

## PRIVACY POLICY HUGO BOSS WEB

### AOC

HUGO BOSS AG, Holy-Allee 3, 72555 Metzingen, Germany (hereinafter referred to as “**Hugo Boss**” or “**we**”) provides the HUGO BOSS Website including the integrated Online Store at [www.hugoboss.com](http://www.hugoboss.com). We also provide adapted versions of our Website in the HUGO BOSS application for mobile devices (hereinafter referred to as “App”), and in the application for the “Order from Store” service that we offer in our high street stores.

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”).

Below you will find information about HUGO BOSS as the data controller responsible for your personal data and about our Data Protection Officer (**Section A**). You will also find information about your rights as a data subject in relation to the processing of your personal data (**Section B**), as well as details about how HUGO BOSS processes your personal data (**Section C**).

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**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](mailto:info@hugoboss.com)

**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)

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. 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.

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

#### **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. We and our service providers use browser and flash Cookies and other common online tracking 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 is no automated individual decision-making cases within the meaning of Art. 22 EU GDPR.

For more information about the service providers, which we use, please go to “Cookie Settings” in the footer of our Website.

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

Some functions of our website 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 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**

When visiting our Website for purely informational purposes (see Section C. II. 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.

You will find more detailed information 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
<p>Protocol data that is generated for technical reasons via the Hypertext Transfer Protocol (Secure) when the website is accessed ("<b>HTTP(S) data</b>").</p>	<p>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.</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 made available, we will not be able to provide the accessed website content.</p>	<p>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.</p>
<p>Data that you have stored during a previous visit ("<b>Return Data</b>").</p>	<p>Information about the last products you visited, e.g. information about products you added to the wish list or shopping cart or the selected specification like size and color.</p>	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>Not providing these data means that we cannot provide you with tailored information in the online store.</p>	<p>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.</p>



Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
<p>In case of (optional) use of personalized size recommendations: Data you provide to receive a personalized size recommendation, e.g. under the link “What is my size?” or “Try it on now” (“<b>Personalized Size Data</b>”).</p>	<p>Body-related data such as your height, weight, body type, preferred fit, photo/video footage of your body etc.</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 made available, we will not be able to provide the accessed website content.</p>	<p>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.</p>
<p>When using the Store locator or the “Check in-store availability” function: Information that allows us to determine your location (“<b>Location data</b>”).</p>	<p>Location data</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 made available, we will not be able to provide the accessed Website content.</p>	<p>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.</p>

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
<p>When using the Online Chat, 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>").</p>	<p>All information related to your online chat, e.g. user ID, IP address, image, audio, communication content and communication time.</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>Voice or video calls are neither recorded nor stored.</p> <ul style="list-style-type: none"> <li>a) The data will be stored until your request has been dealt with.</li> <li>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.</li> <li>c) We also store this data insofar as statutory retention obligations exist, in particular under commercial and tax law.</li> <li>d) If you use the co-browsing function, the image of your browser will not be saved.</li> <li>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.</li> </ul>

Categories of personal data to be processed	Personal data contained in these categories	Obligation to provide personal data	Storage period
<p>When using our Contact form function (optional): Information you provide us with via the Contact forms on our Website (“<b>Contact form data</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 (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>
<p>When contacting us via other communication channels (optional): Information you provide us with when making contact (“<b>Contact data</b>”).</p>	<p>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.</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 cannot accept 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
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
<p>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.</p> <p>This includes tracking the response behavior to the personalized displays of information (e.g. click and purchase behavior).</p>	<p>HTTP(S) Data, Return data, possibly Order Data</p>	<p>Consent (Art. 6 (1) (a) GDPR) via the cookie banner on our Website.</p>	<p>Service provider</p>
<p>Provision of a personalised clothing size recommendation.</p>	<p>Personalized size data</p>	<p>Consent (Art. 6 (1) (a) GDPR via the cookie banner or via a pop-up window on our website.</p>	<p>Service provider</p>
<p>Display of your location and / or stores in the vicinity.</p>	<p>Location data</p>	<p>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.</p>	<p>-</p>
<p>Processing your request</p>	<p>Online chat data, Contact form data and / Contact data</p>	<p>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.</p>	<p>Hosting provider and communications service provider, if applicable</p>

Purpose of the processing of personal data	Categories of personal data to be processed	Legal basis and legitimate interests, if applicable	Recipient
<p>Provision of the “Co-browsing” function to actively support you with your order through our live-chat agents.</p>	<p>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.</p>	<p>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.</p>	<p>Hosting provider</p>
<p>Optimization of our customer service and improving customer satisfaction e.g. by creating chat reports or conducting customer satisfaction surveys.</p>	<p>Contact Form Data, Contact Data, Online Chat Data, Purchase data, e.g. order value</p>	<p>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.</p>	<p>Hosting provider, 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>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.</p>	<p>Blockchain-Data</p>	<p>Performance of contract (Art. 6 (1) (b) GDPR)</p>	<p>-</p>
<p>Storage and processing for evidence purposes for the establishment, exercise or defence of any legal claims.</p>	<p>Contact Form Data and Contact Data, Online Chat Data.</p>	<p>Art. 6 No.1 (f) GDPR. After balancing of the interests our legitimate interest is the establishment, exercise or defence of any legal claims.</p>	<p>-</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**

Recipient	Recipient's role	Recipient's location	Adequacy decision or appropriate safeguards for transfers of personal data to a third country and / or international organisations
Hosting provider	Processor	EU	-
Service provider	Processor	EU	-
App provider	Controller	EU	-
Service provider	Processor	USA	The transfer is subject to the EU standard data protection clauses pursuant to Art. 46 (2) (c), (5) GDPR.
Communications service provider	Controller	Depending on your means of communication and your location	-

**III. 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 defense 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.



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.