Privacy Policy HUGO BOSS Newsletter

AUSTRALIA

HUGO BOSS AG, Holy-Allee 3, 72555 Metzingen, Germany (hereinafter "***HUGO BOSS***" or "***we***") provides the HUGO BOSS Newsletter (hereinafter "**Newsletter**") about the latest news from HUGO BOSS regarding new products, exclusive specials, lifestyle and fashion trends. You can subscribe to the Newsletter online via the HUGO BOSS website (hereinafter "***Website***") or by visiting a HUGO BOSS Outlet Store (hereinafter "***Outlet***"). A list as amended of the current Outlets can be accessed using the HUGO BOSS Store Locater on the Website (www.hugoboss.com/au).

In the following you receive information in accordance with Art. 13 and 14 General Data Protection Regulation (*"**GDPR**"*) about the data controller processing your personal data, the data controller's data protection officer (**Section A**) and about your rights 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 Newsletter subscription.

You can receive further information about the processing of personal data with respect to the Website on www.hugoboss.com/au.

TABLE OF CONTENTS

A.	**Information about the data controller**	**3**
I.	**Name and contact details of the data controller**	**3**
II.	**Contact details of the data controller's Data Protection Officer**	**3**
B.	**Information about the rights of the data subject**	**4**
C.	**Information about the processing of personal data**	**5**
II.	**Additional information regarding Storage Duration**	**8**
1.	**Processing of personal data on the basis of statutory legislation**	**8**
2.	**Processing of personal data on the basis of your consent**	**9**
IV.	**Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations**	**10**
D.	**Effective date and amendment of this Privacy Policy**	**11**

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 the data subject

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: you have the right to request access to your personal data held by HUGO BOSS (Art. 15 GDPR or similar local provisions)

II. Right to rectification or correction: you have the right to rectify or correct personal data held by HUGO BOSS (Art. 16 GDPR or similar local provisions)

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. You have the right to lodge a complaint by contacting our Data Protection Officer. The Data Protection Officer will assess any complaint with the aim of resolving it in a timely and efficient manner and may request relevant information from you that is required to resolve the complaint.

IX. You also have the right to lodge a complaint with the supervisory authority at any time (Art. 57 (1) (f) GDPR)

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

C. Information about the processing of personal data

In connection with the Newsletter different personal data are processed for different purposes. You will find information below regarding the purposes and means of the processing of personal data.

I. Details on the personal data we process

Categories of personal data that are processed	Personal data included in the categories	Necessity to provide the data	Storage Duration
Personal master data that we collect for your Newsletter subscription (*"**Personal Master Data**"*)	Salutation, first name, surname, e-mail address. When registering on the website, we also record the country-specific version of the HUGO BOSS Website via which you subscribe to the Newsletter. We also record the relevant Outlet at which you subscribe to the Newsletter.	There is no statutory or contractual obligation to provide the data. It is necessary that you provide your mobile number/e-mail address to receive the Newsletter. Not providing your mobile number/e-mail address means that you cannot subscribe to the Newsletter.	We store this information as long as you have subscribed to the Newsletter. 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.
Paper based signature information that we collect during the subscription process for Newsletter in our Outlets when you do not subscribe digitally (*"**Signature Data**"*).	Your signature on the paper based subscription form.	There is no statutory or contractual obligation to provide the data. It is necessary that you provide your signature to receive the Newsletter. Not providing these Data means that you cannot subscribe to the Newsletter.	We store this information as long as you have subscribed to the Newsletter. 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	Necessity to provide the data	Storage Duration
Protocol data that are generated technically when subscribing or unsubscribing to the Newsletter online (*"**Subscription and Unsubscription Data**"*)	Date and time of subscription confirmation in double opt-in process, as well as the IP address of the terminal device used for confirmation, data and time of any unsubscription from the Newsletter.	There is no statutory or contractual obligation to provide the data. It is necessary that you give your confirmation in double opt-in process to receive the Newsletter. Not providing this Data means that you cannot subscribe to the Newsletter.	We store this information as long as you have subscribed to the Newsletter. 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.
Protocol data that are generated technically via the Hypertext Transfer Protocol (HTTP) using the web beacons** contained in the Newsletter when our Newsletter is accessed (*"**Newsletter HTTP Data**"*).	IP address, date and time of access	There is no statutory or contractual obligation to provide the data. This Data are automatically processed when the Newsletter is accessed.	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). If there is a security related event, server log files are stored until the security relevant event has been eliminated and clarified in full.
Data that are stored in cookies* in the Newsletter subscriber's browser when our Newsletter is accessed (*"**Newsletter Cookie Data**"*).	Unique ID to (re)identify Newsletter subscribers.	There is no statutory or contractual obligation to provide the data. The data is only transferred when you follow the link in the Newsletter to visit our website and consent to the respective cookies.	Information regarding the storage duration of cookies can be found in the Cookie Policy on the Website.
Data in usage profiles that we create by analysing usage behaviour in the	Data on usage of the Newsletter, in particular visits, visit frequency and click behaviour in accessed Newsletters.	There is no statutory or contractual obligation to provide the data.	We only store this data as long as you have subscribed the Newsletter. We

Categories of personal data that are processed	Personal data included in the categories	Necessity to provide the data	Storage Duration
Newsletter using pseudonyms (*"**Newsletter Usage Profile Data**"*). These Data are autonomously generated.		This Data are automatically processed when the Newsletter is accessed.Not providing these data means that we cannot personalise the content of the information you will receive.	delete such data as soon as you have unsubscribed the Newsletter.
Data in usage profiles that we create by analysing the usage behaviour of Newsletter subscribers on the website by using pseudonyms (*"**Online Usage Profile Data**"*). These Data are autonomously generated.	Data about the use of the website, in particular page visits, visit frequency and time spent on the pages visited	There is no statutory or contractual obligation to provide the data. This Data are automatically processed when the Newsletter is accessed.	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.
Subscriber segments that we create by combining and analysing Newsletter Usage Profile Data using pseudonyms (***"Segment Data"***). These Data are autonomously generated.	Data about affinity to HUGO BOSS brands, their products or content.	There is no statutory or contractual obligation to provide the data. This Data are automatically processed when the Newsletter is accessed.	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..

** Cookies are small text files with information stored on the user's terminal device via its browser when a website is visited. When the website is visited again using the same terminal device, the cookie and the information stored in it can be accessed. Depending on storage duration a differentiation is made between transient and persistent cookies. Transient cookies, already called session cookies, are deleted automatically when you close your browser. Persistent cookies are stored on your terminal device for a defined period even after you close your browser.*

*** Web beacons (also called tracking pixels) are small images that enable a log file to be recorded and analysed when e-mails or websites are accessed.*

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.

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 the Website and the digital or paper based registration form in the Outlets in which you can provide us with your data to subscribe for the Newsletter.	Personal Master Data, Subscription and Unsubscription Data	Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is to simplify the subscription procedure and to collect accurate and valid data.
Operation of a customer database in which we maintain and update your Registration Data.	Personal Master Data	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.
Updating e-mail addresses. In order to ensure the accuracy of this data we validate the mobile phone number/e-mail address data.	Personal Master Data.	Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is ensuring the accuracy of the data.
In order to ensure the accuracy of mobile number data/e-mail address data we validate this data.	Personal Master Data	Required to comply with a legal obligation (point (d) of Art. 5 paragraph (1) ("accuracy")) (point (c) of Art. 6 paragraph 1 of the GDPR). Balancing of interests (point (f) of Art. 6 paragraph 1 of the GDPR). Our legitimate interest is ensuring the accuracy of the data.
Archiving Signature Data for evidence purposes and for the establishment, exercise or defence of any legal claims.	Personal Master Data, Signature Data	Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is the establishment, exercise or defence of legal claims.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests
Creation of anonymised reports analysing and determining Newsletter strategy.	Personal Master Data, Segment Data	Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is to improve the content of the Newsletter.

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

Purpose of processing the personal data	Categories of personal data processed	Legal basis
Sending of information material on the components of relevant, personalised 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 promotions of HUGO BOSS or the Outlet). Sending the Newsletter to Newsletter subscribers. We use: • the salutation and your name specified when subscribing to the Newsletter to personalise your Newsletter. • the country-specific version of the HUGO BOSS Website used when subscribing to the Newsletter on the Website to determine the language and the country specific content of the Newsletter. the language of the Outlet in which the subscription took place and also the. recorded information on the individual outlet in which you registered for the Newsletter to determine the country-specific and outlet-specific content of the Newsletter.	Personal Master Data, Newsletter HTTP Data, Newsletter Cookie Data, Segment Data	Art. 6 No.1 (a) GDPR, Consent

Purpose of processing the personal data	Categories of personal data processed	Legal basis
Cookies are used on our website for these purposes if the participant has consented to this. Additional information can be received on the HUGO BOSS website.		
Analysis of usage behaviour of Newsletter subscribers in our Newsletter and on our Website and creation of usage profiles using pseudonyms and Subscriber Segments based on these for the purposes of personalising and designing the Newsletter in accordance with user preferences.	Registration Data, Newsletter HTTP Data, Newsletter Cookie Data, Newsletter Usage Profile Data, Online Usage Profile Data, Segment Data	Art. 6 No.1 (a) GDPR, Consent

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

Categories of Recipients	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
Hosting provider, E-mail service provider, Survey agencies, Archiving Service Provider, Campaign Service Provider, Newsletter service provider, IT service provider, Text message provider, Subscription service provider.	EU	
Outlets	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 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087
Text message provider		
IT service provider (intragroup)	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 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010D0087
	USA	

If we disclose your personal data to an overseas service provider, we will ensure that appropriate safeguards are implemented to protect your personal data (and any rights you may have in respect of that data) as required under applicable privacy and data protection laws.

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: 15 June 2020