

H&M GROUP PRIVACY NOTICE

This Privacy Notice is applicable to customers of the H&M Group, including current, former, potential customers, users and recipients of a product or service offered by us, visitors to our official websites or stores or members of our loyalty programs or communities.

The H&M Group is the company affiliates of H & M Hennes & Mauritz AB and its brands; **H&M, COS, Weekday, Monki, H&M HOME, & Other Stories** and **ARKET**.

What is personal data?

Personal data is any kind of information that can be directly or indirectly attributed to you. Examples of personal data are name, address, e-mail address, telephone number, payment information and purchase order. Usage history, IP address, member id are also examples of personal data, so can be other types of information you provide when contacting our customer service.

Who is responsible for processing your personal data?

Since the H&M Group consists of different companies (legal entities), the company responsible for the processing of your personal data is dependent on the purpose for which your personal data is collected.

It is the Swedish company **H & M Hennes & Mauritz GBC AB** that is responsible for most of the processing of personal data described within this Privacy Notice. However, for some processing purposes it is **the German company affiliate of the brand you are shopping with who** is the responsible company.

Controllers' Contact information

H & M Hennes & Mauritz GBC AB, Mäster Samuelsgatan 46A, 106 38 Stockholm, Sweden
H & M Hennes & Mauritz B.V. & Co. KG, Spitalerstraße 12, 20095 Hamburg, Germany (H&M, H&M Home, COS, Monki, Weekday)
H & M New Business AB & Co. KG Germany, Spitalerstraße 12, 20095 Hamburg, Germany (ARKET, H&M Garten Mitte)
& Other Stories AB & Co. KG Germany, Spitalerstraße 12, 20095 Hamburg, Germany (& Other Stories)

For each specific processing purpose, you will be informed which entity is responsible for processing your personal data.

The named H&M Group companies (Controller(s)) above are throughout this Privacy Notice individually or collectively referred to as "we" or "us".

When can we process your personal data?

We will only collect, process, use or store personal data if we have valid and lawful reasons to do so. Your personal data may be processed by us based on reasons derived from the following factors:

- **Consent:** When you give us your consent, we will process your personal data for the specific purpose you have consented to. This basis is for example used when you request us to send you one of our newsletters with offers and style updates.
- **Contract:** When making products and services available to you we will process your personal data necessary for fulfilment of a contract (such as purchase agreement) with you and to fulfil any obligations derived from that contract.
- **Legitimate Interest:** We may process your personal information when necessary for our legitimate interests and when these interests do not outweigh your own rights and interests. This covers

processing for purposes such as our customer service support, improving or developing our products and services; and security purposes including fraud prevention.

- **Legal requirement:** Whenever the processing of your personal data is necessary for us to fulfil our legal obligations of the country of operation.

For each specific purpose of processing of personal data, we will inform you about which of the above justifications apply.

How do we process your personal data and why?

Depending on how you interact with us or what type of service you are using we will process your personal data for the following purposes:

Online shopping

Purpose for processing	Type of personal data
To enable your order placement or service requests and handle payment transactions.	<ul style="list-style-type: none"> • Contact information (e.g., phone number, email address, delivery address) • Customer ID and transactional data • Payment data
To be able to manage your deliveries, claims, warranty matters, returns and refunds in a secure and effective manner.	
To contact you when needed and to notify you about order status and other essential updates.	
Further info. We collaborate with Klarna Bank AB to provide you with a “buy now pay later” checkout option in some markets. Klarna Bank AB is an independent payment service provider who acts as a lender and conducts its own credit checks. This means if you choose to use Klarna credit payment method(s), data such as payment related information, contact details as well as data related to your shopping history may be shared with Klarna.	
Responsible entity (Controller): H & M Hennes & Mauritz GBC AB	
Justification: When providing you with products and services, we will process your personal data necessary for fulfilment of a contract with you. This includes fulfilment of any obligations derived from that contract, whether the contract involves a purchase order, payment, return, or the use of other services provided by us or by third parties. For any other purpose referred to herein, the process of your personal data is based on our legitimate interest as a business.	
Retention time: We will keep and process your personal data no longer than necessary for us to perform our contractual and consumer obligations.	

In store shopping

Purpose for processing	Type of personal data
To be able to process your in-store services requested by you, such as self-checkout, issuance of proof of purchase, garment rental, etc. and handle payment transactions.	<ul style="list-style-type: none"> • Contact information (e.g., phone number, email address, delivery address) • Transactional data • Payment data • Location data may be processed within mobile apps if you turn on location-based services, such as in store self-checkout
FRANZI: To process your purchase and handle the payment process (including managing chargebacks, preventing card misuse, and limiting the risk of non-payment).	
In order to guarantee you a safe and efficient execution and management of the services offered in the stores (e.g. complaints, exchanges, tax free, reservations, garment rental, customer requests, claims, deliveries and returns, monogram service, purchase and pick).	

<p>To enable the digitisation of your in-store experience via our in-store shopping apps when you use these services (e.g. Membership Info, Member Sign in, Find my product).</p>	
<p>To be able to manage your deliveries, claims, warranty matters, returns, refunds in a secure and effective manner.</p>	
<p>To enable the digitisation of your in-store experience via our in-store mobile or self-service apps.</p>	
<p>To notify you about in-store service status and other essential updates.</p>	
<p>Responsible entity (Controller): The legal entity of the brand you are shopping with, H & M Hennes & Mauritz B.V. & Co. KG (H&M, H&M Home, COS, Monki, Weekday), H & M New Business AB & Co. KG Germany (Arket, H&M Garten Mitte) or & Other Stories AB & Co. KG Germany (& Other Stories). H & M Hennes & Mauritz GBC AB if you use our in-store shopping app(s).</p>	
<p>Justification: When providing products and services, we process your personal data necessary for fulfilment of a contract with you. This includes fulfilment of any obligations derived from that contract, whether it involves purchase order, payment, return, or the use of other services provided by us or by third parties. For any other purpose referred to herein, we rely on our legitimate interest as a business. If you allow location data to be collected by our mobile app, we rely on your permission given on your mobile device. FRANZI: In addition, we process the data due to legal obligations for document archiving as well as to enable you to make a tax-free purchase if your place of residence is outside the EU/EEA. In case of chargebacks, the processing of your personal data is based on our legitimate interest to prevent card misuse and to limit the risk of non-payment. The processing of your personal data for services such as Membership Info and Find my product is based on your consent.</p>	
<p>Retention time: We will keep and process your personal data no longer than necessary for us to perform our contractual and consumer obligations. FRANZI: We will keep and process your personal data no longer than necessary for us to perform our contractual, legal and consumer obligations .and as long as a consent has not been revoked.</p>	

Commented [YL1]: Franzi: to remove all original text, and replace the copy in red.

Commented [YL2R1]: Can allow additional examples from Franzi, but not preferable as it is too detailed and some examples may not even be seen as processing personal data. I question what benefit does the wording actually bring.

Commented [YL3]: Franzi wants to remove the sentence about LI as legal ground and in her version, there was not location data permission.

Commented [YL4R3]: Rejected, same reasons as Lovisa given in summer 2023.

Commented [YL5]: Franzi's version of retention description.

Commented [YL6R5]: Cannot be accepted as this is mixing two different chapters in this PN (there is compliance with laws later). Consent is incorrect legal ground.

Marketing and Promotions

Purpose	Type of personal data
<p>To be able to generate and distribute marketing materials, such as newsletters, including style and shopping recommendations, push notifications, and marketing surveys, through multiple communication channels.</p>	<ul style="list-style-type: none"> • Contact information (e.g., phone number, email address, delivery address)
<p>To be able to provide you with tailored online contents, including sending you advertisements.</p>	<ul style="list-style-type: none"> • Customer ID and order history • IP address
<p>To ensure our direct marketing communications to you are effective and in line with your preferences.</p>	<ul style="list-style-type: none"> • Behavioural and contextual data collected via cookies or similar technology • Marketing email recipient engagement metrics, including email "read" status, and time stamp
<p>Further info. Marketing and promotions will be sent and displayed to you according to your preferences through email, text messages and postal mail as well as displayed in your mobile app, social media channels or web browser.</p>	
<p>We also enhance your online experience by providing you with personalized marketing based on your engagements with us and analytics of your customer behaviour on our websites, such as your purchase and browsing history.</p>	

Advertising partners. To be more efficient in our marketing we collaborate with different social media, search engine and advertising network providers ("Advertising Partners").

We collaborate with advertising partners such as Facebook, Instagram, Snapchat, Pinterest, TikTok and YouTube for advertising on social networks and with Google for online advertising networks such as Google Ads and Google Marketing Platform.

We also collaborate with affiliate (influencer) marketing partners, such as Rakuten, and to drive traffic to our web sites.

How this works: Advertising partners use data provided by us and collected from cookies and other tracking technologies to predict your preferences and interests and take this into account when creating your personalized ad. This is standard industry practice commonly known as "retargeting". Retargeting allows us to run relevant advertising campaigns to you and to measure the efficiency and reach of the advertising materials. It also helps us to measure the advertising partners' performance and efficiency of campaigns.

Advertising partners use cookies and similar technologies to trace your usage of our websites and services by accessing data stored on your device or in apps.

Our Advertising Partners enable us to identify and engage with the right target audience, to create and distribute personalized marketing content across platforms and services. To be able to choose the content that fits your interests, we can use information obtained from you as a member, account holder, newsletter subscriber or if you have made a purchase with us. We may share this information and a customer identifier, e.g. an encrypted email address or device id, with our Advertising partners. The purpose is to show relevant ads to you on third party websites and apps. In order to do this, your data is matched with the database of the Advertising partner. If a match is found, you will receive relevant promotional content in your feed or search engine. If no match is found your data is securely destroyed. Your personal data is handled in a secure manner using a technique called hashing. This ensures your data is scrambled in a manner that makes it unreadable to anyone other than the recipient for the explicit given purpose.

Each Advertising Partner is responsible for their part of the processing as controllers, including (if any) transfers of personal data to non-EEA countries.

Responsible entity (Controller): H & M Hennes & Mauritz GBC AB

Justification: When we send you direct marketing material, we rely on your **consent** to receive personalised newsletters and text messages. We use pixels in newsletter emails to gauge recipients' engagement metrics, to which we rely on your **consent** given to receive direct marketing. Additionally, the use of cookies or similar tracking technologies on your browser/device is based on your **consent** collected via cookie banner. We may use your personal data to improve targeted marketing campaigns through our advertising partners, relying on our **legitimate interest as business** to carry out these activities.

Retention time: We will process your data no longer than necessary to provide you with marketing and promotions. We will cease processing your data for marketing purposes once you have closed your customer account or membership and/or actively rejecting further marketing communication from us.

Membership program

Purpose	Type of personal data
To be able to provide you with the services, benefits and tailor-made experiences included in our membership programs.	<ul style="list-style-type: none"> Contact information such as name, address, e-mail address and phone number
To maintain your membership profile, from logging in securely to keeping your data, including order history and membership status, up to date.	<ul style="list-style-type: none"> Date of birth Gender preference Customer ID IP address
To notify you of your membership rewards and benefits such as offers, promotions and recommendations, services, events and much more organized by us or our partner companies.	<ul style="list-style-type: none"> Order history, including digital receipt for in-store transactions

<p>To communicate with you of important updates and changes to your membership status or terms.</p> <p>To detect and address non-compliance with our Membership Terms & Conditions or fraudulent behaviour.</p>	<ul style="list-style-type: none"> • User preferences, settings, membership activity logs and other configuration data • Behavioural and contextual data collected via cookies or similar technology
<p>Further info. H&M Group's various brands offer membership/loyalty programs to reward loyal customers and/or improve members' shopping experience. Personal data is only collected to enable your online activities, such as shopping and setting preferences. You are rewarded with loyalty points/vouchers and enhanced online experience accordingly. Different membership details are further described in the Terms & Conditions on each brand's official website.</p>	
<p>Membership is voluntary to enter and can be terminated at any time in My privacy portal. If you choose to do so, your membership will cease to exist, and any membership benefits or rewards will be lost. Additionally, your personal data linked to the membership will be deleted.</p>	
<p>Responsible entity (Controller): H & M Hennes & Mauritz GBC AB</p>	
<p>Justification: The processing of your personal data to create and manage your membership account and to provide you with the personalized services of the membership is necessary to fulfil the membership agreement.</p> <p>Processing your personal data to email you offers, style updates, bonus vouchers, birthday offers and special invites to sales and events is based on your consent to receive marketing from us.</p> <p>For any other purpose referred to herein, the process of your personal data is based on our legitimate interest as a business.</p>	
<p>Retention time: We keep and continue to process your personal data for as long as necessary to fulfil the membership agreement. We will keep your personal data for a longer period of time if there are any legal requirements or if there is an ongoing dispute.</p>	

My Account (when applicable)

Where membership/loyalty program is not available, we offer you a personalized account to be able to provide you with a seamless shopping experience.

Purpose	Type of personal data
<p>To be able to create and administrate your account, such as identify and certify you as the user of the account.</p> <p>To be able to make your purchase information and history available to you and to bring you a personalized account experience and granted services.</p> <p>To be able to locate and authenticate your account.</p>	<ul style="list-style-type: none"> • Contact information such as name, e-mail address and telephone number • Customer ID • Date of birth • Purchase history including digital receipt for in-store transactions • Behavioural and contextual data collected via cookies or similar technology
<p>Responsible entity (Controller): H & M Hennes & Mauritz GBC AB</p>	
<p>Justification: The processing of your personal data for your account is based on your consent when you create your account. The processing of your personal data to provide you with granted services and a personalized account experience such as product recommendations is based on our legitimate interest as a business.</p>	
<p>Retention time: We will use your personal data no longer than necessary for making the account available to you. Personal data solely collected and used for the purpose of providing you with an account will be erased upon termination.</p>	

Customer Service

Purpose	Type of personal data
<p>To be able to manage your questions, handle complaints and warranty matters and to provide technical support as well as to improve customer experience.</p> <p>To be able to contact you, if needed, through email, telephone, social media, or any other means in response to your enquiries regarding order, delivery or return questions or to request your participation in a customer survey.</p>	<ul style="list-style-type: none"> Contact information such as name, e-mail address and telephone number Customer ID and interaction log Content generated by you, such as emails and chat transcript <p>To resolve your case, we may also need to access and use transaction data such as order, payment, and delivery information.</p> <p>To support training and development of employees, we may occasionally record or co-listen your calls and conversation when you are in contact with us.</p>
<p>Responsible entity (Controller): The H & M Hennes & Mauritz GBC AB</p>	
<p>Justification: The processing of your personal data to provide you with the best possible Customer Service is based on our legitimate interest as a business. Before we record any conversations with you, we will always ask for your consent.</p>	
<p>Retention time: We will keep your data for as long as we need to be able to support you regarding your case and, to be able to handle potential legal claims from you as a customer. We may continue to keep and use your data if we have outstanding obligations to you or by any other reasons are prevented from erasure.</p>	

Competitions & Events

Purpose	Type of personal data
<p>To be able to administrate and follow up on competitions and events, such as confirming participation, contact winners, deliver, and follow up on prize deliveries, reach out to you with relevant information about the competition and/or event and grant you access to the venue where the event is held.</p> <p>To be able to market our events improve our services, marketing, customer relationships and experiences and to plan better future events and attendee experience.</p> <p>FRANZI: To publish photos and videos internally, on social networks and in electronic newsletters, print media and other printed materials generated by the company for advertising and marketing purposes. You will be notified if we intend to photograph/film at an Event. There will always be photo free zones for your convenience.</p>	<ul style="list-style-type: none"> Contact information such as name, address, e-mail address and telephone number information submitted in the contest Photo/video <p>We sometimes film and photograph at our events, and the content will be used to market our services and to promote future events on our website, social media channels and in marketing materials. We will also use the content for internal use. You will be notified if we intend to photograph/film at an Event. There will always be photo free zones for your convenience.</p>
<p>Responsible entity (Controller): H & M Hennes & Mauritz B.V. & Co. KG (H&M, H&M Home, COS, Monki, Weekday), H&M New Business AB & Co. KG Germany (ARKET, H&M Garten Mitte), & Other Stories AB & Co. KG Germany (& Other Stories) or H & M Hennes & Mauritz GBC AB depending on which legal entity that is performing the processing of personal data within the scope of the competition or the event.</p>	
<p>Justification: The processing of your personal data in order to make a competition or an event available to you is based on our legitimate interest as a business. FRANZI: We base data processing in the context of participation in competitions and/or events on the fulfillment of the contract. If we take photos/videos of you and publish them (e.g. to announce the winner) or want to contact you to optimize our services and</p>	

Commented [YL7]: Franzi wants to remove the additional info on the left and add this here.

Commented [YL8R7]: Cannot be accepted. This wording is too specific, and incorrect. We will NOT using customer photos in marketing materials. If this is done locally please ensure you have correct consents collected, fully disclose the rights to customers and have marketing legal expertise to check over the practice.

products, the data processing is based on your **consent**. Photos/videos that show the character of a public event (e.g. high attendance, general presentation of the overall event) and the participants are not individually recognizable, we base the legal basis for data processing on the **legitimate interest in the external presentation of our company**.

Retention time: We will keep your personal data for as long as necessary for us to fulfil the purposes mentioned above, and to fulfil any legal obligations connected. **FRANZI: We will process your personal data no longer than necessary for us to perform our contractual and consumer obligations and as long as a consent has not been revoked.**

Commented [YL9]: Franzi wants to change the whole legal ground to this new copy.

Commented [YL10R9]: Cannot be accepted. Suggest DE to remove local controllership and have local PN for events instead

Commented [YL11]: Franzi wants to change retention time into this wording.

Commented [YL12R11]: Cannot be accepted.

Business Development & Analytics

Purpose	Type of personal data
<p>To be able to evaluate, develop and improve our products, services, customer experience, supply chain and store premises.</p> <p>This includes analysis to make our services more user-friendly, such as modifying the user interface to simplify the flow of information or to highlight features that are commonly used by our customers.</p> <p>To be able to reach out to you to respond to enquiries and surveys. In such case, any personal data used and obtained from you will only be processed for the specific purpose described therein.</p> <p>To be able to collect statistics, by using anonymization techniques, turn personal data into anonymized (non-personal data), via your smart devices to gain better insights on how to operate our stores, such as optimized assortment, floor space and staff utilization.</p> <p>To be able to perform analytics and segmentation to provide you with personalised shopping experience.</p> <p>To be able to share personal data with our Advertising Partners for the purpose of optimizing ad targeting.</p>	<ul style="list-style-type: none"> Email address/phone number Customer ID Delivery address Gender Order number and history Transactional data, such as product information, order value, payment type and preferences Behavioural and contextual data collected via cookies or similar technology MAC addresses Other system generated data derived from your activities and engagement with us <p>Any data used for the purpose of development and improvement have been collected for different objectives. We may for example use online transaction data for the purpose of developing our online order system. All analysis is carried out on an aggregated data level.</p>
<p>Responsible entity (Controller): H & M Hennes & Mauritz B.V. & Co. KG (H&M, H&M Home, COS, Monki, Weekday), H & M New Business AB & Co. KG Germany (ARKET, H&M Garten Mitte), & Other Stories AB & Co. KG Germany (& Other Stories) or H & M Hennes & Mauritz GBC AB depending on which legal entity that is performing the processing of personal data.</p>	
<p>Justification: The processing of your personal data for the purpose to develop and improve our services and products, is based on our legitimate interest as a business.</p>	
<p>Retention time: We will process your personal data no more than necessary for us to fulfil the purposes mentioned above. Thereafter the data will be immediately erased for this type of use.</p>	

Commented [YL13]: Franzi wants to remove all CSOs listed. I find it hard to believe. But if DE are sure about this, as in no one in Germany performs analysis in any kind, then it is your decision.

Compliance with Laws

Purpose	Type of personal data
<p>To comply with certain legal obligations. In order to comply with local law, we are obliged to process certain personal data. Such obligations may vary from country to country stipulated in for example tax, accounting, book-keeping,</p>	<p>What type of personal data we process are stipulated by the applicable law.</p>

Commented [YL14]: Franzi please see this chapter for your comments in in store shopping chapter. I hope you can see that it is odd to go down such details concentrating on chargebacks and tax free shopping which impacts a neglectable amount of customers and when we only say "tax and accounting" here in this chapter. The level of disclosure across this document, and amongst other countries/brands, should be roughly align on the same level.

sanctions, health & safety regulations, and consumer legislations.	
Responsible entity (Controller): H & M Hennes & Mauritz B.V. & Co. KG (H&M, H&M Home, COS, Monki, Weekday), H & M New Business AB & Co. KG Germany (ARKET, H&M Garten Mitte), & Other Stories AB & Co. KG Germany (& Other Stories) or H & M Hennes & Mauritz GBC AB depending on which legal entity that is performing the processing of personal data for the purpose of compliance with the applicable legislation.	
Justification: The processing of your personal data is necessary for H&M to fulfil its legal obligations of the country of operation.	
Retention time: The data retention time will vary depending on the purpose, context and specific local legal requirements.	

Security & Safety

Purpose	Type of personal data
<p>To ensure online safety for our customers, users, visitors, assets and business against cyber-attack, fraud, misuse, and other malicious activities.</p> <p>To safeguard offline security, we protect individuals, facilities and equipment, and all information contained therein from incidents, accidents, and malicious/criminal attacks. For this purpose, we use camera surveillance within our stores, offices, and warehouses.</p> <p>FRANZI: We use camera surveillance to ensure the safety of our customers, users, visitors and company property, as well as the prevention and prosecution of crimes, misdemeanors and damage.</p>	<ul style="list-style-type: none"> Customer ID Order history Payment data Shopping behaviour Camera surveillance footage Incident and accident logs Such logs may contain data such as injuries sustained, claimant identity and contact information, and other details about the incident including (suspected) criminal activity
<p>To assess, investigate, document, and report individual incidents/accidents.</p> <p>To generate security analysis and reports on aggregated level.</p>	
<p>To establish, exercise, and/or defend legal claims or disputes.</p> <p>Responsible entity (Controller): H & M Hennes & Mauritz GBC AB for cyber-security and online loss prevention.</p> <p>For physical security operation, the controller is H & M Hennes & Mauritz B.V. & Co. KG (H&M, H&M Home, COS, Monki, Weekday), H & M New Business AB & Co. KG Germany (ARKET, H&M Garten Mitte), or & Other Stories AB & Co. KG Germany (& Other Stories) depending on which brand's store the camera surveillance is conducted.</p> <p>Justification: Unless there is a specific legal obligation, the processing of your personal data for security and safety purposes is based on our legitimate interest.</p>	
<p>Retention time: We will keep your personal data no more than necessary for each purpose. We will keep images from our surveillance cameras for a maximum period of 72 hours. However, we may need to keep and/or process data for a longer period if it is obligatory or reasonable to do so.</p>	

Commented [YL15]: Franzi wants to remove the paragraph above with this copy.

Commented [YL16R15]: I don't understand the reason for change.

Commented [YL17]: I think Franzi wants to move this paragraph to be the 2nd paragraph (?)

Commented [YL18R17]: I don't understand the reason.

Wi-Fi in Store

Purpose	Type of personal data
To be able to provide you with Wi-Fi solution in our stores.	<ul style="list-style-type: none"> MAC address (Media Access Control Address), a unique identifier assigned to your device

	for use as a network address when using the Wi-Fi service.
Responsible entity (Controller): H & M Hennes & Mauritz GBC AB	
Justification: When you connect to our free Wi-Fi service, you permit us to collect and use your personal data necessary to provide the requested Wi-Fi service (fulfilment of a contract).	
Retention time: We will keep your personal data as long as necessary for us to provide the Wi-Fi service in accordance with the agreed Terms & Conditions and to ensure your compliance with these.	

Where and with whom do we share your personal data?

Your personal data is available and accessible only by those who need the data to accomplish the intended processing purpose. We may share your personal data within the H&M Group, with sub-contractors, partners and other third parties whenever needed to fulfil the intended processing purpose.

We reserve the right to transfer any personal data we have about you in the event that we merge with or are acquired by a third party, undergo other business transactions such as a reorganization, or should any such transaction be proposed.

The personal data that we collect from you is generally stored within a country of the European Union or the European Economic Area ("EU/EEA") but may also, whenever necessary, be transferred to and processed in a country outside of the EU/EEA. Any such cross-border transfer of your personal data will be taken place only if permitted and carried out compliance with applicable laws and without undermining your statutory rights.

From time to time, we may transfer personal data from the EU/EEA to a third country not being approved by the European commission as a safe country for such transfer. Whenever applicable we will use the European Commission's [Standard Contractual Clauses](#), e.g. a set of contractual terms and conditions which both the sender and the receiver of the personal data sign up to and ensure that the rights and freedoms of the individual are considered. Whenever appropriate, we also implement additional safeguard measures, such as encryption, pseudonymization and strict access controls to keep your data safe.

In the table below you will find the categories of recipients and the countries to where we transmit or otherwise make available personal data for processing:

Purpose of processing	Category of recipients	Country of processing
IT infrastructure to provide services and products	Information Technology and service providers	EU, IN
Order fulfilment and shipping	3 rd party logistics and courier	EU, Local/regional
Manage the purchasing, redemption and distribution of our gift cards	Gift card management	UK
Process payments, including refunds in relation to our services	Payment Service Provider	EU, Local/regional
Marketing activity within H&M Group, including distribution of direct marketing material	Marketing automation services	EU, US
Tailored marketing efforts to specific audiences; leverage external affiliates to promote products and services.	Affiliate and Targeted marketing services	EU, US
Tools we use by Customer Service centres and survey distribution	Customer engagement solutions	EU
3 rd party contact centres	Customer service centres	EU, Philippines

Commented [YL19]: In Franzi's version, there is disclosure of Payone and Adyden in this field. Based on Franzi's comments to Lovisa during summer 2023, the reason for disclosure was "If specific recipients are known, they must be named and a general naming of categories is not sufficient..."

Commented [YL20R19]: Rejected. ALL the transfer items are of course known to the Group. But we are not going to put hundreds of contractors in the customer PN. It is group decision as there are no benefits of doing so in PN, "Transparency" requirement is not specific about a privacy notice.

Enable and manage Competitions & Events participated by customers	PR/marketing agencies	EU, US
Compliance with law	Courts, law enforcement agencies, government bodies, regulators, auditors	EU, Local/regional
Business analysis	IT systems & consulting	EU, US, Singapore
Cyber-security, asset protection, and loss prevention	Security service providers	EU
Protect individuals, assets and information in or around our premises, crime and attack prevention	Security camera providers, insurance providers and other physical security service providers	EU, Local/regional
In-store wifi service	Communication provider	EU

FRANZI: A description of the data processing by the payment service provider First Data GmbH, Marienbader Platz 1, 61348 Bad Homburg v. d. Höhe can be found via the following link: [TELECASH_Datenschutzinformation_Karteninhaber_POS.pdf](#)

A description of the data processing by the payment service provider ADYEN N.V. German Branch, Friedrichstraße 63, 10117 Berlin for the use of the Breuninger Card can be found via the following link: [Privacy Statement - Adyen](#)

What are the consequences of not providing your data?

Within the scope of the business relationship, you must only provide us with data that is required for the establishment, execution and termination of the legal transaction and the fulfillment of our associated contractual and legal obligations. If you do not provide us with the required data, we cannot offer you the corresponding services.

What are your privacy rights?

Data protection is a fundamental right, and you have several rights in accordance with applicable data protection legislation. These rights are:

Right to access:

You have the right to request information about the personal data we hold on you at any time.

Right to portability:

Whenever we process your personal data, by automated means based on your consent or based on an agreement, you have the right to get a copy of your data transferred to you or to another party. This only includes the personal data you have submitted to us.

Right to rectification:

You have the right to request rectification of your personal data if the information is incorrect, including the right to have incomplete personal data completed.

Right to erasure:

You have the right to request erasure of your personal data processed by us at any time. Your personal data may continue to be processed under certain circumstances, we will fully erase your personal data once it is no longer necessary for the purpose for which we originally collected or processed it, or when we are no longer legally required to process it.

Right to restriction:

You have the right to request that we restrict the processing of your personal data under the following circumstances:

Commented [YL21]: Franzi wants to add this after the table. Also, in franzi's version, the table was not updated.

Commented [YL22R21]: Rejected. With reasons given last year.

Commented [YL23]: Based on comments given by Franzi in summer 2023, this was to fulfil the requirement of Art 13.2 e).

Commented [YL24R23]: Rejected as same reason last year. Transparency requirement does not ONLY regulate the privacy notice. Fields are marked as mandatory fields at membership registration is prime example of such obligation. This paragraph is not needed for other countries comply with the GDPR either.

- if you object to a processing based on our legitimate interest, we will restrict all processing of such data pending the verification of the legitimate interest.
- if you have claimed that your personal data is incorrect, we must restrict all processing of such data pending the verification of the accuracy of the personal data.
- if the processing is unlawful, you can oppose the erasure of personal data and instead request the restriction of the use of your personal data instead
- if we no longer need the personal data but it is required by you to defend legal claims.

Right to withdraw your consent

For each processing purpose you have given us your consent, you have the right to withdraw your consent at any time. If you do so, we will stop the processing of your personal data for that specific purpose. **FRANZI: Data processing remains lawful until the time of withdrawal.**

You can revoke your consent by the following means:

- click on “unsubscribe” button in marketing email and/or follow the instruction given in other communication channels
- edit the subscription settings under “My Account” or “My privacy portal” page
- contact Customer Service

Right to object to processing based on our legitimate interest

You have the right to object to processing of your personal data that is based on our legitimate interest. We will not continue to process the personal data unless we can demonstrate legitimate grounds for the process which overrides your interest and rights or due to legal claims.

How do you exercise your rights?

You can use our My privacy portal as a gateway to view all online interactions with H&M Group linked to your email address and exercise your privacy rights accordingly.

Alternatively, you can send us your requests via email at any time:

H&M	dataprotection.de@hm.com
COS	kundenservice.de@cos.com
Arket	kundenservice.de@arket.com
& Other Stories	kundenservice.de@stories.com
Monki	kundenservice.de@monki.com
Weekday	kundenservice.de@weekday.com

Data Protection Officer

We have appointed a Data Protection Officer to ensure that we continuously process your personal data in an open, accurate and legal manner. You can contact our DPO via the address above for the brand to which your matter applies. Please write DPO as subject matter.

FRANZI: We have appointed data protection officers to ensure that we continuously process your personal data in an open, accurate and lawful manner.

To the extent that H&M Hennes & Mauritz GBC AB is the responsible party, you may contact us at the above contact addresses using the subject DPO.

For H&M Hennes & Mauritz B.V. & Co. KG, H&M New Business AB & Co. KG and & Other Stories AB & Co. KG, you can use the following contact information:
 datenschutz nord GmbH
 Konsul-Smidt-Straße 88
 28217 Bremen

Tel.: 0421 69 66 32 0

Commented [YL25]: Franzi wanted to add this sentence to the paragraph. Unsure the reason.

Commented [YL26R25]: Rejected.

Commented [YL27]: Franzi wants to rewrite the DPO section with this copy.

Commented [YL28R27]: Rejected with the same reason previously. You have to look at the process from the customer/data subjects’ perspective. To follow such instruction requires the customer to fully understand the controllership, and if any GBC related issues being incorrect sent to external DPO may result in delays and misaligned information. This would not be accepted by the Group. The same goes to the CSO, a case being shared directly to external DPO without Customer Service, will (with certainty) cause misaligned communication going forward. I could not stress enough of the importance of streamlined communication.

Right to complain with a supervisory authority:

If you have complaints about the way H&M Group processes and protects your personal data and privacy you have the right to make a complaint to the Swedish Authority for Privacy Protection (Integritetsskyddsmyndigheten - IMY) or any other competent supervisory authority in the country of residence.

Franzi: You also have the right to lodge a complaint with a supervisory authority if you believe that the processing of your personal data violates data protection regulations. However, we recommend that you always first address a complaint to our data protection team or our data protection officer.

Updates to our Privacy Notice:

We may need to update our Privacy Notice. The latest version of our Privacy Notice is always available on our website.

October 2024

General update of this Privacy Notice to make it easier to understand.

Rephrased data processing purposes under *all chapters*.

Added additional information to explain data processing by Klarna Bank AB under *Online shopping*.

Added H & M Hennes & Mauritz GBC AB as controller and its provision of *in-store shopping* mobile app.

Added clarification of the use of email tracking pixels under *Marketing* chapter.

Added additional information to explain *Membership program*.

Clarified types of personal data used for *Business development and analytics* purposes.

Rephrased purpose description within *Security and Safety* chapter to separate cyber and physical security.

Added health & safety regulations under *Compliance with Law* chapter.

Rephrased the *table of data transfer recipients* to make the description clearer.

Removed criteria under *Right to erasure*.

Commented [YL29]: Franzi wants to rewrite the chapter with this wording.

Commented [YL30R29]: Rejected. We cannot not disclose IMY as the IMY will be the leading authority in majority of the processing purposes. It is also not up to us to advise the customer/data subject to "first address it with us".