

NUDIE JEANS – PRIVACY POLICY

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

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) Purchase a product/service in one of Nudie Jeans’ stores or from Nudie Jeans’ online shop on www.nudiejeans.com, please see the following relevant sections for you: 2.1 (your purchase), 2.3 (cookies), 2.4 (marketing), 2.5 (development of our business, products and services) and 2.6 (compliance work).
- b) Become a member of c/o Nudie Jeans, please see the following relevant sections for you: 2.1 (membership), 2.3 (cookies – if you join the membership through our website) 2.4 (marketing), 2.5 (development of our business, products and services) and 2.6 (compliance work).
- c) Interact with Nudie Jeans via Nudie Jeans’ available communication channels, such as e-mail, chat, telephone, social media or non-anonymous whistleblowing, please see the following relevant sections for you: 2.2 (interactions with us), 2.3 (cookies), 2.5 (development of our business, products and services) and 2.6 (compliance work).
- d) Subscribe to Nudie Jeans’ newsletters, please see the following relevant sections for you: 2.4 (newsletter subscription) and 2.6 (compliance work).
- e) Visit Nudie Jeans’ website www.nudiejeans.com or Nudie Jeans’ social media platforms, please see the following relevant sections for you 2.3 (cookies) - 2.6 (compliance work).
- f) Get casted as a model for the production of marketing materials for our products, please see the following relevant sections for you: 2.4 (marketing) and 2.6 (compliance work).

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 AND WHO CAN YOU CONTACT?

Nudie Jeans is the controller for the processing of your personal data and is therefore accountable for ensuring that your personal data are processed in accordance with applicable data protection legislation. If you have any questions about how your personal data are processed, please contact us by using the contact details below.

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

2 WHEN DO WE PROCESS YOUR PERSONAL DATA?

2.1 When providing our products and services

Online purchase of product(s)	
Purpose	To administer your purchase of products from our online shop, including payment, packing and delivery of products ordered by you. <i>We will also process your personal data to optimize our website, send you marketing, develop our business, products and services and to comply with laws etc., see further information under sections 2.3-2.6.</i>
Categories of personal data	Name, telephone number, e-mail address, address and information about your purchase (item, size, order ID, invoice number, customer ID and currency etc.).
Legal basis	Performance of our contract (GDPR, article 6.1 (b)).
Retention	Until the purchase is completed, including payment and delivery, which in most cases is 30 days after the purchase is made.

Order of repair-kit	
Purpose	To administer your order of a repair-kit from our online shop, including packing and delivery to you. <i>We will also process your personal data to follow up on your order of the repair-kit, send you marketing and to comply with laws etc., see further information under sections 2.4 and 2.6.</i>
Categories of personal data	Name, e-mail address, telephone number, address, information about the order (such as order and customer ID).
Legal basis	Performance of our contract (GDPR, article 6.1 (b)).
Retention	Until the repair-kit has been delivered to you, which in most cases is 30 days after the order is placed.

Membership in c/o Nudie Jeans	
Purpose	To administer your membership in c/o Nudie Jeans and your personal account on our website, where you can find information about, e.g., your all time purchase history. As a member we provide you with offers and benefits as determined by us from time to time. <i>We will also process your personal data to send you marketing, to develop our business, products and services and to comply with laws etc., see further information under sections 2.4-2.6.</i>
Categories of personal data	Personal data necessary to register you as a member: Name, e-mail address and country. Personal data that we process in connection with your use of the membership: purchase history and history of repairs, telephone number and customer ID.
Legal basis	Performance of our contract (GDPR, article 6.1 (b)).
Retention	For as long as you are a member of c/o Nudie Jeans, which is during such time you are active on your c/o Nudie Jeans account and three years thereafter. If you would like us to delete your information before that period of time, please contact us.

Repair services	
Purpose	To provide you with free repairs of your jeans at our Nudie Jeans repair shops or repair partners. <i>We will also process your personal data to send you marketing, to develop our business, products and services and to comply with laws etc., see further information under sections 2.4-2.6. When using our repair service you will become a member of c/o Nudie Jeans.</i>
Categories of personal data	Name, e-mail address, telephone number, country and information about your repair.
Legal basis	Performance of our contract (GDPR, article 6.1 (b)).
Retention	For as long as you are a member of c/o Nudie Jeans.

2.2 When in contact with you

Customer support via telephone, e-mail, chat or social media	
Purpose	To respond to your questions and provide you with a high level customer support via telephone, e-mail, chat or social media. <i>We will also process your personal data to develop our business, products and services and to comply with laws etc., see further information under section 2.5 and 2.6.</i>
Categories of personal data	<u>Through social media</u> : Name/username and other personal data provided by you in our contacts. <u>Through other communication channels</u> : Name, e-mail address, telephone number, customer ID, chat or e-mail correspondence with you (if applicable), IP address (when contacting us on the chat), history of your customer support cases and other personal data that you provide us with in regard to the support case.
Legal basis	Our legitimate interest to provide you with customer support services (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.
Retention	<u>Through social media</u> : Until you choose to delete your content or account, or until we have to delete it following our rules on the social media platform (e.g., if the content is disrespectful, bullying etc.). <u>Through other communication channels</u> : As long as your support case is ongoing and for a period of maximum two year after your case has been closed.

Whistleblowing	
Purpose	To provide a whistleblowing function where you can report complaints or deviations associated with Nudie Jeans operations, people or environment. This includes getting back to you personally about the management of the errand (if you report non-anonymously).
Categories of personal data	<u>If you report anonymously</u> : we will not process any personal data. <u>If you report non-anonymously</u> : Name, e-mail address and other information you provide us with regarding the complaint/deviation that may contain personal data about you and others.
Legal basis	Our legitimate interest to provide a whistleblowing function (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.
Retention	Until the errand is completed, including following up and communicating the management of the errand to you as the whistleblower.

2.3 Nudie Jeans' website

For further information on our use of cookies – except what is stated in this section 2.3 – please see our Privacy Preference Center and [Cookie policy](#) on our website, which includes a detailed list of the cookies we use.

Strictly necessary cookies	
Purpose	<p>To provide functions that are strictly necessary to make the website function correctly and that you have requested (such as remembering what items you have placed in your shopping cart).</p> <p>These cookies are not possible to turn down/switch off on the website. However, you can set your web browser to block or warn you of these cookies, but some parts of the website will then not function correctly.</p>
Categories of personal data	IP address, data about your device (such as operating system and browser type) and information regarding your use of the requested function, such as items in your shopping cart.
Legal basis	Our legitimate interest in providing fundamental and necessary features on our website (article 6.1 (f) of the GDPR). Contact us if you want to learn more about how we balance your interests against ours.
Retention	See cookie duration in our Privacy Preference Center.

Performance cookies	
Purpose	For statistical purposes, i.e., to count visits and traffic, to measure and improve the performance of our website and to understand how visitors move around the website.
Categories of personal data	IP address, data about your device (such as operating system and browser type), and digital footprints by browsing the website (such as weblogs, usage statistics, traffic data and location data).
Legal basis	Your consent (GDPR, article 6.1 (a)).
Retention	See cookie duration in our Privacy Preference Center.

Functional cookies	
Purpose	To recognize you as a visitor to our website and improve your user experience by providing enhanced functionality and personalization.
Categories of personal data	IP address, data about your device (such as operating system and browser type), and digital footprints by browsing the website (such as weblogs, usage statistics, traffic data and location data).
Legal basis	Your consent (GDPR, article 6.1 (a)).
Retention	See cookie duration in our Privacy Preference Center.

Targeting cookies	
Purpose	To optimize our marketing and advertising on other websites based on your surfing behaviour. These cookies will make us, together with our advertising partners, capable of building up a profile of your interests to show you relevant adverts on other websites based on your profile/segment affiliation. This will include us sharing your personal data

	with third party providers who will match and combine the shared personal data with the information it already has about you. <i>The purpose includes some profiling. See more information on profiling in section 2.4.1.</i>
Categories of personal data	IP-address, data about your device (such as operating system and browser type), segment affiliation and digital footprints by browsing the website (such as weblogs, usage statistics, traffic data and location data).
Legal basis	Your consent (GDPR, article 6.1 (a)).
Retention	See cookie duration in our Privacy Preference Center.

2.4 **When marketing our business, products and services**

Reminder of abandoned shopping cart (for members only)	
Purpose	To remind you via e-mail of an initiated but non-completed order in your shopping cart.
Categories of personal data	Name, e-mail address and information about your abandoned cart.
Legal basis	Our legitimate interest to remind you of a non-completed order in your shopping cart (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.
Retention	A few days after we have sent you a reminder of the abandoned shopping cart, which is normally done within a few hours after you abandoned your shopping cart.

Marketing of our sustainable offers and services	
Purpose	To market our sustainability offers and services (such as our repair services, repair-kit and re-use service) and provide you with information to prolong the life of our products (such as wash and care instructions). This includes to follow-up on your use of these services. <i>The purpose includes some profiling. See more information on profiling in section 2.4.1.</i>
Categories of personal data	Name, telephone number, address, e-mail address, purchase history, repair history and segment affiliation.
Legal basis	Our legitimate interest to provide you with information to – in a sustainable way – prolong the life of our products (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.

Retention	For three years after your latest order/purchase of a product/service from us, provided you have not opposed to our processing of your personal data for marketing purposes.
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Other marketing from us	
Purpose	To market us and our business by sending you invitations and other information that we believe is relevant to you and matches your interests and needs via e-mail. <i>The purpose includes some profiling. See more information on profiling in section 2.4.1</i>
Categories of personal data	Name, address, e-mail address, purchase and repair history and segment affiliation.
Legal basis	Our legitimate interest to market us, our products and services (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.
Retention	For one year after your latest purchase of a product/service from us, or from the time of ordering a repair-kit from us, provided you have not opposed to or, if applicable, withdrawn your consent to our processing of your personal data for marketing purposes.

Subscribing to our newsletter	
Purpose	To market us, our products and services through the publication and distribution of our newsletter to you, if you have chosen to subscribe.
Categories of personal data	E-mail address and country (if applicable).
Legal basis	Your consent (GDPR, article 6.1 (a)).
Retention	Until you unsubscribe from the newsletter or opt-out from direct marketing from us.

Use of images/videos of street casted models or user-generated content in our marketing materials	
Purpose	To use images and/or videos of you as a street casted model in our marketing materials and to enter into an agreement with you regarding the production and use of the marketing material. We may also use your content on social media regarding our products which you have tagged with our hashtag #yesnudiejeans, e.g. images of our products shared by you on social media. When using this hashtag on social media you give us a non-exclusive, global, unlimited and royalty-free license to use your image for advertising, publicity, promotional, and marketing activities in our social media channels, websites, newsletters and emails.
Categories of personal data	<u>Street casted models</u> : Name, images and videos. <u>User-generated content</u> : Name or alias on your social media account, your content, such as images and videos.

Legal basis	<p><u>Street casted models</u> To enter into a contract with you and to carry out our rights and obligations according to the contract (GDPR, article 6.1 (b)).</p> <p><u>User-generated content</u>: To enter into a contract with you and to carry out our rights and obligations according to the contract (GDPR, article 6.1 (b)), when we have been in contact with you regarding your use of the hashtag. In other situations, the legal basis is our legitimate interest to share user-generated content (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.</p>
Retention	<p><u>Street casted models</u>: A minimum of five years from the entering into the agreement. Thereafter, the personal data will be saved for recurring three-year periods until the agreement is terminated by either us or you in accordance with its applicable terms.</p> <p><u>User-generated content</u>: For as long as we deem the content to be relevant.</p>

2.4.1 Profiling

To make sure that the marketing and communication that you receive from us is relevant to you, we will combine certain types of data to predict your personal preferences and categorise you into a “segment affiliation” with other individuals with similar preferences, interests and behaviour. This means that everyone categorised into the same segment affiliation will receive the same type of marketing. The segments we create are most often wide and may for example include all our members, customers or even all our contacts, but we can also create more specific segments such as “people who has bought our Lean Dean jeans” – but no matter what, the segments will include a lot of people.

For this purpose, we process your name, e-mail address, telephone number, zip code, city, country code, information on your browsing of our website (e.g., products of interest, device information, unique online identifiers and interactions in relation to our ads on third-party websites), aggregated data obtained from third party data providers through cookies (e.g., information about your personal preferences, demographics and content consumption) and data that you provide us with when you interact with us (e.g., such as your interests, purchased products or services and your interactions with us).

We will share your personal data with third party providers we cooperate with (such as Meta, Snapchat and Google, but your name, e-mail address and telephone number will then be shared in pseudonymised form). The third party provider will match and combine the shared personal data with the information it already has about you to find you/your profiles/accounts and push marketing materials to you. The data combined will therefore determine your segment affiliation.

Your segment affiliation may also be used to create so-called lookalike audiences, meaning that we create a target audience based on the same characteristics of the individuals belonging to a certain segment affiliation. This enables us to target potential customers with similar interests, behaviour or characteristics as the people that already have shown an interest in our products and services. In other words, we will use your segment affiliation to target other individuals with the same characteristics.

Your segment affiliation will not produce any legal effects or affect you in any similar way.

The legal basis for placing, collecting and having access to the mentioned information from cookies to create profiles, place you in a segment affiliation, create lookalike audiences and send you marketing based on your segment affiliation is your consent, please read more in our Privacy Preference Center and [Cookie policy](#) on our website.

2.5 When developing our business, products and services

Customer reviews of our products	
Purpose	To improve our products and to give our customers a better understanding of our products (such as size, appearance, etc.) we collect and publish reviews from customers regarding our products on our website. The publication will only include your review and your first name.
Categories of personal data	Name, e-mail address, information about the purchased product, your review and other information you provide us with.
Legal basis	Our legitimate interest to improve our products and give our customers a better knowledge about our products (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.
Retention	For as long as we deem the review of a product as relevant or earlier if you ask us to delete your review or if we stop selling the specific product.

Customer experience surveys	
Purpose	To send out customer experience surveys regarding our products and services and evaluate the feedback to get a better understanding of our customers' perception of us, our products and services, interfaces, communications etc., to develop and improve these parts of our business and the customer experience.
Categories of personal data	Name, e-mail address and purchase history.
Legal basis	Our legitimate interest in following up on your experience to evaluate, develop and improve our business (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.
Retention	Up to one year from collecting the customer experience survey from you, in order to assist you if your are unhappy with our products or services. Thereafter we will anonymise your response in order to compile aggregated data for statistical purposes.

Analysis of product returns	
Purpose	To better understand why our products are returned in order to improve our products and product information, which will also make us identify and reduce unsustainable shopping behaviour.

	If we identify unsustainable shopping behaviour, such as a very high percentage of returns relating to a specific customer, we may contact you to help you finding the right products for you and, in exceptional cases, exclude you from further online shopping with us.
Categories of personal data	Name, telephone number, e-mail address, product, reasons for return and customers' behaviour regarding returns.
Legal basis	Our legitimate interest to understand reasons behind returns to improve our products and our sustainability work (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.
Retention	<u>To better understand why are products are returned:</u> During the period your return is handled. Thereafter the personal data is anonymized in order to compile aggregated data for statistical purposes. <u>To identify unsustainable shopping behaviour:</u> During the period your return is handled and three years thereafter.

Analysis of customers to send marketing to (only members)	
Purpose	To help us understand what customers we should direct our marketing regarding our products and services to in order to enhance our profitability.
DCategories of personal data	Country, customers' purchase history and behaviour (such as purchased products, order ID, returns, invoice number and currency).
Legal basis	Our legitimate interest in understanding what customers we should direct our marketing to (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.
Retention	For one year after your latest purchase of a product/service from us.

2.6 To comply with laws, legal obligations and voluntary undertakings and in the event of claims, disputes, supervision etc.

Claims and complaints	
Purpose	To administer, investigate and respond to claims and complaints, such as reclamations, withdrawals and other complaints.
Categories of personal data	Name, address, telephone number, e-mail address, information about your product/service, payment details, details related to your bank account, receipts, information, photos or videos recordings about and relating to the claim and/or complaint.
Legal basis	Reclamations: Legal obligation (GDPR, article 6.1 (c) and consumer protection laws (for Sweden: konsumentköplag (2022:260))).

	<p>Withdrawal of purchase within the EU: Our legal obligation to provide a withdrawal right. (GDPR, article 6.1 (c) and consumer protection laws (for Sweden: lag (2005:59) om distansavtal och avtal utanför affärslokaler).</p> <p>Other complaints: Our legitimate interest to administer your complaint and compensate you for goodwill purposes (if applicable) (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.</p>
Retention	<p>Reclamations and withdrawals: the longest of 1) the time we investigate and administer the claim and 2) as long as your right to reclamation/withdrawal is valid.</p> <p>Other complaints: Until we have investigated and administered your complaint.</p>

Returns	
Purpose	<p>To administer and handle your return.</p> <p><i>We will also process your personal data to develop our business, products and services and to comply with laws etc., see further information under section 2.5 and 2.6.</i></p>
Categories of personal data	Name, e-mail address, telephone number, address, information about the ordered product, reasons for your return and other information you provide us with that contain personal data.
Legal basis	Performance of a contract (GDPR, article 6.1 (b)).
Retention	Until the return is handled.

Recalls	
Purpose	To administer recalls of our products (if applicable).
Categories of personal data	Name, address, telephone number, e-mail address, purchase history and information about your purchased product.
Legal basis	Legal obligation (GDPR, article 6.1 (c) and legislation regarding product safety (for Sweden: Produktsäkerhetslag (2004:451)).
Retention	Until the recall is administered.

Disputes	
Purpose	To establish, exercise or defend a legal claim, in order to safeguard our and our customers' legal rights.
Categories of personal data	The categories of personal data relating to the data subjects that are necessary with regard to the dispute and the parties involved.

Legal basis	<p>Our legitimate interest in protecting our interest in the event of a dispute (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.</p> <p>Further, if special categories of personal data are processed (according to the definition in article 9 of the GDPR): When it is necessary for the establishment, exercise or defence of legal claims (GDPR, article 9.2 (f)).</p>
Retention	As long as the dispute is ongoing and ten years thereafter.

Data subjects' rights requests	
Purpose	To administer and accommodate your request to exercise any of your GDPR rights.
Categories of personal data	Name, e-mail address, telephone number, your request and the information required to meet your request.
Legal basis	Legal obligation (GDPR, article 6.1 (c) and chapter III).
Retention	Up to two years from the date your request has been met.

Personal data breaches, data subjects claims and supervision	
Purpose	To investigate personal data breaches and other data subject claims and provide requested information to regulatory authorities in the event of supervision.
Categories of personal data	The categories of personal data relating to the data subjects that are necessary and requested during supervision.
Legal basis	Legal obligation (GDPR, article 6.1 (c) and GDPR, articles 33-34 and 58 among others).
Retention	As long as the breach, claim or subsequent supervision is ongoing and two years thereafter.

Bookkeeping purposes	
Purpose	For bookkeeping purposes, such as processing and saving bookkeeping material.
Categories of personal data	Such personal data that constitute transactional data, such as information regarding your purchase and payment (bank account, invoice details etc.).
Legal basis	Legal obligation (GDPR, article 6.1 (c) and bookkeeping legislation (for Sweden: Bokföringslag (1999:1078))).
Retention	Up to and including the seventh year after the end of the financial year the transaction took place.

Mergers and acquisitions	
Purpose	To transfer personal data in the event of a merger, an acquisition or a sale of all or parts of Nudie Jeans' assets.
Categories of personal data	The categories of personal data relating to the data subjects that are covered by the merger or acquisition.
Legal basis	Our legitimate interest to proceed with a merger or acquisition and transfer relevant personal data for this purpose (GDPR, article 6.1 (f)). Contact us if you want to learn more about how we balance your interests against ours.

Retention	N/A
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Sharing with authorities	
Purpose	To share personal data with authorities, such as the police authority, when legally obliged to do so.
Categories of personal data	The categories of personal data relating to the data subjects that are necessary and requested by the authority.
Legal basis	Legal obligation (GDPR, article 6.1 (c) and such legislation or decision from an authority that is applicable in the individual case).
Retention	N/A

Custom declarations	
Purpose	To administrate custom declarations when we send purchased products to customers located outside of the EU.
Categories of personal data	Name, address and product information.
Legal basis	Legal obligation (GDPR, article 6.1 (c), legislation regarding customs (for Sweden: Tullag (2016:253) and bookkeeping legislation (for Sweden: Bokföringslag (1999:1078))).
Retention	During seven years from when the custom declaration was filled out.

3 WHERE DO WE GET YOUR PERSONAL DATA FROM?

We mainly collect your personal data directly from you (including from your device) but in some cases, we also collect personal data from other sources, namely when:

- someone else purchase items from us, and states that the delivery should be made to you, we will receive personal data about you from that person: name, address, telephone number, e-mail address, information about the purchase.
- we create personal data in regard to you which will be personal data about you: order ID. We may also observe and infer personal data about you regarding your online behaviour and segment affiliation. Read more in 2.4.1.
- companies within the Nudie Jeans' group who collect personal data from you which they share with us:
 - o Nudie Jeans Retail AB: all Nudie Jeans' stores in Sweden are gathered under this company, which collects data from you in the stores: name, e-mail address, telephone number, country, purchase history and history of repairs and customer ID.

- Nudie Jeans AS: Nudie Jeans' stores in Norway are gathered under this company, which collects data from you in the stores: name, e-mail address, telephone number, country, purchase history and history of repairs and customer ID.
 - Nudie Jeans Germany GmbH: Nudie Jeans' stores in Germany are gathered under this company, which collects data from you in the stores: name, e-mail address, telephone number, country, purchase history and history of repairs and customer ID.
 - Nudie Jeans UK Ltd: Nudie Jeans' stores in United Kingdom are gathered under this company, which collects data from you in the stores: name, e-mail address, telephone number, country, purchase history and history of repairs and customer ID.
 - Nudie Jeans Inc: Nudie Jeans' stores in USA are gathered under this company, which collects data from you in the stores: e-mail address, telephone number, country, and history of repairs and customer ID.
 - Nudie Jeans Pty Ltd: Nudie Jeans' stores in Australia are gathered under this company, which collects data from you in the stores: name, e-mail address, telephone number, country, purchase history and history of repairs and customer ID.
 - NudieJeans BV: Nudie Jeans' stores in the Netherlands are gathered under this company, which collects data from you in the stores: name, e-mail address, telephone number, country, purchase history and history of repairs and customer ID.
 - Nudie Jeans Ltd: Nudie Jeans' stores in New Zealand are gathered under this company, which collects data from you in the stores: e-mail address, telephone number, country and history of repairs and customer ID.
- Logistic companies who create personal data about your package: package ID.
 - our repair partners (who you can find [here](#)) collect personal data from you when you use our repair services: name, e-mail address, telephone number, country and information about your repair.
 - Meta: Hashed e-mail address and hashed telephone number.
 - Snapchat: Hashed e-mail address and hashed telephone number.

4 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 products, provide c/o Nudie Jeans membership, ordering of repair-kit and subscription to our newsletter. Should you wish not to provide the necessary personal data it will be impossible for us to perform the requested services or provide our products to you.

5 WHO DO WE SHARE YOUR PERSONAL DATA WITH?

5.1 How we share your personal data and who we share it with

In addition to the processing of your personal data performed by us, we need to share your personal data with others in order to provide our products and services as well as to comply with laws and regulations. The categories of recipients and the personal data shared with each category are listed below.

- Companies within the Nudie Jeans' group who we collaborate with in different aspects of our business to provide our products and services to you: name, address, telephone number, e-mail address, information about your purchase, order ID.
- Transportation companies whose services we use to deliver our products to you: name, address, telephone number, e-mail address, information about your purchase, package ID.
- Warehousing companies whose services we use to store and dispatch our products: name, address, telephone number, e-mail address, order ID, customer ID, information about your purchase, package ID.
- IT service providers who manage the necessary operation, technical support and maintenance of our IT solutions, such as internally used systems, platforms and hosting services, and management services necessary for us to carry out our business: name, address, telephone number, e-mail address, customer ID, order ID.
- Bank and payment service providers whose services we use to collect payment for your purchase: name, address, telephone number, e-mail address, product.
- Debt collection companies: information about your purchase and your debt.
- Authorities: The categories of personal data relating to the data subjects that are necessary and requested by the authority.
- Providers of analytics services (such as Google): Hashed e-mail address and hashed telephone number
- Marketing agencies who provide us with marketing material and services (only applicable for members of c/o Nudie Jeans and subscribers of our newsletter): name, telephone number, e-mail address customer ID, order ID, postal code, city.
- Agencies who provide us with technology and design services: name, telephone number, e-mail address, address, country, purchase history (item, size, order ID, invoice number, customer ID and currency etc.) and history of repairs.
- Providers of social media platforms such as Google, Meta and Snapchat: name, e-mail address, telephone number, zip code, city and country code, information on your browsing of our website (e.g., products of interest, device information, unique online

identifiers and interactions in relation to our ads on third-party websites), aggregated data obtained from third party data providers through cookies (e.g., information about your personal preferences, demographics and content consumption) and data that you provide us with when you interact with us (e.g., such as your interests, purchased products or services and your interactions with us).

- Law firms and other legal counsels: the categories of personal data that are necessary to solve the legal matter at hand.
- Potential buyers in order to permit a merger, an acquisition or a sale of all or parts of our assets: the categories of personal data that are covered by the merger, acquisition or sale.

5.2 **Transfer of personal data to countries outside EU/EEA**

We strive to process your personal data within the EU/EEA area. However, your personal data will be transferred outside the EU/EEA in some situations, such as when we share your information with a business partner or subcontractor operating outside the EU/EEA. We transfer personal data to the following countries outside of the EU/EEA: the United States, Australia, Israel and New Zealand.

We always ensure that your personal data enjoys a high level of protection, even when the personal data is processed outside of the EU/EEA. In most cases, the importing party will reside in a country that has been deemed to offer adequate protection by the EU commission (Israel and New Zealand) or adheres to the EU-US Data Privacy Framework (the United States), article 45 of the GDPR. If not, we will enter into the [EU Standard Contractual Clauses](#) (Australia and the United States), article 46 of the GDPR. In addition, we take additional technical and organisational security measures when needed.

6 **YOUR RIGHTS**

6.1 **General**

You have certain rights regarding our processing of your personal data. If you want to exercise any of your rights, you can contact us using the contact details in section 1 above. If you have any objections or complaints about the way we process your personal data, please let us know and we will try to help. We will get back to you as soon as we can, and at the latest within one month of receiving your request. If we cannot answer your request or need more time, we will explain why.

6.2 **Right of access**

You have the right to know if we process personal data about you or not. If we do, you also have the right to receive certain information about the personal data we process and why we do it. Furthermore, you have the right to receive a copy of all personal data we have about you. If you are interested in any specific information, please indicate this in your request. For example, you can specify if you are interested in a certain type of information, such as the specific contact details we have about you, or if you want information from a certain time period.

6.3 **Right to rectification**

If the personal data we hold about you is inaccurate, you have the right to have the personal data corrected. You also have the right to complete incomplete personal data, including by providing supplementary information. Once we have corrected or completed your personal data, we will inform those we have shared your personal data with (when applicable) about the update, if it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your personal data with. If you request to have data corrected, you also have the right to request that we restrict our processing during the time we investigate the matter.

6.4 **Right to erasure**

In certain cases, you have the right to request that your personal data are erased:

- if the personal data are no longer necessary for the purposes for which they were collected or otherwise processed,
- when the personal data have been unlawfully processed, or
- if erasure is required to fulfil a legal obligation.

If we erase the personal data following your request, we will also inform those we have shared your personal data with (when applicable), if it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your personal data with.

6.5 **Right to request restriction**

Restriction means that the personal data are marked so that it may only be used for certain limited purposes in the future. The right to restriction applies:

- when you believe the personal data are inaccurate/incomplete and you have requested rectification. If so, you can also request that we restrict our processing while we investigate if the personal data are accurate/complete or not,
- if the processing is unlawful but you do not want the personal data to be erased, or
- when we no longer need the personal data for the purposes for which we collected it, but you need it to be able to establish, exercise or defend legal claims.

Even if you have requested that we restrict our processing of your personal data, we have the right to use it for storage, to assert or defend legal claims or to protect someone else's rights. We may also use the personal data for reasons relating to important public interest. We will let you know before the restriction expires.

If we restrict the processing of your personal data, we will also inform those we have shared your personal data with (when applicable), if it is not impossible or too cumbersome. If you ask us, we will also tell you who we have shared your personal data with.

6.6 Right to object

You have the right to object to processing that is based on our legitimate interest. If you object to the use, we will, based on your situation, evaluate if our interests in using the personal data outweigh your interests in the personal data not being used for that purpose. If we are unable to provide compelling legitimate grounds that override yours, we will stop using the personal data you object to – provided we do not have to use the data to establish, exercise or defend legal claims. If you object to the use, you also have the right to request that we restrict our use during the time we investigate the matter.

You always have the right to object to, and unsubscribe from, direct marketing.

6.7 Right to withdraw consent

You have the right to withdraw your consent for a specific processing at any time. Please note that your withdrawal will not affect processing that has already been carried out.

6.8 Right to data portability

If the processing is based on your consent or an agreement between us, you have the right to obtain personal data that you have provided to us in a structured, commonly used and machine-readable format and transfer it to another controller (“data portability”).

6.9 Right to complain

If you have any objections or complaints about the way we process your personal data, please contact us and we will do our best to help you, see contact details in section 1. You also have the right to lodge a complaint with the supervisory authority where you live, work or where you believe an infringement has taken place. You can find a list of the data protection authorities within EU [here](#). In Sweden, the supervisory authority is the Swedish Supervisory Authority for Privacy Protection (IMY).

7 CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this privacy policy from time to time. We will inform you of any changes by posting the updated privacy policy on our website (including clarification of updates). If we make any material changes to our privacy policy, we will send a notification by e-mail.