

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**, Mäster Samuelsgatan 46A, 106 38 Stockholm, Sweden that is responsible for most of the processing of personal data described within this Privacy Notice.

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 will apply.

Minors

We do not collect any personal data directly from minors on our websites. If we discover that any such information is in our possession, we will delete it.

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
<p>To enable your order placement or service requests and manage payment transactions.</p> <p>To manage your deliveries, claims, warranty matters, returns and refunds in a secure and effective manner.</p> <p>To contact you when needed and to notify you about order status and other essential updates.</p>	<ul style="list-style-type: none"> • Contact information (e.g., phone number, email address, delivery address) • Customer ID and transactional data • Payment data
<p>Responsible entity (Controller): H & M Hennes & Mauritz GBC AB</p>	
<p>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 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, the process of your personal data is based on our legitimate interest as a business.</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.</p>	

Marketing and Promotions

Purpose	Type of personal data
<p>To generate and distribute marketing materials, such as newsletters, including style and shopping recommendations, push notifications and marketing surveys, through multiple communication channels.</p> <p>To provide you with tailored online contents, including sending you advertisements.</p> <p>To ensure our direct marketing communications to you are effective and in line with your preferences.</p>	<ul style="list-style-type: none"> • Contact information (e.g., phone number, email address, address) • Customer ID and order history • IP address • 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 engagement with us and analytics of your customer behaviour on our websites, such as your purchase and browsing history.</p> <p>Advertising partners. To be more efficient in our marketing we collaborate with different social media, search engine and advertising network providers ("Advertising Partners").</p> <p>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.</p>	

We also collaborate with affiliate (influencer) marketing partners, such as Rakuten, 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 when 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.

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.</p>	<ul style="list-style-type: none"> • Contact information such as name, e-mail address and telephone number • Customer ID • Order history • Date of birth • Behavioural and contextual data collected via cookies or similar technology
<p>Responsible entity (Controller): H & M Hennes & Mauritz GBC AB</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.

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.

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 User generated content, 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>
Responsible entity (Controller): H & M Hennes & Mauritz GBC AB	
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 calls with you, we will always ask for your consent .	
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.	

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>	<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.</p>
Responsible entity (Controller): H & M Hennes & Mauritz GBC AB	

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.

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.

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 • Delivery address • Customer ID • 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 • 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>
Responsible entity (Controller): H & M Hennes & Mauritz GBC AB	
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.	
Retention time: We will process your personal data no more than necessary for us to fulfil the purpose. Thereafter the data will be immediately erased for this type of use.	

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, sanctions, and consumer legislations.</p>	<p>What type of personal data we process are stipulated by the applicable law.</p>
Responsible entity (Controller): H & M Hennes & Mauritz GBC AB	
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 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>	<ul style="list-style-type: none"> • Customer ID • Order history • Payment data • Shopping behaviour • Incident and accident logs
Responsible entity (Controller): H & M Hennes & Mauritz GBC AB.	
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 .	
Retention time: We will keep your personal data no more than necessary for each purpose.	

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 processed in your country or 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 take place only if permitted and carried out in compliance with applicable laws and without undermining your statutory rights.

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

Purpose of processing	Category of recipients
IT infrastructure to provide services and products	Information Technology, integrated platform and service providers
Order fulfilment and shipping	3 rd party logistics and courier
Manage the purchasing, redemption and distribution of our gift cards	Gift card management
Process payments, including refunds in relation to our services	Payment Service Provider
Marketing activity within H&M Group, including distribution of direct marketing material	Marketing automation services

Tailored marketing efforts to specific audiences; leverage external affiliates to promote products and services.	Affiliate and Targeted marketing services
Tools we use by Customer Service centres and survey distribution	Customer engagement solutions
3 rd party contact centres	Customer service centres
Enable and manage Competitions & Events participated by customers	PR/marketing agencies
Compliance with law	Courts, law enforcement agencies, government bodies, regulators, auditors
Business analysis	IT systems & consulting
Cyber-security, asset protection, and loss prevention	Security service providers
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

What are your 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:

- 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.

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?

If you have an account or are a member of a loyalty program, you can exercise your right to access, portability and rectification under your account pages, where you also can delete your account.

You can contact us at any time if you have any questions regarding our privacy policy or the processing of your data:

COS	customerservice.international@cos.com
Arket	customerservice.international@arket.com
& Other Stories	customerservice.international@stories.com
Monki	customerservice.international@monki.com
Weekday	customerservice.international@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.

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 a supervisory authority in the country of residence.

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

Removed *In store shopping, Membership, Content shared by you, Wifi in store* chapters as they are not applicable to International shopping.

Removed the in store physical security operation part under *Security and Safety* as not applicable.

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*.