

## NUDIE JEANS - PRIVACY POLICY

This Privacy Policy describes how Nudie Jeans Marketing AB, below referred to as “**Nudie Jeans**” (or “**we**”, “**us**” or “**our**”), will process your personal data.

The Nudie Jeans global organization consist of several companies, both group companies of Nudie Jeans and individual franchisees. Each of these companies will be responsible for their respective processing of personal data. However, Nudie Jeans has the overall responsibility for the processing of personal data within the group and is your main contact.

If you have any questions regarding Nudie Jeans’ processing of your personal data, please do not hesitate to contact us. Our contact details can be found under Section 1 of this Privacy Policy.

### **This Privacy Policy applies to you if you:**

- a) Visit Nudie Jeans’ website [www.nudiejeans.com](http://www.nudiejeans.com) or Nudie Jeans’ social media platforms.
- b) Purchase and/or receive a product/service in one of Nudie Jeans’ stores.
- c) Become a member of c/o Nudie Jeans.
- d) Interact with Nudie Jeans via Nudie Jeans’ available communication channels, such as e-mail, chat, telephone, social media, or non-anonymous whistleblowing.
- e) Purchase or receive products from Nudie Jeans’ online shop on [www.nudiejeans.com](http://www.nudiejeans.com).
- f) Order or receive a repair-kit from [www.nudiejeans.com](http://www.nudiejeans.com).
- g) Subscribe to Nudie Jeans’ newsletters.

Nudie Jeans will collect and process your personal data, such as name, address, telephone number and e-mail address, but also data regarding the device that you make use of for browsing Nudie Jeans’ website and data regarding your use of Nudie Jeans’ website and online shop. Your personal data is mainly processed for the purpose of administrating your purchase and fulfilling our undertakings under an agreement with you, and for the purpose of providing a high level customer support and communication.

Data privacy is of high importance to Nudie Jeans. We will at all time process your personal data in accordance with applicable laws and regulations and take technical and organizational measures in order to protect your personal data. We want to be transparent with what data we are processing and for what purposes. That is why we encourage you to read through this Privacy Policy, describing Nudie Jeans’ processing of your personal data and also describing your legal rights.

Nudie Jeans may receive e-mails and other correspondence containing personal data about third parties and may therefore process such personal data. If required, we will inform you as a third party of the processing separately.

## 1 WHO IS RESPONSIBLE?

In addition to Nudie Jeans Marketing AB, the companies and franchisees listed [here](#) are responsible for their respective processing of personal data.

<b>Name:</b>	Nudie Jeans Marketing AB
<b>Company organization No.:</b>	556628-9277
<b>Postal address:</b>	Västra Hamngatan 6, 411 17 Göteborg, Sverige
<b>E-mail address:</b>	<a href="mailto:privacy@nudiejeans.com">privacy@nudiejeans.com</a>
<b>Telephone No.:</b>	+46 (0)10 15 15 800

## 2 WHAT PERSONAL DATA DO WE PROCESS?

### 2.1 Personal data that you provide to Nudie Jeans

When you visit Nudie Jeans' website [www.nudiejeans.com](http://www.nudiejeans.com), Nudie Jeans' social media platforms or otherwise interacts with us, purchase and/or receive a product/service in one of Nudie Jeans' stores or online, become a member of c/o Nudie Jeans or subscribe to Nudie Jeans' newsletters, we will process personal data that you provide to us, for example:

- **Contact information**, such as name, address, e-mail address and telephone number.
- **Payment information**, such as choice of payment method and credit card number.
- **Customer information**, other personal data that you provide to us, such as information about you, the reason for contacting our customer support, details regarding your matter and information about your purchase.

### 2.2 Personal data that Nudie Jeans collects

When you visit Nudie Jeans' website [www.nudiejeans.com](http://www.nudiejeans.com), Nudie Jeans' social media platforms or otherwise interacts with us, purchase and/or receive a product/service in one of Nudie Jeans' stores or online, become a member of c/o Nudie Jeans or subscribe to Nudie Jeans' newsletters, we may collect the following information related to you:

***Online customer***

- Data regarding the device that you use for browsing our website and online shop, and data regarding your use of our online shop:
  - Operating system
  - Browser type
  - IP address
  - Traffic data
  - Location data
  - Weblogs
  - Your browsing behavior
  - Your usage statistics
- Data regarding your geographic location
- Chat, call and e-mail log
- Order and payment information
- Purchase history

***c/o Nudie Jeans customer***

- Your first and last name
- Your e-mail address
- Information about your purchase/repair of your jeans
- Your date of birth number (YYMMDD)

**2.3 Personal data that Nudie Jeans receives from third parties**

We may receive e-mails and other correspondence from others, containing personal data about you and therefore process such personal data. This may be the case if someone purchases items from our online shop and asks us to send it directly to you (please find more information under Section 3.5 below), or, if we receive information about your payment of your order from the payment service provider, or information about the delivery of your order from the relevant transportation company.

### 3 NUDIE JEANS' PROCESSING OF YOUR PERSONAL DATA - GENERAL

#### 3.1 Online services

When you visit Nudie Jeans' website [www.nudiejeans.com](http://www.nudiejeans.com) or interact with Nudie Jeans via Nudie Jeans' available communication channels, such as e-mail, chat, telephone, social media, or non-anonymous whistleblowing Nudie Jeans will process your personal data, both personal data provided by you and personal data collected by us.

Nudie Jeans will log conversations with you and track your use of the website and Nudie Jeans' services. Information about Nudie Jeans' use of cookies on [www.nudiejeans.com](http://www.nudiejeans.com) is found in our Cookies Policy, please see Section 11 below and our Cookies Policy [here](#).

*Purpose:* Nudie Jeans will process your personal data for the purpose of being able to respond to your questions and provide a high level customer support. Nudie Jeans will also process your personal data for the purpose of developing Nudie Jeans' business, products and services, such as optimizing Nudie Jeans' website and online shop, improving visitors' browsing experience and Nudie Jeans' customer support services.

Nudie Jeans will also process your personal data for the purpose of providing you with advertising that is relevant to you and matches your interests (behavioral advertising).

*Lawful basis:* The lawful basis for the processing of your personal data for the mentioned purposes, is that the processing is necessary for the purpose of the legitimate interest of Nudie Jeans' and Nudie Jeans' customers, being the interest of Nudie Jeans being able to respond to questions and inquiries regarding Nudie Jeans' products and services and to provide the best possible service that matches Nudie Jeans' customers' interests and needs, and the purpose of developing Nudie Jeans' business and market Nudie Jeans' products and services.

*Timeframe:* Nudie Jeans will process your personal data for the above mentioned purposes, as long as your matter is ongoing and for a period of maximum one year after your matter has been closed. If you never contact Nudie Jeans' customer support, we will process your personal data for the above mentioned purposes during a period of maximum one year after you visited our website.

#### 3.2 Order and purchase by online customer

When you make an order on Nudie Jeans' online shop on [www.nudiejeans.com](http://www.nudiejeans.com) and purchase Nudie Jeans' products, Nudie Jeans will process personal data provided by you to Nudie Jeans.

*Purpose:* Nudie Jeans will process your personal data for the purpose of administrating your order and purchase, including payment, packing and delivery of items ordered by you.

*Lawful basis:* The lawful basis for the processing of your personal data for the mentioned purpose is to fulfill Nudie Jeans' obligations to you, following the performance of the purchase agreement between you and Nudie Jeans.

*Timeframe:* Your personal data will be processed for this purpose until the purchase is completed, including payment and delivery, which in most cases is 30 days after the purchase is made.

### 3.3 **Returns, customer care matters and customer complaints**

In order to be able to handle returns, customer care matters and customer complaints, Nudie Jeans will process personal data provided by you to Nudie Jeans and personal data collected and received by Nudie Jeans.

*Purpose:* Nudie Jeans will process your personal data for the purpose of administering and handling returns and customer complaints.

*Lawful basis:* The lawful basis for the processing of your personal data for the above mentioned purpose is to fulfill Nudie Jeans' obligations to you, following the performance of the purchase agreement between you and Nudie Jeans.

*Timeframe:* Your personal data will be processed for the above mentioned purpose until the purchase is completed, including payment and delivery, and for a period of maximum three years thereafter.

### 3.4 **Repair-kit**

On our website, [www.nudiejeans.com](http://www.nudiejeans.com), you can order a repair-kit. In order for us to send the kit to you, we need to process your personal data that you provide us with. We may also process your personal data in order to get in touch with you.

*Purpose:* Nudie Jeans will process your personal data for the purpose of sending the repair-kit to you, contacting you regarding your purchased item and use of the repair-kit, and responding to questions from you regarding the repair-kit and the shipment of the kit to you.

*Lawful basis:* The lawful basis for processing your personal data for the above mentioned purposes, is that it is necessary in order to fulfill Nudie Jeans' obligations towards you under the agreement to send the repair-kit to you, and that the processing is necessary for the purpose of a legitimate interest of Nudie Jeans, namely to market Nudie Jeans and Nudie Jeans' products and services by contacting you and follow up your order of the repair-kit.

*Timeframe:* We will process your personal data for this purpose until the repair-kit has been sent to you and a period of maximum 60 days thereafter.

### 3.5 **Orders made by a third party**

If you receive items from Nudie Jeans, that someone else has ordered and paid for, we will process your name and address, which we have received from the person that has made the order.

*Purpose:* Nudie Jeans will process your name and address for the purpose of administrating the order, including packing and delivery of items to you. Nudie Jeans may also process your name and address for the purpose of administering and handling returns and complaints regarding the items sent to you.

*Lawful basis:* The lawful basis for the processing of your name and address is, that the processing is necessary for the purpose of the legitimate interest of Nudie Jeans' and Nudie Jeans' customers, being the interest of Nudie Jeans being able to enable Nudie Jeans' customers to have ordered items sent to a third party.

*Timeframe:* Your personal data will be processed for the purpose of administrating the order until the purchase is completed, including delivery, which in most cases is 30 days after the purchase is made. Your personal data will be processed for the purpose of administering and handling returns and customer complaints until the purchase is completed and for a period of maximum three years thereafter.

### 3.6 **Whistleblowing**

When using our Whistleblowing function at nudiejeans.com for reporting complaints or deviations associated with Nudie Jeans operations, people or environment and choosing not to be anonymous, we need to process your personal data that you provide us with. We may also process your personal data in order to get in touch with you.

*Purpose:* When using the whistleblowing function non-anonymously, Nudie Jeans will process your personal data in order to get back to you personally about the management of the errand, additional to officially responding to the errand if of public relevance.

*Lawful basis:* The lawful basis for the processing for this purpose if it is necessary for Nudies Jeans' fulfillment of legal obligations or obligations imposed on Nudie Jeans by an authority.

*Timeframe:* Your personal data will be processed for the above-mentioned purpose until the errand is completed, including following up and communicating the management of the errand to the whistleblower.

### 3.7 **Legal obligations**

To the extent necessary Nudie Jeans will process personal data provided by you to us or collected or received by us, for the purpose of fulfilling legal obligations, or if requested by an authority. For example, Nudie Jeans will process information regarding your purchase and payment in accordance with rules and regulations on bookkeeping.

*Purpose:* Nudie Jeans will process your personal data for the purpose of fulfilling legal obligations and obligations imposed on Nudie Jeans by an authority.

*Lawful basis:* The lawful basis for the processing for this purpose is that it is necessary for Nudie Jeans' fulfillment of legal obligations or obligations imposed on Nudie Jeans by an authority.

*Timeframe:* We will process your personal data only as long as Nudie Jeans is obligated to save such personal data under law. As regards processing for bookkeeping, such information will be processed for seven years.

### 3.8 **Legal claims**

*Purpose:* Nudie Jeans will process your personal data if it is necessary for the purpose to establish, exercise or defend a legal claim, in order to safeguard Nudie Jeans and Nudie Jeans' customers' legal rights.

*Lawful basis:* The lawful basis for such processing is that it is necessary for the legitimate interest of Nudie Jeans or Nudie Jeans' customers', to establish, exercise or defend a legal claim.

*Timeframe:* Nudie Jeans will only process your personal data for the above mentioned purpose if it is necessary and only for the time such matter is ongoing. As soon as such matter is closed, the personal data will be deleted.

### 3.9 **Mergers etc.**

Nudie Jeans will process your personal data if it is necessary for the purpose to permit a merger, an acquisition or a sale of all or parts of Nudie Jeans' assets.

## 4 **NUDIE JEANS' PROCESSING OF YOUR PERSONAL DATA - C/O NUDIE JEANS**

In order to become a member of c/o Nudie Jeans you must submit personal data to us in the form of your first and last name and your e-mail address. We will also collect personal data about you in connection with your use of the membership in c/o Nudie Jeans. Please note that if you do not wish to submit your personal data, you will not be eligible for membership in c/o Nudie Jeans.

*Purpose:* Nudie Jeans will process your personal data for the purpose of providing you with offers and benefits as determined by Nudie Jeans from time to time. Such offers and benefits may include free repairs, free shipping, 20 % off on a new pair of jeans when handing in your worn jeans, extended return window, exclusive access to products, discounts and priority to collections and sales, access to personal service from our customer service staff, access to your order history and exclusive invitations to events.

*Lawful basis:* The lawful basis for our processing of your personal data is that it is necessary in order for us to be able to fulfil our membership agreement with you. If you, in the process of becoming a member of c/o Nudie Jeans, also consent to our processing of your purchase history in order to personalize your membership, the lawful basis for such processing will be your consent.

Regarding our processing of your personal data for marketing purposes, please see Section 5.2.

## **5 NUDIE JEANS' PROCESSING OF YOUR PERSONAL DATA - MARKETING**

### **5.1 General**

Nudie Jeans will process personal data provided by you to Nudie Jeans and collected by Nudie Jeans, for marketing purposes, such as sending newsletters, offers, invitations, gifts and information to you.

*Purpose:* Nudie Jeans will process your personal data for the purpose of marketing Nudie Jeans and Nudie Jeans' products and services. Nudie Jeans will process your personal data in order to be able to send you newsletters, offers, invitations, customer experience surveys, gifts, and information, by e-mail, text message and postal shipments..

*Lawful basis:* The lawful basis for the processing of your personal data for the mentioned purposes is that the processing is necessary for the purpose of a legitimate interest of Nudie Jeans, namely to market Nudie Jeans and Nudie Jeans' products and services and to offer you products and services that are relevant for you and that match your interests and needs.

*Timeframe:* Nudie Jeans will process your personal data for the above mentioned purposes during one year after your latest purchase of a product/service from Nudie Jeans, or the time of ordering a repair-kit.

### **5.2 c/o Nudie Jeans**

If you choose to become a member of c/o Nudie Jeans, Nudie Jeans will process personal data provided by you to the c/o Nudie Jeans and collected by us, for marketing purposes.

*Purpose:* In order to improve our marketing, our knowledge of our members and our offers to you, we may collect and analyze your personal data. We will then provide you with offers and benefits that we think you will perceive as relevant based on the results of this analysis of your usage (so called profiling). We will also process your personal data for the purpose of generating targeted ads on social media platforms such as Facebook and Instagram.

*Lawful basis:* The lawful basis for our processing of your personal data for the purposes set out above is Nudie Jeans' legitimate interest to market Nudie Jeans and Nudie Jeans' products and services and to offer you, as far as possible and not to disturb you



unnecessarily, products and services that are relevant for you and that match your interests and needs.

*Timeframe:* Nudie Jeans will process your personal data for the above mentioned purposes for as long as you are a member of c/o Nudie Jeans or for as long as you have not opposed to or, if applicable, withdrawn your consent to our processing of your personal data for the purpose of marketing in accordance with this Section.

### 5.3 **Subscribing to Nudie Jeans' Newsletter**

If you choose to subscribe to Nudie Jeans' newsletter, Nudie Jeans will process personal data provided by you to us.

*Purpose:* Nudie Jeans will process your personal data for the purpose of marketing Nudie Jeans and Nudie Jeans' products and services. We will also process your personal data for the purpose of generating targeted ads on social media platforms such as Facebook and Instagram.

*Lawful basis:* The lawful basis for our processing your personal data is that it is necessary in order to send the newsletter to you, and that it is necessary in order to fulfill the legitimate interest of Nudie Jeans, being the interest of being able to send relevant information about Nudie Jeans and Nudie Jeans' products and services to Nudie Jeans' customers.

*Timeframe:* We will process your personal data for this purpose until you inform us that you do not want to receive Nudie Jeans' newsletter or you inform us that you do not want us to process your personal data for direct marketing purposes.

## 6 **FOR HOW LONG WILL WE PROCESS YOUR PERSONAL DATA?**

Nudie Jeans will store your personal data for as long as is needed for the processing related to the purposes and lawful basis described above. Your personal data may be processed for a longer period than stated above if necessary to comply with legal requirements or authority decisions.

Your personal data may be stored in different locations in our systems and for different purposes. Thus, personal data which has been deleted from one system because it is no longer needed there may still exist in another system for a different purpose.

## 7 **AM I OBLIGED TO PROVIDE MY PERSONAL DATA?**

It is voluntary to provide Nudie Jeans with your personal data, however, providing your personal data may be necessary in order for our performance of certain services and functionalities offered by the website, such as purchase of items, ordering of a repair-kit and subscription to our newsletter. Should you refuse to provide the necessary personal data, it

will be impossible for us to perform a purchase or the c/o Nudie Jeans membership agreement with you or to provide requested services.

## **8 AUTOMATIZED DECISION / PROFILING**

Nudie Jeans' processing of your personal data based on Nudie Jeans' legitimate interest, does not include automated decision making or profiling that affects you legally or otherwise significantly.

## **9 WHO HAS ACCESS TO YOUR PERSONAL DATA?**

In addition to the processing of your personal data performed by Nudie Jeans, your personal data may be disclosed to and processed by Nudie Jeans' group companies and our franchisees for the purpose of handling orders, returns, exchanges and complaints. If you, as a customer, contact any of Nudie Jeans' group companies or franchisees regarding an order, return, exchange or complaint, we will transfer necessary personal data regarding you and your purchase in order to enable our group company or franchisee to assist you. The legal basis for such transfer is the legitimate interest of Nudie Jeans and our customer, to be able to provide and get relevant customers support in an as convenient way as possible.

Nudie Jeans will transfer your personal data to transportation companies for the purpose of delivering items ordered by you. The legal basis for such transfer is to fulfill Nudie Jeans' obligations to you, following the performance of the purchase agreement between you and Nudie Jeans.

Nudie Jeans will also transfer your personal data to payment service providers, if necessary, for the purpose of collecting payment for your purchase. The legal basis for such transfer is to fulfill Nudie Jeans' obligations to you, following the performance of the purchase agreement between you and Nudie Jeans, and the legitimate interest of Nudie Jeans to be able to receive payment for items sold.

If you are a member of c/o Nudie Jeans or a subscriber to Nudie Jeans' newsletter, Nudie Jeans may transfer your personal data to business partners who provide marketing services, such as generating targeted ads on social media platforms. The legal basis for such transfer is Nudie Jeans' legitimate interest to market Nudie Jeans and Nudie Jeans' products and services and to offer you products and services that are relevant for you and that match your interests and needs.

Nudie Jeans may also transfer your personal data to law firms or authorities, if it is necessary, for the purpose of establishing, exercising or defending a legal claim, in order to safeguard Nudie Jeans and Nudies Jeans' customers' legal rights. The lawful basis for such transfer is that it is necessary for the legitimate interest of Nudie Jeans or Nudie Jean's customers', to establish, exercise or defend a legal claim.

Your personal data will also be disclosed to companies who process personal data on Nudie Jeans' behalf, so-called processors. Nudie Jeans has agreements in place that ensure that the processors process your personal data in accordance with applicable laws and regulations, this Privacy Policy and Nudie Jeans' instructions.

Nudie Jeans may also disclose your personal data to authorities that require that Nudie Jeans discloses such personal data.

Nudie Jeans may also disclose your personal data in order to permit a merger, an acquisition or a sale of all or parts of Nudie Jeans' assets.

## **10 TRANSFER OF PERSONAL DATA TO COUNTRIES OUTSIDE EU/EEA**

Your personal data may be disclosed to entities both within and outside EU and EEA.

In case your personal data is transferred to an entity outside EU/EEA (which would be either a company within the Nudie Jeans' group of companies, a franchisee or a processor, processing your personal data on behalf of Nudie Jeans), we will take all necessary measures to ensure that your personal data continues to be protected, and we will also take all necessary steps to ensure that the transfer is made in accordance with what is set forth in law (the General Data Protection Regulation).

## **11 COOKIES**

Nudie Jeans use cookies on the website [www.nudiejeans.com](http://www.nudiejeans.com). Please read Nudie Jeans Cookies Policy, you will find it [here](#).

## **12 YOUR LEGAL RIGHTS**

When Nudie Jeans process your personal data, you have certain rights under law. Please note that the exercising of these rights is subject to certain requirements and conditions set forth in law (the General Data Protection Regulation).

### **12.1 Your right to be informed and your right to access**

You have the right to be informed about how Nudie Jeans processes your personal data. Thus, we have established this Privacy Policy, which Nudie Jeans encourages you to carefully read. In addition, you have the right to, free of charge, upon written request receive information about what personal data Nudie Jeans stores about you and how your personal data is used and processed. Click [here](#) to see Nudie Jeans' contact details.

If your request is unfounded or your request is excessive, e.g. should you frequently and within short intervals ask to receive information on or a copy of your personal data, Nudie Jeans has the right to refuse to act on your request, or to charge a reasonable fee which covers the administrative costs of the action requested by you.

### **13 Your right to rectification and erasure**

In the event that your personal data is inaccurate or incomplete, you have the right to request that Nudie Jeans corrects or removes the personal data, including the right to have incomplete personal data completed.

You have the right to request the erasure of your personal data under certain circumstances (set forth in the General Data Protection Regulation). Provided your request falls within one of those circumstances, we will erase your personal data.

### **14 Your right to object**

You have the right to object to your personal data being processed for direct marketing purposes, including profiling analysis made for direct marketing purposes.

If you do not want your data to be used for direct marketing, including profiling analysis, you can notify us by sending an e-mail to [privacy@nudiejeans.com](mailto:privacy@nudiejeans.com), or click [here](#).

### **15 Your right to restrict processing**

Under certain circumstances (set forth in the General Data Protection Regulation) you have the right to request the restriction of processing of your personal data. In such case, your personal data shall, with the exception of storage, only be processed with your consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

### **16 Your right to data portability**

Under certain circumstances (set forth in the General Data Protection Regulation) you have the right to receive your personal data, which you have provided to Nudie Jeans, in a structured, commonly used and machine-readable format, for transmitting such data to another controller. You may also have the right to request that personal data is transmitted directly from us to another controller, where technically feasible.

### **17 Your right to file a complaint**

We encourage you to contact us if you have any questions regarding this Privacy Policy or if you are unhappy with the way Nudie Jeans is processing your personal data.

You also have the right to file a complaint with the supervisory authority regarding Nudie Jeans' processing of your personal data or handling of any inquires related to it. At the time of establishing this Privacy Policy the supervisory authority in Sweden is Datainspektionen.

Datinspektionen  
Box 8114  
104 20 Stockholm  
[datinspektionen@datinspektionen.se](mailto:datinspektionen@datinspektionen.se)

[www.datinspektionen.se](http://www.datinspektionen.se)

If your complaint only relates to a business in another member state of the EU, you have the right to file your complaint with the data authority in the relevant country. You can find a list of the data protection authorities here, [http://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).