



H U G O B O S S

Data Protection Policy

Policy

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I. Recitals

“Data is the gold of the 21st century”. This citation makes it clear that in the digital age each individual’s data is an extremely valuable asset and, at the same time, one that is worth protecting.

It goes without saying that employees, customers, suppliers and other third parties expect that the data they provide will be dealt with responsibly. HUGO BOSS too must meet these expectations and the high new statutory data protection requirements.

HUGO BOSS seeks to obtain a level of data protection, which, depending on the task to be performed, is economically viable, taking into consideration the fundamental statutory data protection principles, including the EU’s General Data Protection Regulation (hereinafter referred to as the [GDPR](#)) and the risks associated with this.

1 Subject-Matter and the Objectives of the Data Protection Policy

- (1) This Data Protection Policy establishes the binding basis for the long-term lawful treatment and protection of personal data within the HUGO BOSS Group.
- (2) The strict requirements of the EU General Data Protection Regulation serve in essence as the legal framework for this Data Protection Policy. National data protection legislation such as, for example, the Federal Data Protection Act (Bundesdatenschutzgesetz – BDSG 2018) supplement the content of the Data Protection Policy.

2 Acknowledgment Given by the Managing Board of HUGO BOSS AG

HUGO BOSS AG’s Managing Board acknowledges and undertakes to comply with the rules, requirements and goals of this Data Protection Policy and the statutory provisions.

II. General Part

3 Application of the Policy

- (1) The Data Protection Policy sets out the rules for all processing of personal data belonging to employees, customers, suppliers, partners and third parties; it applies irrespective of the nature and manner of the processing of the personal data (whether automated or not). The Data Protection Policy does not cover anonymized data.
- (2) The Data Protection Policy applies to all companies within the HUGO BOSS Group equally. If national laws impose other requirements on the processing

of personal data, these will take precedence. Any departures from the Data Protection Policy must be agreed in advance with HUGO BOSS AG's Data Protection Officer.

- (3) The Data Protection Policy applies alongside the existing applicable policies of HUGO BOSS, company law provisions and employment contracts.
- (4) All HUGO BOSS employees as well as executive staff are obliged to comply with the Data Protection Policy.
- (5) HUGO BOSS will not tolerate any breaches of the Data Protection Policy and reserves the right to take disciplinary action against the respective employee.

4 Definitions

- (1) **'Personal data'** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- (2) **'Processing'** means any operation or set of operations which are performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- (3) **'Restriction of processing'** means the marking of stored personal data with the aim of limiting their processing in the future.
- (4) **'Profiling'** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyses or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.
- (5) **'Pseudonymization'** means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

- (6) **'Filing system'** means any structured set of personal data which are accessible according to specific criteria, whether centralized, decentralized or dispersed on a functional or geographical basis.
- (7) **'Controller'** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.
- (8) **'Processor'** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
- (9) **'Recipient'** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
- (10) **'Third party'** means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.
- (11) **'Consent'** of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
- (12) **'Personal data breach'** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.
- (13) **'Genetic data'** means personal data relating to the inherited or acquired genetic characteristics of a natural person which give unique information about the physiology or the health of that natural person and which result, in particular, from an analysis of a biological sample from the natural person in question.
- (14) **'Biometric data'** means personal data resulting from specific technical processing relating to the physical, physiological or behavioral characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic data.

- (15) **'Data concerning health'** means personal data related to the physical or mental health of a natural person, including the provision of health care services, which reveal information about his/her health status.
- (16) **'Main establishment'** means:
1. as regards a controller with establishments in more than one Member State, the place of its central administration in the Union, unless the decisions on the purposes and means of the processing of personal data are taken in another establishment of the controller in the Union and the latter establishment has the power to have such decisions implemented, in which case the establishment having taken such decisions is to be considered to be the main establishment.
 2. as regards a processor with establishments in more than one Member State, the place of its central administration in the Union, or, if the processor has no central administration in the Union, the establishment of the processor in the Union where the main processing activities in the context of the activities of an establishment of the processor take place to the extent that the processor is subject to specific obligations under the GDPR.
- (17) **'Representative'** means a natural or legal person established in the Union who, designated by the controller or processor in writing pursuant to Article 27 of the GDPR, represents the controller or processor with regard to their respective obligations under the GDPR.
- (18) **'Enterprise'** means a natural or legal person engaged in an economic activity, irrespective of its legal form, including partnerships or associations regularly engaged in an economic activity.
- (19) **'Group of undertakings'** means a controlling undertaking and its controlled undertakings.
- (20) **'Binding corporate rules'** means personal data protection policies which are adhered to by a controller or processor established on the territory of a Member State for transfers or a set of transfers of personal data to a controller or processor in one or more third countries within a group of undertakings, or group of enterprises engaged in a joint economic activity.
- (21) **'Supervisory authority'** means an independent public authority which is established by a Member State pursuant to Article 51 of the GDPR.
- (22) **'Supervisory authority concerned'** means a supervisory authority which is concerned by the processing of personal data because:
1. the controller or processor is established on the territory of the Member State of that supervisory authority;

2. data subjects residing in the Member State of that supervisory authority are substantially affected or likely to be substantially affected by the processing; or
3. a complaint has been lodged with that supervisory authority.

(23) **'Cross-border processing'** means either:

1. processing of personal data which takes place in the context of the activities of establishments in more than one Member State of a controller or processor in the Union where the controller or processor is established in more than one Member State; or
2. processing of personal data which takes place in the context of the activities of a single establishment of a controller or processor in the Union but which substantially affects or is likely to substantially affect data subjects in more than one Member State.

(24) **'Relevant and reasoned objection'** means an objection to a draft decision as to whether there is an infringement of the GDPR, or whether envisaged action in relation to the controller or processor complies with the GDPR, which clearly demonstrates the significance of the risks posed by the draft decision as regards the fundamental rights and freedoms of data subjects and, where applicable, the free flow of personal data within the Union.

(25) **'Information society service'** means a service as defined in point (b) of Article 1(1) of Directive (EU) 2015/1535 of the European Parliament and of the Council.

(26) **'International organization'** means an organization and its subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

5 Data Protection Officer

- (1) HUGO BOSS has appointed a Data Protection Officer for HUGO BOSS AG in accordance with the German Federal Data Protection Act. The contact details of the Data Protection Officer of HUGO BOSS AG are as follows:

Data Protection Officer of HUGO BOSS AG

Dieselstraße 12
72555 Metzingen, Germany
datenschutz@hugoboss.com

- (2) HUGO BOSS has appointed a local Data Protection Contact for its respective subsidiaries. A list of the local Data Protection Contacts is attached as an **appendix**.

(3) The duties of the Data Protection Officer and the Data Protection Contact are regulated in the **Data Protection Organization Policy**.

6 Principles Relating to the Processing of Personal Data

(1) The following principles apply to the processing of personal data:

- a) personal data shall be processed lawfully, fairly and in a manner that is transparent to the data subject (**'lawfulness, fairness and transparency'**);
- b) personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes (**'purpose limitation'**);
- c) personal data shall be limited to that which is adequate, relevant, and not excessive in relation to the purposes for which they are processed (**'data minimization'**); to the extent possible according to the intended purpose of their processing, personal data must be anonymized and pseudonymized;
- d) personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (**'accuracy'**);
- e) personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods subject to implementation of the appropriate technical and organizational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject (**'storage limitation'**);
- f) personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (**'integrity and confidentiality'**).

(2) HUGO BOSS is responsible for, and must be able to demonstrate compliance with, the principles relating to personal data processing (**'accountability'**).

(3) It is necessary to, from the outset, take into account data protection requirements in the architecture (**privacy by design**) and the settings (**privacy by default**) of data-processing systems. This applies in particular in relation to the settings and integration of new software, web applications, mobile applications and online tracking technologies. HUGO BOSS AG's Data

Protection Officer and the Data Protection Contacts must be consulted in a timely manner. The applications used should, if possible, support anonymization or pseudonymization operation modes.

III. Special Part – Legal Bases

7 Permissibility of Data Processing

Personal data may only be processed where a statute, legal provision, contract, collective-bargaining agreement or similar instrument permit or orders this or the data subject has given his or her valid consent.

8 Contractual Relationships

- (1) HUGO BOSS will, if necessary, process personal data for the performance of a contract to which the data subject is party. Thus processing is permitted for the purposes of entry into, performance and termination of a contract. In addition, a data subject's personal data may be used in order to assert and enforce HUGO BOSS's own rights.
- (2) In particular, HUGO BOSS is permitted to process personal data that is necessary for handling and delivering products from HUGO BOSS online stores.
- (3) HUGO BOSS will, at the data subject's request, process personal data in order to take steps prior to the entry into a contract (lead up to a contract). This includes, for example, cases where a customer requests information about a certain product.

9 Legal Obligation

HUGO BOSS will process personal information if it is necessary for compliance with a legal obligation. Further details may be found in the respective statutory provisions. This is the case in particular where personal data are processed in order to comply with tax obligations or other statutory retention periods such as, for example, those set out in the German Commercial Code (Handelsgesetzbuch – HGB) and the German Fiscal Code (Abgabenordnung – AO).

10 Legitimate Interests

- (1) HUGO BOSS will process personal data if this is necessary for the purposes of legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. This is the case, for example, where the enforcement of civil claims or video surveillance is involved.

- (2) The reasons for the assessment and the justified interests must be documented.

11 Collective Agreements

HUGO BOSS may process personal data on the basis of collective agreements (collective-bargaining agreements, works agreements etc.). HUGO BOSS AG has made use of this provision and has concluded works agreements concerning the processing of personal data with HUGO BOSS AG's works council.

12 Consent

HUGO BOSS endeavors to collect personal data with the consent of the data subject. HUGO BOSS only processes personal data if the data subject has consented to the processing of his or her personal data for one or more specific purposes.

HUGO BOSS has established the following standards for valid consent in order to ensure that consent is given voluntarily and to make the data subject aware of the scope and purpose of processing:

- (1) At the time that the data subject gives consent, he or she must be adequately informed about the processing of the data concerned, the purpose of processing and his or her rights, and must also have consented voluntarily.
- (2) Consent may be revoked at any time with effect for the future. If the declaration of consent is made together with other declarations, it should be visually emphasized (e.g. by using bold print). Consent should be presented in an intelligible and easily accessible form, using clear and plain language.
- (3) Consent must always be obtained in writing or electronically (together with an appropriate record of it) so that it is possible to demonstrate that consent was obtained. A different form of consent may only be used in exceptional cases. In these cases, separate provision for the documentation of the declaration of consent must be made.

13 Advertising

HUGO BOSS processes personal data for advertising purposes. This is done, as a rule, only with the data subject's express prior consent. Prior to consenting, the data subject should be able to choose which of the available channels of communication to use.

14 Special Categories of Personal Information

HUGO BOSS processes special categories of personal data if the data subject has consented or, by way of exception, if there is an express legal basis for doing so. In this case, the relevant department adopts additional technical and organizational measures such as, for example, encryption and the restriction of access in order to protect personal data.

15 Automated Individual Decision-Making

- (1) Where decision-making is automated, it is necessary to ensure that the data subject's personal data is processed in a fair and transparent manner. Technical and organizational measures ensure that factors which result in inaccuracies in personal data are corrected and the risk of errors is minimized.
- (2) HUGO BOSS does not subject the data subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

16 Cookies and Tracking

- (1) HUGO BOSS notifies data subjects in a suitable manner (e.g. in a privacy policy or cookie notice) if personal data is processed on websites or through applications.
- (2) The information must be provided in an intelligible and simple form, using as far as possible clear and plain language. The information should be easily recognizable, directly accessible and always available.
- (3) The relevant departments are responsible for compiling and updating the information referred to in subsection (1) before it is processed. The content of the information must be agreed with HUGO BOSS AG's Data Protection Officer.
- (4) HUGO BOSS only uses personal tracking software if a legal basis exists for doing so or the data subject has consented thereto.
- (5) HUGO BOSS gives the data subject an opportunity to object to the use of pseudonymized tracking.

17 Transfer of Data to Third Parties

- (1) HUGO BOSS only transfers personal data to a third party if it has a legal basis for doing so.
- (2) HUGO BOSS transfers personal data to recipients located outside of the European Union/ European Economic Area only if special measures to safeguard the rights and interests of the data subjects are taken. Accordingly,

it must refrain from transferring data if there is no adequacy decision available for the third country concerned, a territory or one or more specified sectors within that third country. In some cases, special contractual clauses may make it possible to transfer data.

18 Internal Investigations

HUGO BOSS is entitled to take measures to clarify a matter and to avoid or expose crimes or serious breaches of an employment contract provided that it complies with data protection legislation.

19 Change of Purpose

Any changes to the original purpose of the data processing will only be lawful if – in addition to the consent given by the data subjects – the new purpose is compatible with the original purpose. This must be ascertained by taking into account, in particular the reasonable expectations of the data subjects based on their relationship with the company as to the further use of the data, the nature of the personal data, the consequences for the data subjects of the intended further processing and the possibility of encryption or pseudonymization.

IV. Special Part – Data Subjects

20 Duties of Notification

- (1) HUGO BOSS will provide the data subject with extensive information about the collection and handling of his or her personal data. This information will include the purpose of the processing for which the personal data are intended, the identity of the controller, the recipients of the personal data and all other legally required information. Within the territorial scope of the GDPR, compliance with Article 13 of the GDPR is mandatory. The provision of information is designed to ensure fair and transparent processing; the information must be provided in an intelligible and easily comprehensible form, using language that can be understood as easily as possible.
- (2) Where personal data was not obtained from the data subjects, HUGO BOSS will subsequently provide data subjects who are within the territorial scope of the GDPR with extensive information in accordance with Article 14 of the GDPR. This will also apply accordingly to any change in the purpose of data processing.

21 Rights of Access

- (1) HUGO BOSS will at the request of a data subject confirm whether or not the company has stored and processed personal data concerning that data subject.

- (2) Suitable measures must be taken prior to processing such requests to confirm the identity of the respective data subjects with absolute certainty. In the case of any justified doubt as to the identity of a data subject, additional information must be requested from the person requesting the information.
- (3) Data subjects will regularly receive the information requested in writing except in cases in which the request was submitted in electronic form. The information will be accompanied by a copy of the personal data. HUGO BOSS may charge an appropriate general processing fee for any additional copies.
- (4) The content of information provided will be determined by the **Information Request Policy** within the territorial scope of the GDPR.
- (5) HUGO BOSS will provide the information requested within one month after receipt of the corresponding request unless a shorter period is prescribed by law. The period for compliance may be extended by two months if necessary in view of the complexity and the number of requests. HUGO BOSS will notify the data subject of the extension of the period for compliance within one month after receipt of the request and specify the reasons for the delay.
- (6) HUGO BOSS will refrain from providing any information if the rights and freedoms of other persons would be compromised or it is not possible to identify the data subject with absolute certainty.

22 Rectification

- (1) HUGO BOSS will rectify personal data found to be inaccurate if requested to do by a data subject. Similarly, data subjects may request completion of incomplete personal data.
- (2) Section 21 (2), (5) and (6) apply accordingly.

23 Erasure of Data

- (1) HUGO BOSS will without undue delay erase the personal data of data subjects at their request if one of the following grounds applies:
 - a) the data are no longer necessary for the purposes for which they were originally collected;
 - b) the respective data subject has withdrawn his or her consent and no other legal ground exists for processing;
 - c) processing of the data is unlawful;

- d) the data subject objects to the processing for marketing purposes or on grounds relating to his or her particular situation;
 - e) the personal data are of such a unique nature that their accuracy cannot be proven;
 - f) erasure of the data is otherwise required by law.
- (2) In the case of an obligation to erase personal data that have already been made public, other controllers must be notified of the request of the data subject for erasure of all copies of his or her data and all links to such data.
- (3) Section 21 (2), (5) and (6) apply accordingly.

24 Requests for Information from Third Parties

HUGO BOSS will provide third parties with information on data subjects only

- a) if the respective third party has a legitimate interest in such information;
- b) if disclosure of such information is required by law; and
- c) if the identity of the party or organization requesting the information is absolutely certain.

V. Special Part – Data Protection Management

25 Third-Party IT Processors

- (1) HUGO BOSS collaborates exclusively with third-party IT processors that offer sufficient guarantees that appropriate technical and organizational measures will be taken to ensure that processing is carried out in compliance with the requirements of the GDPR and the rights of the respective data subjects protected.
- (2) HUGO BOSS chooses its third-party IT processors carefully. Selection must be documented. Data may be processed by a third-party IT processor only after execution of an agreement covering such third-party processing. Formal legal requirements must be respected. The original must be forwarded to the Legal Department without delay.
- (3) Compliance with the agreed technical and organizational measures must be regularly reviewed and documented in an appropriate manner.

26 Record of Processing Activities

- (1) HUGO BOSS companies that fall under the territorial scope of the GDPR are under an obligation to keep records of all processing activities. This also applies accordingly for all other companies that are legally required to keep records of processing activities.
- (2) The various departments are responsible for preparing and updating descriptions of their processing activities on an ongoing basis. Such documentation must be in place prior to commencement of any data processing. The same applies accordingly in the case of any change in data processing.
- (3) The content of records of processing must at the very least comply with the requirements set forth in Article 30(a)-(g) of the GDPR.
- (4) The Data Protection Officer of HUGO BOSS AG or the Data Protection Contact may be consulted for advice.
- (5) Records of processing activities must be submitted to and approved by the Data Protection Officer of HUGO BOSS AG.
- (6) HUGO BOSS will make records of processing activities available to the competent supervisory authority if requested to do so.

27 Data Protection Impact Assessment

- (1) Departments of HUGO BOSS companies that fall within the territorial scope of the GDPR and all other companies under a legal obligation to do so must prepare documented data protection impact assessments whenever processing is likely to entail a high risk to the rights and freedoms of natural persons.
- (2) The results of the data protection impact assessment are to be submitted to the Protection Officer of HUGO BOSS AG.

28 Breach of Personal Data (Data spill)

The **Data Breach Complaint Policy** prescribes the procedure to be followed in the case of a personal data breach.

29 Security Awareness and Training of Employees

HUGO BOSS takes suitable measures on a timely basis to raise the security awareness of and train employees involved in processing operations. This may take the form of, for example, printed informational materials, online-based courses or face-to-face presentations.

30 Duty of Confidentiality

Employees may not process personal data without permission. HUGO BOSS requires that its employees agree to treat personal data confidentially before they are allowed to commence work. This obligation must be documented.

31 Audits

- (1) HUGO BOSS regularly conducts internal audits to ensure a high level of data protection and assess the data protection conformity of its own processes. The results must be documented.
- (2) Remedial measures must be taken immediately in the case of deficiencies. Remedial measures must be tested for efficacy.

VI. Special Part – Data Security

32 Availability, Confidentiality and Integrity of Data

- (1) HUGO BOSS takes appropriate technical and organizational measures to ensure an appropriate level of protection that takes into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons.
- (2) Further details are specified and described in separate HUGO BOSS Policies.

VII. Final Provisions

33 Accountability

HUGO BOSS agrees to ensure that it is able to demonstrate at any time that it is in compliance with this Policy. The necessary documentation must be prepared in a transparent and understandable manner.

34 Updating of the Data Protection Policy

- (1) To determine whether the Data Protection Policy needs to be amended or supplemented, the Data Protection Officer of HUGO BOSS AG will examine it regularly, at the very latest every 12 months, or where circumstances demand. In particular, the Data Protection Officer will take into account any developments in data protection law or changes in the technical and organizational measures implemented. Where necessary, the Data Protection Policy will be amended.

(2) No formalities are required in order for amendments to the Data Protection Policy to take effect. The employees and managerial personnel must be notified of the amendments in a suitable manner without delay.

(3) The appendices may be amended informally at any time.

35 Point of Contact

(1) Any questions regarding the rules contained in this Data Protection Policy and their implementation should be addressed to the Data Protection Officer of HUGO BOSS AG.

(2) In the event of any data breaches by HUGO BOSS, data subjects may contact HUGO BOSS's external ombudsman.

36 Application

This Policy will enter into force and effect on as of 25 May 2018.

Valid for:	HUGO BOSS	Version:	1.0
Valid from:	25 May 2018	Status:	released, valid
Approved by:	Managing Board		