

PRIVACY POLICY FOR PARTICIPATION IN HUGO BOSS MEMBERSHIP PROGRAM

These Privacy Notices explain how HUGO BOSS processes personal data in connection with participation in a HUGO BOSS Membership Program.

The HUGO BOSS Membership Program is available in the online store accessible via the website (hereinafter “Online Store”), the HUGO BOSS application for mobile services (hereinafter “App”), as well as in participating brick-and-mortar retail stores, including outlets and, where available, the “Order-from-Store” service in retail stores (outlets excluded) that are operated by HUGO BOSS, our affiliated companies or our participating distribution partners (hereinafter “Retail Stores”), hereinafter jointly the “Participating Stores”.

You can receive further information about the contact details of the companies affiliated of HUGO BOSS on the group website of HUGO BOSS (<https://group.hugoboss.com/en/company/contact>).

Depending on the country or region, HUGO BOSS offers different Membership Program Services. References to the “Membership Program” in these Privacy Notices mean any customer loyalty, membership, rewards or benefits program offered by HUGO BOSS.

An overview of the current participating Retail Stores and the offered Membership Program Services can be found in the HUGO BOSS Store Locator on the HUGO BOSS Website (www.hugoboss.com, hereinafter “Website”).

These Privacy Notices also provide information about your privacy rights and how to contact HUGO BOSS and its Data Protection Officer.

The Privacy Notices are available in all Participating Stores.

TABLE OF CONTENTS

A. INFORMATION ABOUT THE DATA CONTROLLER4

 I. Name and contact details of the data controller4

 II. Contact details of the data controller’s Data Protection Officer4

B. INFORMATION ABOUT THE RIGHTS OF DATA SUBJECTS5

C. INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA6

 I. Account and Membership Program Management6

 II. Membership Program, Functionalities, Communication, Benefits and Rewards.....9

 III. Personalised Customer Experience10

 IV. Advertising and Audience Activation14

 V. Business Intelligence and Reporting15

 VI. Data Quality, Security and Fraud Prevention16

 VII. Sources of Personal Data18

 VIII. Obligation to provide personal data.....18

 IX. Recipients of personal data and international data transfers18

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.21

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):21

• Encryption of personal data.....21

• Pseudonymisation of personal data21

• 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)21

• HUGO BOSS personnel and service providers are subject to an obligation of confidentiality21

• Implementation of numerous precautionary measures to protect your personal data against unauthorized access, loss, alteration21

- Contracting service providers of HUGO BOSS are contractually obliged to ensure the same appropriate level of security.21

All technical and organizational measures implemented by HUGO BOSS shall always reflect the “state of the art”.21

E. APPLICABLE DATA PROTECTION LAW21

F. EFFECTIVE DATE AND AMENDMENT OF THIS PRIVACY POLICY21

A. INFORMATION ABOUT THE DATA CONTROLLER

I. Name and contact details of the data controller

The data controller for the Membership Program 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.

- 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 for the purpose of exercising your rights.

References in these Privacy Notices to specific rights of data subjects and legal bases under the GDPR shall, where applicable, also include equivalent rights and legal bases under any local data protection laws that apply to the processing of personal data.

C. INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

The processing activities described in these Privacy Notices cover the various services, functionalities and customer touchpoints that may be offered as part of the HUGO BOSS Membership Program. Not all services, functionalities or customer touchpoints are available in every country or region and certain services or functionalities may not be used by every customer. Accordingly, not all processing activities described below will apply to every customer. The applicability of a particular processing activity depends on the services, functionalities and customer touchpoints available in your country or region and on how you interact with the HUGO BOSS Membership Program.

I. Account and Membership Program Management

This section describes how HUGO BOSS processes personal data in connection with the creation, administration and termination of customer accounts and related membership services.

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
HUGO BOSS processes personal data to enable customers to register for its Membership Program, create and manage customer accounts, access account-related services, authenticate users, and provide account functionality across HUGO BOSS channels.	customer registration, account creation, authentication and login, password management, account recovery, account administration, member onboarding, provision of customer account functionality, customer service support relating to account administration.	first and last name, email address, telephone number, postal address, date of birth, country, signature and language preferences, customer identifiers, account credentials, registration details, account status information.	Personal data is retained for the duration of the customer account in the Membership Program and thereafter for periods required to comply with legal obligations, establish or defend legal claims, or fulfil applicable retention requirements.	Art. 6(1)(b) GDPR The processing is necessary for the creation, administration and performance of the customer account in the Membership Program relationship.
Where available, HUGO BOSS allows customers to register and authenticate using supported third-party identity providers in order to simplify	social login authentication, identity, verification, account linking, account recovery, synchronization of login credentials.	social account identifier, authentication tokens and responses, profile information made available by the social login provider, account-linking information.	Social-login-related information is retained as long as the linked account remains active or until the social login connection is removed.	Art. 6(1)(b) GDPR The processing is necessary for providing and maintaining

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
account creation and login processes.				customer account access functionality.
HUGO BOSS maintains a central customer master data environment to ensure consistent and accurate customer information across connected systems and customer touchpoints.	customer profile administration, maintenance of customer master records, profile synchronization, customer recognition, transaction linking and assignment of purchases to customer profiles incl. transaction history within customer profiles, customer service support, cross-system profile management.	customer identification data, contact information, account information, transaction references, loyalty information, consent information, profile attributes, customer service interaction data.	Customer master data is retained for the duration of the customer relationship and thereafter in accordance with applicable statutory retention requirements.	Art. 6(1)(b) GDPR where necessary for account and membership administration. Art. 6(1)(f) GDPR to ensure data quality, consistency and efficient customer relationship management.
HUGO BOSS enables customers to maintain accurate and up-to-date account information and communication preferences.	profile updates, contact detail changes, password changes, account maintenance, profile completion, communication preference updates.	account information, contact details, customer preferences, communication preferences, profile information updated by the customer.	Updated data forms part of the customer profile and is retained according to the applicable account retention periods.	Art. 6(1)(b) GDPR for account administration. Art. 6(1)(f) GDPR for maintaining accurate customer records and ensuring account security.
HUGO BOSS processes personal data in order to	consent collection, consent administration, communication	consent status, permission status, communication	Consent information is retained for as long as necessary to	Art. 6(1)(a) GDPR

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
record, maintain and manage customer communication preferences, marketing consents and related permissions.	preference management, synchronization of permissions across systems, withdrawal processing.	preferences, channel-specific permissions, consent timestamps, withdrawal records.	demonstrate compliance with applicable legal requirements and to manage customer preferences.	where consent is recorded and managed. Art. 6(1)(c) GDPR where retention of consent information is required to demonstrate compliance with applicable legal obligations.
HUGO BOSS processes personal data to fulfil account deletion requests, terminate memberships and ensure the deletion or anonymization of data within connected systems where required.	account deletion, membership termination, anonymization, deletion workflow management, synchronization of deletion requests across connected systems.	account information, customer identifiers, deletion request information, membership status, deletion workflow records, compliance records.	Data will be deleted, anonymized or restricted in accordance with applicable legal requirements and HUGO BOSS retention obligations. Information that must be retained for compliance, accounting or legal purposes may be retained for the required statutory period.	Art. 6(1)(b) GDPR where necessary to administer the termination of customer accounts and memberships. Art. 6(1)(c) GDPR where necessary to comply with legal obligations relating to data protection rights and data deletion requests.

II. Membership Program, Functionalities, Communication, Benefits and Rewards

This section describes how HUGO BOSS processes personal data in connection with the administration, operation and support of its Membership Program, including, where available, the management of membership achievements such as points, membership levels, rewards, benefits and program-related communications.

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
HUGO BOSS processes personal data to administer the Membership Program, calculate and manage loyalty achievements and benefits, determine membership status and provide program-related services and rewards.	Membership Program administration, calculation of achievements such as points calculation, points validation, points expiry management, membership tier administration, level upgrades and downgrades, reward administration, voucher administration, benefit administration, loyalty fulfilment, member status management.	customer identifiers, Membership Program status, achievements such as loyalty points balances, membership tier and level information, level progression data, points-to-next-level information, downgrade information, reward indicators, reward information, voucher information, loyalty event history, transaction references relevant to loyalty activities.	Personal data processed in connection with the Membership Program is retained for as long as necessary to administer Program participation, provide rewards and benefits, process loyalty events, provide customer support and comply with applicable legal, accounting, and retention requirements.	Art. 6(1)(b) GDPR The processing is necessary for the performance and administration of the Membership Program and the provision of associated benefits and rewards.
HUGO BOSS processes personal data to provide customers with communications relating to the administration of the Membership Program and, where applicable, personalized loyalty-related	Program communications, loyalty event notifications, reward notifications, membership status communications, benefit communications, event invitations, loyalty engagement communications,	customer identifiers, contact information, communication preferences, membership status, loyalty achievements/points information, membership level information, reward information, voucher information, loyalty engagement information,	Information relating to loyalty communications is retained for as long as necessary to administer the Membership Program, provide program-related communications and maintain communication records in accordance with	Art. 6(1)(b) GDPR where communications are necessary to administer the Membership Program, provide Program benefits or inform members about program-related events and developments.

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
experiences and communications.	personalized loyalty communications.	event participation information.	applicable legal and compliance requirements.	Art. 6(1)(a) GDPR where communications are personalized, marketing-related or based on customer permissions and preferences.

III. Personalised Customer Experience

This section describes how HUGO BOSS creates and uses customer profiles, audience segments and personalized content to provide a seamless and tailored Membership Program experience across digital, retail and communication channels. By connecting customer interactions across touchpoints, HUGO BOSS can better understand customer preferences and interests and provide a more relevant, consistent and personalized customer experience throughout the Membership Program. The extent of these activities depends on the services used by the customer and, where applicable, the permissions and preferences selected by the customer. Certain personalization, analytics and customer recognition activities rely on tracking technologies used on the Website and within the App. The use of such technologies is subject to your consent where required under applicable law. Further information, including available consent options, is provided on the Website and within the App, where consent can also be managed or withdrawn at any time.

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
HUGO BOSS maintains a unified customer profile to recognize customers, and, where sufficient identifiers are available, link customer interactions across	profile creation, profile consolidation, identity resolution, profile stitching, customer recognition, synchronization of customer information, cross-channel	customer identifiers, account information, contact information, loyalty information, purchase and transaction information, communication preference	Unified customer profile information is retained for the duration of the customer relationship and thereafter in accordance with applicable	Art. 6(1)(a) GDPR where profile consolidation, customer recognition and

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
touchpoints in order to provide a consistent customer experience, support Membership Program participation and enable personalization. Depending on the circumstances and the permissions granted by the customer, this may include the use of account identifiers, customer identifiers, recognized devices, online identifiers, contact information or other identifiers that allow HUGO BOSS to determine that different interactions relate to the same customer.	recognition, activation of connected customer engagement systems.	information, communication engagement information, website interaction data, mobile application interaction data, customer service information, audience memberships.	legal, compliance and retention requirements.	personalization activities rely on customer consent. Art. 6(1)(b) GDPR to the extent necessary to operate and administer the Membership Program services.
HUGO BOSS analyses customer profiles in order to create customer segments, audiences, classifications, scores and predictive indicators that support personalization, customer engagement, Membership Program administration, analytics and reporting.	profile enrichment, attribute generation, segmentation, audience creation and management, profiling, customer scoring, predictive analytics, recommendation modelling, communication eligibility assessment, customer journey optimization, campaign planning, marketing	Depending on the specific use case, profile enrichment, segmentation, audience management, profiling and predictive analytics may utilize: customer profile data, demographic information, communication preferences, purchase history, transaction information, loyalty information, browsing behavior, website and	Derived profile attributes and segmentation data are retained for as long as necessary to support the relevant customer engagement, personalization, analytics and loyalty activities	Art. 6(1)(a) GDPR where profiling supports personalization, audience creation, segmentation, marketing and customer engagement activities. Art. 6(1)(b) GDPR where loyalty-related scoring is necessary for the operation

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
	activation, analytics and reporting activities.	application interactions, communication engagement data, customer interaction history, audience memberships, customer lifecycle information, behavioral data, existing profile attributes. HUGO BOSS may derive customer value indicators, engagement indicators, affinity indicators, audience memberships and customer segments from customer data.		and administration of the Membership Program. Art. 6(1)(f) GDPR where profiling supports internal analytics, reporting, business intelligence and performance measurement activities.
HUGO BOSS personalizes digital experiences in order to provide tailored content, product recommendations and customer experiences across websites and mobile applications.	real-time personalization, content personalization, recommendation generation, behavioral analysis, loyalty-specific experience management, audience-based content delivery, optimization of digital customer experiences. Categories of personalized content may include e.g.: product recommendations, personalized banners, tailored website content,	customer identifiers, pseudonymous identifiers, audience memberships, loyalty information, Membership Program status, transaction information, website interactions, application interactions, behavioral information, engagement indicators, affinity indicators, country and language information.	Personalization-related information is retained only for as long as necessary to provide personalized digital experiences and support related analytics activities	Art. 6(1)(a) GDPR Consent.

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
	personalized app experiences, loyalty-level experiences, reward reminders, token-related experiences, upgrade prompts, category recommendations, Membership Program-specific experiences.			
HUGO BOSS may communicate with customers through various communication channels in order to provide personalized content, recommendations, offers, loyalty-related information and other relevant customer communications.	Personalized communications, communication orchestration, recommendation delivery, audience-based messaging, triggered communications, loyalty-related communications and customer engagement activities. Examples include newsletters, promotional communications, event invitations, loyalty notifications, browse-abandonment reminders, basket-abandonment reminders, wishlist reminders and reward-related communications.	Contact information, communication permissions, communication preferences, loyalty information, audience memberships, engagement information, behavioral and communication interaction data.	Communication-related information is retained for as long as necessary to provide personalized communications, maintain communication records, measure communication performance and comply with applicable legal and compliance requirements.	Art. 6(1)(a) GDPR Consent.

Information About Profiling

The profiling, scoring and predictive analytics activities described above are intended to support customer segmentation, personalization, customer experience optimization, loyalty programme administration, analytics and reporting.

HUGO BOSS does not currently use these activities to make solely automated decisions that produce legal effects concerning individuals or similarly significantly affect individuals. If this position changes in the future, HUGO BOSS will update this Privacy Policy and provide any additional information required under applicable law.

IV. Advertising and Audience Activation

This section describes how HUGO BOSS may use customer information for audience activation, advertising purposes and cooperation with advertising platforms where the relevant permissions have been granted. Audience sharing activities are intended to improve the relevance of advertising, support customer acquisition and enable measurement of advertising campaigns. Customers who have not granted the relevant permissions will not be included in consent-based advertising and audience-sharing activities.

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
HUGO BOSS may use customer information to create, activate and share advertising audiences, deliver personalized advertising, measure advertising effectiveness, optimize advertising campaigns and support customer acquisition activities.	audience creation, audience sharing, customer matching, custom audience activation, lookalike audience modelling, retargeting, remarketing, advertising delivery, campaign optimization and advertising performance measurement. Advertising partners may include Google, Meta, TikTok, Microsoft Advertising, Criteo and other advertising platforms and advertising technology providers used by HUGO	customer identifiers, hashed identifiers, email addresses, telephone numbers, audience memberships, customer segment information, advertising identifiers, website and application interaction information, communication engagement information, behavioral information and loyalty-related audience attributes where applicable.	Advertising audience information is retained only for as long as necessary to support advertising, audience activation, campaign measurement and related legal and compliance requirements.	Art. 6(1)(a) GDPR; Art. 46 (2) (c), (5) GDPR, Consent.

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
	BOSS and communicated to customers.			

V. Business Intelligence and Reporting

This section describes how HUGO BOSS processes personal data for reporting, analytics and business intelligence purposes to better understand customer engagement, measure business performance, and support Membership Program business improvements.

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
HUGO BOSS analyses customer, loyalty, communication and marketing information in order to understand customer engagement and Membership Program participation and to improve customer experiences and Membership Program services.	customer and loyalty analytics, customer profiling and segmentation, customer journey and engagement analysis, audience analysis, campaign effectiveness measurement and optimization.	customer profile information, purchase and transaction information, Membership Program information, customer interaction and engagement information, digital interaction information, audience and segmentation information, and derived analytical information.	Analytics information is retained only for as long as necessary to support analytics, reporting, optimization, compliance and legitimate business purposes.	Art. 6(1)(f) GDPR for analytics, reporting, planning, performance measurement, business intelligence and optimization activities. Art. 6(1)(a) GDPR where analytics relies on consent-based communications, personalization, behavioral analysis or tracking activities. Art. 6(1)(b) GDPR

				to the extent analytics is necessary for the operation and administration of the XP programme.
HUGO BOSS analyses customer, loyalty, communication and business information in order to measure business performance.	business intelligence, reporting, performance measurement, trend analysis and business planning.	customer, transaction and loyalty information, customer engagement and audience information, and aggregated analytics and business performance information.	Business intelligence and reporting information is retained in accordance with applicable reporting, business, compliance and legal retention requirements.	Art. 6(1)(f) GDPR The processing is necessary for planning, monitoring, reporting, business intelligence and performance measurement purposes.

VI. Data Quality, Security and Fraud Prevention

This section describes how HUGO BOSS processes personal data to maintain data quality, safeguard customer accounts and systems, prevent unauthorized access and detect, investigate and prevent fraudulent or abusive activities. These activities support the reliable operation of customer accounts, the Membership Program and related customer engagement services.

Purpose of Processing	Processing Activities	Categories of Personal Data	Retention	Legal Basis
HUGO BOSS processes personal data to maintain data quality, data integrity and consistency across customer, loyalty and business systems,	Data validation, duplicate detection, record matching, consistency checks, integrity controls, data-quality monitoring, email validation, address validation,	Customer identifiers, contact information, account information, transaction references, loyalty information, communication information, profile attributes,	Data-quality and integrity information is retained only for as long as necessary to support quality assurance, operational integrity, compliance, audit and	Art. 6(1)(f) GDPR The processing is necessary for HUGO BOSS' legitimate interests in maintaining accurate, reliable and

to identify and resolve data inconsistencies, and to support the reliable operation of customer-related processes.	reconciliation activities, error detection and correction processes.	validation records and data-quality indicators.	business continuity requirements.	consistent information across systems, ensuring operational effectiveness and supporting efficient customer, loyalty and business processes.
HUGO BOSS processes personal data to protect customer accounts, secure systems and services, prevent unauthorized access, detect and prevent fraudulent or abusive activities, and ensure the security and integrity of personal data and digital services.	Authentication, account security management, access control, security monitoring, fraud detection, abuse detection, anomaly detection, identity verification, security investigations, incident management and protective security measures.	Customer identifiers, account information, authentication information, login and access records, device and technical information, transaction information, Membership Program information, communication information, security event records and fraud-related indicators.	Security, authentication and fraud-prevention information is retained only for as long as necessary to protect HUGO BOSS systems, investigate security-related events, prevent fraud, comply with legal obligations and establish, exercise or defend legal claims.	Art. 6(1)(f) GDPR The processing is necessary for HUGO BOSS' legitimate interests in protecting customer accounts, preventing fraud and abuse, maintaining the security of systems and services, safeguarding personal data and ensuring business continuity. Art. 6(1)(c) GDPR Where processing is necessary to comply with applicable legal obligations relating to information security, fraud prevention, data protection and regulatory compliance.

VII. Sources of Personal Data

HUGO BOSS generally collects personal data directly from customers during their interactions with HUGO BOSS, including when customers create an account, participate in the Membership Program, make a purchase or interact with customer care.

In certain cases, customers may choose to connect or use third-party authentication, identity or sign-in services. Where customers do so, relevant information may be transmitted to HUGO BOSS by the selected service provider in accordance with the customer's instructions and the settings chosen by the customer.

In limited circumstances and where the customer has provided the required consent, HUGO BOSS may receive profile-related information, identifiers, audience information from selected service providers supporting customer recognition, personalization, audience activation and marketing activities. Such information may be derived only from the customer's interactions with digital services operated by such providers or their participating partners.

VIII. Obligation to provide personal data

Certain personal data is required in order for HUGO BOSS to provide specific Membership Program services and to fulfil customer requests. Whether the provision of personal data is mandatory depends on the relevant service, functionality or customer interaction and will generally be indicated at the time of collection.

If mandatory information is not provided, HUGO BOSS may be unable to provide the requested service, create or maintain a customer account, administer Membership Program participation, assign purchases to a Membership Account, respond to customer requests or otherwise fulfil the relevant customer interaction. Personal data that is not identified as mandatory may generally be provided on a voluntary basis.

IX. Recipients of personal data and international data transfers

This section provides information about the categories of recipients that may receive personal data in connection with the HUGO BOSS Membership Program and the services, functionalities and customer touchpoints described in these Privacy Notices.

The recipients involved depend on the Membership Program services used by the customer, the communication channels provided, the country or region in which Membership Program services are offered or used and the specific processing activity concerned. Personal data will only be shared where necessary for the relevant purpose and in accordance with applicable data protection laws.

To provide the Membership Program and related services, personal data may be transferred within the HUGO BOSS Group, to Participating Retail Stores, affiliated companies and carefully selected service providers supporting customer account management, Membership Program administration, communications*, customer service, analytics, personalization, marketing*, hosting, IT operations and other business functions.

Below HUGO BOSS provides overviews of the categories of recipients that may receive personal data and, where applicable, the safeguards used for transfers of personal data to countries outside the European Economic Area ("EEA").

Categories of Recipients: HUGO BOSS affiliated companies and Participating Retail Stores, IT, hosting and cloud service providers, Identity, registration and customer platform providers, Customer service providers, Communication, messaging and marketing service providers*, Analytics and reporting providers, Service providers supporting the operation of the Membership Program.

Location of Recipients	Transfer Mechanism
EU/EEA	n/a
Canada, Israel, Switzerland, United Kingdom	Adequacy decision of the EU Commission for the protection of personal data provided in: - Canada, see here: https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1585235093416&uri=CELEX%3A32002D0002, - Israel. For information regarding personal information protection systems in Japan, please refer to the "Survey on Personal Information Protection Systems in Foreign Countries" published on the Personal Information Protection Commission website: https://www.ppc.go.jp/enforcement/infoprovision/laws/offshore_report_israel/. The receiving third party complies with the personal information protection system of that foreign country. - Switzerland, see here: https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1585235701773&uri=CELEX%3A32000D0518, - United Kingdom

Location of Recipients	Transfer Mechanism
United States of America	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 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087. For information regarding personal information protection systems in Japan, please refer to the "Survey on Personal Information Protection Systems in Foreign Countries" published on the Personal Information Protection Commission website: https://www.ppc.go.jp/enforcement/infoprovision/laws/offshore_report_america/. The receiving third party complies with the personal information protection system of that foreign country.
Other Countries in which Participating Retail Stores or affiliated HUGO BOSS companies operate depending on customer's place of residence or use of the Membership Program services	Adequacy Decision where available, otherwise the transfers are subject to EU Standard Data Protection Clauses pursuant to Art. 46 (2) (c), (5) GDPR

Additional requirements may apply under the Federal Law on Protection of Personal Data Held by Private Parties (FLPPD) in Mexico. Certain transfers of personal data may require consent or may be permitted under statutory exceptions, including those provided for under Article 37 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 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. APPLICABLE DATA PROTECTION LAW

These Privacy Notices have been prepared in accordance with the data protection laws applicable to HUGO BOSS as the controller, including the GDPR. Depending on the country or region in which a customer is located, additional or alternative local data protection laws may apply. References in these Privacy Notices to specific rights of data subjects and legal bases under the GDPR shall, where applicable, also include equivalent rights and legal bases under any local data protection laws that apply to the processing of personal data.

F. 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: 01.09.2026