account, subject to the functions on HUGO BOSS Website and HUGO BOSS's Social Media Platform, you can conveniently maintain the Personal Master Data, Participant Data, 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 Account.</p> <p>If you are logged in to your My Account on HUGO BOSS Website, the sizes stored in your My Account on HUGO BOSS Website 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) is 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 Account with an overview of your purchases to date.</p>	<p>Personal Master Data, Participant Data, Transaction Data, Online 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>
<p>Data transfer to/from the Participating Stores, HUGO BOSS Website and HUGO BOSS's Social Media Platform to provide the benefits of the Customer Loyalty Programme described in detail in the Terms and Conditions for participation in HUGO BOSS EXPERIENCE as well as to our Customer Care department.</p>	<p>Personal Master Data, Participant Data, Transaction 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 to provide the benefits of the Customer Loyalty Programme to the customer also in other countries than the respective residence country.</p>

## 2. 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
Offering personalized shopping advice in the Brick-and-Mortar Retail Stores, via customer telephone service and/or HUGO BOSS's Social Media Platform on the basis of the information stored in our customer database.	Personal Master Data, Registration Protocol Data, Participant Data, Transaction Data, Customer Service Inquiry Data, Shopping Advice Data, Reaction Behaviour Data, Segment Data.	Art. 6 No.1 (a) GDPR, Consent.
<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 (HUGO BOSS's Social Media Platform, email, post, telephone and/or SMS/MMS messages and push messages within HUGO BOSS applications for mobile user devices, provided you have consented to the receipt of app push messages in HUGO BOSS applications).</p> <p>You can select or change your preferred communication channels at any time in your My Account.</p> <p>We use:</p> <ul style="list-style-type: none"> <li>• your salutation, first name and last name specified when registering to adapt gender-specific content in our marketing materials.</li> <li>• the country or region recorded during the registration to determine the language and country-specific content of our marketing materials.</li> <li>• the date of birth you may have provided voluntarily to have personal birthday wishes and information tailored to your age sent to you.</li> <li>• the store in which you registered, the stores located near the address you may have specified or the store in which you generate the most turnover to send you invitations to relevant events and promotions in these stores.</li> <li>• voluntary information you may have provided regarding your personal preferences, your Transaction Data, your Segment Data and</li> </ul>	Personal Master Data, Online Usage Profile Data, Transaction Data, Reaction Behaviour Data, Segment Data and marketing cookie data processed when visiting HUGO BOSS Website provided you have consented to the use of cookies.	Art. 6 No.1 (a) GDPR, Consent.

<p>your wish list in your My Account on HUGO BOSS Website to provide you with shopping advice and to have content tailored to your personal preferences sent to you.</p> <p>We may also send you reminder via SMS, emails or text via HUGO BOSS's Social Media Platform if you have not completed orders in the Online Store or articles are still on your wish list in your My Account on HUGO BOSS Website.</p> <p>Cookies are used on HUGO BOSS Website for these purposes if you have consented to the use of cookies. Additional information can be received on HUGO BOSS Website.</p>		
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<b>Purpose of processing the personal data</b>	<b>Categories of personal data processed</b>	<b>Legal basis and, if applicable, legitimate interests</b>
<p>We transfer your Personal Master Data, Participant Data, Transaction Data, Segment Data and your preferred communication channels to the Brick-and-Mortar Retail Store in which you registered for the Customer Loyalty Programme for the purpose of marketing materials being sent to you by the relevant Brick-and-Mortar Retail Store. The marketing materials in particular contain information about local promotions taking place in the relevant Brick-and-Mortar Retail Store.</p>	<p>Personal Master Data, Participant Data, Transaction Data, Segment Data.</p>	<p>Art. 6 No.1 (a) GDPR, Consent.</p>
<p>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 content that you primarily receive information which we consider to be particularly interesting for you.</p> <p>Cookies are used on HUGO BOSS Website for these purposes if the participant has consented to the use of cookies. Additional information can be received on HUGO BOSS Website.</p>	<p>Personal Master Data, Participant Data, Transaction Data, Shopping Advice Data, Online Usage Profile Data, Reaction Behaviour Data and Segment Data based on these and marketing cookie data processed when visiting HUGO BOSS Website provided you have consented to the use of cookies.</p>	<p>Art. 6 No.1 (a) GDPR, Consent.</p>

<p>Display of personalized banner advertising on third-party websites.</p> <p>For (re-)targeting participants in the Customer Loyalty Programme, the behaviour of users of HUGO BOSS Website is recorded and analysed. Users are marked in a pseudonymously form so that they can be recognised again on the website to increase the marketing relevance and therefore the click and conversion rate (e.g. order rate).</p> <p>Cookies are used on HUGO BOSS Website for these purposes if the participant has consented to the use of cookies. Additional information can be received on HUGO BOSS Website.</p>	<p>Online Usage Profile Data and Segment Data based on these, marketing cookie data processed when visiting HUGO BOSS Website provided you have consented to the use of cookies.</p>	<p>Art. 6 No.1 (a) GDPR, Consent.</p>
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#### IV. Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations<sup>2</sup>

Categories of Recipients	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
<p>Hosting provider, Brick-and-Mortar Retail Stores in the EU and Norway, Email service provider, IT service provider, IT service provider (intragroup), SMS provider, Survey agencies, Archiving service provider, Campaign service provider, Postal services provider, Customer service provider, Newsletter service provider, Digital Member Card service provider, Registration service provider, Marketing Service Provider.</p>	<p>EU, European Economic Area</p>	<p>The transfer is necessary for the performance of the Customer Loyalty Programme.</p>
<p>Email Service Provider</p>	<p>United Kingdom</p>	<p>The transfer is necessary for the performance of the Customer Loyalty Programme and also for the performance of receiving information material provided you consented to receive this information.</p>
	<p>Switzerland</p>	<p>Adequacy decision of the EU Commission for the protection of personal data provided in Switzerland: <a href="http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32000D0518&amp;from=EN">http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32000D0518&amp;from=EN</a></p>

<sup>2</sup> This section aligns with the PDPA. When transferring personal data to third countries or international organizations, the recipient must meet adequate data protection standards as defined by the PDPC. However, there are exceptions to this requirement, such as the necessity for the performance of a contractual obligation to which the data subject is a party, or for compliance with a contract between data controllers and other entities in the interest of the data subject. This may also align with the exception specified in Art. 49(1)(b)(c) of the GDPR. In this case, the transfer to the Hosting Provider and Email Service Provider may fall within these exceptions under the PDPA as well. Therefore, this section should remain unchanged.

Brick-and-Mortar Retail Stores	Australia	The transfers are subject to EU Standard Data Protection Clauses pursuant to Art. 46 (2) (c), (5) GDPR. A copy of the Standard Data Protection Clauses can be obtained under <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087</a>
	Malaysia	
	Singapore	
	Thailand	
IT service provider (intragroup)	USA	
	Hong Kong	The transfers are subject to EU Standard Data Protection Clauses pursuant to Art. 46 (2) (c), (5) GDPR. A copy of the Standard Data Protection Clauses can be obtained under <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087</a>
SMS provider	Thailand	The transfers are subject to EU Standard Data Protection Clauses pursuant to Art. 46 (2) (c), (5) GDPR. A copy of the Standard Data Protection Clauses can be obtained under <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087</a>

#### D. 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: [\*] 2024