

Privacy Policy

HUGO BOSS Speak Up Channel

HUGO BOSS AG, Holy-Allee 3, 72555 Metzingen, Germany (hereinafter referred to as "HUGO BOSS" or "we") attaches great importance to the protection of your personal data. The [HUGO BOSS Speak Up Channel](#) (hereinafter referred to as the "Portal") serves as a whistleblowing channel and for contacting us with questions about compliance at HUGO BOSS. We process your data exclusively in accordance with the principles described below and in compliance with the applicable data protection laws, in particular the EU General Data Protection Regulation (GDPR). Insofar as other legal norms - in particular legal norms of other countries - apply, these shall apply accordingly. Whether and to what extent these laws are applicable depends on the individual case. Insofar as data protection laws other than the GDPR are applicable in individual cases, references to GDPR provisions are (also) to be understood 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
Telephone: +49 7123 94 - 0
Fax: +49 7123 94 - 80259
E mail: info@hugoboss.com

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

HUGO BOSS AG
Data Protection Officer
Holy-Allee 3, 72555 Metzingen, Germany
Telephone: +49 7123 94 – 80999
Fax: +49 7123 94 – 880999
E mail: privacy@hugoboss.com

B. YOUR RIGHTS AS A DATA SUBJECT

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:

- Right of access (Art. 15 GDPR)
- Right to rectification (Art. 16 GDPR)
- Right to erasure ("right to be forgotten") (Art. 17 GDPR)
- Right to restriction of processing (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- 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 **Error! Reference source not found.** of this Privacy Policy.

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

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

C. INFORMATION REGARDING THE PROCESSING OF PERSONAL DATA

You can use our portal purely for information purposes, but you can also get in touch with us by sending us an enquiry or a message.

I. Informational use of the portal incl. tracking / cookies

When using the portal for purely informational purposes, the browser used on your end device sends certain information to the server of our website for technical reasons, such as the IP address or the browser used. We process this information to provide the website content accessed. To ensure the security of the IT infrastructure used to provide the website, this information is also temporarily stored in a so-called web server log file.

You will find more detailed information below.

1. What data do we process and for what purposes?

We process log data that is generated for technical reasons when the website is accessed via the Hypertext Transfer Protocol (Secure) - HTTP(S) ("HTTP(S) data"). This includes, for example, IP address, type and version of your Internet browser, operating system used, the page accessed, the previously visited page (referrer URL), date and time of access. This data originates from you as a user of the website. The provision of this data is not required by law or contract or necessary for the conclusion of a contract. There is no obligation to provide the data. However, if the data is not provided, we will not be able to provide the website content accessed.

This portal only uses cookies that are necessary for the functioning of the website. Cookies are small data packets that are stored on your end device by your browser. No further tracking takes place.

2. On what legal basis do we process your data?

HTTP(S) data is temporarily processed on our web server to provide the website content accessed by the user. The processing is based on a balancing of interests (Art. 6 para. 1 f) GDPR). Our legitimate interest is the provision of the website content accessed by the user.

HTTP(S) data is temporarily processed in web server log files to ensure the security of the IT infrastructure used to provide the website, in particular to detect, eliminate and document malfunctions (e.g. DDoS attacks). The processing is based on a balancing of interests (Art. 6 para. 1 f) GDPR). Our legitimate interest is to ensure the security of the IT infrastructure used for the provision of the website, in particular for the detection, elimination and conclusive documentation of malfunctions.

3. Who receives your data?

The data is generally passed on to our (hosting) provider(s) as our processor(s), including those based in third countries. If the service providers are based in the USA, the legal requirements for legally compliant data processing are met either in the form of EU-US Privacy Framework certification or standard contractual clauses and additional measures.

4. How long do we store your data?

The log data is stored in server log files in a form that enables the identification of the persons concerned for a few days, unless a security-relevant event occurs (e.g. a DDoS attack). In the event of a security-relevant event, server log files are stored until the security-relevant event has been eliminated and fully clarified.

5. Does automated decision-making take place?

There is no automated decision-making within the meaning of Art. 22 GDPR.

II. Contact and Further Use

1. What data do we process and for what purposes?

You can use the portal to contact HUGO BOSS either to ask questions about compliance or to report possible violations. In both cases, we collect the data you provide ("**contact data**"). This typically includes personal information such as your name and contact details, your relationship with HUGO BOSS and whether you wish to remain anonymous in whole or in part, as well as information on the facts of the case, such as the organisational unit concerned, the incident, the persons involved, the time and place and, if applicable, photographs or video recordings.

This data originates from you as a user of the website. The provision of this data is not required by law or contract or necessary for the conclusion of a contract. There is no obligation to provide the data. If you decide to submit your enquiry completely anonymously, HUGO BOSS will not receive any personal data about you in this case. Instead, you will receive a case number via the portal and can set a password. Only with these two pieces of information can you then access the feedback on your enquiry in the portal.

The data of other data subjects may also be processed, in particular of accused persons, witnesses and other parties involved. Data processing does not differ for these groups, unless different data processing is described below.

- a) If you have provided personal data, this will be processed in order to **process and respond to your enquiry**.
- b) HUGO BOSS takes information about possible compliance violations very seriously. If the internally responsible team comes to the conclusion that a matter requires further investigation, this investigation will be carried out. In addition to the original contact data, personal and non-personal data is collected and stored to reflect the content and status of the investigation ("**case management data**").
- c) All data in connection with a substantive enquiry or a possible infringement will be stored and processed **for evidence purposes** and for the possible assertion, exercise or defence of legal claims.

2. On what legal basis do we process your data?

- a) Insofar as data is processed to process and respond to your enquiry, the processing is based on a balancing of interests (Art. 6 para. 1 f) GDPR). Our legitimate interest is to respond to your enquiry. If employees contact HUGO BOSS with general enquiries on the subject of compliance, the legal basis for data processing is the existing employment relationship pursuant to Art. 6 para. 1 b) GDPR.

b) Insofar as data is processed in connection with reported violations under the Whistleblower Protection Act, the processing is based on a legal obligation (Art. 6 para. 1 c) GDPR in conjunction with Section 10 Hin-SchG). If other violations are reported, the processing is based on a balancing of interests (Art. 6 para. 1 f) GDPR). Our legitimate interest is the clarification of possible violations of relevant standards or internal guidelines that occur within or with the involvement of HUGO BOSS.

c) Insofar as data is processed for evidence purposes and for the possible assertion, exercise or defence of legal claims, the legal basis is a balancing of interests (Art. 6 para. 1 f) GDPR). After weighing up the interests, our legitimate interest is the establishment, exercise or defence of legal claims.

3. Who receives your data?

HUGO BOSS uses IT service providers to provide the cloud-based portal and to perform other IT support and administrative tasks. If the service providers are based in the USA, the legal requirements for legally compliant data processing are met either in the form of EU-US Privacy Framework certification or standard contractual clauses and additional measures.

It may be necessary to disclose personal data during the investigations. The data may be passed on to specialised departments within the Group in particular, but also to external service providers for independent analysis, who are obliged to maintain confidentiality. The whistleblower's data will only be passed on if the whistleblower has consented to this.

If the whistleblower has decided to make a report to the ombudsperson rather than to HUGO BOSS, all communication with the whistleblower will take place via the ombudsperson. The whistleblower's personal data will only be passed on after consent has been given.

Personal data is always protected against unauthorised access by the necessary security measures (encryption, physical security measures for servers, etc.).

4. How long do we store your data?

We store the data until it is necessary to respond to your enquiry or to clarify the reported matter. The data will also be stored for the defence against legal claims and as proof of the proper processing and clarification of possible violations of relevant standards or internal guidelines that occur within or with the involvement of HUGO BOSS. The data will be deleted by HUGO BOSS once the purpose no longer applies.

5. Does automated decision-making take place?

There is no automated decision-making within the meaning of Art. 22 GDPR.

D. CHANGES TO THIS PRIVACY POLICY

It may be necessary to amend this data protection information for technical and/or business reasons and/or due to changes in legal and/or official requirements. The current data protection information can be accessed at any time in the Speak Up Channel.