



Brooks Brothers

PERSONAL DATA PROCESSING POLICY Remote Sales

Brooks Brothers UK Ltd (“**BB**” or the “**Company**”) well aware of the importance of the protection of personal data, in its capacity as Controller, informs its customers (“**Data Subjects**”) that the personal data collected to perform the remote sales service (the “**Service**”) shall be processed in compliance with the law regarding the protection of personal data including, but not limited to, the Data Protection Act 2018 and the General Data Protection Regulation (EU) No. 2016/679 (the ‘**Regulation**’).

Following the United Kingdom’s exit from the European Union, all references to the Regulation shall be interpreted as references to the United Kingdom’s equivalent to the Regulation (known as the “UK GDPR”).

In accordance with Article 13 of Regulation (EU) No 2016/679 (the “**Regulation**”), BB shall provide the following information concerning the management and the processing of data. It is understood that the personal data provided by the same customers in other circumstances shall be processed according to the privacy statement(s) rendered before their collection.

1. Categories of data collected. To perform the Service, BB shall process the following data of Data Subjects as willingly provided by the Data Subjects (“**Data**”): (i) personal data; (ii) contact data; (iii) purchasing data; (iv) any other data necessary to perform the Service.

2. Purpose and legal basis of the processing. BB shall process the Data for the following purposes:

- a. *to perform the Service.* The legal basis justifying said processing is set out in Article 6(1)(b) of the Regulation, since the processing is necessary for the performance of a contract of which the Data Subject is a part of or for the performance of pre-contractual measures adopted at the request of the latter;
- b. *to discharge obligations laid down by law.* The legal basis justifying said processing is set out in Article 6(1)(c) of the Regulation, since the processing is necessary to fulfil a legal obligation to which BB is subject;
- c. *to assert or defend a right in court.* The legal basis justifying said processing is set out in Article 9(2)(f) of the Regulation, since the processing is necessary to ascertain, exercise or defend a right in court;

3. Data retention period. The Data collected and processed by BB for the purposes of which 2. a, 2. b and 2. c shall be stored for all the time necessary to perform the Service and then immediately removed, with the exception of those necessary to comply with fiscal, accounting and administrative regulations or to fulfill other legal obligations and document the activities performed. In these hypotheses, the data will be deleted in the terms provided for by the aforementioned regulations.

4. Methods of processing. The Data shall be processed by staff of the Company that have express authority to do so, by analogue and electronic means, stored on any suitable device and organised in a database. Specific security measures shall be implemented to prevent the loss of the Data, as well as any illegal or incorrect use thereof and unauthorised access thereto. The processing of the Data shall not involve automated decision-making methods.



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5. Provision of Data. The provision of Data is necessary to perform the Service and therefore mandatory for the purposes referred to in points 2. a, 2. b and 2. c: in default, BB shall not perform the Service.

6. Disclosure of Data. Data can be disclosed to: (i) subjects having the right and interest to access the personal data of the Data Subjects under national or EU laws; (ii) companies within the Company's group; (iii) companies, associations or professional firms that provide services for the fulfilment of legal obligations as well as services for any other organisational and administrative requirements, on behalf of the Controller as the Processor. The names of the Processors are reported in an updated list available from the Company (to be requested by using the contact details indicated in Section 9). The Data shall not be disseminated.

7. Transfer of data to entities located outside the United Kingdom or the European Economic Area or to international organisations. BB does not transfer customer data processed for the purposes indicated in this policy in countries located outside the United Kingdom or the European Economic Area or to international organisations. However, since its service providers, appointed as data processors, might transfer the Data outside the UK and the EEA while providing their services, BB binds them to adopt appropriate safeguards, such as the execution of Standard Contractual Clauses according to art. 46 of the Regulation.

8. Rights of the Data Subjects. The Data Subjects may at any time exercise their rights provided for in the Regulation, including:

- to request information on: (i) the origin of the Data; (ii) the purposes and methods of processing; (iii) the logic applied in the event of the use of electronic devices; (iv) the details of the Controller and of the Processors.

- to obtain: (i) access to, the updating of, or the rectification or integration of the Data; (ii) the erasure, anonymisation or blocking of Data unlawfully processed; (iii) limitation of the processing of Data; (iv) a copy of the Data in standard format.

- **to object, in whole or in part, to the processing carried out:**

a) for the purposes of scientific, historical or statistical research, even if pertinent to the collection purpose, if such opposition is based on reasons related to their particular situation;

b) for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller or to pursue the legitimate interest of the Controller or of a third party;

c) for the purpose of sending promotional materials, advertising and direct marketing;

- to revoke, at any time, the consent given and on the basis of which the processing has been allowed, without affecting the lawfulness of the processing already carried out on the basis of the consent given before revoking said consent.

In the event that Data Subjects believe that the processing of their Data is against the law, the Data Subjects may submit a complaint to the supervisory authority of the Member State of their habitual residence or work, or to the place in which the alleged violation occurred. The Information Commissioner's Office could be contacted at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.



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9. Data controller. The Data Controller is Brooks Brothers UK Limited (ICO registration no. ZA044351) with registered office at Elsley Court, 20-22 Great Titchfield Street, London, United Kingdom, W1W 8BE, acting through its legal representative *pro tempore*. BB may also be contacted by e-mail at europa.info@eu.brooksbrothers.com.

To exercise the rights listed above, the Data Subject may submit their request by e-mail to europa.info@eu.brooksbrothers.com.

BB reserves the right to update this information on the processing of Data.