

## PRIVACY POLICY HUGO BOSS WEB AND APP

**IRELAND, GERMANY, AUSTRIA, FRANCE, ITALY, NETHERLANDS, SPAIN, BELGIUM, DENMARK, SWEDEN**

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”).

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**A. INFORMATION ABOUT THE DATA CONTROLLER**

**I. Name and contact details of the joint controllers**

Below you will find information about HUGO BOSS AG and the respective HUGO BOSS local seller company as jointly responsible (hereinafter referred to as “**HUGO BOSS**” or “**we**”) for your personal data.

HUGO BOSS AG

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Telephone: +49 7123 94 - 0

Fax: +49 7123 94 - 80259

E-mail: [info@hugoboss.com](mailto:info@hugoboss.com)

HUGO BOSS local seller company for each country:

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

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](mailto:privacy@hugoboss.com)

## B. INFORMATION REGARDING YOUR RIGHTS AS A 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 (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)

Pursuant to Art. 21 (1) of the GDPR you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data that is carried out on the basis of a legitimate interest of HUGO BOSS under Article 6(1)(f) GDPR (including profiling).

Pursuant to Art. 21 (2) of the GDPR you have the right to object at any time to processing of your personal data for direct marketing purposes (including profiling, insofar as it is related to such direct marketing).

Information on which processing activities rely on these legal bases can be found below (**Section C.**).

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

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

## **C. INFORMATION 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 and how. A further use of your personal data for secondary purposes beyond the scope specified below does not take place.

In every section of data processing, you will find below information whether a data processing is a) part of the data protection responsibility and thus within the operational range of HUGO BOSS AG as joint controller party or b) the respective local HUGO BOSS seller company as the other joint controller party.

### **I. Tracking including the use of cookies**

HUGO BOSS AG provides the HUGO BOSS Website including the integrated Online Store and the App as a technical infrastructure for all HUGO BOSS subsidiaries. . Therefore, HUGO BOSS AG is the responsible joint controller party for data processing related to the visit of the website and App as well as tracking measures integrated into them.

#### **1. General information**

Personal data may also be processed as part of the tracking process. Personal data is all data that can be related to you personally. The execution of programs or the transfer of viruses to the terminal device used by you is not possible.

Your browser uses so-called Cookies when you visit our website. Cookies are small text files that your browser stores on your hard drive. If you access the HUGO BOSS websites again, HUGO BOSS may retrieve the stored cookie information. Personal data may also be stored in Cookies. Personal data is all data that can be related to you personally. The execution of programs or the transmission of viruses to your computer is not possible. We and our service providers use browser and flash Cookies and other common technologies, including small graphics known as counting pixels, pixel tags, web beacons or clear GIFs, which are used in connection with the provision of our services to track the use of the online service by our users. In general, Tracking-Technologies and Cookies are referred to as “**Cookies**”.

We would also like to point out that you can generally prohibit the use of Cookies or delete Cookies in your browser settings. Please refer to the manufacturer's instructions for further details on the specific procedure.

If our app is available and you use it, log data is collected via the Hypertext Transfer Protocol (Secure) (HTTP(S)). Your terminal device (model and IMEI), operating system, the accessed (sub) page, date and time of access, country (according to IP address), technical usage data (e.g., which products were accessed, shopping cart

information, completion of a purchase) are processed. So-called IP anonymization is activated in the App. This means that the technically transmitted IP address is anonymized or alienated by shortening the IP address (by deleting the last octet of the IP address) before storage.

Cookies and tracking technologies in the App are collectively referred to as “Tracking Technologies.”

You can find detailed information about the tracking technology used in each case, such as the purpose of processing, the data processed, the storage period and the service providers used on the website via the cookie banner/ cookie settings, and in the app via the consent overlay/ consent settings. You can also revoke your consent at any time either for a tracking technology category or for individual services via the “Cookie Settings” in the footer of our website or via the “Consent Settings” tab in the app. If you prohibit the use of tracking technologies, functional impairments are possible.

## **2. Various types of Tracking-Technologies**

HUGO BOSS uses various types of Tracking-Technologies, namely necessary Tracking-Technologies, functional Tracking-Technologies, Tracking-Technologies for analytics and Tracking-Technologies for marketing purposes. In the following you will receive more information about these various types of Tracking-Technologies.

Within our company, we pass on your personal data exclusively to those units and persons who need this data to fulfil their contractual and legal obligations or to execute our legitimate interest. There are no automated individual decision-making cases within the meaning of Art. 22 EU GDPR.

### **a) Necessary Tracking-Technologies**

Some functions of our website/App cannot be offered without the use of technically necessary Tracking-Technologies. In these Tracking-Technologies, we collect technical communication and usage data, such as the IP address, technical log information, login information if applicable, and a unique Cookie/User-ID, which enables us to recognize you when you return to our website or open our App.

The provision of your personal data is necessary for the use of the website/ App. Please note that if you do not provide your personal data to the extent described above, you will not be able to use the website/App to its full extent.

### **b) Functional Tracking-Technologies**

Functional Tracking-Technologies serve the purpose of enabling you to have a better surfing experience. These Tracking-Technologies are not required, but they simplify your visit to the website/App by storing communication and usage data, such as font, country and currency settings, as well as a unique Cookie/User-ID, which enables us to recognize you when you return to our website or open our App.

The provision of your personal data is not necessary for the use of the website/ App. Please note that it can have a negative influence on the presentation and user comfort (usability) if you do not provide your data.

**c) Tracking-Technologies for analytics**

HUGO BOSS uses various Tracking-Technologies for analytics purposes, e.g. to better understand how the website/ App is used and to improve its services.

For this purpose, we collect technical communication and usage data, such as the IP address, technical log information, login information if applicable, and a unique Cookie/User-ID, which enables us to recognize you when you return to our website or open our App. We also collect certain data in connection with your order as well as analysis data, i.e. aggregated data on which conclusions are drawn.

The provision of your personal data is not necessary for the use of the website/ App.

**d) Tracking-Technologies for marketing purposes**

HUGO BOSS uses various Tracking-Technologies for advertising and targeted marketing purposes, e.g. to place personalized advertisements. This also includes the use of Tracking-Technologies from various social media providers, such as Facebook.

For this purpose, we collect technical communication and usage data, such as the IP address, technical log information, login information if applicable, and a unique Cookie/User-ID, which enables us to recognize you when you return to our website or open our App. We also collect certain data in connection with your order as well as analysis data, i.e. aggregated data on which conclusions are drawn.

The provision of your personal data is not necessary for the use of the website/ App.

## II. Visiting our Website and App

When visiting our Website for purely informational purposes (see Section C. III. below on how we process your personal data when using our Online Store), the browser and / or the App that you are using will, per default, send certain technical data to our Website server, for example your IP address. To ensure the security of the IT infrastructure used to provide the Website, this technical data is temporarily stored in a so-called Web Server Log File.

We also provide different functions intended to support you when visiting our website and / or using the App (e.g. chat function, contact form, store locator). Depending on which functions you use, additional data is processed.

HUGO BOSS AG provides the HUGO BOSS Website including the integrated Online Store and the App as a technical infrastructure for all HUGO BOSS subsidiaries.. Therefore, HUGO BOSS AG is the responsible joint controller party for data processing related to the visit of the website and App as well as tracking measures integrated into them.

You will find more detailed information on the data processing in the table below.

### 1. Details regarding personal data to be processed

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
Protocol data that is generated for technical reasons via the Hypertext Transfer Protocol (Secure) when the website is accessed (" <b>HTTP(S) data</b> ").	On the Website: IP address, type and version of your internet browser, operating system used, the webpage accessed, the webpage previously visited ("Referrer URL"), date and time of access. In the App: device ID (IMEI), IP-address, operating system, webpage accessed, date and time of access.	There is no statutory or contractual requirement for the provision of personal data, nor is it a requirement necessary to enter into a contract. There is no obligation to provide the personal data. If the data is not made available, we will not be able to provide the accessed website content.	Data is stored in Web Server Log Files in a way that allows for identification of the individual concerned and for a maximum period of 7 days, unless a security-relevant event occurs (e.g. a DDos attack). In the event of a security-relevant event, Web Server Log Files are stored until the security-relevant event has been corrected and fully resolved.



Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
Data that you have stored during a previous visit (" <b>Return Data</b> ").	Information about product views, products added to and removed from basket, products added to wish list, product purchases, view on navigation page, view on search results, click on product as well as the selected specification like size and color.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.  Not providing these data means that we cannot provide you with tailored information in the online store.	The data is collected through tracking technologies. Information on the storage period can be found on the website via the cookie banner / cookie settings or in the app via the consent overlay / consent settings.
In case of (optional) use of personalized size and fit recommendations as well as virtual try-on with avatar creation:  Data you provide to receive a personalized size recommendation, e.g. under the link "What is my size?" or "Try it on now" or "Virtual try-on" (" <b>Personalized size data</b> ").	Body-related data such as your height, shoulder width, arm length, hip circumference, weight, body type, preferred fit, photo/video footage of your body etc.	There is no statutory or contractual requirement for the provision of personal data, nor is it a requirement necessary to enter into a contract. There is no obligation to provide the personal data.  If the data is not made available, we will not be able to provide the accessed website content.	The data is collected through tracking technologies. Information on the storage period can be found on the website via the cookie banner / cookie settings or in the app via the consent overlay / consent settings.

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
When using the Store locator or the “Check in-store availability” function: Information that allows us to determine your location (“ <b>Location data</b> ”).	Location data	There is no statutory or contractual requirement for the provision of personal data, nor is it a requirement necessary to enter into a contract. There is no obligation to provide the personal data. If the data is not made available, we will not be able to provide the accessed Website content.	When using the map (Store locator) and / or the “in-store availability” function and sharing your location with our Website via your browser, data is processed in order to display your location or to determine the nearest store. This data is not retained beyond that.
When using the Online Chat function, Chat Assistant and / or the style advice function (optional): Information you communicate to us in the Online Chat / via the style advice function (“ <b>Online Chat data</b> ”).	All information related to your online chat, e.g. user ID, IP address, image, audio, communication content and communication time.	There is no statutory or contractual requirement for the provision of personal data, nor is it a requirement necessary to enter into a contract. There is no obligation to provide the personal data. If the data is not provided, we will not be able to process your request.	Voice or video calls are neither recorded nor stored. a) The data will be stored until your request has been dealt with. b) We will also store this data for evidential purposes in relation to the possible assertion, exercise or defence of legal claims for a transitional period of 3 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.

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
			<p>c) We also store this data insofar as statutory retention obligations exist, in particular under commercial and tax law.</p> <p>d) If you use the co-browsing function, the image of your browser will not be saved.</p> <p>e) Insofar as the data is collected by tracking technologies, you can find information on the storage period on the website via the cookie banner/ cookie settings or in the app via the consent overlay/ consent settings.</p>
<p>When using our Contact form function (optional): Information you provide us with via the Contact forms on our Website (<b><i>Contact form data</i></b>).</p>	<p>Form of address, name, surname, street, house number, postcode, city, country, E-mail address, your request, your message (mandatory), title, telephone number, order number, salutation (optional).</p>	<p>There is no statutory or contractual requirement for the provision of personal data, nor is it a requirement necessary to enter into a contract. There is no obligation to provide the personal data. If the data is not provided, we will not be able to process your request.</p>	<p>We store the data as described above under a), b), and c).</p>

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
When contacting us via other communication channels (optional): Information you provide us with when making contact (" <b>Contact data</b> ").	Depending on the communication channel: telephone number when contacting us via telephone, mobile telephone number and username when contacting us via messenger (communication service provider), E-mail address when contacting us via e-mail. In addition, we store the information you provided us with in relation to your reason for contacting us.	There is no statutory or contractual requirement for the provision of personal data, nor is it a requirement necessary to enter into a contract. There is no obligation to provide the personal data. If the data is not provided, we cannot accept your request.	We store the data as described above under a), b), and c).
When using our notification service for the availability of products (" <b>Notification data</b> ")	E-mail address, product and size	There is no obligation to provide the data.  Not providing this data means that you cannot use the notification service.	60 days after registration for notifications
Protocol data that accrue for technical reasons when subscribing to push notifications (" <b>Push Notification Protocol Data</b> ").	Date and time of subscription, push-token, device ID, operating system	There is no obligation to provide the data.  Not providing this data means that you cannot subscribe to push notifications.	We store this data for as long as you subscribe to push notifications.  In addition, we store this data as an exception beyond this if and as long as we are subject to statutory retention or documentation obligations for such data or to the extent this is necessary for evidence purposes.

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
Data you share with us and our partners when you connect your Wallet with us or any partner of us (" <b>Blockchain Data</b> ").	<p>Wallet ID, User ID, public blockchain user information</p> <p>We do not store your private key. You are responsible for maintaining the confidentiality of your Wallet information, including your private key.</p>	In case of non-provision of the data, you will not be able to participate in blockchain related activities with us.	Permanent storage of information within the blockchain. At your request, only a disconnection from your Wallet ID to us is possible.

## 2. Details regarding the processing of personal data

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
Provision of content of Website / App accessed by the user.	HTTP(S) data	Balancing of interests (Art. 6 (1) (f) GDPR). Our legitimate interest is the provision of the Website content accessed by the user.	Hosting provider and / or App provider, respectively
Ensuring the security of the IT infrastructure used to provide the Website, in particular to identify, correct and ensure the evidential value of our documentation in case of any disruptions (e.g. DDos attacks).	HTTP(S) data	Balancing of interests (Art. 6 (1) (f) GDPR). Our legitimate interest is to ensure the security of the IT infrastructure used to provide the Website, in particular to identify, correct and ensure the evidential value of our documentation in case of any disruptions (e.g. DDos attacks).	Hosting provider

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
Personalized display of information about payment and financing options based on shopping cart content	HTTP(S) data	Consent (Art. 6 (1) (a) GDPR) via the cookie banner on our Website.	Service provider
Provision of more merchandising options and more effective search results as well as personalized displays of information, e.g. on the attractiveness of our products, on current price or product changes, and on equivalent or thematically related products and content, in order to tailor the website visit to the respective personal interests in the best possible way.  This includes tracking the response behavior to the personalized displays of information (e.g. click and purchase behavior).	HTTP(S) Data, Return data, possibly Order Data	Consent (Art. 6 (1) (a) GDPR) via the cookie banner on our Website.	Service provider
Provision of a personalized clothing size and fit recommendation as well as creation of a personalized mannequin.	Personalized size data	Consent (Art. 6 (1) (a) GDPR via the cookie banner or via a pop-up window on our website.	Service provider
Display of your location and / or stores in the vicinity	Location data	Balancing of interests (Art. 6 (1) (f) GDPR). Our legitimate interest is to support our customers in searching for our stores. Your data is only submitted when released by you in your browser.	-

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
Provision of the “Co-browsing” function to actively support you with your order through our live-chat agents.	Online chat data as well as a copy of your browser, whereby it is technically ensured that the chat agent can only access the content in our online store that is necessary in order to provide support and that no personal data from your computer or other (in particular browser) windows is processed.	Insofar as you agree, in the course of an online chat on our website, that the respective chat agent can control your browser remotely, the chat agent can carry out individual steps in the ordering process for you (see also section 3 of the General Terms and Conditions for our Online Store). Balancing of interest (Art. 6 (1) (f) GDPR). Our legitimate interest is the user-friendly, technical support of the ordering process.	Hosting provider, HUGO BOSS Customer Care
Optimization of our customer service and improving customer satisfaction e.g. by creating chat reports or conducting customer satisfaction surveys	Contact Form Data, Contact Data, Online Chat Data, Purchase data, e.g. order value	Consent (Art. 6 (1) (a) GDPR) via the cookie banner on our website to create chat reports or balancing of interests (Art. 6 (1) (f) GDPR). Our legitimate interest is the improvement of our customer service.	Hosting provider and service provider, HUGO BOSS Customer Care
Processing your notification request by informing you about the availability of products.	Notification Data	Steps prior to entering into a contract (Art. 6 (1) (b) GDPR) or balancing of interests (Art. 6 (1) (f) GDPR). Our legitimate interest is to support our customers in getting the desired product.	Email Service Provider

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
Display push notifications with order information, shipping information, package tracking status, as well as marketing content if you have agreed to receive app push notifications within the app or through the settings in your mobile device.	Push Notification Protocol Data, Purchase Data	Consent (Art. 6 para. 1 a) GDPR via the communication settings in our app or via the settings in your mobile device.	Service provider; Hosting provider
Processing your request	Contact form data and / Contact data, Online Chat Data	Consent (Art. 6 (1) (a) GDPR) via the cookie banner on our website.  Insofar as your enquiry concerns the performance of a contract to which you are a contracting party, or the implementation of pre-contractual steps: Art. 6 (1) (b) GDPR.  Otherwise: Balancing of interests (Art. 6 (1) (f) GDPR). In this case, our legitimate interest is the processing of your request.	Hosting provider, HUGO BOSS Customer Care and communications service provider, if applicable
Storage and processing for evidence purposes for the establishment, exercise or defence of any legal claims.	Contact Form Data, Contact Data, Online Chat Data.	Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is the establishment, exercise or defence of any legal claims.	-



Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
To disclose your NFTs, we need to connect to your crypto wallet. Your wallet ID is needed for you to make future purchases in the Blockchain (e.g., additional accessories for NFTs). For NFT based reward mechanisms (e.g., sending and holding NFTs on platforms designated for this purpose) and verifications of transactions made.	Blockchain-Data	Performance of contract (Art. 6 (1) (b) GDPR)	-

Automated decision-making in the sense of Art. 22 GDPR does not take place.

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

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. 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.

Recipient	Recipient's role	Recipient's location
HUGO BOSS Customer Care	Processor	EU & UK
Hosting provider	Processor	EU
Service provider	Processor/ Joint Controller	EU

Recipient	Recipient's role	Recipient's location
App provider	Controller	EU
Communications service provider	Controller	Depending on your means of communication and your location
Service Provider	Processor	USA

### III. Using our Online Store

In addition to the purely informational use of our Website (as described above under Section C. II.) you have the option of making purchases through our Online Store. Use of our Online Store will trigger further data processing, as described below. We process different kinds of personal data in relation to different functions within our Online Store, to conclude and execute purchase agreements and for debt recovery purposes.

The respective local HUGO BOSS seller company uses the HUGO BOSS Website and App with an integrated Online Store, which is provided by HUGO BOSS AG, as a sales channel. It acts as a contractual partner and in this role it is responsible for the fulfilment of the purchase contracts. HUGO BOSS AG is the responsible joint controller party for data processing related to dispatch of online orders.

You will find more detailed information on the data processing in the table below.

**1. Details regarding personal data to be processed**

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
Information that you provide us with in order to process your purchase order (" <b>Purchase order form data</b> ").	Form of address, name, surname, address, as well as your e-mail address.	<p>Provision is required for the conclusion of the purchase contract.</p> <p>If the data is not provided, you will not be able to purchase products from our Website.</p>	<p>a) The data will be stored until your order has been processed completely, i.e. until the products are shipped.</p> <p>b) We will also store this data for evidential purposes in relation to the possible assertion, exercise or defence of legal claims for a transitional period of 3 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>c) We also store this data insofar as statutory retention obligations exist, in particular under commercial and tax law.</p> <p>d) If you participate in our customer loyalty programme HUGO BOSS EXPERIENCE and use your My HUGO BOSS customer account in order to place your purchase order, we will store your address details for the operations of the HUGO BOSS customer account, as well as use them for the purposes described in Section C. II. of our Privacy Policy for the participation in HUGO BOSS EXPERIENCE.</p>

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
Technical data regarding the device used for the purchase order (" <b>Device data</b> ").	<p>Type of browser, type of device (e.g. iPad, iPhone, Android mobile), IP address.</p> <p>In the App: your terminal device (model and IMEI), operating system, the (sub-) webpage accessed, date and time of access, country (according to IP address).</p>	<p>There is no statutory or contractual requirement for the provision of personal data, nor is it a requirement necessary to enter into a contract. There is no obligation to provide the personal data.</p> <p>If the data is not provided, we cannot process your request.</p>	We store the data as described above under a) and b).
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 (" <b>Payment data</b> ").	<p>Information regarding the selected payment method (e.g. PayPal, credit card, by invoice, by instalment, instant bank transfer, Amazon Pay, Google Pay, Apple Pay) and information (e.g. the username of the account) to be provided for the respective means of payment, as applicable.</p> <p>We may receive information from the payment service provider you have chosen regarding confirmation or cancellation of your payment, as applicable.</p>	<p>Provision of personal data is required for the conclusion or setting aside of the purchase contract.</p> <p>If the data is not provided, you will not be able to purchase products from our Online Store.</p>	We store the data as described above under a), b), and c).

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
<p>When using the direct “PayPal”, “Google Pay”, “Amazon Pay” or “Apple Pay” order method (optional):</p> <p>Your contact details provided by PayPal, Google Pay, Apple Pay, Amazon Pay (“<b>Payment contact details</b>”)</p>	<p>Form of address, name, surname, address, as well as e-mail address</p>	<p>Provision is required for the conclusion of a purchase contract via “PayPal Express”, “Google Pay”, “Amazon Pay” or “Apple Pay” order channel.</p> <p>If the data is not provided, you will not be able to purchase products via this ordering channel.</p>	<p>We store the data as described above under a), b), and c).</p>
<p>Information regarding your purchase required to process your order (“<b>Purchase data</b>”).</p>	<p>Information regarding product(s) purchased (product name, product number, quantity, clothing size, colour, purchase price, currency, order number), store version used, date and time of respective purchase, selected means of payment and shipping method, status of your order including information on product returns.</p>	<p>Provision is required for the conclusion of a purchase contract.</p> <p>If the data is not provided, you will not be able to purchase products via our Online Store.</p>	<p>We store the data as described above under a), b), c), and d).</p>
<p>When using our omnichannel services, information on your identification through presentation of a legitimization paper (“<b>Identification data</b>”)</p>	<p>Data that can be seen on a legitimization paper, typically name and address</p>	<p>Presentation of the legitimization document is necessary for identification.</p> <p>If the data is not provided, you will not be able to pick up your orders from our Retail Store.</p>	<p>Only presentation of the document, no data storage takes place</p>

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
When using the service gift packaging in checkout, your personal message content ( <b>"Personal message data"</b> )	Information you have provided to us in relation to your personal message.	Provision is required when using the service gift packaging with personal message.  If the data is not provided, you will not be able to create a personal message.	We store the data as described above under a), b), and c).
Information in transaction e-mails sent by us regarding the processing / reversal of your purchase order, e.g. order confirmation ( <b>"Transaction e-mail data"</b> ).	Purchase order form data, purchase data, further content and time of transaction e-mail	Provision is required for the conclusion of a purchase contract.  If the data is not provided, you will not be able to purchase products via our Online Store.	We store the data as described above under a), b), and c).
Information about your responses to our transactional e-mails ( <b>"Response behavior data"</b> ).	Click and open behavior with date and time information	-	We store the data for a period of 1 year after sending the e-mail.

**2. Details regarding the processing of personal data**

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
Provision of our Online Store functions on the Website.	HTTP(S) data	Balancing of interests (Art. 6 (1) (f) GDPR). Our legitimate interest is the provision of the Website content accessed by the user.	Hosting provider
<p>Conclusion and performance of purchase contracts concluded via our Website or App.</p> <p>This includes in particular preparation of shipment of the products purchased by you by the shipping service provider selected by you, as well as estimating the delivery date and sending transaction e-mails to inform you about the respective status of your order.</p> <p>This also includes the registration of a potential return with the respective shipping service provider in order to provide a return label for you.</p>	Purchase order form data, purchase data, further content and time of transaction e-mail	Performance of contract (Art. 6 (1) (b) GDPR) or balancing of interests (Art. 6 (1) (f) GDPR). Our legitimate interest is the reversal of the purchase contract.	<p>Hosting provider; E-mail service provider;</p> <p>Payment service provider; Gift card service provider, if applicable,</p> <p>Shipping service provider</p>

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
<p>Conclusion and performance of contracts when using our omnichannel purchasing options, e.g. Order from (Retail) Store, Click &amp; Collect, Remote Selling.</p> <p>This includes presenting a legitimization paper for identification when picking up a parcel in our Retail Stores.</p> <p>This also includes the registration of a potential return with the respective shipping service provider in order to provide a return label for you.</p>	<p>Purchase order form data, purchase data, further content and time of transaction e-mail, Identification data</p>	<p>Performance of contract (Art. 6 (1) (b) GDPR) or balancing of interests (Art. 6 (1) (f) GDPR). Our legitimate interest is the reversal of the purchase contract.</p>	<p>Hosting provider; E-mail service provider; Payment service provider; Gift card service provider, if applicable, Shipping service provider</p>
<p>Provision of the “PayPal Express”, “Google Pay”, “Apple Pay” or “Amazon Pay” order channel in order to process payment via the respective link of the payment service provider. They then transmits the data required for processing the order to us so that we can execute the order.</p>	<p>Payment Contact details</p>	<p>Conclusion and performance of contract (Art. 6 (1) (b) GDPR).</p>	<p>Payment service provider; Hosting provider</p>



Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
<p>When selecting the Klarna payment methods “by invoice”, “by instalment”, and “pay now”:</p> <p>Provision of said payment methods for processing of payment. Your data will be transmitted to Klarna. Klarna may carry out its own risk and fraud checks to determine whether the selected payment method can be offered. For that purpose, Klarna may process further personal data in their own responsibility. More information about this and other data protection matters in relation to Klarna’s payment methods can be found in <a href="#">Klarna’s Privacy Policy</a>. Questions regarding data processing in connection with Klarna’s payment methods should be addressed to Klarna. Contact details of the respective controller as well as detailed information on your rights as a data subject can also be found in Klarna’s Privacy Policy linked above.</p>	<p>Purchase order form data, purchase data</p>	<p>Conclusion and performance of contract (Art. 6 (1) (b) GDPR).</p>	<p>Payment service provider</p>

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
<p>When selecting credit card as payment method (optional):</p> <p>Provision of credit card payment option for processing of payment. Credit card information is processed exclusively by our payment service provider, subject to strict information security measures.</p>	<p>Purchase order form data, Purchase data, Payment data, Device data</p>	<p>Conclusion and performance of contract (Art. 6 (1) (b) GDPR)</p>	<p>Payment service provider</p>
<p>Analysis of return behavior to avoid excessive cost burdens.</p> <p>If customers maintain a customer account, we analyze their return behavior by calculating a return rate. This is determined by the number and total value of the most recent orders placed with us in relation to the total value of the returned items. Customers with an exceptionally high return rate may be temporarily excluded from using the payment method "payment on invoice" (Klarna Pay Later) and installment payment options. This does not affect the ability to complete orders using other available payment methods.</p>	<p>Purchase order form data, Payment data, Purchase data</p>	<p>Balancing of interests (Article 6(1)(f) GDPR). Our legitimate interest lies in avoiding excessive cost burdens for our company caused by disproportionately high return behavior, so that we can continue to offer our voluntary free return service in the future.</p>	<p>-</p>

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
<p>Fraud Prevention / Credit Card Misuse</p> <p>In order to run sufficient fraud prevention checks, we save information about payment attempts (successful and unsuccessful).</p> <p>When selecting credit card as payment method incl. "Google Pay" and "Apple Pay" (optional): By means of various parameters – also using address and data from former online and offline transactions with HUGO BOSS – risk of fraud / credit card misuse is assessed. If such a risk is identified, the customer is required to verify their identity with the card issuer using the "3-D-Secure procedure" or in rare cases needs to select a different payment method.</p>	<p>Purchase order form data, Purchase data, Payment data, Device data</p> <p>Data will be used only for two years.</p>	<p>Balancing of interests (Art. 6 (1) (f) GDPR). Our legitimate interest is the prevention of fraud / credit card misuse.</p>	<p>Payment service provider</p>
<p>Address completion and validation</p>	<p>Address</p>	<p>Steps prior to entering into a contract (Art. 6 (1) (b) GDPR).</p>	<p>Address validation service provider</p>
<p>Provision of shipping information / track and trace</p>	<p>Purchase order form data, e-mail data</p>	<p>Performance of contract (Art. 6 (1) (b) GDPR).</p>	<p>E-mail service provider; Hosting provider; Shipping service provider</p>

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
Optimization of our customer service e.g. through creation of e-mail reports or processing order-related customer inquiries	Response behavior data	Balancing of interests (Art. 6 (1) (f) GDPR. Our legitimate interest is in optimizing the provision of of order related information, e.g. shipping information.	E-mail service provider
Personalized displays of information, e.g. on equivalent, thematically related or similar products and content in transactional emails.	E-mail address, Purchase Data	Balancing of interests (Art. 6 (1) (f) GDPR. Our legitimate interest is direct advertising.	E-mail service provider, Service Provider
Provision of gift packaging with a personal message	Personal message data	Balancing of interests (Art. 6 (1) (f) GDPR. Our legitimate interest is the fulfilment of the gift packing service.	-
Providing customer care service to customers who bought items in the online shop. This includes support regarding returns and refunds.	All categories of personal data	Insofar as your enquiry concerns the performance of a contract to which you are a contracting party: Art. 6 (1) (b) GDPR.  Otherwise: Balancing of interests (Art. 6 (1) (f) GDPR). In this case, our legitimate interest is the processing of your request.	HUGO BOSS Customer care
Storage and processing of data for evidential purposes in relation to the possible assertion, exercise or defence of legal claims.	Purchase order form data, Payment data, Purchase data, Transaction e-mail data	Balancing of interests (Art. 6 (1) (f) GDPR. Our legitimate interest is the enforcement, exercise or defence of legal claims.	Hosting provider

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
<p>Reversal of purchase contracts in case of revocation or other reasons for reversal by returning the parcel by post or to a Retail Store.</p> <p>For any payment refunds we use the same payment method that you used for making the payment.</p> <p>If you use our “Order from Store” service, pay directly at store checkout and subsequently decide to cancel your purchase, we will collect and process your bank account details for the refund, as we do not store details of your payment at our store checkouts. For this purpose we will contact you by e-mail and inform you about the next steps</p>	<p>Purchase order form data, Payment data, Purchase data, Transaction e-mail data</p>	<p>Performance of contract (Art. 6 (1) (b) GDPR) and balancing of interests (Art. 6 (1) (f) GDPR). Our legitimate interest is in this case the reversal of the contract.</p>	<p>Hosting provider; E-mail service provider</p>
<p>Storage of data in compliance with statutory retention obligations, in particular under commercial and tax law.</p>	<p>Purchase order form data, Payment data, Purchase data, Transaction e-mail data</p>	<p>Compliance with a legal obligation (Art. 6 (1) (c) GDPR).</p>	<p>Hosting provider</p>

Automated decision-making in the sense of Art. 22 GDPR does not take place.

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

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. 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.

Recipient	Recipient's role	Recipient's location
HUGO BOSS Customer Care	Processor	EU & UK
Hosting provider	Processor	EU
E-mail service provider	Processor	EU
Gift card service provider	Processor	EU
Payment service provider	Controller / Processor	EU
Address validation service provider	Processor	EU
Shipping service provider	Controller	EU

## **IV. Use of sales platforms**

In addition to purchasing via our online store, you have the option to purchase our products via sales platforms of other providers (Zalando, Amazon, etc.), so-called marketplaces, which triggers further data processing. We receive order form and purchase data from our respective marketplace partner, which we use for the processing of your order, e.g. preparation of the shipment of the goods ordered by you, provision of shipping information/shipment tracking. We give your data to the shipping service provider selected by you or the Marketplace partner. The legal basis for this data processing on our side is contract performance (Art. 6 para. 1 b) GDPR). We store the data until your order has been fully processed, i.e. until the goods have been shipped. In addition, we store this data for evidence purposes for any assertion, exercise or defence of legal claims beyond that for a transitional period of three years from the end of the year in which you provided us with the data and in the event of any legal disputes until their termination. We also store this data insofar as legal, in particular commercial and tax law, retention obligations exist. Depending on the type of documents, there may be retention obligations under commercial and tax law of six or ten years (§ 147 of the German Fiscal Code (AO), § 257 of the German Commercial Code (HGB).

The respective local HUGO BOSS seller company acts as a contractual partner of the marketplace. HUGO BOSS AG is the responsible joint controller party for data processing related to dispatch of orders placed via a marketplace.

The marketplace partner of the sales platform remains responsible for the processing of your data under data protection law. There is no joint processing of your data with the marketplace partner or on our behalf. Our marketplace partners have their own privacy policies, which can usually be found on their websites. We are not responsible for the privacy policies and data processing practices of the marketplace partners.

### **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. CHANGES TO THIS PRIVACY POLICY**

It may become necessary to adapt this Privacy Policy due to technical development and / or changes in legal requirements and / or regulatory standards. The latest Privacy Policy can be accessed at any time at [www.hugoboss.com](http://www.hugoboss.com) under Data Protection and in the App under My HUGO BOSS, Info & Legal, Data Protection.