

# HUGO BOSS

## **Privacy Policy for subscription to HUGO BOSS Newsletter** **SINGAPORE**

HUGO BOSS AG, Dieselstrasse 12, 72555 Metzingen, Germany (hereinafter “**HUGO BOSS**” or “**we**”) provides the HUGO BOSS Newsletter (hereinafter “**Newsletter**”) about the latest news from HUGO BOSS regarding new products, exclusive specials, lifestyle and fashion trends. You can subscribe to the Newsletter online via the HUGO BOSS website (hereinafter “**Website**”).

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 Newsletter subscription.

You can receive further information about the processing of personal data with respect to the Website on [www.hugoboss.com](http://www.hugoboss.com).

## TABLE OF CONTENTS

<b>A.</b>	<b>Information about the data controller .....</b>	<b>3</b>
<b>I.</b>	<b>Name and contact details of the data controller.....</b>	<b>3</b>
<b>II.</b>	<b>Contact details of the data controller’s Data Protection Officer .....</b>	<b>3</b>
<b>B.</b>	<b>Information about the rights of data subjects .....</b>	<b>4</b>
<b>I.</b>	<b>Right to access.....</b>	<b>4</b>
<b>II.</b>	<b>Right to rectification .....</b>	<b>5</b>
<b>III.</b>	<b>Right to erasure (“right to be forgotten”) .....</b>	<b>5</b>
<b>IV.</b>	<b>Right to the restriction of processing.....</b>	<b>6</b>
<b>V.</b>	<b>Right to data portability.....</b>	<b>6</b>
<b>VI.</b>	<b>Right to object .....</b>	<b>7</b>
<b>VII.</b>	<b>Right to withdraw consent.....</b>	<b>8</b>
<b>VIII.</b>	<b>Right to lodge a complaint with the supervisory authority.....</b>	<b>8</b>
<b>C.</b>	<b>Information about the processing of personal data.....</b>	<b>9</b>
<b>I.</b>	<b>Details on the personal data we process .....</b>	<b>10</b>
<b>II.</b>	<b>Details on the processing of the personal data .....</b>	<b>13</b>
<b>III.</b>	<b>Details on the recipients of personal data and the transfer of personal data to third countries and/or international organisations.....</b>	<b>16</b>
<b>D.</b>	<b>Effective date and amendment of this Privacy Policy .....</b>	<b>16</b>

**A. Information about the data controller**

**I. Name and contact details of the data controller**

The data controller for the Newsletter is:

HUGO BOSS AG  
Dieselstrasse 12, 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**

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: [privacy@hugoboss.com](mailto:privacy@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 addition, you will also have the rights under the data protection laws applicable in Singapore.

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 the Newsletter, different personal data are processed for different purposes. For example, we process your Personal Master Data (as defined below) that you provide to us when subscribing to the Newsletter.

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 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
Personal master data that we collect for your Newsletter subscription (" <b>Personal Master Data</b> ").	Salutation, first name, surname, e-mail address.  We also record the country-specific version of the Website when you subscribe via website.	Newsletter subscribers	The provision of the e-mail address is required for Newsletter subscription. Not providing this data means that you cannot subscribe to the Newsletter.  The provision of salutation, first name and surname is voluntary and there is no obligation to provide the mentioned data above.	We store this information as long as you subscribe to the Newsletter.  We store this data for evidence purposes for statutory retention periods or in case we are obliged to document such data and also for an interim period of three years commencing at the end of the year in which you unsubscribe and in the event of any legal disputes until such have been concluded.
Protocol data that are generated technically when subscribing or unsubscribing to the Newsletter (" <b>Subscription and Unsubscription Data</b> ")	Date and time of subscription, confirmation in double opt-in process, as well as the IP address of the terminal device used for confirmation, date and time of any unsubscription from the Newsletter.	Newsletter subscribers		We store this information as long as you subscribe to the newsletter.  We store this data for evidence purposes for statutory retention periods or in case we are obliged to document such data and also for an interim period of three years commencing at the end of the year in which you unsubscribe 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 subscription to the Newsletter is confirmed in the double opt-in procedure ( <b>“Protocol Data”</b> )	Date and time of confirmation of the subscription in double opt-in procedure and IP address of the device used for the confirmation.	Newsletter subscribers	The provision of the Protocol Data is required for subscription to the Newsletter. Not providing these Registration Protocol Data means that you cannot subscribe to the Newsletter.	We store this information as long as you subscribe to the Newsletter.  We store this data for evidence purposes for statutory retention periods or in case we are obliged to document such data and also for an interim period of three years commencing at the end of the year in which you unsubscribe and in the event of any legal disputes until such have been concluded.
Protocol data that accrue for technical reasons via the Hypertext Transfer Protocol (HTTP) using the web beacons** contained in the Newsletter when the Newsletter is accessed ( <b>“Newsletter HTTP Data”</b> ).	IP address, date and time of access.	Newsletter subscribers	The Provision of the Newsletter HTTP Data is required for subscription to the Newsletter.  Not providing these data means that you cannot subscribe to the Newsletter.	Data are stored in server log files in a form allowing the identification of data subject for a maximum period of 7 days, unless any security related event occurs (e.g. a DDoS attack).  If there is a security related event, server log files are stored until the security

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
				relevant event has been eliminated and clarified in full.
Data that are stored in cookies* in the Newsletter subscriber's browser when the Newsletter is accessed ( <b>"Newsletter Cookie Data"</b> ).	Unique ID for (re-)identifying Newsletter subscribers.	Newsletter subscribers	There is no obligation to provide the data. The data is only transferred when you follow the link in the Newsletter to visit our website and accept the according cookie policy.	We store this information as long as you subscribe to the Newsletter.
Data in usage profiles that we create by analysing the usage behaviour of subscribers to the Newsletter using pseudonyms ( <b>"Newsletter Usage Profile Data"</b> ).	Data about the use of the Newsletter, in particular page visits, visit frequency, click behaviour in accessed Newsletter.	Generated autonomously	-	We store this information as long as you subscribe to the Newsletter.
Protocol data that are generated technically via the Hypertext Transfer Protocol (HTTP) when the HUGO BOSS Website is visited ( <b>"Website HTTP Data"</b> ).	IP address, type and version of your Internet browser, operating system used, page visited, page visited beforehand (referral URL), date and time of visit.	Newsletter subscribers	There is no obligation to provide the data. The data is only transferred when you follow the link in the Newsletter to visit our website and accept the according cookie policy.	We store this information as long as you subscribe to the Newsletter.
Data that are stored in cookies* in the Newsletter subscriber's browser when the HUGO BOSS Website is	Unique ID to (re)identify Newsletter subscribers and aggregated Segment Data with objective of improving campaign content.	Newsletter subscribers	There is no obligation to provide the data. The data is only transferred when you follow the link in the Newsletter to visit our website	We store this information as long as you subscribe to the Newsletter.

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
accessed (" <b>Website Cookie Data</b> ").			and accept the according cookie policy.	

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

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

## 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 on the website in which you can provide us with your data to subscribe to the Newsletter.	Website HTTP Data, Personal Master Data, Protocol Data, Subscription and Unsubscription Data.	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 Newsletter subscriber.	Hosting provider, Newsletter service provider.
"Double opt-in" procedure to confirm subscription to the Newsletter.  For this we send an e-mail requesting confirmation to the e-mail address	Personal Master Data, Protocol Data, Subscription and Unsubscription Data	Balancing of interests (point (f) of Article 6 paragraph 1 of the General Data Protection Regulation). Our legitimate interest is the legally secure	Newsletter service provider.

Purpose of processing the personal data	Categories of personal data processed	Legal basis and, if applicable, legitimate interests	Recipient
given by you when subscribing to the Newsletter. Any subscription first becomes effective when the Newsletter subscriber has confirmed the e-mail address by accessing the confirmation link in the e-mail.		documentation of your consent to receiving SMS marketing.	
Operation of a customer database in which we maintain and update Personal Master Data.	Personal Master 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.
In order to ensure the accuracy of e-mail address data we validate the e-mail address data.	Personal Master Data	Required to comply with a legal obligation (point (d) of Article 5 paragraph (1) ("accuracy")) (point (c) of Article 6 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.	IT service provider, newsletter 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
<p>Sending of information material on the components of relevant, personalised marketing for our own offers (e.g. information about HUGO BOSS, product information, newsletters, customer survey and exclusive offers or invitations to take part in competitions, events and promotions of HUGO BOSS). For this we use the current data in each case that we have stored in our customer database.</p> <p>We use the salutation and your name specified when subscribing to adapt gender-specific content in our marketing materials.</p> <p>We use the country recorded during subscription to determine the language and country-specific content of our marketing materials.</p>	Data listed above under 1.1 of this Privacy Policy.	Consent (point (a) of Article 6 paragraph 1 of the General Data Protection Regulation).	Survey agencies, newsletter 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	
Newsletter service provider	Data processor		
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
Subscription service provider	Data Processor	EU	

#### D. Effective date and amendment of this Privacy Policy

The effective date of this Privacy Policy is ***June 15<sup>th</sup> 2020***.

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](http://www.hugoboss.com).