

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. However, for some processing purposes it is the **H & M Hennes & Mauritz Holding Asia Ltd.** Suite 1-6 11/F., Suite 1-3, 5-6 12F., Tower 6, China Hong Kong City, 33 Canton Road, Tsim Sha Tsui, Kowloon, Hong Kong, who is the responsible company. 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 will apply.

Minors

We do not knowingly collect any personal data 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
To enable your order placement or service requests and manage 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.	
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 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.	
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 the in-store services requested by you, such as self-checkout, issuance of proof of purchase, garment rental, and handle payment transactions.	<ul style="list-style-type: none">• Contact information (e.g., phone number, email address, delivery address)• Transactional data• Payment data
To be able to manage your deliveries, claims, warranty matters, returns and refunds in a secure and effective manner.	
To notify you about in-store service status and other essential updates.	
Responsible entity (Controller): H & M Hennes & Mauritz Holding Asia Ltd.	
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.	
Retention time: We will keep and process your personal data no longer than necessary for us to perform our contractual and consumer obligations.	

Marketing and Promotions

Purpose	Type of personal data
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<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> <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, delivery 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> <p>We also collaborate with affiliate (influencer) marketing partners, such as Rakuten, to drive traffic to our web sites.</p> <p><i>How this works:</i> 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.</p> <p>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.</p> <p>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.</p> <p>Each Advertising Partner is responsible for their part of the processing as controllers, including (if any) transfers of personal data to non-EEA countries.</p>	
<p>Responsible entity (Controller): H & M Hennes & Mauritz GBC AB</p>	
<p>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.</p>	

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
<p>To provide you with the services, benefits and tailor-made experiences included in our membership programs.</p> <p>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.</p> <p>To maintain your membership profile, from logging in securely to keeping your data, including order history and membership status, up to date.</p> <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"> • Contact information such as name, address, e-mail address and phone number • Date of birth • Gender preference • Customer ID • IP address • Order history, including digital receipt for in-store transactions • 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>	

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>	<ul style="list-style-type: none"> • Contact information such as name, e-mail address and telephone number • Customer ID and interaction log

<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"> • 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): 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 calls 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>	<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>
<p>Responsible entity (Controller): H & M Hennes & Mauritz GBC AB or H & M Hennes & Mauritz Holding Asia Ltd. depending on which entity is handling 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.</p>	
<p>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.</p>	

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</p>	<ul style="list-style-type: none"> • Email address/phone number • Delivery address • Customer ID • Gender • Order number and history

<p>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 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"> • Transactional data, such as product information, order value, payment type and preferences • Behavioural and contextual data • Free text generated by you, such as survey results and interactions with Customer Service • 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 GBC AB or H & M Hennes Mauritz Holding Asia Ltd depending on which legal entity is carrying out the processing activities.</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 purpose. Thereafter the data will be immediately erased for this type of use.</p>	

Compliance with Laws

<p>Purpose</p> <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, health & safety regulations, sanctions, and consumer legislations.</p>	<p>Type of personal data</p> <p>What type of personal data we process are stipulated by the applicable law.</p>
<p>Responsible entity (Controller): H & M Hennes & Mauritz GBC AB or H & M Hennes & Mauritz Holding Asia Ltd. depending on which legal entity that is performing the processing of personal data in scope of the legislation.</p>	
<p>Justification: The processing of your personal data is necessary for H&M to fulfil its legal obligations of the country of operation.</p>	
<p>Retention time: The data retention time will vary depending on the purpose, context and specific local legal requirements.</p>	

Security & Safety

<p>Purpose</p> <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</p>	<p>Type of personal data</p> <ul style="list-style-type: none"> • Customer ID • Order history • Payment data • Shopping behaviour • IP address • Camera surveillance footage • Incident and accident logs
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<p>purpose, we use camera surveillance within our stores, offices and warehouses.</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>	<p>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>
<p>Further info. We may utilize automated processing technologies, including artificial intelligence, to identify and mitigate security risks efficiently and accurately. These technologies aim to monitor and protect against potential cyber threats, prevent data and asset loss, and enhance the overall integrity of our systems.</p>	
<p>Responsible entity (Controller): H & M Hennes & Mauritz GBC AB for cyber security and loss prevention online. H & M Hennes & Mauritz Holding Asia Ltd. for physical security operations.</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 30 days. However, we may need to keep and/or process data for a longer period if we consider it reasonable or obligatory.</p>	

Wi-Fi in Store (when applicable)

Purpose	Type of personal data
<p>To be able to provide you with Wi-Fi solution in our stores.</p>	<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.
<p>Responsible entity (Controller): H & M Hennes & Mauritz GBC AB</p>	
<p>Lawful basis: 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).</p>	
<p>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.</p>	

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
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IT infrastructure to provide services and products	Information Technology 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
In-store wifi service	Communication provider

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?

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.hk.en@hm.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 H&M Local entity as data controller for locally defined processes.

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

Added additional information to explain *Membership program*.

Removed *My Account* and *Content shared by you* chapters as no longer 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*.