



# Brooks Brothers

## PERSONAL DATA PROCESSING POLICY MTM

Brooks Brothers Ireland Ltd (“**BB**” or the “**Company**”) understands the importance of the protection of personal data, in its capacity as Controller. This policy informs BB’s customers (“**Data Subjects**”) how their personal data collected for the sale of tailored garments will be processed in compliance with the law regarding the protection of personal data.

In accordance with Article 13 of the Regulation (EU) No. 2016/679 (the ‘**Regulation**’), BB shall provide the following information concerning the management and the processing of data.

- 1. Types of data collected.** When collecting personal data for the sale of tailored garments, BB processes the following personal data deliberately provided by the Data Subjects (“**Data**”): *(i)* title, forenames, surname; *(ii)* address, telephone number, email address; *(iii)* tailor’s measurements; *(iv)* payment card details.
- 2. Purpose and legal basis of the processing.** The Data will be processed for the following purposes:
  - a. *to perform the MTM service requested by the customer.* The legal basis justifying said processing is set out in Article 6(1)(b) of the Regulation since said 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 Data Subject;
  - b. *to discharge obligations resulting from the law in accounting and tax matters.* The legal basis justifying said processing is set out in Article 6(1)(c) of 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 for the purposes referred to in Section 2.a, 2.b and 2.c will be retained for the entire duration of the contractual relationship 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. 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 the staff of BB 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.

**Brooks Brothers Ireland Limited**

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**5. Provision of Data.** The provision of the Data is necessary to enter into and perform the contract between BB and the customer and therefore mandatory for the purposes referred to in Section 2.a, 2.b and 2.c: without such Data, BB may not be able to perform the contract.

**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 European Economic Area or to international organisations.** BB might transfer customer data processed for the purposes indicated in this policy – and notably to manufacture the requested good(s) – to its providers in countries located outside the European Economic Area (and notably: USA, Hong Kong and Malaysia). The transfer is made exclusively to providers appointed as data processors – and limited to the data necessary to the performance of the order - pursuant to art. 49, par. 1, let. b) Regulation – since it is necessary to the performance of the agreement between the data subject and the data controller. No other transfer is made outside the European Union or to international organizations.

**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 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

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residence or work, or to the place in which the alleged violation occurred. The Supervisory Authority can be reached at the addresses on its own website.

**9. Data controller.** The Data Controller is Brooks Brothers Ireland Ltd - Arthur Cox Building, Earlsfort Terrace – Dublin 2 - Ireland in the person of the legal representative pro tempore. The Company may also be contacted at the e-mail address [europa.info@eu.brooksbrothers.com](mailto:europa.info@eu.brooksbrothers.com). To exercise the rights listed above, the data subject may make a request using the e-mail account [europa.info@eu.brooksbrothers.com](mailto:europa.info@eu.brooksbrothers.com). BB retains the right to update this personal data processing policy.

Date \_\_\_\_\_

**Sign for Acknowledgement**

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