

PRIVACY POLICY HUGO BOSS NEWSLETTER

SWITZERLAND

HUGO BOSS AG, Holy-Allee 3, 72555 Metzingen, Germany (hereinafter referred to as “**Hugo Boss**” or “**we**”) offer visitors to the HUGO BOSS website (www.hugoboss.com) and visitors to the HUGO BOSS Outlet Stores (hereinafter „**Outlets**“) the possibility to subscribe to the HUGO BOSS Newsletter (hereinafter „**Newsletter**“). HUGO BOSS attaches great importance to the protection of your personal data and processes it exclusively in accordance with the principles laid out below and in compliance with applicable data protection laws, in particular with the EU General Data Protection Regulation (hereinafter referred to as “GDPR”) and the Swiss Federal Act on Data Protection (hereinafter referred to as “FADP”). The applicability of these laws depends on the specific circumstances.

You can find additional information about the processing of personal data in connection with the website in the Privacy Policy of the HUGO BOSS Website.

If you take part in the HUGO BOSS EXPERIENCE customer loyalty programme (hereinafter „**Customer Loyalty Programme**“), we also store your subscription to our Newsletter in your My HUGO BOSS customer account. You can find detailed information on the processing of personal data in connection with the Customer Loyalty Programme in the Privacy Policy for Participation in HUGO BOSS EXPERIENCE.

A. INFORMATION ABOUT THE DATA CONTROLLER

I. Name and contact details of the data controller

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 according to article 37 et seqq. GDPR

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 REGARDING YOUR RIGHTS AS A DATA SUBJECT

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

Please note that you are only entitled to the rights listed below within the scope of the applicable data protection laws and that, depending on the circumstances, specific conditions, exceptions, or restrictions apply.

I. Right to information

As a data subject you have a right to information.

Specifically, this means that you have the right to request information from us about whether we are processing personal data relating to you. Depending on the applicable data protection law, the right to information may include further information, including personal data as such, the purposes of processing, the categories of personal data and the recipients or categories of recipients to whom the personal data have been or will be disclosed.

II. Right to rectification

As a data subject you have a right to rectification.

In particular, this means that you have the right to request that we correct any incorrect personal data relating to you as well as complete any incomplete personal data without undue delay.

III. Right to erasure

As a data subject you have a right to erasure.

This means that you have the right to request that we delete personal data relating to you without undue delay and that we are obliged to delete personal data. For example, this may be the case if the personal data is no longer necessary for the purposes for which it was collected or processed in any other way.

Exceptionally, the right to erasure does not apply if the processing is necessary, for example, for compliance with a legal obligation or for the establishment, exercise or defense of legal claims.

IV. Right to restriction of processing

As a data subject you have a right to restriction of processing.

This means that you have the right to request us to restrict processing if, for example, you question the correctness of the personal data or if, for example, you do not want your personal data to be used for certain purposes.

V. Right to data portability

As a data subject you have a right to data portability.

You may request that the personal data relating to you, which you have provided to us, be delivered free of charge in a commonly used electronic format. You may also request that we transmit such data to another data controller, provided that the processing is based on consent or on a contract and that the processing is carried out by automated means.

VI. Right to object

As a data subject, you have a right to object to data processing of personal data relating to you.

If personal data are processed for the purpose of direct marketing, you have the right to object at any time to the processing of personal data relating to you for the purpose of such marketing. For information on whether and to what extent personal data are processed for direct marketing purposes, please refer to the information on the purposes of processing in Section C of this Privacy Policy.

In the instance of an objection to processing for direct marketing purposes, we will no longer process the personal data concerned for these purposes. The lawfulness of previous data processing is not affected by the objection.

VII. Right to withdraw consent

If the processing is based on consent, you as the data subject have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. We will inform you about this before you give your consent. For information on whether processing is based on consent, please refer to the information on the legal basis for processing in Section C of this Privacy Policy.

VIII. Right to contact the supervisory authority

As a data subject, you have the right to contact the competent supervisory authority if you believe that your personal data is not being processed in accordance with data protection laws or if you wish to address any other data protection concern.

C. INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA

In relation to our online activities we process different kinds of personal data for different purposes. Below you will find detailed information regarding the specific instances in which we process your personal data.

I. Categories and sources of personal data

We process the following (categories of) personal data:

Categories of personal data to be processed	Personal data contained in these categories	Source of the personal data
Data we collect when you register for the Newsletter (" Registration Data ").	E-mail address (mandatory), title, first name, surname (voluntary). When registering on the website, we also record the country-specific version of the HUGO BOSS Website via which you subscribe to the Newsletter. When registering in an Outlet, we also record the Outlet and the country in which you subscribe to the Newsletter.	Newsletter subscribers
Protocol data that are generated technically when subscribing or unsubscribing to the Newsletter (" 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.	Newsletter subscribers

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	Newsletter subscribers
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	Newsletter subscribers
Data in usage profiles that we create by analysing usage behaviour in the Newsletter using pseudonyms (“Newsletter Usage Profile Data”).	Data on usage of the Newsletter, in particular visits, visit frequency and click behaviour in accessed Newsletters	Generated autonomously
Protocol data that are generated technically via the Hypertext Transfer Protocol (HTTP) when the HUGO BOSS Website is visited (“Website HTTP Data”).	IP address, type and version of your Internet browser, operating system used, page visited, page visited beforehand (referral URL), date and time of visit.	Newsletter subscribers
Data that are stored in cookies* in the Newsletter subscriber’s browser when the HUGO BOSS Website is accessed (“Website Cookie Data”).	Unique ID to (re)identify Newsletter subscribers and aggregated Segment Data with objective of improving campaign content.	Newsletter subscribers

Data in usage profiles that we create by analysing the usage behaviour of Newsletter subscribers on the website by using pseudonyms (" Website Usage Profile Data ").	Data about the use of the Website, in particular visits, visits frequency and visit duration on the pages visited.	Generated autonomously
Subscriber segments that we create by combining and analysing Newsletter Usage Profile Data using pseudonyms (" Segment Data ").	Data about affinity to HUGO BOSS brands, their products or content.	Generated autonomously

* *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. Purpose and legal basis of processing personal data

We process the (categories of) personal data specified in C. above for the following purposes and on the legal bases. If processing is based on Article 6 (1) (f) GDPR, we also specify the legitimate interests pursued by us or any third party.

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis	Categories of recipients
Web applications made available on the Website in which you can provide data to us regarding your subscription or unsubscription of our Newsletter.	Website HTTP Data, Registration Data, Subscription and Unsubscription Data	Our legitimate interest is to provide our web applications.	Hosting service providers, Newsletter service providers
(Digital) subscription forms made available in the Outlets, in which you can provide data to us regarding the subscription of our Newsletter.	Registration Data, Subscription and Unsubscription Data	Our legitimate interest is to provide our web applications.	Newsletter service providers
<p>“Double opt-in” procedure to confirm subscription.</p> <p>For this purpose we send you an e-mail message requesting you to confirm the e-mail address specified when subscribing to the Newsletter A subscription does not take effect until the e-mail address has been confirmed by clicking on the confirmation link in the email.</p>	Registration Data, Subscription and Unsubscription Data	Our legitimate interest is in compliance with legal obligations.	Newsletter service providers
<p>Sending the Newsletter to Newsletter subscribers.</p> <p>We use the title and name you specified when subscribing to the Newsletter to personalise your Newsletter.</p> <p>To determine the language and the country-</p>	Registration Data, Newsletter HTTP Data, Newsletter Cookie Data, Segment Data	Your consent.	Newsletter service providers

<p>specific content of th Newsletter we use the country-specific version of the HUGO BOSS Website used when registering for the Newsletter on the Website. When registration takes place in an Outlet, we use the language of the Outlet in which the registration took place for this.</p> <p>When registration takes place in an outlet we also use 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.</p>			
<p>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.</p>	<p>Registration Data, Newsletter HTTP Data, Newsletter Cookie Data, Newsletter Usage Profile Data, Website HTTP Data, Website Cookie Data, Website Usage Profile Data, Segment Data</p>	<p>Your consent.</p>	<p>Newsletter service providers</p>
<p>Creation of anonymised reports analysing and determining Newsletter strategy.</p>	<p>Registration Data, Segment Data</p>	<p>Our legitimate interest is to improve our services.</p>	

III. Details regarding recipients of personal data and the transfer of personal data to a third country and/or international organisations

Recipient	Recipient's role	Recipient's location
Hosting provider	Processor	EU, potentially worldwide
Newsletter provider	Processor	EU, potentially worldwide

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, particularly 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.

IV. Duration for which personal data are stored

The duration for which the personal data are stored is set forth below and determined based on the following criteria:

Categories of personal data to be processed	Duration for which personal data are stored / criteria for determining this duration
Registration Data, Subscription and Unsubscription Data	We store this data for as long as you subscribe to our 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.
Newsletter HTTP Data, Newsletter Cookie Data, Newsletter Usage Profile Data, Website HTTP Data, Website Cookie Data, Website Usage Profile Data, Segment Data	We only store this data as long as you subscribe to our Newsletter. We delete such data as soon as you have unsubscribed our Newsletter.

V. Necessity or obligation to provide personal data and possible consequences of not providing such data The provision of the following personal data is required/mandatory by law/contract or in order to conclude a contract:

Categories of personal data to be processed	Obligation to provide personal data	Possible consequences of not providing such data
Registration Data	You must provide your e-mail address when registering in order to receive the Newsletter.	Not providing your e-mail address means that we cannot send you the Newsletter.

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 to 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 technical and organizational measures, including the following (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, or 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. CHANGES TO THIS PRIVACY POLICY

It may become necessary to adapt this Privacy Policy due to technical and/or business reasons and/or changes in legal requirements and/or regulatory standards. The latest Privacy Policy can be accessed at any time at www.hugoboss.com.