

# Hugo Boss USA Privacy Policy

Last Updated as of January 1, 2020

We at HUGO BOSS USA (including HUGO BOSS FASHIONS, INC., HUGO BOSS RETAIL, INC., and their U.S. affiliates) respect your concerns about privacy. This Privacy Policy describes the type of Personal Information that we collect about our consumers on our U.S. Sites and certain other U.S. Channels (as defined below); how we collect, process, use and share the information; as well as choices that you have regarding such use. For the purposes of this Privacy Policy, “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household; “Personal Information” also includes any other information related to a particular individual that constitutes “personal information” or “personal data” under any privacy or data protection law that applies to our consumers. Data that is aggregated or de-identified is not Personal Information.

## Note for California Residents

If you are a **California resident**, there are additional disclosures, rights and procedures that apply to you or from which you may benefit, in addition to those described in the general Hugo Boss USA Privacy Policy; please see our **Privacy Notice for California Residents** [below](#), for more information.

## Summary of Key Policy Provisions

<b><u>Collection</u></b>	We collect Personal Information about you that you provide to us while you are using our Sites or other Channels.
<b><u>Protection</u></b>	We employ appropriate technical, administrative, and physical safeguards that are designed to prevent unauthorized access, maintain data accuracy, and designed to ensure correct use of Personal Information.
<b><u>Use By Us</u></b>	We use Personal Information to provide you with services, to build features that will make the services available on our Sites or Other Channels easier to use; to contact you about these services, to send advertisements, marketing material or other offers that we think might be of interest to you; to perform data analytics; or for other purposes permitted by law.
<b><u>Marketing</u></b>	You have control on how we use Personal Information for marketing, including exercising your right to opt-out of further marketing communications.
<b><u>Sharing</u></b>	We share your Personal Information with our affiliates, external service providers, third party vendors, agents, and/or other, unaffiliated third parties for marketing; collection and analysis, including for fraud prevention or other lawful services; and/or as may be necessary to perform transactions with you and manage our business.
<b><u>Cross-Border Data Transfers</u></b>	Our Sites and Other Channels are operated solely for the United States (“U.S.”) market and are not designed for sales of products to individuals located in foreign jurisdictions. If you are located outside the U.S. and use our Sites, you are advised that your Personal Information will be automatically transferred to the U.S. To the fullest extent permitted by law, you assume all risks relating to any such cross-border data transfer.

<b><u>Children</u></b>	Persons under the age of 13 are not eligible to use any services on our Sites.
<b><u>Changes</u></b>	We will prominently post any material changes to our Privacy Policy. Any material changes to this Privacy Policy will be effective after posting.
<b><u>Contact Us</u></b>	If you have any questions, concerns, or comments, please contact customerservice-us@hugoboss.com. You may also contact us directly at Hugo Boss Fashions, Inc., Attn.: Privacy Office, 55 Water Street, 48th Floor, New York, NY 10041

## What information does this Privacy Policy cover?

This Privacy Policy applies to Personal Information that we collect through the following channels (each, a “**Channel**”) in the United States:

- (1) www.hugoboss.com/US or HUGO BOSS related US: websites, mobile applications or other digital communication platforms with a link to this Privacy Policy directed to U.S. shoppers (collectively, “**Sites**”);
- (2) your visits to freestanding Retail and Outlet stores operated in the U.S. by Hugo Boss Retail, Inc. or its US affiliates (collectively, “**Retail Stores**”);
- (3) other channels associated with such Sites, Retail or Outlet stores that are operated by us or on our behalf, such as when you connect with us via telephone, at our events, through surveys you may choose to complete; sweepstakes or promotions which you may participate in; the HB My Experience iPad or online registration program; or via our official social media pages or similar networks directed to the U.S. market (collectively, “**Other Channels**”)

This Privacy Policy is effective as of the date that this Privacy Policy is posted. Any links that we provide to third-party websites or services are provided for your convenience and information. We do not own, operate or control such third party properties and this Privacy Policy does not apply to unaffiliated sites or services. If you visit any linked third party sites or services, please review any applicable privacy policies. We are not responsible for the content of unaffiliated sites, any use of such sites or services, or the privacy practices of any third parties.

## Disclaimer of Liability for Any Transfer of Personal Information from Other Jurisdictions to the United States

Hugo Boss USA is headquartered in the U.S. and our Sites and Other Channels are operated solely for the U.S. market and are not designed for sales to individuals located in foreign jurisdictions. If you decide to use our Sites or Other Channels, your Personal Information will be automatically transferred to the U.S., and processed according to the terms described in this Privacy Policy. To the fullest extent permitted by law, we disclaim all liability, and you assume all such risk, hold us harmless, and irrevocably waive an claim you may have against us relating to, any cross-border transfer or your Personal Information.

## What types of Personal Information do we collect?

If you are a **California resident**, please see our Privacy Notice for California Residents, below.

The Personal Information collected by Hugo Boss USA may include, for example, your:

1. Contact information (such as name; postal or billing address; email address, mobile or other telephone number);
2. Username and password for Sites;
3. Purchase and transaction information;
4. Photographs, comments and other content you provide;
5. Information you provide about friends, merchandise recipients, or others;
6. Social Media account information (username and website);
7. Customer service and technical support information (e.g., inquiries, comments, incident information, returns information);
8. Payment card or other related information (such as your payment card number, expiration date, authorization number or security code, and billing address), collected and stored through our third party payment service providers;
9. Survey response information, such as information regarding personal or professional interests, demographic information, marital status, and experiences with our products or services; and
10. Birth date for those choosing to provide it as part of MY HUGO BOSS EXPERIENCE;
11. Information you submit in connection with a career opportunity at Hugo Boss, including contact details, work history, education, skills, and details about your current employment; and
12. General activity information as part of our and our third party payment providers' fraud-prevention programs.

If you can't or choose not to provide us with the Personal Information we reasonably require, we may be unable to provide you with the information or services you have requested.

## **How do we collect Personal Information?**

**Information Submitted by You.** We collect Personal Information from you when you:

1. Register with us online, at a Hugo Boss Retail Store, for the MY HUGO BOSS EXPERIENCE program or through any Other Channels;
2. Purchase products or services from our Sites, Retail Stores, or Other Channels;
3. Sign up for our newsletter or to receive other marketing information;
4. Request we alert you when an item or type of item is back in stock;
5. Participate in promotions or surveys;
6. Submit comments, reviews, or other user-generated content;
7. Connect or interact with us through social networks (e.g., Facebook, Google+, Twitter);
8. Request customer or technical support, including but not limited to through our chat function, 800 number and via e-mail;
9. Participate in MY HUGO BOSS EXPERIENCE; and
10. Submit payment information (which we will use, e.g., to process a transaction or prevent fraud and allow for safer e-commerce shopping experiences).

**Information Collected Through Technology.** We also obtain information in other ways through technology. Some of this information may be linked to you personally. This information helps our Sites function correctly and supports the work we do to understand the needs of our customers. Device and activity data may be automatically collected via our Sites, as described below.

- **Device Information.** Depending on the permissions you've granted and other factors, we may receive information about your location and your mobile device when you download or use apps created by our Sites, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, certain player search results, and other personalized content. Examples of the device information we may collect include:
  - Attributes such as the operating system, hardware version, device settings, file and software names and types, battery and signal strength, and device identifiers.
  - Device locations, including specific geographic locations.
  - Connection and device information such as the name of your mobile operator or ISP, browser type, language and time zone, mobile phone number and IP address.

Most mobile devices allow you to turn off location services, and we encourage you to contact your device manufacturer for detailed instructions on how to do that.

- **Activity and Cookie Data.** Your Internet browser has a feature called cookies, which store small amounts of data on your computer or device about your visit to our Sites. We and our service providers use browser and flash cookies and other common online tracking technologies, including electronic images known as "web bugs" (sometimes called transparent GIFs, clear GIFs, or beacons"). We generally refer to such other tracking technologies and cookies as "cookies."

Cookies allow us and our service providers to automatically collect information regarding general user-traffic patterns, and your interactions with our Sites, including managed social media presences, and other unaffiliated sites and mobile applications. In using such technology, we thus collect such automatically transmitted data as the page served, time, source of the request, type of browser making the request, preceding page view, dynamic IP addresses and other such information to understand how our advertising campaigns are performing or how to improve and tailor advertising and the Sites experience for you. Unless you have registered for one of our products or services, the information we gather through the use of tracking technologies cannot be matched with any personally identifiable information about you. Please see below for a description of how our Sites may be impacted by cookie settings on your devices.

**Payment Information.** If you purchase any products on our Sites, we will collect payment card information from you, including your name, expiration date, authentication code, and billing address. This information will be transmitted to appropriate third party payment service providers. We may offer you the option to save certain payment card information on our Sites. If you elect to save such information on our Sites, you will be able to add, delete, or modify that information at any time using your account settings. However, we may from time to time request and receive some of your financial, transactional or other information from such third party payment service providers for the purposes of completing transactions you have initiated through the Sites, enrolling you in discount, rebate, and other programs in which you elect to participate, protecting against or identifying possible fraudulent transactions, and otherwise as needed to manage our business.

## **What are our policies to manage cookies, "Do Not Track" signals and interest-based advertising?**

### **Cookie Policy; Controlling Our Tracking Tools.**

You do not need to have cookies turned on to visit our Sites, although active participation in certain areas of our Sites may require cookies. You can set your browser to refuse or delete cookies. Please consult the corresponding instructions of the manufacturer for more detailed information on the actual procedure. If you configure your computer or device to block all cookies, you may disrupt certain features of our sites and limit the functionality we can provide when you visit or use our Sites. If you block or delete cookies, not all of the tracking that we have described in this Privacy Policy will stop.

**Responding to “Do Not Track.”** Some browsers have a “**Do Not Track**” (DNT) feature that lets you tell websites that you do not want to have your online activities tracked. These browser features are still not uniform, so we are not currently set up to respond to those signals.

**Controlling Online Interest-Based Ads.** We sometimes work with online advertising vendors to provide you with relevant and useful ads, including ads served on or through our Sites or on other companies’ websites. These ads may be based on information collected by us or third parties. For example, your postal code may be used to target an ad for people in your area. These ads may also be based on your activities on our Sites or on third party websites.

For more information about our ad service provider and its cookies, including information about how to opt out of these technologies, you may visit <http://www.aboutads.info/choices>. In addition, you may prevent Google’s collection of data generated by your use of the Sites (including your IP address) by downloading and installing a Browser Plugin available at <https://tools.google.com/dlpage/gaoptout?hl=en>.

To learn more about certain Cookies used for interest based advertising (including through cross-device tracking) and to exercise certain opt-out choices you may have regarding Cookies, please visit the Digital Advertising Alliance, Network Advertising Initiative, or your device settings for our mobile app.

## **How do we use and share your Personal Information?**

If you are a **California resident**, please also see our Privacy Notice for California Residents, below.

**Hugo Boss Business Activities.** We process and may disclose your Personal Information to both the HUGO BOSS Group (affiliates and subsidiaries) and to third party vendors, consultants and service providers to:

- Respond to your questions, complaints, or reviews of our product or services;
- Administer contests, promotions, or surveys;
- Send you communications, including ads, electronic newsletters, or other marketing or promotional offers or opportunities tailored to you, including such communications relating to our products and services or those of affiliated and unaffiliated third parties;
- Enable our advertisers to provide you with more personalized content, and track the effectiveness of certain advertising campaigns;
- Help us run our business, including the performance of transactional or support services by us or third parties;
- For product development and administration of our Sites or Other Channels;
- Text messages to the extent you consented;
- Call you for transactional reasons (e.g., to confirm appointment times or if we have an issue with your order); to invite you to events or inform you of new products or sales, to the extent that you consented to receive such calls; or as otherwise permitted by applicable laws; and/or
- For any other business purpose as permitted by applicable law.

**Authorized Service Providers.** We use other companies and individuals to perform certain functions on our behalf. Those functions include payment card processors, fraud screening providers, shipping vendors, third party logistic providers, call-center or other support providers, e-commerce service

providers, analytics providers, data hosting providers, and other companies that help us provide and improve our products and services. We may disclose your Personal Information to these companies and other individuals performing services in the United States or other locations where Hugo Boss or our service providers maintain a facilities or operations. For the purposes of fraud prevention, we may share your Personal Information with Forter, Inc., our third-party provider of fraud screening services, who may use such information in accordance with the Forter privacy policy accessible here: <https://www.forter.com/service-privacy-policy/>.

**Businesses Sales.** If we sell all or part of our business as part of a merger, acquisition, bankruptcy or other transaction in which a third party assumes control of all or part of our business, Personal Information may be transferred to the purchaser in connection with that transaction.

**Compliance with Laws, Law Enforcement Request and to Protect Others.** We may disclose Personal Information to comply with federal, state or local law; or to comply with a civil, criminal or regulatory investigation, inquiry, subpoena or summons by federal, state or local authorities. We may also disclose Personal Information to exercise or defend against legal claims or to cooperate with law enforcement agencies concerning conduct or activity that we or our service providers reasonably and in good faith believe may violate federal, state or local law.

**Other Marketing or Permissible Uses.** We may also share what we know about you with unaffiliated third parties for our own or their own marketing purposes, or to offer you the products and services of affiliated or unaffiliated third parties. To the extent legally permitted, we may combine your information with information collected from third party sources or information we already have. We may also use and disclose certain Personal Information to our corporate affiliates as well as others for any purpose allowed by law.

**Non-Personal Information.** We may also aggregate information that we gather about you (e.g., online sales, traffic patterns) and provide these statistics to others in aggregate form.

## **What choices do you have about the collection, use, and sharing of your Personal Information?**

If you are a **California resident**, please also see our Privacy Notice for California Residents, below.

If you signed up to receive newsletters or consented to receive other marketing communications from us, you can opt-out any time by clicking the unsubscribe link at the bottom of the message. You can also log-in to your account to opt-out and update your marketing preferences at any time. Even after you opt-out or update your marketing preferences, please allow sufficient time to process your marketing preferences. It may take up to ten (10) days to process your e-mail marketing related requests, and up to thirty (30) days for all other marketing-related requests. And even after you've opt-out of receiving marketing communications from us, we may still contact you for transactional or informational purposes. These include, for example, customer service issues, returns or product-related inquiries, surveys or recalls, or any questions regarding a specific order.

## **What kinds of security measures do we take to safeguard your Personal Information?**

The security and confidentiality of your Personal Information matters to us. That's why we have technical, administrative, and physical controls in place that are designed to protect your Personal Information from unauthorized access, use, and disclosure. For example, we use Secure Sockets Layer ("SSL") technology to

help protect information transmitted over the Internet. Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable. You can check the security of your connection by looking at the URL line of your browser. When accessing a secure site, the first characters of the site address change from “http” to “https.” If your browser or firewall does not allow use of secure sites, you will not be able to make purchases on our Sites.

You are also responsible for keeping your Personal Information secure. We strongly recommend that you keep passwords unique from other identifiers such as user ID to help protect your privacy. In addition, you should make sure you only use trusted wireless connections in transmitting any Personal Information or other sensitive information.

### **How can you access, update, or block your Personal Information?**

You can update the Personal Information you provided to us by logging-in to your profile, and making the appropriate changes or corrections yourself. You can also contact us directly any time at the address below to update your Personal Information. If you wish to de-activate your account, you may do so by contacting our customer support team at [customerservice-us@hugoboss.com](mailto:customerservice-us@hugoboss.com). Once you do so, your account will then be de-activated on a going-forward basis, although certain Personal Information may still be retained in accordance with our Record Retention Policy or to the extent necessary to comply with applicable law.

You can opt-out of receiving HUGO BOSS marketing e-mails at any time by emailing your unsubscribe request to [customerservice-us@hugoboss.com](mailto:customerservice-us@hugoboss.com). You can also unsubscribe by using the unsubscribe link in each marketing communication you receive from us.

### **Minors and Children Under 13**

Our Sites are not intended for minors. We do not knowingly collect any Personal Information from children under the age of 13 or knowingly track the use of our Sites by minors.

### **How can you file a complaint, ask questions, or send us comments about this Privacy Policy?**

If you have any questions, have a complaint, or wish to send us comments about this Privacy Policy, e-mail us at [customerservice-us@hugoboss.com](mailto:customerservice-us@hugoboss.com) or call or write to us. We will investigate your complaint, and use reasonable efforts to respond to you as soon as possible.

Our postal address is:

Hugo Boss Fashions, Inc.  
Attn.: Privacy Office  
55 Water Street, 48th Floor  
New York, NY 10041

### **How will you know if we amend this Privacy Policy?**

We may amend this Privacy Policy at any time. If we make any material change to this Privacy Policy, we will prominently post the updated Privacy Policy and indicating at the top of the Privacy Policy when it was updated. If you disagree with our Privacy Policy changes, you may de-activate your account or

exercise your right to opt out, if appropriate.



## Privacy Notice for California Residents

### Updated and Effective as of January 1, 2020

Please note, other sections of the Hugo Boss USA Privacy Policy apply to California residents, please read the Hugo Boss USA Privacy Policy above in its entirety. In particular, you are encouraged to read the following sections: What information does this Privacy Policy cover?, Fraud Prevention Policy, How do we collect Personal Information?, What are our policies to manage cookies, “Do Not Track” signals and interest-based advertising?, What kinds of security measures do we take to safeguard your Personal Information?, How can you access, update, or block your Personal Information?, Minors and Children Under 13, How can you file a complaint, ask questions, or send us comments about this Privacy Policy, and How will you know if we amend this Privacy Policy?.

### Your Rights under the California Consumer Privacy Act of 2018 (“CCPA”)

- California residents have the right to request that we disclose to them what Personal Information we collect, use, disclose and sell; you may request to know the categories of Personal Information collected about you or the specific pieces of Personal Information collected about you (“**Right to Know**”).
- California residents have the right to request that we delete their Personal Information we have collected or maintained (“**Right to Request Deletion**”).
- California residents have the right to opt-out of the sale of their Personal Information.
- California residents have the right not to receive discriminatory treatment by us for the exercise of their privacy rights conferred by the CCPA.

If you are a California resident, please see the section titled Exercising California Residents’ Privacy Rights, below, for information on how to exercise your CCPA rights.

“**Personal Information**,” as used in this Privacy Notice for California Residents, means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

### Personal Information Collection and Purposes of Use

We collect the categories of Personal Information of California residents set forth below for use for the purposes described, for each category, below:

Categories and Specific Pieces of Personal Information Collected	Business or Commercial Purposes for which the Personal Information is Used
Identifiers <ul style="list-style-type: none"><li>• <i>Name and aliases</i></li><li>• <i>Postal address</i></li><li>• <i>Email address</i></li><li>• <i>IP address</i></li><li>• <i>Account ID</i></li><li>• <i>Telephone and mobile phone</i></li></ul>	Performing internal operations necessary to run our business and provide excellent services to you Consulting order-related information and addressing customer service inquiries Managing customer information Providing order management information and fulfillment Performing analytics Enabling transactions and logistical fulfillment for e-commerce and payment

<ul style="list-style-type: none"> <li><i>numbers</i></li> <li><i>Signature</i></li> </ul>	<p>processing</p> <p>Enabling and providing fraud prevention mechanisms</p> <p>Improving digital advertising and marketing</p> <p>Facilitating integration of customer loyalty platform</p>
<p>Financial transaction information</p> <ul style="list-style-type: none"> <li><i>Payment card number</i></li> <li><i>Authorization number or security code</i></li> <li><i>Billing address</i></li> <li><i>Card type (debit or credit card)</i></li> <li><i>Expiration date</i></li> <li><i>Tender Type</i></li> </ul>	<p>Managing customer information</p> <p>Performing analytics</p> <p>Enabling transactions and logistical fulfillment for e-commerce and payment processing</p> <p>Improving digital advertising and marketing</p>
<p>Commercial Information</p> <ul style="list-style-type: none"> <li><i>Transaction history of consumers</i></li> </ul>	<p>Consulting order-related information and addressing customer service inquiries</p> <p>Managing customer information</p> <p>Providing order management information and fulfillment</p> <p>Performing analytics</p> <p>Enabling transactions and logistical fulfillment for e-commerce and payment processing</p> <p>Enabling and providing fraud prevention mechanisms</p> <p>Improving digital advertising and marketing</p>
<p>Internet or other electronic network activity information</p> <ul style="list-style-type: none"> <li><i>Behavioral data</i></li> <li><i>Email engagement</i></li> <li><i>Browsing activity</i></li> <li><i>Device type</i></li> </ul>	<p>Consulting order-related information and addressing customer service inquiries</p> <p>Managing customer information</p> <p>Performing analytics</p> <p>Enabling transactions and logistical fulfillment for e-commerce and payment processing</p> <p>Enabling and providing fraud prevention mechanisms</p> <p>Improving digital advertising and marketing</p>

## Our Personal Information Handling Practices in the Preceding 12 Months

The chart below describes, for the preceding 12 months, the categories of Personal Information we have collected from California residents and, for each such category, the categories of sources of the information, the business or commercial purposes for collection and the categories of third parties with whom we share the information:

Categories and Specific Pieces of Personal Information Collected	Categories of Sources of Collection	Business or Commercial Purposes for Collection	Categories of Third Parties with Whom We Share the Information
Identifiers <ul style="list-style-type: none"> <li>• <i>Names and aliases</i></li> <li>• <i>Birth date</i></li> <li>• <i>Postal address</i></li> <li>• <i>Email address</i></li> <li>• <i>IP address</i></li> <li>• <i>Account ID</i></li> <li>• <i>Telephone and mobile phone numbers</i></li> <li>• <i>Signature</i></li> </ul>	Consumer directly  Service providers  Data analytics providers	Performing internal operations necessary to run our business and provide excellent services to you  Consulting order-related information and addressing customer service inquiries  Managing customer information  Providing order management information and fulfillment  Performing analytics  Enabling transactions and logistical fulfillment for e-commerce and payment processing  Enabling and providing fraud prevention mechanisms  Improving digital advertising and marketing Facilitating integration of customer loyalty platform	Advertising networks  Internet service providers  Data analytics providers  Payment card processors  Anti-fraud protection providers  Operating systems and platforms
Financial transaction information <ul style="list-style-type: none"> <li>• <i>Payment card number</i></li> <li>• <i>Authorization number or security code</i></li> <li>• <i>Billing address</i></li> <li>• <i>Card type (debit or credit card)</i></li> <li>• <i>Expiration date</i></li> <li>• <i>Tender Type</i></li> </ul>	Consumer directly  Service providers  Data analytics providers	Managing customer information  Performing analytics  Enabling transactions and logistical fulfillment for e-commerce and payment processing  Enabling digital advertising and marketing	Data analytics providers  Payment card processors  Anti-fraud protection providers  Operating systems and platforms

<p>Commercial information</p> <ul style="list-style-type: none"> <li>• <i>Transaction history of consumers</i></li> </ul>	<p>Consumer directly</p> <p>Service providers</p> <p>Data analytics providers</p>	<p>Consulting order related information and addressing customer service inquiries</p> <p>Managing customer information</p> <p>Providing order management information and fulfillment</p> <p>Performing analytics</p> <p>Enabling transactions and logistical fulfillment for e-commerce and payment processing</p> <p>Enabling and providing fraud prevention mechanisms</p> <p>Improving digital advertising and marketing</p>	<p>Advertising networks</p> <p>Internet service providers</p> <p>Data analytics providers</p> <p>Anti-fraud protection providers</p> <p>Operating systems and platforms</p>
<p>Internet or other electronic network.</p> <ul style="list-style-type: none"> <li>• <i>Behavioral data</i></li> <li>• <i>Email engagement</i></li> <li>• <i>Browsing activity</i></li> <li>• <i>Device type</i></li> </ul>	<p>Consumer directly</p> <p>Service providers</p> <p>Data analytics providers</p>	<p>Performing internal operations necessary to run our business and provide excellent services to you</p> <p>Consulting order related information and addressing customer service inquiries</p> <p>Managing customer information</p> <p>Performing analytics</p> <p>Enabling transactions and logistical fulfillment for e-commerce orders and payment processing</p> <p>Enabling and providing fraud prevention mechanisms</p> <p>Improving digital advertising and marketing</p>	<p>Advertising networks</p> <p>Internet service providers</p> <p>Data analytics providers</p> <p>Payment card processors</p> <p>Anti-fraud protection providers</p> <p>Operating systems and platforms</p>
<p>Education information (publicly available personally identifiable information).</p> <ul style="list-style-type: none"> <li>• <i>Education Level Attained</i></li> </ul>	<p>Service providers</p> <p>Data analytics providers</p>	<p>Performing analytics</p>	<p>Data analytics providers</p>

<p>Inferences drawn from any of the Personal Information collected.</p> <ul style="list-style-type: none"> <li>• <i>Preference selections by consumers</i></li> <li>• <i>Homeowner vs renter status</i></li> <li>• <i>Presence of children</i></li> <li>• <i>Estimated household income</i></li> <li>• <i>Mail order purchaser</i></li> <li>• <i>Length of residence</i></li> <li>• <i>Working woman present in household</i></li> </ul>	<p>Consumer directly</p> <p>Service providers</p> <p>Data analytics providers</p>	<p>Performing internal operations necessary to run our business and provide excellent services to you</p> <p>Managing customer information</p> <p>Performing analytics</p>	<p>Advertising networks</p> <p>Data analytics providers</p> <p>Operating systems and platforms</p>
<p>Characteristics of protected classifications under California or federal law.</p> <ul style="list-style-type: none"> <li>• <i>Gender based on salutation selected by consumer</i></li> <li>• <i>Age</i></li> <li>• <i>Marital Status</i></li> </ul>	<p>Consumer directly</p> <p>Service providers</p> <p>Data analytics providers</p>	<p>Performing internal operations necessary to run our business and provide excellent services to you</p> <p>Consulting order-related information and addressing customer service inquiries</p> <p>Managing customer information</p> <p>Performing analytics</p>	<p>Advertising networks</p> <p>Data analytics providers</p> <p>Operating systems and platforms</p>

### **Sale of California Residents' Personal Information**

We have not sold any California residents' Personal Information to third parties in the preceding 12 months.

As of January 1, 2020, we do not and will not sell California residents' Personal Information.

### **Minors and Children Under 16**

We do not sell the Personal Information of minors under 16 years of age without the affirmative authorization of such consumers or their parental guardians.

### **Disclosure for a Business or Commercial Purpose of Personal Information Collected in the Preceding 12 Months**

In the preceding 12 months, we disclosed the following categories of Personal Information for a business purpose or commercial purpose:

- Identifiers (such as real name, alias, birth date, telephone and mobile phone numbers, postal addresses, unique personal identifiers, including, but not limited to online identifiers, Internet Protocol addresses, account names, signatures or other similar identifiers).
- Characteristics of protected classifications under California or federal law, such as gender, age and marital status.
- Credit card numbers, debit card numbers and other financial information, such as card type, expiration date, and tender type.
- Commercial information, including, but not limited to records of personal property, products or

services purchased, obtained or considered or other purchasing or consuming histories or tendencies.

- Internet or other electronic network activity information, including, but not limited to consumers' browsing histories, search histories, and information regarding consumers' interactions with Internet websites, applications or advertisements.
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act.
- Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, predispositions, behavior, and attitudes.

## **Exercising California Residents' Privacy Rights**

As described above, as a California resident, you have certain additional rights with respect to your Personal Information, as described above in the section Your Rights under the California Consumer Privacy Act of 2018 ("CCPA").

You can submit your request to exercise these various rights (including the Right to Know and the Right to Request Deletion) in the following manner:

1. 1-800-484-6267
2. Send your request to: [informationrequests\\_US@hugoboss.com](mailto:informationrequests_US@hugoboss.com)
3. The web form accessible [here](#)
4. In our Retail Stores in California

### **Process for Verifying a Consumer's Request**

We will verify any consumer's request to exercise the Right to Know or the Right to Request Deletion using the following process:

Whenever feasible, we will match, or will engage a third-party identification verification service to match, the identifying information provided by you to the Personal Information that we maintain already on our systems. We will generally avoid requesting additional information for the purposes of verification. Only if we are unable to verify your identity or residency from the information already maintained by us will we request additional information from you. The additional Personal Information collected will only be used for the purposes of accurately verifying your identity in order to effectively allow you to exercise your rights under the CCPA and for the purposes of fraud prevention. Once we have satisfied these purposes, we will delete the additional Personal Information collected from you as soon as practically possible, except as required for compliance with our CCPA record-keeping requirements and applicable law.

We will require you to provide us with data points that ensure that we can verify your consumer request to a reasonable degree of certainty.

*Exercising the Right to Know.* If you are requesting to know the categories of Personal Information collected, we may require two data points to be provided by you that match two of the data points that we maintain. However, if you request to know specific pieces of information, a higher bar for verification is required (a reasonably high degree of certainty), which may require us to match three data points of information provided by you with three data points that we maintain in our records together with a signed declaration under penalty of perjury that you are the individual whose Personal Information is the subject of the request. We will maintain all signed declarations as part of our record-keeping obligations under the CCPA.

*Exercising the Right to Request Deletion.* If you submit a request that we delete your Personal Information, the level of reasonable certainty that will be required through our verification process will depend on the nature of the Personal Information being requested to be deleted. For sensitive Personal Information, we will require that three data points provided by you match three data points we maintain in our records along with a signed declaration under penalty of perjury. For all other kinds of Personal Information subject to a deletion request we will collect the requisite data points consistent with a reasonable degree of certainty standard described above. We will act in good faith when determining what standard to applying when verifying all consumer requests.

#### **Inability to Verify a Request**

If we are unable to verify your identity to a degree of certainty as required by the CCPA through any reasonable method, we will state that we are unable to verify in a written response to you along with a reason as to why there is no reasonable method by which we can verify your identity. We will evaluate our methods for verifying the identity of all consumers who request to know or delete Personal Information on a yearly basis.

#### **Household Requests**

If all the consumers of a household jointly request access to specific pieces of information for the consumers of the household or deletion of the household's Personal Information, we will comply with the request if we can verify the identity of all members of the household pursuant to our procedures for identity verification mentioned above.

#### **Authorized Agents**

As a California resident, you may designate an authorized agent to act on your behalf to make a request under the CCPA, such as requesting disclosure of any Personal Information sold or collected by Hugo Boss USA; or requesting deletion of such Personal Information. If you should use an authorized agent to exercise your various rights under the CCPA, we may require that you provide your authorized agent with written permission to exercise your various rights and to verify your own identity with us through the processes laid out in the section titled Exercising California Residents' Privacy Rights, above. If your authorized agent does not submit proof that they have been authorized by you to submit verified requests for disclosure and deletion, we reserve the right to deny such a request that we have received and will explain to your authorized agent why we have deny such request.

#### **Concerns about our Privacy Policy and Practices**

If you have questions or concerns about our privacy policy or practices, please contact **800-484-6267** or e-mail [Informationrequests\\_US@hugoboss.com](mailto:Informationrequests_US@hugoboss.com).