

## PRIVACY POLICY GROUP SITE

HUGO BOSS AG (hereinafter “**HUGO BOSS**” or “**we**”) provides the HUGO BOSS company website under the URL <https://group.hugoboss.com/en/>. 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”).

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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)

Pursuant to Art. 21 (1) of the GDPR you have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data that is carried out on the basis of a legitimate interest of HUGO BOSS under Article 6(1)(f) GDPR (including profiling).

Pursuant to Art. 21 (2) of the GDPR you have the right to object at any time to processing of your personal data for direct marketing purposes (including profiling, insofar as it is related to such direct marketing).

Information on which processing activities rely on these legal bases can be found below (**Section C**).

- 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 incl. the the online contact form**

When the use of the website is purely informational, certain information is technically transmitted to the server of our website by the browser or app used on your device, such as your IP address. We process this information to provide the content of the website you have accessed. Additionally, to ensure the security of the IT infrastructure used to provide the website, this information is temporarily stored in a so-called web server logfile. On various sections of our website, we also offer you the option to contact us via a contact form. We process the information you provide in the contact form to address your inquiry

You receive more detailed information on this below.

**1. Details on the personal data that is 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 that accrue via the Hypertext Transfer Protocol (Secure) (HTTP(S)) for technical reasons (" <b>HTTP(S) Data</b> ").	IP address, type and version of your Internet browser, operating system used, the page accessed, the site accessed before visiting the site (referrer URL), data and time of the visit.	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.  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).  If there is a security related event, server log files are stored until the security relevant event has been eliminated and clarified in full.

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
<p>Data that you provide us with in the contact forms on the website (“<b>Contact Form Data</b>”).</p>	<p>Subject, email-address, your request/message (mandatory); Title, first name, last name, telephone number, order number (voluntary).</p>	<p>Website users.</p>	<p>Provision is not a statutory or contractual requirement, or a requirement necessary to enter into a contract. There is no obligation to provide the data.</p> <p>Not providing the data means that we cannot process your request.</p>	<p>Data are stored until your request has been handled.</p> <p>We store these data for evidence purposes for the establishment, exercise or defence of any legal claims and also for an interim period of three years commencing at the end of the year in which you deregister and in the event of any legal disputes until such have been concluded. We also store these data longer if we are legally required to do so, especially pursuant to commercial and tax law. Depending on the type of documentation, document retention requirements can be six or ten years pursuant to commercial or tax law (Section 147 German Tax Code – Abgabenordnung (AO), Section 257 German Commercial Code – Handelsgesetzbuch (HGB)).</p>

**2. Details on the processing of the 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 processed temporarily on our web server to provide the contact forms on the website.	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 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.
If you are contacting us: Processing your request.	Contact Form Data.	If your request relates to a contract to which you are a party or the implementation of pre-contractual measures: Art. 6 (1) b) of the General Data Protection Regulation.  Otherwise: balancing of interests (Art. 6 (1) f) of the General Data Protection Regulation). In this case, our legitimate interest is processing your request.	IT service provider.

Purpose of processing the personal data	Categories of personal data that are processed	Legal basis, and, if applicable, legitimate interests	Recipient
Storage and processing for evidence purposes for the establishment, exercise or defence of any legal claims.	Contact Form Data.	Balancing of interests (Art. 6 (1) f) of the General Data Protection Regulation). Our legitimate interest is the establishment, exercise or defence of any legal claims.	IT service provider.
<p>Storage of data in order to meet statutory document retention requirements, in particular commercial and tax law document retention requirements.</p> <p>Depending on the document type, commercial and tax law document retention requirements of six or ten years can exist (Sec. 147 German Fiscal Code (Abgabenordnung – AO), Sec. 257 German Commercial Code (Handelsgesetzbuch – HGB)).</p>	Contact Form Data.	Compliance with a legal obligation (Art. 6 (1) c) of the General Data Protection Regulation).	IT service provider.

No automated decision-making.

**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	-
It service provider	Processor	EU	-

There are no automated individual decision-making cases.

**II. Tracking including the use of cookies**

HUGO BOSS AG provides the HUGO BOSS Website including the integrated Online Store and the App as a technical infrastructure for all HUGO BOSS subsidiaries. . Therefore, HUGO BOSS AG is the responsible joint controller party for data processing related to the visit of the website and App as well as tracking measures integrated into them.

**1. General information**

Personal data may also be processed as part of the tracking process. Personal data is all data that can be related to you personally. The execution of programs or the transfer of viruses to the terminal device used by you is not possible.

Your browser uses so-called Cookies when you visit our website. Cookies are small text files that your browser stores on your hard drive. If you access the HUGO BOSS websites again, HUGO BOSS may retrieve the stored cookie information. 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 technologies, including small graphics known as counting pixels, pixel tags, web beacons or clear GIFs, which are used in connection with the provision of our services to track the use of the online service by our users. In general, Tracking-Technologies and Cookies are referred to as “**Cookies**”.

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

If our app is available and you use it, log data is collected via the Hypertext Transfer Protocol (Secure) (HTTP(S)). Your terminal device (model and IMEI), operating system, the accessed (sub) page, date and time of access, country (according to IP address), technical usage data (e.g., which products were accessed, shopping cart information, completion of a purchase) are processed. So-called IP anonymization is activated in the App. This means that the technically transmitted IP address is anonymized or alienated by shortening the IP address (by deleting the last octet of the IP address) before storage.

Cookies and tracking technologies in the App are collectively referred to as “Tracking Technologies.”

You can find detailed information about the tracking technology used in each case, such as the purpose of processing, the data processed, the storage period and the service providers used on the website via the cookie banner/ cookie settings, and in the app via the consent overlay/ consent settings. You can also revoke your consent at any time either for a tracking technology category or for individual services via the “Cookie Settings” in the footer of our website or via the “Consent Settings” tab in the app. If you prohibit the use of tracking technologies, functional impairments are possible.

## **2. Various types of Tracking-Technologies**

HUGO BOSS uses various types of Tracking-Technologies, namely necessary Tracking-Technologies, functional Tracking-Technologies, Tracking-Technologies for analytics and Tracking-Technologies for marketing purposes. In the following you will receive more information about these various types of Tracking-Technologies.

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

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

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

The provision of your personal data is necessary for the use of the website/ App. Please note that if you do not provide your personal data to the extent described above, you will not be able to use the website/App to its full extent.

### **b) Functional Tracking-Technologies**

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

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

**c) Tracking-Technologies for analytics**

HUGO BOSS uses various Tracking-Technologies for analytics purposes, e.g. to better understand how the website/ App is used and to improve its services.

For this purpose, we collect technical communication and usage data, such as the IP address, technical log information, login information if applicable, and a unique Cookie/User-ID, which enables us to recognize you when you return to our website or open our App. We also collect certain data in connection with your order as well as analysis data, i.e. aggregated data on which conclusions are drawn.

The provision of your personal data is not necessary for the use of the website/ App.

### **III. Use of shareholder and shareholder representative data**

We process personal data of shareholders and their representatives as part of the maintenance of our share register. Pursuant to Section 67 of the German Stock Corporation Act (AktG), HUGO BOSS is required by law to maintain a share register of all shareholders holding registered shares in HUGO BOSS AG. In addition, personal data is processed for the Annual Shareholders' Meeting. You receive more detailed information on this below. For this purpose, the respective provider uses cookies on its website (see subsection II). Please refer to the provider's cookie information.

You receive more detailed information on this below.

**1. Details on the personal data that is processed**

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
Data required for maintaining the share register („ <b>Shareholder Data</b> “).	First name, last name, address, email address, shareholder number, number of shares, title, gender, nationality, correspondence language, industry key and profession, type of share ownership, submitting bank	The shareholder's credit institution and the central securities depository Clearstream Holding AG.	Pursuant to Section 67 (1) and (4) of the German Stock Corporation Act (AktG), there is a legal obligation for shareholders and banks to provide this data.  The share register cannot be maintained without the provision of this data.	We store this data for the entire duration of the shareholding. After the sale of all your shares, we store the data for another ten years to fulfil legal retention requirements.
Mailing and communication data („ <b>Correspondence Data</b> “).	Title, first name, last name, residential address, email address, mailing information, email dispatch information	The shareholder's credit institution, the central securities depository Clearstream Holding AG and the shareholder or shareholder representative.	There is a legal obligation to provide this data pursuant to Section 67 (1) and (4) of the German Stock Corporation Act (AktG).  Without providing the data, the required correspondence cannot be guaranteed. In the event of non-registration for email dispatch, no email correspondence can take place.	We store this data for six or ten years, depending on the context, in order to fulfil statutory retention obligations, in particular commercial and tax retention obligations.

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
Data processed as a result of a transaction (e.g. share purchase or disposal) and to track the respective shareholding („ <b>Transaction and Shareholding Data</b> “).	Transaction number, transaction type, number of shares registered in the transaction, transaction date, registration date, transaction status, BIC data, bank details	The shareholder's credit institution and the central securities depository Clearstream Holding AG.	There is a legal obligation to provide this data pursuant to Section 67 (1) and (4) of the German Stock Corporation Act (AktG).  Without the provision of this data, the share register cannot be maintained to the extent required by law.	We store this data for ten years after receiving the transaction (transaction date).
Data processed for the Annual Shareholders' Meeting („ <b>Annual Shareholders' Meeting Data</b> “).	Number and date of the Annual Shareholders' Meeting, participant status, shareholder number, participant name, representative if applicable, participation card type, exercise of voting rights, residential address, number of shares, questions submitted if applicable	Shareholder or shareholder representative and the service provider for preparing and holding the Annual Shareholders' Meeting.	Pursuant to Section 129 of the German Stock Corporation Act (AktG), a register of all shareholders or shareholder representatives attending the meeting must be kept and be accessible to all participants. In addition, pursuant to Section 129 of the German Stock Corporation Act (AktG), it must be ensured to prove whether and how a vote was counted.  There is no obligation to submit questions. Without a provision, questions cannot be answered.	We store the data, in particular to fulfil statutory obligations to provide evidence and to retain records, for a maximum of ten years from the date of the respective Annual Shareholders' Meeting, depending on the context.

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
Online Services Data	Date and time of retrieval, login details, user information, usage behavior, log file data	Shareholder or shareholder representative and the service provider for maintaining the share register as well as the service provider for preparing and holding the Annual Shareholders' Meeting.	There is no obligation to provide the data.  In the event that the data is not provided, we will not be able to provide the requested content of the website.	We store the data, in particular to fulfil statutory obligations to provide evidence and to retain records, for a maximum of ten years, depending on the context.
Statistical Data	No data traceable to individuals, only institutional analysis: investor type, stock holdings data, stock date, stock changes, geographic location.	The service provider for maintaining the share register.	No personal data is processed. We only retain the aforementioned data for statistical analysis purposes in anonymized form for an indefinite period of time.	No processing of personal data takes place. We retain the aforementioned data in anonymized form for an indefinite period of time solely for the purpose of statistical evaluations.

**2. Details on the processing of the personal data**

Purpose of processing the personal data	Categories of personal data that are processed	Legal basis, and, if applicable, legitimate interests	Recipient
Maintenance of the share register and relating purposes.	Shareholder Data, Transaction and Shareholding Data	The legal basis for the processing is Art. 6 (1) c), f) and (4) GDPR in conjunction with Section 67 (1) and (4) German Stock Corporation Act (AktG).	The service provider for maintaining the share register.

Purpose of processing the personal data	Categories of personal data that are processed	Legal basis, and, if applicable, legitimate interests	Recipient
Correspondence with the shareholder or shareholder representative.	Correspondence Data	The legal basis for the processing is Art. 6 (1) c), f) and (4) GDPR in conjunction with Section 67 (1) and (4) German Stock Corporation Act (AktG).	The service provider for maintaining the share register.
Handling of the Annual Shareholders' Meeting	Annual Shareholders' Meeting Data	<p>The legal basis for the processing is Art. 6 (1) c) GDPR in conjunction with Sections 67, 118 et seq. of the German Stock Corporation Act (AktG).</p> <p>Insofar as the processing of personal data is necessary for organizational reasons for the implementation of the (virtual) Annual Shareholders' Meeting, the legal basis is Art. 6 (1) f) GDPR.</p>	Service provider for preparing and holding the Annual Shareholders' Meeting.
Storage and processing for evidence purposes for the establishment, exercise or defence of any legal claims.	Shareholder Data, Transaction and Shareholding Data, Annual Shareholders' Meeting Data, Correspondence Data	The legal basis for the processing is Art. 6 (1) f) GDPR. After balancing of the interests, our legitimate interest is the establishment, exercise or defence of legal claims.	Service provider for preparing and holding the Annual Shareholders' Meeting..

Purpose of processing the personal data	Categories of personal data that are processed	Legal basis, and, if applicable, legitimate interests	Recipient
<p>Provision and documentation of the use of the shareholder portal and participation in the (virtual) Annual Shareholders' Meeting.</p>	<p>Online Services Data</p>	<p>The legal basis for the processing is Art. 6 (1) f) GDPR. After balancing of the interests, our legitimate interest is the provision of the shareholder portal, in particular also in order to meet the further obligations arising from Section 67 (1) and (4) German Stock Corporation Act (AktG) as well as Sections 67, 118 et seq. German Stock Corporation Act (AktG),.</p>	<p>The service provider for maintaining the share register as well as the service provider for preparing and holding the Annual Shareholders' Meeting.</p>
<p>Statistical analysis of shareholdings and changes in holdings as well as geographical locations of institutional shareholder representatives.</p>	<p>Statistical Data</p>	<p>The legal basis for the processing is Art. 6 (1) f) and (4) GDPR. After balancing of the interests, our legitimate interest is the statistical evaluation of institutional shareholder representative data as well as share data in order to be informed about the company shareholding structure.</p>	<p>The service provider for maintaining the share register.</p>

No automated decision-making takes place

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
Service provider for preparing and holding the Annual Shareholders' Meeting	Processor	EU	-
Service provider for maintaining the share register	Processor	EU	-

IV. Use of our social media profiles

HUGO BOSS operates social media profiles such as on Facebook, Instagram, TikTok. In this case, HUGO BOSS and the respective platform operator of our social media profiles are joint controllers within the meaning of Art. 26 (1) GDPR. You as a social media user can influence the extent to which your user behavior can be recorded and analysed by choosing the appropriate privacy settings in your social media profile. This data includes any information about you that we receive through various social media channels such as Facebook, Instagram, Google, etc. when we use these channels for advertising, analytics or optimization purposes. This includes, but is not limited to: Any social media information that is publicly available, such as social media handles, social media interactions and public postings, photos posted or sent to us, comments or messages shared with us publicly or privately on social media platforms. In addition, we may indirectly receive information from social media companies (Meta, Google, etc.) when we advertise on these platforms.

For this purpose, we and the respective providers use cookies (**Subsection III**). Please also note the data protection and cookie information of the respective platform operator.

1. Details on the personal data that is processed

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
Statistical information about social media users in relation to our social media profile generated by the social media platform operator and provided to us in order to customize our social media activities (" <b>Statistical Data</b> ").	e.g. total page views, likes, page activity, comments, shared content, reach, percentage of men and women, etc.	Respective social media platform, individual user him or herself.	Please note the privacy notices and settings of the respective platform operator.	No storage of personal data at HUGO BOSS.
Attribution to user segments by analysing the statistical data of the users (" <b>Segment Data/Targeting Data</b> ").	Data on affinity with HUGO BOSS brands, their products or content. Data that is stored in cookies for the respective tracking pixel (for Facebook, for example, the Facebook Pixel) on the user's end device.  Unique ID for (re)recognizing returning visitors.  - Order value (Order Value) - Purchased products (Product IDs) - Products viewed (Product IDs) - Searched products (Product IDs) - Page Type.	Respective social media platform, individual user him or herself.	There is no obligation to provide the personal data.	No storage of personal data at HUGO BOSS.

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
<p>If you contact us via social media channels:</p> <p>Information you share with us in a direct message ("<b>Social Media Contact Data</b>").</p>	<p>All information related to your contact, e.g. username, user profile, message content and time of message.</p>	<p>Respective social media platform, individual user him or herself.</p>	<p>There is no obligation to provide the personal data.</p>	<p>Generally 60 days.</p>
<p>If you contact us via social media channels:</p> <p>Posting content on our social media pages ("<b>User-generated Data</b>").</p>	<p>All information related to your contribution, e.g. username, user profile, image, text, video.</p>	<p>Respective social media platform, individual user him or herself.</p>	<p>There is no obligation to provide the personal data.</p>	<p>Please note the privacy notices and settings of the respective platform operator.</p>

Categories of personal data that are processed	Personal data included in the categories	Data source(s)	Obligation to provide the data	Storage duration
<p>"<b>Analysis data</b>" of the platform providers.</p>	<p>Data generated separately in each case by the provider of the respective tracking pixel (for the Facebook Pixel, for example, Facebook) based on the information collected by the respective tracking pixel.</p> <p>This includes information about the effectiveness of the advertisements via the respective provider and attributions of users to target groups for advertisements via the respective provider.</p>	<p>Generated independently by the respective provider.</p>	<p>There is no obligation to provide the personal data.</p>	<p>The respective provider only makes data available to us in an aggregated, anonymized form. We cannot link this data to any natural person.</p> <p>The collection and processing of personal data is the responsibility of the respective provider. We do not have any knowledge about the storage duration.</p>

**2. Details on the processing of the personal data**

Purpose of processing the personal data	Categories of personal data that are processed	Automated decision-making	Legal basis, and, if applicable, legitimate interests	Recipient
We receive data from users that is analysed in pseudonymous form for visit activity evaluation, segmentation of visitors and evaluation of campaign performance.	Statistical Data, Segment Data/Targeting Data, User-generated Data, Analysis Data	We do not use automated decision-making in our scope of responsibility.  For details on the processing of data in the scope of responsibility of the social media providers, please refer to the information provided by the platform provider.	Art. 6 (1) a) GDPR (Consent to the processing).  We do not process any personal data in our scope of responsibility.	Social Media Platform Provider
Evaluating the effectiveness of our advertisements and creating target groups, e.g. for our Facebook ads, using "Facebook Pixel". If you are registered with a service of the platform provider, e.g. Facebook, Facebook may be able to link the visit to your account.	Statistical Data, Segment Data/Targeting Data, User-generated Data, Analysis Data	We do not use automated decision-making in our scope of responsibility.  For details on the processing of data in the scope of responsibility of the social media providers, please refer to the information provided by the platform provider.	Art. 6 (1) a) GDPR (Consent to the processing).  We do not process any personal data in our scope of responsibility.	Social Media Platform Provider
Processing your request.	Social Media Contact Data	No automated decision-making takes place.	Art. 6 (1) b) GDPR (Contract) insofar as your request concerns a contract or pre-contractual measures.  Otherwise Art. 6 (1) f) GDPR (legitimate interest in the processing of your request).	Social Media 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
Hosting-Provider	Processor	EU	-
Meta Platforms Ireland Limited	(Joint) Controller	EU and USA	There is no adequacy decision of the EU Commission within the meaning of Article 45 (3) GDPR. Meta Platforms has standard contractual clauses (SSC) that have been approved in accordance with Article 46 GDPR.
Twitter International Company	(Joint) Controller	EU and USA	There is no adequacy decision of the EU Commission within the meaning of Article 45 (3) GDPR. Twitter has standard contractual clauses (SSC) that have been approved in accordance with Article 46 GDPR.
TikTok Technology Limited	(Joint) Controller	EU	There is no adequacy decision of the EU Commission within the meaning of Article 45 (3) GDPR. TikTok has standard contractual clauses (SSC) that have been approved in accordance with Article 46 GDPR.

**V. Use of Online Services to Protect Our Brands and Products**

To protect our brands, our products, and our customers, we process personal data in order to detect, prevent, and pursue counterfeits, trademark infringements and other intellectual property infringements. This includes, in particular, the processing of reports, transaction data, and communication data, insofar as this is necessary to examine and enforce our claims. The data processing serves to protect the intellectual property rights of HUGO BOSS, to ensure the authenticity of our products, and to prevent economic harm and reputational risks. It is carried out on various websites, platforms, etc.

We process personal data that we obtain from publicly accessible sources (e.g., online marketplaces, social media platforms, independent websites, domain registries), from the respective platform operators, from domain registrars, from service providers engaged by us, as well as from the affected providers/sellers themselves (Art. 14 GDPR). This may in particular include names, contact details, account and profile information (e.g., seller name, shop name, username, seller ID), listing data (e.g., product descriptions, images, prices, URLs, domain names), as well as communication content in connection with reports, takedown actions, complaints, or objections.

The processing of this data is carried out for the purpose of detecting and assessing potential intellectual property infringements and product counterfeits, initiating and documenting appropriate measures (e.g., reporting infringements to platform operators, social media platforms, hosting providers or domain registrars), handling inquiries, complaints, and objections, as well as asserting, exercising, or defending legal claims. The legal basis is Art. 6(1)(f) GDPR. Our legitimate interest lies in protecting and enforcing our trademark and other intellectual property rights, protecting our customers from misleading or unlawful offers, and protecting our company from economic loss and reputational damage.

To achieve these purposes, we use specialized service providers (brand protection providers) who act as processors under our instructions on the basis of contractual agreements. These service providers may use technical solutions, including automated and AI-based analysis tools, to identify suspicious offers. However, the decision on whether to take measures (e.g., submitting a takedown notice) is always made by natural persons; no automated decision-making within the meaning of Art. 22 GDPR takes place.

Other recipients may include, in particular, platform operators, marketplaces, domain registrars, hosting providers, internal departments, as well as external legal advisors where applicable. Data may be transferred to countries outside the EU/EEA; in such cases, where no adequacy decision of the European Commission exists, we ensure an adequate level of data protection through appropriate safeguards (e.g., EU Standard Contractual Clauses and supplementary measures).

Personal data is stored for the duration of the examination and handling of the respective case (including any takedown actions and objections), and beyond that for the duration of any out-of-court or court proceedings and in accordance with statutory limitation and retention periods, generally 10 years. Thereafter, the data will be deleted or stored in a form that no longer permits the identification of individuals. There is no statutory or contractual obligation for the data subjects to provide us with this data; however, without processing the relevant information, it is generally not possible, or only to a limited extent possible, to review and enforce our intellectual property rights or to conduct a renewed review in the context of complaints or objections.

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

HUGO BOSS has implemented various technical and organizational measures to ensure an appropriate level of data security while processing your personal data. HUGO BOSS is officially certified according IEC/ISO 27001 with regard to the protection of customer data.

To ensure confidentiality, integrity and availability of your personal data, HUGO BOSS has implemented f. e. the following technical and organizational measures (non-exhaustive list):

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

All technical and organizational measures implemented by HUGO BOSS shall always reflect the “state of the art”.

## **E. 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. The currently valid version of this Privacy Policy can be accessed at any time at <https://group.hugoboss.com/en/> under “Data Protection”.