



Brooks Brothers

PERSONAL DATA PROCESSING POLICY Tax Free

Brooks Brothers UK Ltd (“**BB**” or “**Company**”) understands the importance of the protection of personal data, in its capacity as Controller. This policy informs BB’s customers (“**Data Subjects**”) that the personal data collected to execute their invoice or sales tax request shall be processed in compliance with the laws on 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”).

Therefore, with reference to the methods of management and processing the personal data of its customers, pursuant to Article 13 of the Regulation, BB provides the following information:

- 1. Types of data collected.** BB collects and processes the following data of customers for the issue of an invoice or tax-free sale (“**Data**”). In particular, it collects and processes: (i) title, forenames, surname; (ii) address, telephone number, email address; (iii) tax data.
- 2. Purpose and legal basis of the processing.** BB shall process the Data for the following purposes:
 - a. *to execute the customer's invoice or sales tax issue requests.* The legal basis justifying said processing is set out in Article 6(1)(b) the Regulation since said processing is necessary for the performance of a contract of which the customer is a part of or for the performance of pre-contractual measures adopted at the request of the customer;
 - b. *to discharge obligations laid down by law.* The legal basis justifying said processing is set out in Article Article 6(1)(c) the Regulation since said processing is necessary to fulfil a legal obligation to which the data controller 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 said 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 will be retained for all the time necessary to perform the customer's request and then immediately deleted, with the exception of those necessary to comply with fiscal, accounting, social security, health, welfare and administrative regulations or to fulfil 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 data 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



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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.

5. Provision of Data. The provision of Data for the purposes referred to in Section 2 is necessary to perform the customer's invoice or sales tax issue requests and therefore mandatory for these purposes: without such Data, BB may not provide the requested 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 outside the United Kingdom or the European Economic Area or to international organisations. BBE does not transfer the Data processed for the purposes indicated in this statement in countries located outside the United Kingdom or the European Economic Area or to international organizations (except that the transfer of the Data to BBE itself will involve the transfer of Data outside the United Kingdom).

8. Rights of 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 they 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 can 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.