



H U G O B O S S

Information Request Policy

Policy

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1 Purpose

The purpose of this Information Request Policy (hereinafter referred to as the “Policy”) is to safeguard the rights of data subjects and create and define minimum standards for processing requests for information regarding the processing of personal data.

2 Territorial Scope

This Policy applies equally to all companies of the HUGO BOSS Group located within the territorial scope of the General Data Protection Regulation of the European Union ([GDPR](#)). The Policy and the provisions contained therein are consistent with the HUGO BOSS Code of Conduct. They are binding upon all employees and must be strictly observed.

In the event that provisions of local law contain other requirements concerning the organization of data protection and the authority of persons responsible for implementation and monitoring, such provisions will take precedence.

The Data Protection Officer of HUGO BOSS AG and the Central Legal Department must be consulted in advance in the case of any deviations.

3 Will of Data Subjects and Distinctions

3.1 Interpretation of the Will of Data Subjects

The intent of the respective data subject and the grounds for his or her request must first of all be examined and interpreted accordingly. Data subjects may in this context assert all rights to which they are entitled (information, objection (as regards processing and the transfer of data), erasure, rectification and restriction of processing).

It is necessary to make a clear distinction made between the right to ‘information’, which is the most exhaustive of the rights of data subjects, and the other rights (objection, erasure, rectification and restriction), which data subjects will typically exercise in a second step.

The present Policy addresses exclusively requests for information from data subjects. The other rights are addressed in the Policy Governing Erasure, Objection, Rectification and Restriction.

3.2 Distinction – Information and Complaints

The distinction between a mere request for information and a complaint regarding specific conduct is especially important. A distinction must be made here between the Information Request Policy and the Data Breach Complaint Policy and as a result a decision as to which applies in the specific case. The content of the request of the data subject is the criterion for making this distinction:

Information – “Information Request Policy”

If a data subject only requests information, i.e., submits a question regarding his or her own personal data, the Information Request Policy applies.

Complaints – “Data Breach Complaint Policy”

If a data subject lodges a complaint concerning a personal data breach, e.g., objects to conduct in connection with the treatment of his or her own personal data, the Data Breach Complaint Policy applies.

As soon as it becomes obvious that a request for information involves a complaint, the provisions of the Data Breach Complaint Policy must be applied immediately and the Data Breach Emergency Response Team designated in that Policy notified accordingly.

4 Rights of Data Subjects

4.1 Data Subjects

All identified or identifiable natural persons, for example, customers or employees, qualify as data subjects, and therefore have a right to receive information.

The police, prosecution authorities, other governmental authorities and other legal entities do not qualify as data subjects and are therefore not entitled to receive information under this Policy. Such enquiries are to be immediately forwarded to the Compliance Office.

4.2 Confirmation of Processing

Data subjects who submit enquiries are entitled to receive confirmation (positive or negative) of whether HUGO BOSS processes their personal data. When an enquiry is received, HUGO BOSS will first verify the identity of the data subject requesting the information (see 5 Security & Identification).

4.3 Content of Response to Request

In the event that HUGO BOSS does process the personal data of the data subject, the data subject will receive the following information:

- a) the **purposes of processing**;
- b) the **categories of personal data** processed;
- c) the **recipients** or categories of recipients to whom the personal data have been or are still being disclosed, in particular in the case of recipients in other countries or international organizations;
- d) the **planned duration** of retention of personal data if possible or, if not possible, the criteria for determination of such duration;
- e) the **right to rectification or erasure** of their personal data or **restriction of processing** by the controller or to **object** to processing;
- f) the right to **lodge complaints with a supervisory authority**;
- g) all available **information on the origin of personal data** not obtained from the data subject; and
- h) **automated decision-making, including profiling**, pursuant to Article 22(1) and (4) of the GDPR and – at least in these cases – meaningful information on the logic involved and the **scope and intended effects** of such processing for the data subject.

4.4 Notification in the Case of the Transfer of Data to a Third Country

If personal data are transferred to a third country, the respective data subjects have the right to be notified of the appropriate safeguards put in place (pursuant to Article 46 of the GDPR) in connection with such transfer.

4.5 Form of Responses to Requests

A copy of the personal data processed is made available to the data subject. If the information is to be provided electronically, the personal data are to be made available in a commonly used, electronic, structured and machine-readable form.

The IT Department will determine the corresponding standard.

The **Request Form** in the **Appendix** is to be used.

4.6 Response Period

HUGO BOSS will process legitimate requests for information received from data subjects concerning the processing of their personal data without delay and in any case within one month. The data subject is to be notified as quickly as possible to the effect that his or her request is being processed

5 Security & Identification

HUGO BOSS will make every reasonable effort to verify the identity of any data subject submitting a request for information. HUGO BOSS will obtain the information required to confirm the identity of data subjects, especially in the case of requests received by electronic means or telephone.

The Data Protection Officer of HUGO BOSS AG must be notified immediately in the case of any suspicion that personal data are being requested by a party not authorized to receive such data. No data are to be provided until the issue is clarified in such cases.

6 Exceptions

Data subjects requesting information have no right to receive information on personal data that have been processed if the rights and freedoms of other persons, business secrets or proprietary rights and in particular software copyrights are infringed.

Requests for information may also be refused in the case of data subjects who exercise their right to request information unreasonably often. One request per quarter will regularly be considered acceptable if no changes occur in the data inventory of HUGO BOSS.

The Data Protection Officer of HUGO BOSS AG is to be notified prior to notification of data subjects of denial of their request for information in the cases described above.

7 Application and Point of Contact

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

Any questions regarding the implementation of this Policy should be addressed to the Data Protection Officer of HUGO BOSS AG.

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