

RALPH LAUREN HOTLINE - DATA PROTECTION NOTICE

Information about the Data Controller

The Hotline is a confidential telephonic and online reporting system to facilitate the receipt and handling of reports by Ralph Lauren staff members and contractors regarding potential violations of Ralph Lauren's legal and ethical obligations. The entity responsible for the processing of your personal data through the Hotline (i.e., the data controller) is the Ralph Lauren company employing you ("RL"). Click [here](#) for a list of Ralph Lauren companies and their contact details.

When and How to Use the Hotline?

The Hotline provides an alternative mechanism for Ralph Lauren staff members and contractors to report concerns or suspected violations of company policy or applicable laws and regulations. In certain countries, RL may only accept reports through the Hotline that relate to certain serious matters under local laws. Please click [here](#) for a list of permitted matters in the country of your habitual place of work. The Hotline should not be used to report on issues covered by medical secrecy and legal privilege or other issues than those permitted under local laws. If your concern pertains to a matter that, under local laws, may not be accepted by RL through the system, you will need to use RL's regular information and reporting channels to report the matter.

Use of the Hotline is optional and entirely voluntary. You will not suffer any adverse consequences for not using it. You may nevertheless be obligated to report misconduct to management through other channels under the laws of the country of your workplace. The Hotline supplements Ralph Lauren's regular information and reporting channels. Whenever you have concerns that may need to be reported, you should first talk to your line manager. You also can use the "open door" policy to talk to someone else in management, including speaking to your manager, Global Security, Asset Protection, People & Development or Legal. If, for whatever reason, you feel unable to use those channels, or if you think that your concerns have not been handled properly, and if your concerns fall within the scope of the Hotline, you may report them through the Hotline using one of the following mechanisms:

1. Calling the toll-free Hotline at the number provided for your location. The Hotline is staffed 24 hours a day, 365 days a year.
2. Logging onto www.ralphlauren.ethicspoint.com from any computer with an Internet connection and click on the Hotline link to file a web report.

Please be aware that the information you provide about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, is correct and factual. RL has a strict non-retaliation policy for any report made in good faith, i.e., you will not be disciplined if you report concerns based on good faith allegations, even if they later turn out to be incorrect or if RL decides to close the matter. However, knowingly providing false or misleading information may result in consequences, including disciplinary proceedings, up to and including termination, or judicial proceedings.

Collection and Use of Personal Data

The Hotline invites you to submit: your name and contact details, the name, position and contact details of all individuals you may be reporting, and a description of the suspected violation, including all relevant facts and details. You should provide your name and contact details so that RL may contact you directly if further information is needed or to inform you of the outcome of the report. Your identity will be kept confidential to the fullest extent practicable, consistent with RL's need to conduct a thorough investigation. In particular, your identity will not be disclosed to the reported individual(s). However, we may disclose information revealing your identity if you consent to such disclosure or if we are required to do so by law, such as in response to a court order. RL will accept anonymous reports to the extent permitted by local law. For example, anonymous reports will not be processed in Spain and Portugal.

Please do not provide any data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, data concerning health or data concerning a person's sex life or sexual orientation, about yourself or another person, unless this information constitutes a key element of your report.

Please be aware that your information may also be included in the evidence gathered in the course of the investigation, the report of the investigation and the outcome of the report. This information may be obtained via third parties (e.g., other Ralph

Lauren staff members) in the course of the investigation. Your cooperation and assistance in such investigation may be necessary. If an investigation indicates that a violation of company policy or applicable laws or regulations has occurred, RL will take such action as it determines appropriate under the circumstances.

Legal Basis For Processing Personal Data

We will collect and process your personal data to the extent necessary to achieve RL's legitimate interests in conducting business in compliance with all applicable laws and regulations and in accordance with the highest ethical principles, or to comply with a legal obligation to which RL is subject.

Recipients of your Personal Data and Data Transfers

The information you provide will be stored on servers hosted by RL's third-party service provider, NAVEX Global, Inc. in the U.S. ("NAVEX Global"), which operates the Hotline on behalf of RL. When a concern or allegation is introduced through the Hotline, a report will be prepared by NAVEX Global and then forwarded to appropriate Ralph Lauren representatives responsible for investigation and follow-up. Unless otherwise required by law, the information within the Hotline may only be reviewed and used by specially trained Ralph Lauren employees that may include representatives from the Internal Audit, Asset Protection, Global Security, People & Development or Legal departments, and personnel in the company's Finance and IT functions. RL may also use external advisors retained to assist in investigating the report. If you reside or work in the European Economic Area ("EEA"), United Kingdom, Switzerland or Turkey, please be aware that some of these recipients may be located in countries outside of the EEA, including in the United States and Switzerland. Switzerland has been recognized by the European Commission as providing an adequate level of data protection. However, the United States has not been recognized as providing such a level of data protection. RL complies with legal requirements providing adequate safeguards for the transfer of personal data. Both Ralph Lauren Corporation in the U.S. and NAVEX Global are certified to the EU-U.S. and Swiss-U.S. Privacy Shield frameworks. Details of these certifications are available on the [Privacy Shield list](#). U.S. companies that comply with the Privacy Shield frameworks are considered as ensuring an adequate level of data protection under Article 45 of the EU General Data Protection Regulation ("GDPR").

Retention of your Personal Data

Personal data contained within a report submitted through the Hotline in the EEA, United Kingdom, Switzerland or Turkey will be destroyed or archived as soon as practicable under the particular facts and circumstances, and within two (2) months after the conclusion of the investigation, so long as the investigation does not lead to disciplinary action and/or a dispute. If disciplinary measures are imposed or a dispute arises, your personal data will be retained until final adjudication. Personal data contained within a report submitted through the Hotline in the other countries will be retained in accordance with local retention laws and policies. RL endeavors to promptly destroy or archive any personal data outside the scope of the Hotline.

Your Rights

Subject to applicable law and in particular in the EEA, United Kingdom, Switzerland and Turkey, you have the right to request access to and rectification or erasure of your personal data, or restriction of the processing of your personal data. You may also object at any time, on grounds relating to your particular situation, to the processing of your personal data through the Hotline in accordance with applicable law. Please note that the exercise of these rights may be subject to certain exemptions.

How to Contact Us

If you wish to exercise any of the above rights or have a question or concern about the processing of your personal data through the Hotline, please contact RL's Data Protection Officer at DataProtectionOfficer@RalphLauren.com. If you are not satisfied with our Data Protection Officer's response or if you consider your privacy rights have been breached, you may lodge a complaint with a data protection supervisory authority, in particular in the country of your habitual residence, place of work or of an alleged infringement of the GDPR (where applicable).