

Privacy Policy
for participation in HUGO BOSS EXPERIENCE
FI, 01 August 2019

HUGO BOSS AG, Dieselstraße 12, 72555 Metzingen, Germany (hereinafter “**HUGO BOSS**” or “**we**”) operates the customer loyalty programme HUGO BOSS EXPERIENCE (hereinafter also “Customer Loyalty Programme”).

In the following you receive information in accordance with Articles 13 and 14 of the [General Data Protection Regulation](#) (“**GDPR**”) about the data controller processing your personal data, the data controller’s data protection officer (**Section A**) and about your rights with respect to the processing of your personal data (**Section B**). You also receive information in the following about the processing of your personal data (**Section C**) in connection with the Customer Loyalty Programme.

The participating brick-and-mortar retail stores in the EU, Switzerland and Norway (hereinafter “**Brick-and-Mortar Retail Stores**”) operated by HUGO BOSS or companies affiliated to HUGO BOSS participate in the Customer Loyalty Programme. A list as amended of the current Brick-and-Mortar Retail Stores can be accessed using the HUGO BOSS Store Locator on the HUGO BOSS website (www.hugoboss.com). The online store operated by HUGO BOSS which can be accessed via the HUGO BOSS website, the HUGO BOSS application for mobile user devices and the application for the “Order from Store” service in our Brick-and-Mortar Retail Stores (“**Online Store**”) also participates in the Customer Loyalty Programme of HUGO BOSS. The Brick-and-Mortar Retail Stores and the Online Store are also referred to jointly hereinafter as “**Participating Stores**”.

You can receive further information about the processing of personal data with respect to our website in the [HUGO BOSS Website Privacy Policy](#).

Information about the processing of personal information with respect to the HUGO BOSS Newsletter can be found in the [HUGO BOSS-Newsletter Privacy Policy](#).

TABLE OF CONTENTS

A.	Information about the data controller.....	3
I.	Name and contact details of the data controller	3
II.	Contact details of the data controller’s Data Protection Officer	3
B.	Information about the rights of data subjects.....	4
I.	Right to access	4
II.	Right to rectification	5
III.	Right to erasure (“right to be forgotten”)	5
IV.	Right to the restriction of processing	5
V.	Right to data portability	6
VI.	Right to object	6
VII.	Right to withdraw consent	7
VIII.	Right to lodge a complaint with the supervisory authority	8
C.	Information about the processing of personal data	8
I.	Details on the personal data we process.....	9
II.	Details on the processing of the personal data	14
III.	Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations	22
D.	Effective date and amendment of this Privacy Policy	24

A. Information about the data controller

I. Name and contact details of the data controller

The data controller for the Customer Loyalty Programme is:

HUGO BOSS AG
Dieselstrasse 12, 72555 Metzingen, Germany
Telephone: +49 7123 94-0
Fax: +49 7123 94-80259
E-mail: info@hugoboss.com

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

Our Data Protection Officer can be contacted as follows:

HUGO BOSS AG
Data Protection Officer
Dieselstraße 12, 72555 Metzingen, Germany
Telephone: +49 7123 94 – 80999
Fax: +49 7123 94 880999
E-mail: datenschutz@hugoboss.com

B. Information about the rights of data subjects

As a data subject you have the following rights with respect to the processing of your personal data:

- Right of access (Article 15 of the General Data Protection Regulation)
- Right to rectification (Article 16 of the General Data Protection Regulation)
- Right to erasure (“right to be forgotten”) (Article 17 of the General Data Protection Regulation)
- Right to restriction of processing (Article 18 of the General Data Protection Regulation)
- Right to data portability (Article 20 of the General Data Protection Regulation)
- Right to object (Article 21 of the General Data Protection Regulation)
- Right to withdraw consent (Article 7 paragraph 3 of the General Data Protection Regulation)
- Right to lodge a complaint with the supervisory authority (point (f) of Article 57 paragraph 1 of the General Data Protection Regulation)

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

In the following you will find information about your rights with respect to the processing of your personal data:

I. Right to access

As a data subject you have a right to obtain access and information under the conditions in accordance with Article 15 of the General Data Protection Regulation.

This means in particular that you have the right to obtain confirmation from us as to whether we are processing your personal data. If so, you also have the right to obtain access to the personal data and the information listed in Article 15 paragraph 1 of the General Data Protection Regulation. This includes information regarding the purposes of the processing, the categories of personal data that are being processed and the recipients or categories of recipients to whom the personal data have been or will be disclosed (points (a), (b) and (c) of Article 15 paragraph 1 of the General Data Protection Regulation).

You can find the full extent of your right to access and information in Article 15 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

II. Right to rectification

As a data subject, you have the right to rectification under the conditions provided in Article 16 of the General Data Protection Regulation.

This means in particular that you have the right to receive from us without undue delay the rectification of inaccuracies in your personal data and completion of incomplete personal data.

You can find the full extent of your right to rectification in Article 16 of the GDPR, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

III. Right to erasure (“right to be forgotten”)

As a data subject, you have a right to erasure (“right to be forgotten”) under the conditions provided in Article 17 of the General Data Protection Regulation.

This means that you have the right to obtain from us the erasure of your personal data and we are obliged to erase your personal data without undue delay when one of the reasons listed in Article 17 paragraph 1 of the General Data Protection Regulation applies. This can be the case, for example, if personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed (point (a) of Article 17 paragraph 1 of the General Data Protection Regulation).

If we have made the personal data public and are obliged to erase it, we are also obliged, taking account of available technology and the cost of implementation, to take reasonable steps, including technical measures, to inform data controllers which are processing the personal data that you have requested the erasure by such data controllers of any links to, or copy or replication of those personal data (Article 17 paragraph 2 of the General Data Protection Regulation).

The right to erasure (“right to be forgotten”) does not apply if the processing is necessary for one of the reasons listed in Article 17 paragraph 3 of the General Data Protection Regulation. This can be the case, for example, if the processing is necessary for compliance with a legal obligation or for the establishment, exercise or defence of legal claims (points (a) and (e) of Article 17 paragraph 3 of the General Data Protection Regulation).

You can find the full extent of your right to erasure (“right to be forgotten”) in Article 17 of the GDPR, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

IV. Right to the restriction of processing

As a data subject, you have a right to restriction of processing under the conditions provided in Article 18 of the General Data Protection Regulation.

This means that you have the right to obtain from us the restriction of processing if one of the conditions provided in Article 18 paragraph 1 of the General Data Protection Regulation applies. This can be the case, for example, if you contest the accuracy of the personal data. In such a case, the restriction of processing lasts for a period that enables us to verify the accuracy of the personal data (point (a) of Article 18 paragraph 1 of the General Data Protection Regulation).

Restriction means that stored personal data are marked with the goal of restricting their future processing (Article 4 paragraph 3 of the General Data Protection Regulation).

You can find the full extent of your right to restriction of processing in Article 18 of the GDPR, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

V. Right to data portability

As a data subject, you have a right to data portability under the conditions provided in Article 20 of the General Data Protection Regulation.

This means that you generally have the right to receive your personal data with which you have provided us in a structured, commonly used and machine-readable format and to transmit those data to another data controller without hindrance from us if the processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6 paragraph 1 of the General Data Protection Regulation and the processing is carried out by automated means (Article 20 paragraph 1 of the General Data Protection Regulation).

You can find information as to whether an instance of processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6 paragraph 1 of the General Data Protection Regulation in the information regarding the legal basis of processing in Section C of this Data Privacy Policy.

In exercising your right to data portability, you also generally have the right to have your personal data transmitted directly from us to another data controller if technically feasible (Article 20 paragraph 2 of the General Data Protection Regulation).

You can find the full extent of your right data portability in Article 20 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

VI. Right to object

As a data subject, you have a right to object under the conditions provided in Article 21 of the General Data Protection Regulation.

At the latest in our first communication with you, we expressly inform you of your right, as a data subject, to object.

More detailed information on this is given below:

1. Right to object on grounds relating to the particular situation of the data subject

As a data subject, 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 point (e) or (f) of Article 6 paragraph 1, including profiling based on those provisions.

You can find information as to whether an instance of processing is based on point (e) or (f) of Article 6 paragraph 1 of the General Data Protection Regulation in the information regarding the legal basis of processing in Section C of this Data Privacy Policy.

In the event of an objection relating to your particular situation, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

You can find the full extent of your right to objection in Article 21 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

2. Right to object to direct marketing

Where your personal data are processed for direct marketing purposes, 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 information as to whether and to what extent personal data are processed for direct marketing purposes in the information regarding the legal basis of processing in Section C of this Data Privacy Policy.

If you object to processing for direct marketing purposes, we no longer process your personal data for these purposes.

You can find the full extent of your right to objection in Article 21 of the General Data Protection Regulation, which can be accessed using the following link: <http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679>.

VII. Right to withdraw consent

Where an instance of processing is based on consent pursuant to point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation or on a contract pursuant to point (b) of Article 6 paragraph 1 of the General Data Protection Regulation, as a data subject, you have the right, pursuant to Article 7 paragraph 3 of the General Data Protection Regulation, to withdraw your consent at any time. The withdrawal of your consent does not affect the legitimacy of the processing that occurred based on your consent until the withdrawal. We inform you of this before you grant your consent.

You can find information as to whether an instance of processing is based on point (a) of Article 6 paragraph 1 or point (a) of Article 9 paragraph 2 of the General Data Protection Regulation in the information regarding the legal basis of processing in Section C of this Data Privacy Policy.

VIII. Right to lodge a complaint with the supervisory authority

As a data subject, you have a right to lodge a complaint with the competent supervisory authority under the conditions provided in point (f) of Article 57 paragraph 1 of the General Data Protection Regulation.

C. Information about the processing of personal data

In connection with Customer Loyalty Programme different personal data are processed for different purposes. For example, we process your Customer Master Data which you provide to us when registering for the Customer Loyalty Programme.

You will find information below regarding the purposes and means of the processing of personal data, in particular on

- the personal data or categories of personal data that are processed,
- the purposes of the processing for which the personal data are intended,
- the legal basis for the processing and, where the processing is based on point (f) of Article 6 paragraph 1 of the General Data Protection Regulation, the legitimate interests pursued by us or by a third party,
- the recipients or categories of recipients of the personal data, if any,
- the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period.

Where we obtain your personal data from you as the data subject, you also find below information on whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and of the possible consequences of failure to provide such data.

Where we do not obtain personal data from you as the data subject, you will also find below information on from which source the personal data originate, and if applicable, whether it came from publicly accessible sources.

Automated decision-making within the meaning of Article 22 of the General Data Protection Regulation does not take place.

I. Details on the personal data we process

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
Customer master data that we collect during registration for the Customer Loyalty Programme ("Customer Master Data").	Last name, first name, e-mail address, country of residence, a password, when registering online. We also record the relevant Participating Store at which you register for the Customer Loyalty Programme.	Participants in the Customer Loyalty Programme as data subjects.	The provision of the Master Customer Data is required for participation in the Customer Loyalty Programme. Not providing these data means that you cannot participate in the Customer Loyalty Programme.	We store this information as long as you are registered for the Customer Loyalty Programme. We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.
Signature information that we collect as a digital image during a digital registration for the Customer Loyalty Programme in our Brick-and-Mortar Retail Stores ("Signature Data").	You signature on the digital registration form as a digital image.	Participants in the Customer Loyalty Programme as data subjects.	The provision of your signature is required for participation in the Customer Loyalty Programme. Not providing your signature means that you cannot participate in the Customer Loyalty Programme.	We store this information as long as you are registered for the Customer Loyalty Programme. We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
				of any legal disputes until such have been concluded.
Protocol data that accrue for technical reasons when the registration for the Customer Loyalty Programme is confirmed in the double opt-in procedure (“Registration Protocol Data”)	Date and time of confirmation of the registration in double opt-in procedure and IP address of the device used for the confirmation.	Participants in the Customer Loyalty Programme as data subjects.	The provision of the Registration Protocol Data is required for participation in the Customer Loyalty Programme. Not providing these Registration Protocol Data means that you cannot participate in the Customer Loyalty Programme.	We store this information as long as you are registered for the Customer Loyalty Programme. We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.
Voluntary information that the participant provides when registering for the Customer Loyalty Programme, in the My HUGO BOSS customer account or when placing orders in our Online Store (“Participant Data”)	Title, telephone number, mobile phone number, date of birth and /or postal address that we store as your invoice address, information on your preferred communication channels and on your personal preferences (e.g. preferred HUGO BOSS brands, interests, styles etc.), sizes, body measurements, your wish list with HUGO BOSS products that you have selected in your My HUGO BOSS customer account, delivery addresses you have saved in your My HUGO BOSS customer	Participants in the Customer Loyalty Programme as data subjects. We collect the Participant Data during your registration for the Customer Loyalty Programme, in your My HUGO BOSS customer account or when you place orders in our Online Store, provided you are logged on to your My HUGO BOSS customer account. To keep our customer data up-to-date at all times, we always only store one	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. If your preferred communication channels are not provided, we cannot contact you via these communication channels. Not providing the other Participant Data means that we cannot personalise our marketing content,	We store this information as long as you are registered for the Customer Loyalty Programme. We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
	account or have used when placing orders in the Online Store, credit card information via tokenization which is connected to your delivery address and which you may have saved in your My HUGO BOSS customer account directly or when placing orders in the Online Store.	invoice address for you and use for this, if available, the address most recently given as “invoice address” when placing an order or the address most recently stored by you in your My HUGO BOSS customer account, depending on which is most recent. We receive the credit card token from our payment service provider.	shopping advice or online functions on the basis of these data. If credit card information is not provided, the credit card memory function for placing orders in the Online Store cannot be provided to you.	of any legal disputes until such have been concluded.
Information about your purchases (“Transaction Data”) if you identify yourself when making a purchase in a Brick-and-Mortar Retail Store as participant in HUGO BOSS EXPERIENCE or identify yourself in the Online Store as a participant by entering your access data.	Information about the articles purchased (article description, article number, quantity, size, if applicable body measurements, colour, price, currency, order number), on the type of transaction (purchase, exchange, return etc.) on the location (Online Store or country, city and store for Brick-and-Mortar Retail Stores) and the time of the relevant purchase.	Participating Stores.	-	We store this information as long as you are registered for the Customer Loyalty Programme. We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.
Information that you provide us with in your inquiries made to customer service by telephone, chat or online contact form (“Customer Service Inquiry Data”).	Information that you provide us with in your inquiries made to customer service by telephone, chat or online contact form, e.g.	Participants in the Customer Loyalty Programme as data subjects.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter	We store this information as long as you are registered for the Customer Loyalty Programme.

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
	subject of and background to your inquiry.		into a contract. There is no obligation to provide the data. Not providing these data means that we cannot personalise our advising content, shopping advice and online functions of the basis of these data.	We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.
Shopping advice provided by our sales staff and personal shopping assistants (" Shopping Advice Data ").	Information about inquiries made to customer service by telephone, chat or online contact form and shopping advice discussions with employees of Brick-and-Mortar Retail Stores (in particular date, time and subject of your inquiry); specification of the personal shopping assistant and his/her personal product recommendations for you.	Participating Stores, generated autonomously.	-	We store this information as long as you are registered for the Customer Loyalty Programme. We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded.
Protocol data that accrue via the Hypertext Transfer Protocol (HTTP) for technical reasons when the Online Store is accessed (via the HUGO BOSS website, the HUGO	IP address, type and version of your Internet browser, operating system used, the page accessed, the site accessed before visiting the site	Participants in the Customer Loyalty Programme as data subjects.	Provision is not a statutory or contractual requirement, or a requirement necessary to enter	Data are stored in server log files in a form allowing the identification of data subject for a maximum period of 7 days, unless any security

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
BOSS application for mobile user devices or the application for the "Order from Store" service in our Brick-and-Mortar Retail Stores) ("HTTP Data").	(referrer URL), data and time of the visit.		into a contract. There is no obligation to provide the data. Not providing these data means that we cannot provide the requested website content.	related event occurs (e.g. a DDoS attack). If there is a security related event, server log files are stored until the security relevant event has been eliminated and clarified in full.
Data that are stored in cookies* in the participant's browser when the Online Store is accessed by participants in the Customer Loyalty Programme (via the HUGO BOSS website, the HUGO BOSS application for mobile user devices or the application for the "Order from Store" service in our Brick-and-Mortar Retail Stores) ("Cookie Data").	Unique ID for (re-)identifying participants in the Customer Loyalty Programme and aggregated segment information with the objective of improving campaign content.	Participants in the Customer Loyalty Programme as data subjects.	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 the data means that we cannot carry out any analysis of usage behaviour on our website.	We store this information as long as you are registered for the Customer Loyalty Programme.
Data in usage profiles that we create by analysing the usage behaviour of participants in the Customer Loyalty Programme in the Online Store which can be accessed via the HUGO BOSS website, the HUGO BOSS application for mobile user devices or the application for the "Order from Store" service in our Brick-and-Mortar Retail Stores ("Online Usage Profile Data").	Data about the use of the website, in particular page visits, visit frequency and time spent on the pages visited, information about the articles you have looked at or placed in your shopping cart or have put on the wish list in your My HUGO BOSS customer account.	Generated autonomously.	-	We store this information as long as you are registered for the Customer Loyalty Programme.
Information about the type and scope of the Customer Loyalty	Data about the type and scope of your reaction to our marketing and	Generated autonomously.	-	We store this information as long as you are registered for

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
Programmes services used by you and your reactions to our marketing in the Participating Stores (<i>"Reaction Behaviour Data"</i>).	the use of HUGO BOSS Experience Programme services.			the Customer Loyalty Programme.
Allocation to participant segments that we create by analysing Customer Master Data, Participant Data, Transaction Data, Customer Service Inquiry Data, Shopping Advice Data, Online Usage Profile Data and Reaction Behaviour Data (<i>"Segment Data"</i>).	Data about affinity to HUGO BOSS brands, their products or content, e.g. determining the store at which the participant uses most often for purchases or is closest where the participant lives.	Generated autonomously.	-	We store this information as long as you are registered for the Customer Loyalty Programme.

II. Details on the processing of the personal data

1. Processing of personal data on the basis of statutory legislation

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests	Recipient
Provision of web applications in the Online Store in which you can provide us with your data to register for the Customer Loyalty Programme.	HTTP Data, Customer Master Data, Registration Protocol Data, Participant Data if these have already been provided in the registration form.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the provision of the website content requested by the participant.	Hosting provider.
Provision of the (digital) registration form in the Brick-and-Mortar Retail Stores in which you can provide us with your data to register for the Customer Loyalty Programme.	HTTP Data, Customer Master Data, Registration Protocol Data, Participant Data if these have already been provided in the registration form.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the provision of the registration forms in the Participating Stores.	Participating Store in which you register for the Customer Loyalty Programme.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests	Recipient
“Double opt-in” procedure to confirm registration in the Online Store. For this we send an e-mail message requesting confirmation to the e-mail address given by you when registering for the newsletter. Any registration first becomes effective when the participant has confirmed the e-mail address by accessing the confirmation link in the e-mail.	Customer Master Data, Registration Protocol Data.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the legally secure documentation of your consent to receiving e-mail marketing.	E-mail service provider, campaign service provider.
Operation of a customer database in which we maintain and update Customer Master Data and Participant Data.	Customer Master Data, Participant Data.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the operation of an organised customer database as the basis for optimum maintenance of customer data.	Hosting provider.
Archiving of registration forms in paper form as well as digital Signature Data for evidence purposes and for the establishment, exercise or defence of any legal claims.	Customer Master Data, Signature Data, Participant Data.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise or defence of legal claims.	Archiving service provider.
Digitalisation of the registration forms in paper form. We transfer Customer Master Data and Participant Data that we collect in registration forms in paper form to our customer database.	Customer Master Data, Participant Data.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the operation of a standardised, organised customer database as the basis for optimum maintenance of customer data.	Archiving service provider.
Updating of postal and e-mail addresses. In order to ensure the accuracy of address data we validate the postal and e-mail	Participant Data.	Required to comply with a legal obligation (point (d) of Article 5 paragraph (1) (“accuracy”)) (point (c) of Article 6	IT service provider.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests	Recipient
address data. We automatically correct any obvious errors in the postal address provided, e.g. digit typing errors in the postal code. We contact you personally in cases which are unclear.		paragraph 1 of the General Data Protection Regulation). Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is ensuring the accuracy of the data.	
Provision of the functions of the My HUGO BOSS customer account and a convenient ordering process in the Online Store.: In your MY HUGO BOSS customer account you can conveniently maintain the Customer Master Data, Participant Data, preferences and your wish you provided by you. We use your data regarding your preferences, your Transaction Data and your Reaction Behaviour Data to personalise your My HUGO BOSS customer account. If you are logged in to your My HUGO BOSS customer account when you use the Online Store, the sizes stored in your customer account will automatically be preselected for your purchases in the Online Store to make shopping in the Online Store as easy and pleasant as possible for you. On the basis of the preferred sizes and Brick-and-Mortar Retail Stores specified by you in your My HUGO BOSS customer account, we inform you in the Online Store whether a selected product is available in your	Customer Master Data, Participant Data, Transaction Data, HTTP Data, Cookie Data, Online Usage Profile Data, Reaction Behaviour Data, Segment Data.	Performance of a contract (point (b) of Article 6 paragraph 1 of the General Data Protection Regulation).	Hosting provider.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests	Recipient
preferred Brick-and-Mortar Store in your preferred size. Information requested during the order process (e.g. invoice address) are autocompleted with the data stored in the customer database to make the ordering process even easier for you. On the basis of your Transaction Data we provide you in your My Hugo Boss customer account with an overview of your purchases to date and show the order and delivery status of orders placed in the Online Store. For articles you have placed on your My HUGO BOSS customer account we show you which of these articles are available in your preferred Brick-and-Mortar Retail Stores and in the Online Store.			
Anonymisation of the data for an anonymised analysis of the store information for the development and improvement of the content and functions of the Customer Loyalty Programme.	All personal data specified in Section C in anonymised form.	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the development and improvement of the Customer Loyalty Programme.	Campaign service provider.

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

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests	Recipient
Offering personalised shopping advice in the Brick-and-Mortar Retail Stores and via customer telephone service on the basis of the information stored in our customer database.	Customer Master Data, Registration Protocol Data, Participant Data, Transaction Data, Customer Service Inquiry Data, Shopping Advice Data, Reaction Behaviour Data, Segment Data.	Consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation).	Brick-and-Mortar Retail Stores, customer service provider.
Sending of information material on the components of the Customer Loyalty Programme and of relevant, personalised marketing for our own offers (e.g. information about HUGO BOSS, product information, newsletters, customer survey and exclusive offers or invitations to take part in competitions, events and promotions of HUGO BOSS or the Participating Stores) to the communication channels selected by the participant (e-mail, posit, telephone and/or SMS MMS messages and push messages within the HUGO BOSS applications for mobile user devices, provided you have consented to the receipt of app push messages in the HUGO BOSS applications). For this we use the current data in each case that we have stored in our customer database. You can select or change the communication channels at any time in your My HUGO BOSS customer account. You can manage the receipt of app push messages in the settings of the HUGO BOSS application for mobile user devices.	Customer Master Data, Cookie Data, Online Usage Profile Data, Transaction Data, Reaction Behaviour Data, Segment Data.	Consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation).	E-mail service provider, SMS provider, postal services provider, survey agencies, campaign service provider.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests	Recipient
We use the title and your name specified when registering to adapt gender-specific content in our marketing materials. We use the country recorded during registration to determine the language and country-specific content of our marketing materials. We use the date of birth you may have provided voluntarily to have personal birthday wishes and information tailored to your age sent to you. We use the store in which you registered, the stores located near the address you may have specified or the store in which you generate the most turnover to send you invitations to relevant events and promotions in these stores. We use voluntary information you may have provided regarding your personal preferences, your Transaction Data, Segment Data and your wish list in your My HUGO BOSS customer account to provide you with shopping advice and to have content tailored to your personal preferences sent to you. We also send you reminder e-mails if you have not completed orders in the Online Store or articles are still on your wish list in your My HUGO BOSS customer account.			

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests	Recipient
If you register in a participating brick-and-mortar store and your place of residence is in the registration country, we transfer your Customer Master Data, Participant Data, Transaction Data, Segment Data and your preferred communication channels to the participating brick-and-mortar store in which you registered for the Customer Loyalty Programme for the purpose of marketing materials being sent to you by the participating brick-and-mortar store. The marketing materials in particular contain information about local promotions taking place in the relevant participating brick-and-mortar store.	Customer Master Data, Participant Data, Transaction Data, Segment Data.	Consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation).	Brick-and-Mortar Retail Stores.
Personalised analysis of affinity of participants in the Customer Loyalty Programme to HUGO BOSS products and personalisation and design of marketing content in line with user preferences. We use difference analysis methods for this which allow us to personalise marketing content optimally and tailor this to your individual personal interest which we derive from all the information stored in our customer database. In this way we create a customer-specific optimised marketing and communication strategy for each participant. We want to ensure with this personalisation of marketing content that you primarily receive information	Customer Master Data, Participant Data, Transaction Data, Shopping Advice Data, HTTP Data, Cookie Data, Online Usage Profile Data, Reaction Behaviour Data and Segment Data based on these.	Consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation).	Newsletter service provider, campaign service provider, e-mail service provider, SMS provider.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests	Recipient
which we consider to be particularly interesting for you.			
Display of personalised banner advertising on third-party websites based on your Online Usage Profile and Segment Data. For (re-)targeting participants in the Customer Loyalty Programme, the behaviour of users of our website is recorded and analysed. Users are marked in pseudonymised form so that they can be recognised again on the website. The objective of this process is to draw the attention of a user who has already shown interest in a website or a product to this website or product again to increase the marketing relevance and therefore the click and conversion rate (e.g. order rate). Cookies are used on our website for these purposes if the participant has consented to this. Additional information can be obtained by visiting the website. You have the possibility there to grant your consent to the setting of cookies for these purposes.	Online Usage Profile Data and Segment Data based on these, Cookie Data.	Consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation).	Campaign service provider.

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

Recipient	Recipient's role	Recipient's location	Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations
Hosting provider	Data processor	EU	
Brick-and-Mortar Retail Stores in the EU with respect to the data transferred to them relating to participants who have registered for the Customer Loyalty Programme in their store for the purpose of sending out their own marketing materials. An up-to-date overview of participating Brick-and-Mortar Retail Stores can be accessed via the HUGO BOSS Store Locator on the website.	Data controller	EU	
Brick-and-Mortar Retail Stores in Switzerland with respect to the data transferred to them relating to participants who have registered for the Customer Loyalty Programme in their store and are resident in Switzerland for the purpose of sending out their own marketing materials. An up-to-date overview of participating Brick-and-Mortar Retail Stores in Switzerland can be accessed via the HUGO BOSS Store Locator on the website.	Data controller	Switzerland	Adequacy decision of the EU Commission for the protection of personal data provided in Switzerland: http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32000D0518&from=EN
Brick-and-Mortar Retail Stores in Norway with respect to the data transferred to them relating to participants who have registered for the Customer Loyalty Programme in their store and are resident	Data controller	Norway	

in Norway for the purpose of sending out their own marketing materials. An up-to-date overview of participating Brick-and-Mortar Retail Stores in Norway can be accessed via the HUGO BOSS Store Locator on the website.			
Brick-and-Mortar Retail Stores in the EU with respect to the registration forms that they provide and accept on our behalf in their stores.	Data processor	EU	
Brick-and-Mortar Retail Stores in Switzerland with respect to the registration forms that they provide and accept on our behalf in their stores.	Data processor	Switzerland	Adequacy decision of the EU Commission for the protection of personal data provided in Switzerland: http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32000D0518&from=EN
Brick-and-Mortar Retail Stores in Norway with respect to the registration forms that they provide and accept on our behalf in their stores.	Data processor	Norway	
E-mail service provider	Data processor	EU	
IT service provider	Data processor	EU	
IT service provider (intragroup)	Data processor	USA	Standard data protection clauses
IT service provider (intragroup)	Data processor	Hong Kong	Standard data protection clauses
SMS provider	Data processor	EU	
SMS provider	Data processor	Switzerland	Adequacy decision of the EU Commission for the protection of personal data provided in Switzerland: http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32000D0518&from=EN

SMS provider	Data processor	Norway	
Survey agencies	Data processor	EU	
Archiving service provider	Data processor	EU	
Campaign service provider	Data processor	EU	
Postal services provider	Data controller	EU	
Customer service provider	Data processor	EU	
Newsletter service provider	Data processor	EU	
Digital Member Card service provider	Data Processor	EU	
Registration service provider	Data Processor	EU	
Payment service provider	Data controller	EU	

D. Effective date and amendment of this Privacy Policy

The effective date of this Privacy Policy is 01 August 2019

It may be necessary to amend this Privacy Policy due to technical developments and/or changes to statutory or regulatory requirements,

The most up-to-date version of this Privacy Policy can be accessed at any time at www.hugoboss.com.