



Brooks Brothers Privacy Policy

Last Modified December 2019

Thank you for your interest in Brooks Brothers Group, Inc. (“Brooks Brothers”). Brooks Brothers is committed to protecting the information that you share with us, and explaining how we collect, use, process, and share that information.

Scope and information that this Privacy Policy covers

This Privacy Policy applies to Personal Information (defined below) collected at our stores, and on our websites and mobile applications (referred to as our “Site”), cloud-based services, or controlled widgets embedded in communication platforms with a link to this Privacy Policy (collectively, our “Services”). It covers how we collect, use, share, and otherwise process such Personal Information as of the date that this Privacy Policy is posted. It does not apply to any other information collected by Brooks Brothers through any other means. By “Personal Information,” we mean information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person or household. “Personal Information” also includes any other information related to a particular individual that constitutes “personal information” or “personal data” under any privacy or data protection law that applies to our consumers. Information that is de-identified, aggregated, or anonymized is not considered Personal Information. Publicly available information that is made available from federal, state, or local government records, also may not be Personal Information.

Note for California Residents

If you are a **California resident**, there are additional disclosures, rights and procedures that apply to you or from which you may benefit; please see our [Privacy Notice for California Residents](#), below, for more information.

Summary of Key Considerations

Collection	We collect Personal Information about you that you provide to us or that we obtain while you are using our Services.
Protection	We employ appropriate technical, administrative, and physical safeguards that are designed to prevent unauthorized access, maintain data accuracy, and designed to ensure correct use of Personal Information.
Use	We use Personal Information to provide you with our services, to build features that will make our services easier to use and available on our Sites, to contact you about our services, and to send advertisements, marketing material or other offers that we think might be of interest to you, to perform data analytics, or for other purposes permitted by law.
Marketing and Choices	You have control on how we use Personal Information for marketing. To exercise your control in any marketing communication, please contact us at service@brooksbrothers.com for more information, or follow the instructions provided in the marketing communication.
Sharing	We share your Personal Information with our affiliates, external service providers, third party vendors, in-store tailors and associates, and/or other unaffiliated third parties for marketing and/or as otherwise necessary to perform transactions with you and manage our business.
Cookies	Our Site uses cookies and other similar technologies. To opt-out of advertising and certain other cookies, please review the information below, or contact us at service@brooksbrothers.com for more information.
Access and Data Subject Rights	Brooks Brothers understands that you may want to change, access, or delete your Personal Information. You may do so by accessing your profile or by contacting us at service@brooksbrothers.com .

<p>Cross-Border Data Transfers</p>	<p>Certain of our Services, including our Site, are operated in the United States. If you are located outside the US, your Personal Information will be transferred to the US, a jurisdiction that may not provide an equivalent level of protection as your home jurisdiction. Cross-border transfer is, therefore, necessary for the conclusion or performance of a transaction that you are requesting, and for the establishment, exercise, and defense of legal claims. To the extent permitted by local law, your use of our Services or provision of any Personal Information constitutes your consent to the cross-border transfer of Personal Information and the other activities identified in this Privacy.</p>
<p>Children</p>	<p>We do not knowingly collect Personal Information from children under the age of 16. If a child under the age of 16 has provided us with Personal Information, we ask that a parent or guardian contact us at service@brooksbrothers.com.</p>
<p>Changes</p>	<p>We will provide notice of any material changes to this Privacy Policy by posting a prominent notice on our Site and/or emailing you.</p>
<p>Contact Us</p>	<p>If you have any questions, please contact customer service at service@brooksbrothers.com, or contact us at any other available method set forth in this Privacy Policy.</p>

1. Collection of your Personal Information

We collect your Personal Information to offer our Services, maintain and enhance our Services, protect the security of you and our Services, comply with legal obligations, and inform you about other services and products that may be available through us, our affiliated companies, and our marketing partners. We collect Personal Information about you when you interact with or use our Services, such as when you:

1. Visit our Site;
2. Sign up as a registered user on our Site;
3. Register with us online or at one of our stores for the My Brooks Rewards program;

4. Sign up for our newsletter;
5. Make a purchase or use a service on this Site or in store;
6. Interact with our customer service personnel, by phone, email, or at one of our stores;
7. Participate in promotions or surveys;
8. Submit comments, reviews, or other user-generated content;
9. Connect or interact with us through social networks (e.g. Facebook, Google+, Twitter, Yelp) or Live Chat;
10. Interact with our store locator;
11. Interact with our mobile application, including the receipt of push notifications; and
12. Request customer or technical support.

The Personal Information we collect depends on how you interact with us. Personal Information we collect includes:

1. Identification and contact information (including name, postal or billing address, e-mail address, telephone or mobile number);
2. Username and password for Sites;
3. Credit card and payment information;
4. Location, including via IP address;
5. Cookies and similar technologies;
6. Purchase, transaction, return, and exchange information;
7. My Brooks Rewards account information;
8. Birthdate and age;
9. Gender;
10. Wish list;
11. Measurements;

12. Device information (e.g. device model, operating system version, device date and time, unique device identifiers, mobile network information, IP address);
13. The manner in which you use our Site or mobile applications (e.g., search terms used, pages visited, application performance);
14. Social media information and other content you provide;
15. Demographic and socioeconomic information; and
16. Other Personal Information, including information that you have disclosed to us in our communications with you, by phone, email, or in person.

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from you, for example from forms you complete, preferences you express or provide, or products you purchase.
- Indirectly from you, for example from observing your actions on our Site.
- Automatically from you, for example through cookies as you navigate through our Site.
- From third-parties, such as our joint marketing partners, third-party websites, the banks that operate our private label credit card programs, or other unrelated third-parties, in connection with the products and services we provide to you.

We may combine information about you that we have with information we obtain from business partners or other companies. In those cases, we will apply this Privacy Policy to the combined information. Please note that if you apply for or utilize a branded credit card from one of our brands, you are providing your information to the bank that administers the credit card, which will share that information with us.

Even if you do not send us any Personal Information, we collect certain non-Personal Information about how you use our Site. This information is used for statistical purposes and to provide personalized marketing content.

Our Site contains links to third-party websites, including websites of our business partners. We do not own, operate or control the websites of such third-parties. Accordingly, this Privacy Policy does not apply to any websites maintained or operated by third-parties for the collection, use, storage, disclosure, or other processing of your Personal Information. When you click on those links, you

will go to a third-party website where you will be subject to that website's privacy statement and we encourage you to read that policy statement. We are not responsible for the content of third-party websites, any use of such sites or services, or the privacy practices of any third parties.

2. Use of your Personal Information

We generally process and may disclose your Personal Information to others to effectuate our business activities, including to:

- Provide you with products and services, including managing product returns or exchanges, authenticating authorized users, and marketing our products and services;
- Perform certain transactions initiated by you;
- Respond to your communications, questions, complaints, or reviews of our products;
- Send you communications about online transactions, product information, ads and promotions, including relating to other products and services, electronic newsletters, or other notices you requested or offers tailored to you;
- Notify you when an item or type of item is back in stock and when new items become available for purchase;
- Enable our advertisers to provide you with more personalized content, and track the effectiveness of certain advertising campaigns;
- Prevent fraud and allow for safer e-commerce shopping experiences;
- Comply with applicable law, obey judicial orders, cooperate with law enforcement authorities, or prevent any suspected illegal activities;
- Help us run our business; and
- Assist with everyday business purposes, such as product development and Site administration.

We may combine your online information with information collected from offline or online sources, or information we already have.

3. Sharing of your Personal Information

Brooks Brothers does not sell your Personal Information to third parties, and will not sell your Personal Information to third parties. At times, we may share your Personal Information as follows:

- With our group of companies, affiliates, and subsidiaries;

- With third-party vendors, consultants, and other service providers who are working on our behalf and require access to your information to carry out that work, such as to process billing, provide customer support, etc. We process and share your Personal Information to fulfill your requests and meet our legitimate business and legal objectives. When we disclose Personal Information to external entities to perform support services for us, we establish by contract that they may access your Personal Information only for the purposes of performing those support services;
- With other persons with whom you have requested, we share information in order to fulfill services you request;
- In connection with, or during the negotiation of, any merger, sale of company stock or assets, financing, acquisition, divestiture, or dissolution of all or a portion of our business;
- If we believe that disclosure is reasonably necessary (a) to comply with any applicable law, regulation, legal process or governmental request; (b) to enforce or comply with our [Terms of Use](#) or other applicable agreements or policies, (c) to protect our rights or property, or the security or integrity of our services, or (d) to protect us, users of our services or the public from harm or potentially prohibited or illegal activities; and
- With others, for any purpose allowed by law.

Location of Servers and Transfer of Information to the United States. Our Site is hosted by servers in the United States and we operate our business globally. Some countries may not provide the same level of data protection as your home country. If you are located, for example, in European Economic Area or Switzerland (collectively, “**Europe**”), your Personal Information will be transferred to the United States and possibly to other jurisdictions (e.g., to the location of a property for which you have requested information), which are not considered to provide an adequate level of protection under your local data protection laws. We, therefore, provide appropriate protections for cross-border transfers as required by applicable law. For transfers from Europe to the United States, or other non-European jurisdictions, we have implemented the standard contractual clauses approved by the European Commission, and other approved mechanisms to protect Personal Information, as required by applicable law. As permitted by data protection laws, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below.

4. Legal grounds for the collection, use, sharing, and other processing of Personal Information

Certain jurisdictions, including those in Europe, require the identification of the legal grounds for the collection, use, sharing, and other processing of Personal Information. Brooks Brothers relies on the following legal grounds for its collection, use, sharing, and other processing of Personal Information as described in this Privacy Policy:

- Necessary to provide information or otherwise carry out the performance of a contract with you as an individual;
- Our legitimate interests, including:
 - Performance of the contract with you;
 - Implementation and operation of a group-wide matrix structure and group-wide information sharing;
 - Customer relationship management and other forms of marketing and analytics;
 - Fraud prevention, misuse of company IT systems, or money laundering;
 - Whistleblower scheme operations;
 - Physical, IT, and network perimeter security;
 - Internal investigations; and
 - Intended mergers and acquisitions.
- Compliance with legal obligations and/or defense against legal claims, including those in the area of labor law, social security, and data protection, tax, and corporate compliance laws;
- Protection of the vital interests of any individual;
- Performance of a task carried out in the public interest or in the exercise of official authority vested in Brooks Brothers; and
- Consent, as permitted by applicable law.

5. Your rights concerning your Personal Information

You have the following choices regarding our use and disclosure of your Personal Information:

- **Marketing Communications.** If you no longer wish to receive any marketing communications, remain on a mailing list to which you previously subscribed or receive any other communication from Brooks Brothers, please follow the unsubscribe link in the relevant communications or contact us using the link at the bottom of the message. Even after you opt-out or update your marketing preferences, however, we may still contact you for transactional or informational purposes. These include, for example, customer service issues, returns or product-related inquiries, surveys or recalls, or any questions regarding a specific order.
- **Cookies and Similar Technologies.** Please review your browser or computer settings for

certain cookies and see below to exercise certain choices regarding cookies.

Privacy Notice for California Residents

If you are a California resident, the California Consumer Privacy Act of 2018 (“CCPA”) additionally affords rights to you with respect to your Personal Information. Please note that other sections of this Privacy Policy apply to California residents, and this notice supplements the information contained in the Privacy Policy. Please read the Privacy Policy in its entirety.

Your Rights under the CCPA

- California residents have the right, following a verifiable request, to access (twice in a 12-month period, free of charge) the categories and specific pieces of Personal Information Brooks Brothers has collected about you, the categories of sources from which the Personal Information is collected, and the business purpose for collecting the Personal Information for the 12-month period prior to the request (“Right to Know”).
- California residents have the right to request that we delete their Personal Information we have collected or maintained, subject to certain exceptions set forth in the CCPA (“Right to Request Deletion”). Please note that we may not be able to honor deletion requests in all cases, including when your Personal Information is subject to a statutory exception. Those exceptions include, for example, when we need to retain the information to: (i) complete a transaction or otherwise perform a contract between us and the consumer; (ii) detect or protect against security incidents or fraud; (iii) comply with legal obligations; and/or (iv) as otherwise set forth as an applicable exception under the CCPA or other relevant privacy laws.

Brooks Brothers will not discriminate against you for exercising your rights afforded by the CCPA, which is further in accordance with California residents’ rights under that title. Brooks Brothers’ loyalty program, My Brooks Rewards, is in compliance with the CCPA, including because (1) participation is voluntary; (2) the program is not unjust, unreasonable, coercive, or usurious in nature; and (3) we do not sell the Personal Information of consumers, including the Personal Information collected as part of our loyalty program. You have a Right to Request Deletion and opt out of our loyalty program at any time.

Personal Information Collection and Purposes of Use

The chart below describes the categories of Personal Information we have collected from California residents and, for each such category, the categories of sources of the information, the business or commercial purposes for collection and the categories of third parties with whom we share the information. This chart is meant to be read along with the entirety of the Privacy Policy.

Categories and Specific Pieces of Personal Information Collected	Categories of Sources of Collection	Business or Commercial Purposes for Collection	Categories of Third Parties with Whom We Share the Information
Identifiers and Characteristics <ul style="list-style-type: none"> ■ Names and aliases ■ Postal address ■ Email address ■ Account names ■ Birth date ■ Gender ■ Age ■ IP address ■ Account ID ■ Online identifier ■ Telephone and mobile phone numbers ■ Body Measurements ■ Demographics 	Consumer directly Service providers Data analytics providers	Performing internal operations necessary to run our business and provide products and services to you Consulting order-related information and addressing customer service inquiries Managing customer information Providing order management information and fulfillment Performing analytics Enabling transactions and logistical fulfillment for e-commerce and payment processing Enabling and providing fraud prevention mechanisms Improving digital advertising and marketing Facilitating integration of customer loyalty platform	Advertising networks Internet service providers Data analytics providers Payment card processors Anti-fraud protection providers Operating systems and platforms
Financial transaction information <ul style="list-style-type: none"> ■ Payment card number ■ Authorization number or security code ■ Billing address ■ Card type (debit or credit card) ■ Account information ■ Expiration date ■ Tender Type 	Consumer directly Service providers Data analytics providers	Managing customer information Performing analytics Enabling transactions and logistical fulfillment for e-commerce and payment processing Enabling digital advertising and marketing Facilitating integration of customer loyalty platform	Data analytics providers Payment card processors Anti-fraud protection providers Operating systems and platforms

Commercial information <ul style="list-style-type: none"> ■ Transaction history of consumers ■ Concierge 	Consumer directly Service providers Data analytics providers	Consulting order related information and addressing customer service inquiries Managing customer information Providing order management information and fulfillment Performing analytics Enabling transactions and logistical fulfillment for e-commerce and payment processing Enabling and providing fraud prevention mechanisms Improving digital advertising and marketing Facilitating integration of customer loyalty platform	Advertising networks Internet service providers Data analytics providers Anti-fraud protection providers Operating systems and platforms
Internet, electronic network or other activity <ul style="list-style-type: none"> ■ Behavioral data ■ Email engagement ■ Browsing activity ■ Search history ■ Device type ■ Geolocation data ■ Preference selections by consumers 	Consumer directly Service providers Data analytics providers	Performing internal operations necessary to run our business and provide products services to you Consulting order related information and addressing customer service inquiries Managing customer information Performing analytics Enabling transactions and logistical fulfillment for e-commerce orders and payment processing Enabling and providing fraud prevention mechanisms Improving digital advertising and marketing	Advertising networks Internet service providers Data analytics providers Payment card processors Anti-fraud protection providers Operating systems and platforms

We have not sold any California residents' Personal Information to third parties in the preceding 12 months. As of January 1, 2020, we do not and will not sell California residents' Personal Information.

Exercising California Residents' Privacy Rights

California residents can submit a data request to exercise these various rights (including the Right to Know and the Right to Request Deletion) in any of the following manners:

1. via phone at (800) 274-1815
2. via email at service@brooksbrothers.com
3. The web form accessible [here](#).
4. In participating retail stores

Process for Verifying a Consumer's Request

We will verify any consumer's request to exercise the Right to Know or the Right to Request Deletion. In order to adequately protect your Personal Information, we will verify your identity either by using a third-party identification verification service or matching the identifying information provided by you to the Personal Information that we maintain already on our systems. Making a verifiable consumer request does not require you to create an account with us. If we are able to verify your request, we will provide a response within 45 days, or notify you that we require a further 45-day extension in order to provide the requested information.

You may also authorize an agent to submit a request on your behalf, so long as you provide the authorized agent written permission to request on your behalf, and your authorized agent is able to provide appropriate verification with our third-party identification service. If your authorized agent does not submit proof that they have been authorized by you to submit verified requests for disclosure and deletion, we reserve the right to deny such a request that we have received and will explain to your authorized agent why we have denied such request.

Should you need access to this policy in an alternative format due to a disability, please contact us through the methods provided above.

European Union and European Economic Area Privacy Rights

Europe and certain other non-US jurisdictions maintain local data protection regulations that confer certain data protection rights on individuals. Brooks Brothers will address those rights where required by applicable laws. If applicable, and you wish to exercise any of these rights, please contact us as set out below.

1. **Right of access:** You have the right to obtain from us confirmation as to whether or not Personal Information concerning you is processed, and, to request access to the Personal Information. The access information includes, among other things, the purposes of the processing, the categories of Personal Information concerned, and the recipients or categories of recipient to whom the Personal Information have been or will be disclosed. This is not, however, an absolute right, and the interests of other individuals may restrict your right of access. You may have the right to obtain a copy of their Personal Information undergoing processing.
2. **Right to rectification:** You have the right to obtain from us the rectification of inaccurate Personal Information about you. Depending on the purposes of the processing, you may have the right to have incomplete Personal Information completed, including by means of providing a supplementary statement.
3. **Right to erasure (right to be forgotten):** Under certain circumstances, you have the right to obtain from us the erasure of Personal Information concerning you, and we may be

obligated to erase that Personal Information.

4. **Right to restriction of processing:** Under certain circumstances, you have the right to obtain from us restriction of processing your Personal Information. In that case, your data will be marked and may only be processed by us for certain limited purposes. As Brooks Brothers processes and uses your Personal Information primarily for purposes of carrying out the contract for a services relationship with your employer, Brooks Brothers will have a legitimate interest for the processing which will override your restriction request, unless the restriction request relates to marketing activities.
5. **Right to data portability:** Under certain circumstances, you have the right to receive the Personal Information about you, which you have provided to us, in a structured, commonly used and machine-readable format, and you have the right to transmit that data to another entity without hindrance from us.
6. **Right to object:** Under certain circumstances, you have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Information by us, and we can be required to no longer process your Personal Information.

Where permitted by applicable law, you also have the right to lodge a complaint with a competent data protection supervisory authority.

6. Security

The security and confidentiality of your Personal Information matters to us. That's why we have adequate technical, administrative, and physical controls in place to protect your Personal Information from unauthorized access, use, and disclosure. For example, we provide the option to encrypt all information you submit to us using Secure Sockets Layer ("SSL") technology that helps protect information during transport to our Site. We also review our security procedures periodically to consider appropriate new technology and updated methods. Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable, and we urge you to similarly take efforts to protect your personal information.

7. Data Retention

Depending on the Service you require, we will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Policy or as set out in our contracts with our business partners, unless a longer retention period is required or permitted by a law that applies to us.

8. Children

This Site is not intended or directed to children under the age of 16, and we do not knowingly collect any Personal Information, or knowingly track the use of our Site, from children. If Brooks Brothers has actual knowledge that Personal Information about a child under 16 years old has been collected, then Brooks Brothers will take the appropriate steps to delete such Personal Information. If you believe that a child under age 16 (or other age applicable in a different jurisdiction) has provided Personal Information to us on this Site without the consent of a parent or guardian, or if you wish to delete your child's Personal Information collected from this Site, please notify us at service@brooksbrothers.com.

9. Cookies And Similar Tracking Technologies

Information Collected Through Technology. Information is also obtained in other ways through technology. Some of this information may be linked to you personally. In accordance with applicable law, Brooks Brothers uses and allows third parties to use essential and non-essential cookies, online tracking tools, web beacons, and similar technologies (collectively, "cookies") on our Site. We process this information to help our Site function correctly, and better understand the needs of our customers.

Cookies on our Site generally fall into the following categories:

- **Strictly Necessary Cookies:** These are required for the operation of our Site. They include, for example, cookies that enable you to log into secure areas. These cookies are session cookies which are erased when you close your browser.
- **Analytical/Performance Cookies:** These allow us to recognize and count the number of users of our Site and see how such users navigate through our Site. This helps to improve how our Site works, for example, by ensuring that users can find what they are looking for easily. These cookies are session cookies which are erased when you close your browser.
- **Functional Cookies:** These improve the functional performance of our Site and make it easier for you to use. For example, cookies are used to remember that you have previously visited our Site and asked to remain logged into it. These cookies are session cookies which are erased when you close your browser.
- **Targeting Cookies:** These record your visit to our Site, the pages you have visited and the links you have followed to recognize you as a previous visitor and to track your activity on the Site and other websites you visit. These cookies qualify as persistent cookies, because they remain on your device for us to use during a next visit to our Site. You can delete these cookies via your browser settings. We will not collect these cookies from individuals in Europe without proper consent.

Use of cookies. We advertise in a number of ways, including online through managed social media presences, and on other unaffiliated sites and mobile applications. To understand how our advertising campaigns are performing, we may collect certain information via cookies on our Site through our

advertising service providers. The information we collect includes IP addresses, the number of page visits, pages viewed via our Site, search engine referrals, browsing activities over time and across other websites following your visit to our Site or applications, and responses to advertisements and promotions on the websites and applications where we advertise.

We also use certain information to identify new visitors to our Site, recognize returning visitors, advertise on other websites and mobile applications not affiliated with us, analyze the effectiveness of our advertisements, better understand our audience, customers, or other Site visitors, and determine whether you might be interested in new products or services.

Controlling Our Tracking Tools. Your browser may give you the ability to control cookies. How you do so, however, depends on your browser and the type of cookie. Certain browsers can be set to reject all browser cookies. If you configure your computer to block all cookies, you may disrupt certain web page features, and limit the functionality we can provide when you visit or use our Site. You can change your cookie settings at any time. Some browsers have a “Do Not Track” feature that lets you tell websites that you do not want to have your online activities tracked. These browser features are still not uniform, so we are not currently set up to respond to those signals.

Controlling Online Interest-Based Ads. We work with online advertising vendors to provide you with relevant and useful ads. This may include ads served on or through our Site. This may also include ads served on other companies’ websites. These ads may be based on information collected by us or third parties. For example, your postal code may be used to target an ad for people in your area. These ads may also be based on your activities on our Site or on third-party websites.

For more information about our ad service provider and its cookies, including information about how to opt out of these technologies, you may visit <http://optout.aboutads.info> In addition, users may prevent Google’s collection of data generated by your use of our Site (including your IP address) by downloading and installing a Browser Plugin available at <https://tools.google.com/dlpage/gaoptout?hl=en>.

10. Changes or other updates to this Privacy Policy

We may amend this Privacy Policy at any time. If we make any material changes in how we collect, use, disclose, or otherwise process Personal Information, we will prominently post an updated Privacy Policy on our Site and/or email you. Any material changes to this Privacy Policy will be effective after our posting of the updated Privacy Policy or as otherwise required by applicable law. Where required to do so by law, we may seek your prior consent to any material changes we make to this Privacy Policy. Your continued use of our Services following the posting of changes constitutes your acceptance of such changes.

11. Comments and Questions

If you have any questions or comments about this Privacy Policy, wish to correct or update your Personal Information, wish to unsubscribe from any industry updates you have requested by modifying or deleting your profile on our Site, or need to access this Privacy Policy in an alternative format due to a disability, please:

- write to customer service at: Brooks Brothers Corporate Office, 346 Madison Avenue, New York, NY 10017;
- call us toll-free at [\(800\) 274.1815](tel:8002741815); and/or
- send us an email to service@brooksbrothers.com.

Canada Security & Privacy

12. Privacy

Brooks Brothers Canada values its customers and respects their privacy. We have prepared this Security & Privacy Statement to explain the manner in which we collect, use, disclose and otherwise treat the personal information of our customers in Canada. This Security & Privacy Statement applies to personal information we collect from our Canadian customers at Brooks Brothers stores in Canada (“Stores”), through our website located at www.BrooksBrothers.com (“Website”), and through our catalogue and call centre services.

13. Information Collected

We may collect personal information (such as your name, email address, mailing address, phone number and/or payment card-related information) that you provide when you:

- Purchase, order, return, or exchange products and services
- Subscribe to our email list or sign up to receive other marketing communications
- Request a catalogue
- Register with us on our Website
- Enroll in an incentive program
- Participate in a contest, promotion or survey
- Email a friend through our Website to tell them about one of our products and services

- Contact us with feedback or a comment, question or complaint; and/or
- Apply for employment at Brooks Brothers.

14. Updating Or Changing Information

Shopping at Brooks Brothers:

You do not have to provide us with any personal information when you purchase products and services for cash at one of our Stores. If you use a debit or credit card for any of your purchases, we collect your payment card-related information. We maintain a record of your purchases and, with your permission, other information such as product interests and sizing in order to assist us in providing you with personalized services. As part of our online express checkout service, you may sign up to have us store your credit card information for future purchases.

When you return previously purchased merchandise or request a refund or exchange, you may be asked to give your name, address, and phone number. We collect this information for loss prevention purposes, including helping to detect and prevent fraud.

Marketing Communications:

If you sign up for one of our contact lists, we may collect your mailing address, email address or telephone number, as applicable. We use this information to send you periodic marketing or promotional mailings or emails about Brooks Brothers or its marketing partners, such as new products and services, discounts, special promotions or upcoming events. If you do not want to continue to receive such mailings or emails from us, please contact us via email, phone or mail (below). You may also unsubscribe from emails by clicking on the unsubscribe link in any email you receive.

Catalogue:

If you sign up to receive our catalogue, we collect personal information including your first and last name and address. If you do not wish to receive our catalogue, please contact us via email, phone or mail (below).

Online Registration:

You do not have to register to visit our Website. However, some of the services offered through our Website may require you to register and provide personal information such as your name, address, email address, birthday (optional) and a user name and password that you select. Your registration information is used to provide you with the products and services you requested as well as a faster,

more convenient shopping experience. When you register we may provide you with an opportunity to sign up to receive our catalogue or future marketing information from Brooks Brothers or its marketing partners. If you wish to withdraw your consent for such communications, please contact us via email, phone or mail (below). You may also unsubscribe from emails by clicking on the unsubscribe link in any email you receive.

Incentive Programs:

If you are eligible to enrol in one of our corporate incentive programs, we collect personal information such as your name, employer, address, phone number and/or email address. We use this information for the purpose of administering your participation in our program.

Contests, Promotions or Surveys:

When you enter a contest, participate in a promotion, or respond to one of our surveys, we may collect your name, address, phone number and/or email address. We use this information to administer your participation in the contest or promotion and, for surveys, to contact you with follow-up questions. At the time you are entering the contest, we may ask your permission to send future marketing information from Brooks Brothers, its sponsors or its marketing partners.

Email a Friend:

You may be able to send an email to a friend through our Website to tell them about our products or services. We collect you and your friend's name and email address as well as any message you provide.

Customer Service:

When you contact us with a comment, question or complaint, you may be asked for information that identifies you along with additional information we need to help us promptly answer your question or respond to your comment or complaint. The information we collect for these purposes may include your name, address and phone number. We may retain this information to assist you in the future and to improve our product and service offerings.

Secondary Marketing:

From time to time, we may obtain your permission to send you marketing information about our product and service offerings or those of our marketing partners. We may combine information you give us with demographic information that is publicly available. We use this combined information to enhance and personalize your shopping experience with us and to enhance our ability to communicate with you about products and services that may be of interest to you.

Employment at Brooks Brothers:

In connection with a job application or related inquiry, you may provide us with certain personal information about yourself, such as that contained in a resume or similar employment-related materials. We use this information for the purpose of processing and responding to your application.

Optional Information:

From time to time, we may collect optional demographic and/or preference information. We use this information to improve our product and service offerings, as well as for internal marketing research purposes.

15. Information Disclosed

Brooks Brothers does not disclose, trade, sell, rent or otherwise transfer the personal information you provide to us to any third party without your prior consent except as otherwise set out herein.

Service Providers:

Brooks Brothers may, from time to time, transfer personal information to our affiliates or unaffiliated third parties who provide services on our behalf, such as to assist in maintaining and managing customer information to provide customer and internet services; to take, fulfill and deliver orders; to conduct Brooks Brothers promotions and surveys; or to more effectively communicate with our customers. These companies are not authorized to use your information in any manner, other than in helping us to provide you with products and services or as otherwise required by applicable law. Your personal information may be stored and processed in the United States by our affiliates and other third party service providers.

Legal:

Please note that we must provide your personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by law. We may also disclose personal information to assist us in collecting a debt owed by you, or otherwise where necessary for the establishment, exercise or defence of legal claims.

Sale of Business:

Additionally we may transfer your personal information to a third party acquirer as a result of the sale or transfer of the stock or all or part of the assets of Brooks Brothers, whether by merger, acquisition,

or similar or related transactions or in the event of a liquidation of the assets of the company.

16. Links To Third Party Websites And Advertisements

We may also use third parties to serve our advertisements on other websites. These companies may use tracer tags or web beacons to report certain information (but not your name, address, email address or telephone number) about your visits to our Website and the websites which advertise and feature links to our Website, in order to measure the effectiveness of our advertisements.

Our Website may include links to third party websites. Except as provided herein, we will not provide any of your personal information to these third parties without your prior consent. Brooks Brothers provides links to third party websites as a convenience to the user. The inclusion of any link does not imply our endorsement of any other company, its websites, or its products and/or services. These linked websites have separate and independent privacy policies, which we recommend you read carefully. We have no control over such websites and therefore have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose and otherwise treat your personal information.

17. Accessing, Updating Or Changing Information

If at any time you want to update or change your registration information, simply sign on to www.BrooksBrothers.com as usual, and click on “Edit Your Personal Information and Preferences,” “Edit Your Shipping/Billing Information” or “Change Your Password.”

You may access, update and correct inaccuracies in your other personal information in our custody and control, subject to certain exceptions prescribed by law, by contacting us in writing as set out (below).

18. Cookies And Website Information

We use “cookies” to enhance your experience with our Website. Cookies are text files we place in your computer’s browser to store your preferences. We use cookies to understand website usage and to improve the content and offerings on our Website. For example, we may use cookies to personalize your experience at our Web pages (e.g. to recognize you by name when you return to our Website), save your password in password-protected areas, and enable you to use shopping carts on our Websites. We also may use cookies to offer you products, programs, or services. You can refuse cookies by turning them off in your browser but in doing so you may not be able to take advantage of all of the features of our Website. To take full advantage of the www.BrooksBrothers.com experience, we recommend that you leave them turned on. However, if you would still like to place an order, simply call us at 1.800.274.1815 to place your order by phone.

We collect certain technical information from your computer each time you request a page during a visit to our Website. This information may include your Internet Protocol (IP) address, your computer's operating system, browser type and the address of a referring website, if any. We collect this information to monitor and improve our Website.

19. Security Of Personal Information

We have implemented measures in an effort to safeguard the personal information in our custody and control, including only providing access to personal information to employees and authorized service providers who require such information for the purposes described in this Security & Privacy Statement. We maintain reasonable administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, modification and disclosure of personal information in our custody and control.

To provide you with an increased level of security, online access to certain personal information may be protected with a password you select. We strongly recommend that you do not disclose your password to anyone. We will never ask you for your password in any unsolicited communication.

When you place an order on our Website, Brooks Brothers encrypts your order and registration information by using Secure Sockets Layer (SSL) technology. SSL is designed to avoid the decoding of your information by anyone other than Brooks Brothers.

Your personal information is maintained in electronic records on our servers located in the United States. We only keep your personal information as long as necessary for the purposes we collected it, or as otherwise required by law.

20. Children's Privacy

We will never knowingly request personal information from anyone under the age of 13 without prior verifiable parental consent. If we become aware that a subscriber is under the age of 13 and has registered without prior verifiable parental consent, we will remove his or her personally identifiable registration information from our files. Please note: we may nevertheless maintain a record of that person's name and address in a "do not register" file to avoid subsequent registration by a child under the age of 13.

21. Changes To This Statement

Brooks Brothers may update this Security & Privacy Statement from time to time. When we make changes, we will post them here. We will treat your personal information in accordance with the Security & Privacy Statement in place at the time of collection, or as you otherwise consent.

22.Contact Us

You may contact us at any time if:

- you have any questions or comments about this Security & Privacy Statement,
- you wish to withdraw your name from an email or other marketing list;
- you wish to access, update, and/or correct inaccuracies in your personal information,
- you have a complaint about the manner in which we treat your personal information.

You may contact us as follows:

By Email: canadaprivacy@BrooksBrothers.com

By Phone: 1.800.274.1815 (001.860.741.4800 outside the United States)

By Mail:

Brooks Brothers Customer Service

100 Phoenix Avenue, Enfield, CT 06082

You may contact our Chief Privacy Officer at:

By Email: canadaprivacy@BrooksBrothers.com

By Phone: 1.800.274.1815 (001.860.741.4800 outside the United States)

By Mail:

Retail Brand Alliance, Inc.

Brooks Brothers Corporate Office

Attention: Chief Privacy Officer

100 Phoenix Avenue, Enfield, CT 06082