

PRIVACY NOTE

1. CONTROLLER, CONTACT PERSON AND CONTACT DETAILS

The controller for the processing of your personal data in all areas is E. Breuninger GmbH & Co., Marktstraße 1–3, 70173 Stuttgart, Germany.

You can reach us by phone at +352/450231-0 and by e-mail at info@bram.lu.

If you have any questions about data protection at Breuninger, you can contact privacy@breuninger.de. Furthermore, all data subjects can contact Breuninger's data protection officer, who can be reached at privacy@breuninger.de or by mail at the above address with the addition "c/o the Data Protection Officer". If you wish to contact the responsible supervisory authority with a question concerning the processing of your data or lodge a complaint, this is the State Officer for Data Protection and Freedom of Information, postal address: PO Box 10 29 32, 70025 Stuttgart, Germany, Phone: 0711/61 55 41–0, Fax: 0711/61 55 41–15, E-mail: wpoststelle@fdi.bwl.de. However, you can also contact any other supervisory authority for data protection. In Luxembourg you may contact the National Commission for Data Protection Authority (CNPd), 15 boulevard du Jazz, L-4370 Belvaux (<https://cnpd.public.lu>).

2. DATA PROCESSING BY BREUNINGER

2.1 BRAM Card

Purposes of processing and legal basis:

As a BRAM Card customer, you enjoy numerous advantages and benefit from selected specials such as tailor-made offers, services and exclusive events. For this purpose, we process the personal data (name, address, date of birth [for the purpose of sending the birthday mailing], e-mail address, telephone number, IBAN and BIC¹, results of credit checks¹, income data¹) provided when an application for a BRAM Card is submitted and later on when the BRAM Card is used. These data concern the primary or secondary BRAM Card holder (hereafter card holders). Breuninger will only use these data to process the BRAM Card application, manage the customer relationship, process and effect payments, and prevent payment defaults.

Breuninger uses the card holders' e-mail address to send information about the BRAM Card and its other offers that supplement the card relationship or are related to it as well as for authentication purposes. In addition, personal data of card holders will be used for Breuninger's own advertising and marketing purposes, in particular for sending advertising information, as well as for Breuninger's own market research, in compliance with the statutory provisions.

The legal basis for this is Art. 6 (1) lit. b of the GDPR, i.e. data processing for the fulfilment of the contract, as well as Art. 6 (1) lit. f of the GDPR (legitimate interest) with regard to checks in the event of bad debts as well as statistical evaluations and advertising and marketing purposes.

Data recipients:

If there is a payment default, data is forwarded to lawyers, debt collection agencies and credit agencies¹.

Storage duration:

Breuninger will normally delete your personal data when the card relationship is no longer required (usually within 15 months of the end of the contract) and any other legally required retention periods expire (e.g. up to ten years in accordance with the German Commercial Code and the German Tax Code). If the card is not used for an extended period of time, Breuninger will delete your personal data 48 months after the last time the card was used and after the expiry of other legal retention periods.

2.2 Newsletter mailing

Purposes of processing and legal basis:

As part of your customer relationship, but also independently from registration or ordering goods, we offer you a personalized newsletter service.

In this context, we use your personal data to send you personally tailored information about products, promotions, events and news in the fashion and lifestyle segment as well as information about product details on your favorites list and shopping cart and to send you recommendations matching products you have searched in service e-mails for notification when products become available again.

The data processing includes the following data:

- Your contact details such as salutation and e-mail address
- Your purchase and order data for sending the satisfaction bonus
- Your date of birth for our annual birthday mailing if you are registered in the online shop
- Your preferences (online/offline, preferred stores, product range, favorites) based on your purchase and order data
- Your online user behavior in order to send you personalized content in the newsletter based on your interests as long as you have consented to the corresponding cookies
- Your country of origin and gender
- General click behavior, i.e. if and when you have opened our newsletter and your click behavior in the newsletter, i.e. if and when you clicked specific information in the newsletter, in order to send you information about products and services that are interesting for you
- Device tracking, i.e. we record the device on which you opened the newsletter as well as the operating system
- Product data from your shopping cart if you did not complete the purchase: If no purchase has been made after two days, you will receive a one-time reminder e-mail from us with Product data from your favorites list. We will send you an e-mail as a reminder with information about items on your favorites list, e.g. about their availability, price changes or about relevant offers

To prevent errors and misuse, when you request the newsletter you will first receive a confirmation e-mail to ensure that you actually requested the newsletter. Once you provide confirmation, the personalized newsletter will be sent to you. The legal basis for the data processing operations mentioned above is your consent pursuant to Art. 6 (1)(a) GDPR.

Data recipients:

If external processors are tasked with the newsletter mailing, these are carefully selected and

contractually obligated pursuant to Art. 28 GDPR. For the implementation of direct marketing by e-mail, the processor is:

- XQueue GmbH (provider of the e-mail distribution tool Maileon),
Christian-Pless-Str. 11–13, 63069 Offenbach am Main, Germany ("XQueue")

In this context, your data will be saved on servers in Germany and will not be transferred to third parties. You can find more details about the data protection guidelines in the Privacy Policy of XQueue GmbH at <https://maileon.com/datenschutz/>.

Storage duration:

You can unsubscribe from the newsletter at any time free of charge using the Unsubscribe link at the end of each newsletter, or by e-mail at info@bram.lu. After you unsubscribe from the newsletter, reaction data held by the e-mail service provider are erased at the contact level after two months. The e-mail address is retained for three months after you unsubscribe and then anonymized. Data about opening and clicks will then only be available in aggregated form and cannot be attributed to the user. Anonymized contacts will be deleted after one year.

2.3 Customer surveys and market and opinion research

Purposes of processing and legal basis:

At various points in time during the customer relationship, we invite you to submit feedback about your experiences with Breuninger and your shopping experience in this regard. We use your personal data for a target group-specific evaluation and for the corresponding derivation of strategic measures to make your future shopping experience even more pleasant.

The data processing includes the following data:

- Your contact data such as salutation and e-mail address
- Data such as country of origin, gender and age
- Your purchase and order data as well as your affinities (e.g. online/offline, product range) based on your purchase and order data
- General click behavior, i.e. if and when you have opened our feedback invitations or whether you have fully completed a survey
- Device tracking, i.e. we record the device you used to open your feedback invitation as well as the operating system

The legal basis for participation in market and opinion research is your consent pursuant to Art. 6 (1)(a) GDPR. To prevent errors and misuse, you will first receive a confirmation e-mail when you request to participate, to ensure that you actually requested to participate in our market and opinion research. Once you provide confirmation, the invitations to customer surveys will be sent to you.

Data recipients:

The data we collect in the context of customer surveys and market and opinion research is only intended for internal use in order to make your future shopping experience more pleasant. However, in order to conduct customer surveys and market and opinion research, we make use of external service providers. These processors are all carefully selected and contractually obligated pursuant to Art. 28 GDPR. You can view these processors at e-breuninger.de/bram-dse.

Storage duration:

The analysis of survey results is carried out anonymously. If you submit your personal data yourself in the context of a survey (e.g. phone number for follow-up calls), this will be erased after 18 months at the latest. All other personal data (e.g. e-mail address or survey invitation) will be erased after three years at the latest. You can withdraw your consent at any time by using the unsubscribe link located at the bottom of each e-mail or by sending us a message to info@bram.lu.

3. YOUR RIGHTS AS A DATA SUBJECT

As the data subject, you have the right to access information about the personal data concerning you in accordance with Art. 15 of the GDPR. If you would like to exercise your right to information or data research or any other data protection right in accordance with Art. 15–22 of the GDPR, including revocation of consent for marketing purposes and unsubscription from the newsletter, please send an email to info@bram.lu.

In the case of requests for information, we may ask you for further proof of identity to ensure that your data will not be disclosed to third parties. You are welcome to enclose sufficient proof of identity with your application to enable rapid processing.

In accordance with Art. 16 of the GDPR, you have the right to have your data rectified or, if the conditions detailed in Art. 17 of the GDPR are met, erased. You also have the right to restrict the processing of your data in accordance with Art. 18 of the GDPR. If you can assert a special personal situation, you can object to the processing of your data in general or in part in accordance with Art. 21 of the GDPR, provided that the data processing is based on Art. 6 (1) lit. e or f. You also have the right to data portability under the conditions set out in Art. 20 of the GDPR.

If you have given consent for us to process your data, you can withdraw it at any time. Please note that the withdrawal of consent will only affect future activities and any processing performed before then will therefore not be unlawful.

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority if you believe that the processing of personal data concerning you is in breach of the GDPR. You can contact the State Commissioner for Data Protection and Freedom of Information of the State of Baden-Württemberg for this purpose.

We check our privacy notices regularly and will update them as required. You can find any important changes made to these privacy notices and further information about data protection at e-breuninger.de/dse.

¹ does not apply to the BRAM Card