

## PRIVACY POLICY – SUPPLIER & FRANCHISE/LICENSE PARTNERS

HUGO BOSS AG, Holy-Allee 3, 72555 Metzingen, Germany (hereinafter “**HUGO BOSS**” or “**we**”) provides the HUGO BOSS Supplier Portal as well as a Learning Platform for respective **Suppliers** of HUGO BOSS.

**Franchise and/or license partners** may also be affected by the data processing. Insofar as this document only refers to suppliers, references to suppliers and other synonymous terms shall (also) be understood as references to franchise and/or license partners.

HUGO BOSS attaches great importance to the protection of your personal data and processes it exclusively in accordance with the principles laid out below and in compliance with applicable data protection laws, in particular with the EU General Data Protection Regulation (hereinafter referred to as “**GDPR**”). If data protection laws other than the GDPR are applicable in any given case, references to GDPR provisions and their terminology shall be understood (also) as references to the provisions in these data protection laws.

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**A. INFORMATION ABOUT THE DATA CONTROLLER**

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

HUGO BOSS AG  
Holy-Allee 3, 72555 Metzingen, Germany  
Phone: +49 7123 94-0  
Fax: +49 7123 94-80259  
E-mail: [info@hugoboss.com](mailto:info@hugoboss.com)

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

HUGO BOSS AG  
Data Protection Officer  
Holy-Allee 3, 72555 Metzingen, Germany  
Phone: +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 can exercise the following rights with respect to the processing of your personal data, provided that the relevant conditions are met:

- I. Right of access (Art. 15 GDPR)
- II. Right to rectification (Art. 16 GDPR)
- III. Right to erasure ("right to be forgotten") (Art. 17 GDPR)
- IV. Right to restriction of processing (Art. 18 GDPR)
- V. Right to data portability (Art. 20 GDPR)
- VI. Right to object (Art. 21 GDPR)

Under the conditions provided in Art. 21 No. 1 GDPR you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on Art. 6 (1) e) or f) GDPR, including profiling based on those provisions. Under the conditions provided in Art. 21 No.2 GDPR you have the right to object at any time to processing of your personal data for such marketing, which includes profiling to the extent that it is related to such direct marketing.

You can find detailed information regarding the legal basis of processing in **Section C** of this Privacy Policy.

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

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

## C. INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

In connection with our online presence different personal data are processed for different purposes. You will find information below regarding the purposes and means of the processing of personal data.

### I. Use of the website

When the use of the website is purely informational, certain information, for example your IP address, is for technical reasons sent to our server by the browser used on your end device. We process this information in order to provide the website content requested by you. To ensure the security of the IT infrastructure used to provide the website, this information is also stored temporarily in what is referred to as a “web server log file”.

You receive more detailed information on this below:

#### 1. Details on the personal data that are processed

| Categories of personal data that are processed  | Personal data included in the categories   | Data source(s) | Obligation to provide the data  | Storage duration   |
|---|--|----------------|---|--|
| Protocol data which accrue via the Hypertext Transfer Protocol (Secure) (“HTTP(S) Data”) for technical reasons when the website is visited. | IP address, date and time of the visit, the page accessed, the site accessed before visiting the site (referrer URL), type and version of the Internet browsers installed on your device, operating system used, device-information. | Website users. | 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.<br><br>Not providing these data means that we cannot provide the requested website content. | 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).<br><br>If there is a security related event, server log files are stored until the security relevant event has been eliminated and clarified in full. |

## 2. Details on the processing of personal data

| Purpose of processing the personal data  | Categories of personal data that are processed | Legal basis, and, if applicable, legitimate interests   | Recipient         |
|--|--|---|-------------------|
| HTTP(S) Data are temporarily processed on our server to provide the website content requested by the user.   | HTTP(S) Data.                                  | Balancing of interests (Art. 6 (1) f) of the General Data Protection Regulation). Our legitimate interest is providing the website content requested by the user.   | Hosting provider. |
| HTTP(S) data are processed temporarily in web server log files to ensure the security of the IT infrastructure used to provide the website, in particular to identify, eliminate and preserve evidence of disruptions (e.g. DDoS attacks). | HTTP(S) Data.                                  | Balancing of interests (Art. 6 (1) f) of the General Data Protection Regulation). Our legitimate interest is ensuring the security of the IT infrastructure used to provide the website, in particular to identify, eliminate and preserve evidence of disruptions (e.g. DDoS attacks). | Hosting provider. |

**3. 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 | Processor        | EU                   | -   |

**II. Use of cookies on this website****1. General information**

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

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

## **2. Various types of Cookies**

HUGO BOSS uses various types of cookies, namely necessary Cookies and functional Cookies. In the following you will receive more information about these various types of cookies.

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

### **a) Necessary Cookies**

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

### **b) Functional Cookies**

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

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



### III. Use of the Supplier Portal

To use the Supplier Portal, you need to set up an account and register in advance to get access. Within the scope of this registration and when using the Supplier Portal, personal data will be processed and stored. In the following, we inform you about the scope of the processing of this data.

#### 1. Details on the personal data that are processed

| Categories of personal data that are processed  | Personal data included in the categories   | Data source(s)            | Obligation to provide the data   | Storage duration   |
|---|--|---------------------------|--|--|
| Required data processed upon registration and to create a user access to the Supplier Portal (" <b>Required User Data</b> ").                       | User ID, login credentials, salutation, first name, last name, company, company address, company phone number, company fax, company email address. | Registered website users. | Provision is a statutory or contractual requirement, or a requirement necessary to enter into a contract.<br><br>Not providing these data means that we will not be able to grant user access and provide the contents of the Supplier Portal. | The data is stored for the duration of the partnership.<br>In addition, we store this data for the purpose of exercising statutory retention or documentation obligations. |
| Optional data that can be processed upon registration and in order to create a user account to the Supplier Portal (" <b>Optional User Data</b> "). | Title, department, function, mobile phone number, fax, company website (URL), address, comments, language, further company information.            | Registered website users. | 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.  | The data is stored for the duration of the partnership.<br>In addition, we store this data for the purpose of exercising statutory retention or documentation obligations. |

## 2. Details on the processing of personal data

| Purpose of processing the personal data  | Categories of personal data that are processed | Legal basis, and, if applicable, legitimate interests   | Recipient                        |
|--|--|---|----------------------------------|
| In order to provide the contents of the Supplier Portal accessed by the user, registration is required in advance. Personal data is processed to ensure authenticated access to the Supplier Portal. | Required User Data                             | Performance of a contract (Art. 6 (1) b) of the General Data Protection Regulation).  | Tool Provider, Platform Provider |
| During registration, additional personal data can be provided, which enables a more targeted user approach and communication.  | Optional User Data                             | Balancing of interests (Art. 6 (1) f) of the General Data Protection Regulation). Our legitimate interest is providing the website content requested by the user. | Tool Provider, Platform Provider |

**3. 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  |
|---------------|------------------|---------------------------|--|
| Tool Provider | Processor        | EU, potentially worldwide | We may also transfer personal data to third countries that do not currently ensure a level of data protection equivalent to that of the EU or Switzerland. We compensate for the lower level of protection through appropriate contracts, especially the recognized standard contractual clauses, insofar as the recipient is not already subject to a legally recognized set of rules for ensuring data protection and we cannot rely on a legal exception. An exception may apply namely in the case of legal proceedings abroad, but also in cases of overriding public interests or if the performance of a contract requires such disclosure, if you have consented or if it is a matter of data made generally available by you, the processing of which you have not objected to. |

| Recipient         | Recipient's role | Recipient's location | Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations  |
|-------------------|------------------|----------------------|--|
| Platform Provider | Processor        | Hong Kong            | We may also transfer personal data to third countries that do not currently ensure a level of data protection equivalent to that of the EU or Switzerland. We compensate for the lower level of protection through appropriate contracts, especially the recognized standard contractual clauses, insofar as the recipient is not already subject to a legally recognized set of rules for ensuring data protection and we cannot rely on a legal exception. An exception may apply namely in the case of legal proceedings abroad, but also in cases of overriding public interests or if the performance of a contract requires such disclosure, if you have consented or if it is a matter of data made generally available by you, the processing of which you have not objected to. |

## IV. Use of the Learning Platform

To use the Learning Platform, an account is needed. Within the scope of the creation of a user profile and when using the Learning Platform, personal data will be processed and stored. In the following, we inform you about the scope of the processing of this data.

### 1. Details on the personal data that are processed

| Categories of personal data that are processed  | Personal data included in the categories   | Data source(s)            | Obligation to provide the data  | Storage duration   |
|---|--|---------------------------|---|--|
| Required data processed upon registration and to create a user access to the Learning Platform (" <b>Required User Data</b> ").                       | User ID, login credentials, salutation, first name, last name, company, company address, company phone number, company fax, company email address. | Registered website users. | Provision is a contractual requirement, or a requirement necessary to enter into a contract.<br><br>Not providing these data means that we will not be able to grant user access and provide the contents of the Learning Platform. | The data is stored for the duration of the partnership.<br>In addition, we store this data for the purpose of exercising statutory retention or documentation obligations. |
| Optional data that can be processed upon registration and in order to create a user account to the Learning Platform (" <b>Optional User Data</b> "). | Title, department, function, mobile phone number, fax, company website (URL), address, comments, language, further company information.            | Registered website users. | 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.   | The data is stored for the duration of the partnership.<br>In addition, we store this data for the purpose of exercising statutory retention or documentation obligations. |

## 2. Details on the processing of personal data

| Purpose of processing the personal data  | Categories of personal data that are processed | Legal basis, and, if applicable, legitimate interests  | Recipient                        |
|--|--|--|----------------------------------|
| In order to provide the contents of the Learning Platform accessed by the user, creation of a user profile is required in advance. Personal data is processed to ensure authenticated access to the Learning Platform. | Required User Data                             | Performance of a contract (Art. 6 (1) b) of the General Data Protection Regulation). Our legitimate interest is providing the website content requested by the user. | Tool Provider, Platform Provider |
| During registration, additional personal data can be provided, which enables a more targeted user approach and communication.  | Optional User Data                             | Balancing of interests (Art. 6 (1) f) of the General Data Protection Regulation). Our legitimate interest is providing the website content requested by the user.    | Tool Provider, Platform Provider |

**3. 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  |
|---------------|------------------|---------------------------|--|
| Tool Provider | Processor        | EU, potentially worldwide | We may also transfer personal data to third countries that do not currently ensure a level of data protection equivalent to that of the EU or Switzerland. We compensate for the lower level of protection through appropriate contracts, especially the recognized standard contractual clauses, insofar as the recipient is not already subject to a legally recognized set of rules for ensuring data protection and we cannot rely on a legal exception. An exception may apply namely in the case of legal proceedings abroad, but also in cases of overriding public interests or if the performance of a contract requires such disclosure, if you have consented or if it is a matter of data made generally available by you, the processing of which you have not objected to. |

| Recipient         | Recipient's role | Recipient's location | Adequacy decision or appropriate or suitable safeguards for transfers to third countries and/or international organisations  |
|-------------------|------------------|----------------------|--|
| Platform Provider | Processor        | Hong Kong            | We may also transfer personal data to third countries that do not currently ensure a level of data protection equivalent to that of the EU or Switzerland. We compensate for the lower level of protection through appropriate contracts, especially the recognized standard contractual clauses, insofar as the recipient is not already subject to a legally recognized set of rules for ensuring data protection and we cannot rely on a legal exception. An exception may apply namely in the case of legal proceedings abroad, but also in cases of overriding public interests or if the performance of a contract requires such disclosure, if you have consented or if it is a matter of data made generally available by you, the processing of which you have not objected to. |



## **V. Use of Data for customer loyalty and advertising purposes**

If you are an existing customer and have not objected to such use, we will use your contact details for customer loyalty and advertising purposes via email, particularly for sending informational materials about similar products or services to those you have already used with us. The processing is based on the legitimate interest in customer loyalty and sales promotion of HUGO BOSS in accordance with Article 6 (1) (f) of the GDPR. You can object to this processing at any time. The option to object can be found in the respective newsletter. Once you object, you will no longer receive informational emails from us in the future.

## **VI. Use of Data for Compliance Purposes**

To comply with internal and external compliance requirements, your data is processed for the purposes of sanctions list checks, anti-money laundering measures, and whistleblower protection measures. For this purpose, your data may also be shared with third parties who may act as independent controllers within the meaning of Article 4 No. 7 GDPR. The processing is based on the fulfillment of legal obligations, Article 6 (1) (c) GDPR, as well as the legitimate interests of HUGO BOSS, Article 6 (1) (f) GDPR.

The categories of personal data affected may include all personal data mentioned in Sections III & IV. The processing involves the following categories of affected individuals: Suppliers and Franchise as well as License Partners.

The retention period and deletion deadlines are determined within the framework of necessity for the duration of compliance measures as well as the business relationship. This also includes the initiation and execution of a business relationship and the regular limitation period of three years to defend against or assert legal claims.

**D. PROTECTION OF YOUR PERSONAL DATA (SECURITY OF PROCESSING)**

HUGO BOSS has implemented various technical and organizational measures to ensure an appropriate level of data security while processing your personal data.

HUGO BOSS is officially certified according IEC/ISO 27001 with regard to the protection of customer data. To ensure confidentiality, integrity and availability of your personal data, HUGO BOSS has implemented f. e. the following technical and organizational measures (non-exhaustive list):

- Encryption of personal data
- Pseudonymisation of personal data
- Consistent application of the “need-to-know-principle” (access to your personal data is strictly limited to personnel who require access to provide the requested products and services)
- HUGO BOSS personnel and service providers are subject to an obligation of confidentiality
- Implementation of numerous precautionary measures to protect your personal data against unauthorized access, loss, alteration
- Contracting service providers of HUGO BOSS are contractually obliged to ensure the same appropriate level

**E. EFFECTIVE DATE AND AMENDMENT OF THIS PRIVACY POLICY**

This Privacy Policy is effective immediately. It may be necessary to amend this Privacy Policy due to technical developments and/or changes to statutory or regulatory requirements.