

Privacy Notice Colleague

GENERAL

This Privacy Notice is applicable to all potential, current and former colleagues (including in-house consultants) when performing work for and under supervision of H&M. Where appropriate based on the context of this Privacy Notice, the term “colleague(s)” (including former) used in this Privacy Notice shall equally apply to “in house consultant(s)” and “employee(s)” and the term “employment” shall equally apply to “consultancy” and “former/potential employment”. This means that references to e.g. “colleague ID” include the equivalent ID number for consultants and employees (including former) and that “employment contract” includes consultancy contracts and employment contracts.

This Privacy Notice may also be applicable to colleagues’ family members, next of kin, referees, and/or job applicants recommended by you. If you provide H&M with information of these third parties, you are responsible to forward this Privacy Notice to the relevant persons.

Who is responsible for processing your personal data?

Your employer, H & M Hennes & Mauritz GBC AB or H & M Hennes & Mauritz SVERIGE AB (referred to as “we” “us” or “H & M Company”), and/or the H&M Group Company, is the controller(s) of the personal data under applicable data protection law, unless otherwise explicitly stated in each chapter below.

In cases when your employer and your reporting organization are two separate H&M Companies, your personal data is processed, where necessary, by both entities as independent data controllers. The processing is carried out to fulfill employment contract and to other necessary purposes derived from your employment.

Where do we store your data?

The data that H&M Company collects from you is stored either in the country where H&M Company is established, in a country within the European Economic Area (“EEA”) and/or transferred to and processed in a country outside of the EEA if this is necessary for carrying out certain tasks, achieve certain goals etc. Any cross-border transfer of your personal data will be carried out in compliance with applicable laws.

Whenever applicable, for transfers of personal data from a country within the EEA to a country outside of the EEA which has not been qualified for an adequacy decision by the European commission, H&M Company use Standard Contractual Clauses as well as other necessary safeguard measures to protect your privacy and other rights during and after the cross-border transfer.

Who has access to your personal data?

Only H&M Company has access to your personal data, including its contracted suppliers and trusted partners carrying out certain tasks on our behalf. H&M Company may also share personal data with other legal entities within the H&M Group to the extent necessary to accomplish the intended purpose of processing, however, without compromising any of your rights.

Please be aware that many of these third-party recipients have an independent right or obligation to process your personal data in their own responsibility. We may share your personal data with external parties under the following circumstances:

Purpose of processing	Category of recipients
IT environment that facilitates daily operations and supports employment processes	Information Technology, integrated platform and service providers, external training providers
Payroll and benefits administration	Payroll service, banks, insurance providers, pension providers
Compliance with labour practice and applicable laws	Trade union, public authorities, government bodies, auditors
Health and Safety	Insurance provider, travel tracker service provider, emergency response planner, health service management, counselling and support service, auditors, public authorities
Cyber-security, asset protection, loss prevention, and investigation of disloyal or malicious activities	Security service providers, forensic firms, public authorities, surveillance camera providers, insurance providers
Business travel administration	Travel booking platforms, travel agencies, hotels, insurance companies, business credit card provider, immigration service provider, public authorities
Talent acquisition and recruitment	Recruitment agencies, Applicant Tracking System (ATS) provider, specialized assessment centre providers, background/reference checking provider
International work assignment	Relocation service providers, insurance providers, public authorities
Organisational development and optimization	Survey service providers, compensation benchmarking agencies, trade unions, counselling and support service, internal and external communication channels

What is the legal ground for processing?

H&M is not allowed to collect, process, use, store etc. personal data without a valid legal ground. Lawfulness of processing personal data may be derived from your employment contract, statutory obligations, collective agreements, your consent, or from our legitimate interest as an employer. For each specific processing purpose, we will inform you about which legal ground that will apply, and what rights you are entitled to exercise.

What are your rights?

Right to access:

You have the right to request information about the personal data we hold on you at any time. We will provide you with your requested information via appropriate means of communication.

Right to portability:

Whenever H&M Company process your personal data by automated means based on your consent or based on an agreement, you are entitled to obtain a copy of your data in a structured, commonly used,

and machine-readable format transferred to you or to another party. This only includes the personal data you have submitted to us.

Right to rectification:

You have the right to request rectification of your personal data if they are incorrect, including the right to have incomplete personal data completed.

Right to erasure:

You have the right to request erasure of your personal data processed by us at any time. Your personal data may continue to be processed under certain circumstances, we will fully erase your personal data once it is no longer necessary for the purpose for which we originally collected or processed it, or when we are no longer legally required to process it.

Your right to object to processing based on legitimate interest:

You have the right to object to processing of your personal data that is based on H&M Company's legitimate interest. H&M Company will stop processing your personal data and immediately erase it, unless we can demonstrate a legitimate reason for the processing which overrides your interest and rights or due to legal claims.

In cases where your personal data has been processed via an automated decision making or profiling procedure, you have the right to obtain an explanation and challenge the decision reached.

Right to restriction:

You have the right to request that H&M restricts the process of your personal data under the following circumstances:

- if you object to a processing operation based on H&M's legitimate interest, H&M shall restrict all processing of such data pending the verification of the legitimate interest
- if you have claim that your personal data is incorrect, H&M must restrict all processing of such data pending the verification of the accuracy of the personal data
- if the processing is unlawful you can oppose the erasure of personal data and instead request the restriction of the use of your personal data instead
- if H&M no longer needs the personal data but it is required for you to make of defending legal claims

How can you exercise your rights?

We take data protection very seriously and therefore we have a dedicated process to handle your requests in relation to your rights stated above. You can send in your request in the following ways:

- Colleagues with access to ServiceNow – use SelfService to place a request.
- Colleagues and colleagues on leave of absence without access to Service Now – email request to: GDPRemployHO@hm.com

Data Protection Officer:

We have appointed a Data Protection Officer (DPO) to ensure that we continuously process your personal data in a transparent, accurate and legal manner. You reach our Data Protection Officer at:

If there is no DPO appointed for your organization, use the following e-mail address:

dataprivacy@hm.com

Right to complain:

If you consider H&M to process your personal data in an incorrect way, we expect you to contact us immediately. You also have the right to turn in a complaint to the competent supervisory authority.

Integritetsskyddsmyndigheten/Swedish Authority for Privacy Protection

e-mail: imy@imy.se

Updates to our Privacy Notice:

We may need to update our Privacy Notice. We will communicate any material changes to the Privacy Notice on The Circle.

TO MANAGE YOUR EMPLOYMENT

Why do we process your personal data?

We will process your personal data necessary to fulfill our obligations directly or indirectly deriving from your employment contract, law, and collective agreement, or for the purpose of entering such contract.

Hence, we will collect and use your personal data to manage the below areas:

- Internal and external hiring process
- Salaries, payment, and other work-related benefits and remuneration
- Time and attendance
- Work performance and appraisals
- Grievances, including discrimination and mistreatment, and employment law actions
- Workforce management, including organizational charts, work scheduling, planning, and supervision
- Termination of employment
- Work-environment related matters

What type of data do we process?

We will process the following categories for us to manage your employment:

- Contact information such as name, e-mail address, postal address, and telephone number
- Date of birth
- Gender
- Photo
- Personal ID number
- Bank account details
- Nationality
- Emergency contact information
- Work related information such as contract terms, work role description, training records, attendance and absence, performance review and appraisals
- Phone recordings between Customer Service agents and customers may be used as a part of performance review

- Documentation created in case of grievance and employee relation case handling
- Other official documentation derived from your employment terms, such as pension agreement, signed declarations, Power of Attorney, and insurance

We will also process personal data within special categories of data:

- Health information where applicable
- Union membership where applicable

What is the legal ground for processing your personal data?

We either process your personal data to perform a duty stipulated by the employment contract, such as processing of personal data for the purpose of payment of salaries and other benefits or to comply with a legal obligation such as book-keeping rules, discrimination, and labor laws. For employee (including former) relation management we process your personal data in our own legitimate interest as a business and employer.

We will process sensitive personal data such as health records and trade union membership only to the extent necessary for us to carry out obligations derived from the employment contract and permitted by law or collective agreements.

How long do we keep your data?

We retain personal data related to employment for as long as you are employed by us. Data specifically linked to employment terms and terminations are kept for an additional 24 months in case of disputes. Grievance cases may be stored for up to 10 years after resolution, depending on the severity. Remuneration-related data is stored for 10 years from the start of your pension or at least until you are 77 years of age, in accordance with national laws.

TO PERFORM YOUR WORK TASKS

Why do we process your personal data?

It is essential for H&M Company, as the employer, to equip you with the necessary skills, tools, system accesses, and facilities to perform your work efficiently. We will process your personal data for purposes as listed below:

- Work task allocation and execution
- Equipment and facility assignment, e.g. providing company phone, computer, etc.
- IT system accesses management, including providing, approving, and changing accesses
- Training activities, including planning, inviting participants, and managing training records and feedback

What type of data do we process?

We will process the following categories of data:

- Contact information such as name, e-mail address, telephone number
- Work related information such as job role description, cost centre, training records, tasks assigned, and skills required

- Content of work tasks executed, which may include signatures and communication with external business partners
- Username and credentials provided by H&M Company and, if applicable, external business partners
- Documentation as a part of your work tasks such as Non-Disclosure Agreements, vendor agreements where applicable

What is the legal ground for processing your personal data?

For the processing of personal data to enable your performance of work tasks, the legal ground is based on H&M's legitimate interest.

How long do we save your data?

We will retain personal data related to work tasks no longer than necessary for fulfilling business purposes. Training records and skills-related data will be kept until they are no longer relevant to your job role or until the end of your employment. Credential data is kept for up to 24 months after termination for access control purposes.

HEALTH AND WELLBEING

Why do we use your personal data?

To fulfil our duty of care as an employer and to sustain efficient productivity, your data may be used for the below purposes:

- Managing and improving workplace health & safety, including logging, and reporting accidents, incidents and crises, logging, as well as implementing preventative and improvement measures
- Managing and supporting your individual health and wellbeing at workplace, including handling sick leave, rehabilitation, and taking preventive and reactive measures to ensure colleagues' well-being and health
- Securing colleagues' rights through grievance reporting, whistleblowing, and harassment investigations
- Providing assistance in case of emergency at workplace or during business travel

What type of data do we process?

We will process the following categories:

- Contact information such as name, home address, e-mail address and telephone number
- Emergency contact information
- Notes from individual health and wellbeing management errands
- Date of birth
- Employment related information such as job role, department, and cost center
- Health and safety related certificates or documentation, such as First Aider certificate and substance test results
- Personal ID number
- Travel and hotel information
- Any other data related to individual workplace incident/accident reporting

We may also process special categories of data:

- Health information including medical documents where applicable

What is the legal ground for processing your personal data?

For the processing of incidents, accidents, workplace health management and whistle blowing the legal ground is based on obligations deriving from applicable laws and regulations. For record keeping, we rely on H&M's legitimate interest to process your personal data.

How long do we keep your data?

We will keep your personal data only as long as necessary to fulfill our responsibilities as an employer towards your health and wellbeing at work. We are required to keep work-related incident reports for 24 months and emergency travel assistance data for 7 years. Ethical investigation cases may be stored for up to 10 years, depending on the severity.

SECURITY

Why do we use your personal data?

Security measures, including physical and information security, are vital to protect our colleagues, customers, and our business. Therefore, your personal data may be used for the below purposes:

- To protect workplaces, facilities and equipment, and all information contained therein from incidents, accidents, and malicious/criminal attacks.
- To ensure online safety for our customers, users, visitors, assets and business against cyber-attack, fraud, misuse, and other malicious activities.
- To generate security analysis and reports on aggregated level.
- To assess, investigate, document, and report a crime or act of disloyal behavior based on a serious suspicion, such as breach of law, company policies fraudulent activities etc., for example through a digital forensic investigation.
- To ensure H&M's legal compliance and protect our position in the events of potential crime reporting & investigations.
- To establish, exercise and/or defend, current and/or future, legal claims, or disputes.

What type of data do we process?

We will process the following categories:

- Contact information such as name, address, e-mail address and telephone number
- System logs linked to identifiers such as fob key, user ID and e-mail address
- Employment related information such as job role, department, and cost center
- IP address and device ID
- Data stored in/on company owned devices/(cloud) servers, including e-mails or other messages sent or received through your work email account and all digital collaboration linked to it.
- Video footage captured by Surveillance cameras in our stores, warehouses, and offices.
- Incident and accident logs
Such logs may contain data such as injuries sustained, claimant identity and contact information, and other details about the incident including (suspected) criminal activity

What is the legal ground for processing your personal data?

Unless there is a specific legal obligation, the processing of your personal data is based on our legitimate interest for us to ensure an appropriate level of physical, personal, and information security.

How long do we keep your data?

We will keep your personal data for the duration necessary to fulfill the various security purposes listed above. Notably, camera surveillance data is kept for 30 days unless there is a compelling or obligatory reason to retain it longer. System logs linked to your access credentials are kept for up to 24 months after deactivation. Where Payment Card Industry Standard (PCI) compliance is applicable, we will save your data for up to 15 months. Personal data included in security audit reports are saved for 5 years.

INCENTIVES & BENEFITS

Why do we process your personal data?

H&M company adopts many employee incentives and reward schemes to boost retention and employee satisfaction. Your personal data will be used for the below purposes:

- To identify, administrate and manage general benefits for all H&M Group employees, such as Global Employee Discount (GED) and H&M Incentive Program (HIP)*.
- To identify specific incentive entitlements for some H&M Company employees, such as extra pension, private health care insurance etc.
- To recognize and reward employees with exceptional performance and/or demonstrate our company values.

*Global Employee Discount (GED) and H&M Incentive Program (HIP) are subject to their own privacy notice and hence excluded hereof.

What type of data do we process?

We will process the following categories:

- Contact information such as name, e-mail address, home address and telephone number
- Personal identity number
- Colleague ID
- Employment information such as work role, cost center, employment contract and salary information

What is the legal ground for processing your personal data?

The processing of your personal data for managing benefits and incentives (e.g. insurance, early retirement, and healthcare) is necessary to fulfilment of terms derived from your employment contract. For the processing of recognition and other awards, the legal ground is based on H&M's legitimate interest.

How long do we keep your data?

Personal data will be retained for the duration necessary to fulfill the relevant purposes and will be processed as long as the associated activities are ongoing. Our records of specific incentive entitlements

(such as early retirement and privacy health insurance) agreements and transactions will be kept in accordance with our legal and/or contractual obligations.

BUSINESS TRAVEL

Why do we process your personal data?

Sometimes, you may be asked to make business trips and we will use your personal data for the below purposes:

- To enable you booking your business travel with our Business Travel Booking partners, where applicable we may also enable you to apply for business credit card.
- To notify you of travel disruptions and ensure your safety via SOS.
- To comply with regulatory requirements related to business travelers.

What type of data do we process?

We will process the following categories:

- Contact information such as name, e-mail and home address and telephone number
- Employment information such as work role, department and cost center, term of contract etc.
- Date of birth
- Nationality
- Personal ID number
- Company credit card account number
- Emergency contact number
- Gender
- Travel and hotel information

What is the legal ground for processing your personal data?

Any processing of personal data for the purpose of facilitating business travels and providing associated services is based on H&M Company's legitimate interest. For frequent business travelers who may be subject to taxation rules in Sweden we rely on fulfilment of a legal obligation.

How long do we keep your data?

Your personal data related to business travel will be processed for the duration necessary to fulfill the relevant purposes. Where applicable, we will process it in accordance with taxation, bookkeeping, and banking rules.

RECRUITMENT

Why do we process your personal data?

The main reasons for using your personal details are to recruit, both internally and externally, suitable candidates and to manage candidate pipeline. Your personal data will be used for the below purposes:

- To identify, evaluate and communicate with presumptive and prospective candidates.
- To screen, select and assess applicants for a vacancy.

- To establish and maintain talent acquisition where job alerts and/or Employer Branding related material may be pushed out.

When necessary, we may use an automated system, including profiling and/or assisted decision-making, to shortlist applicants. The source of the data we use in such automated process may include information you provided in your application, data collected during the ongoing application and from previous applications. We employ automated recruitment tool not only to expedite the recruitment process when there is a high volume of applications, but also to ensure a fair and objective assessment of your application. You have the right to obtain an explanation and challenge the decision reached by contacting email listed in this notice or contact your recruiter directly.

What types of data do we process?

We will process the personal data being submitted to us either by yourself or by a third party. We will process the following categories when you submit your application to us:

- Contact information such as name, e-mail address, postal address, and telephone number
- Date of birth
- Employment and education history
- Skills, certificates, and all other information included in your CV
- References
- Documentation generated during recruitment process, such as interview notes and test results and/or answers
- Video and audio

We do not request sensitive personal data, for example racial or ethnical origin, political views, religious or philosophical conviction, union membership, health, or sexual orientation. Please refrain from including such information in your application unless it is required by law or necessary for H&M Company to comply with legal obligations.

What is the legal ground for processing your personal data?

Candidate selection process along with contract negotiation we rely on fulfilment of contract.

Administration of talent pools, referral programs, processing of referee data, and job fairs and surveys are based on our legitimate interest. Sending employer branding material and job alerts (via H&M Career site) is based on your consent.

How long do we keep your data?

We will keep your data for a maximum period of three years from when the data was last handled within our recruitment process.

INTERNATIONAL ASSIGNMENTS

Why do we process your personal data?

H&M company will use your (and dependents where applicable) personal data to support you when you are tasked with assignment abroad:

- To manage your international assignment, from preparation through to the end of the assignment.
- To ensure you (and dependents where applicable) receive benefits at host country similar to home country, such as healthcare insurance, extra pension, and housing compensation etc.
- To advise on immigration, tax, social security, and labour law related obligations.

Where applicable, H&M Company in the context of international assignments refers to the legal entities/employers in both your home country and the host country.

What type of data do we process?

We will process the following categories:

- Contact information such as name, e-mail address and telephone number
- Employment information such as contract terms, work role, home, and host business units
- Date of birth
- Gender
- Personal ID number or social security number
- Information related to your dependents
- Passport or residency related information
- Other official documentation derived from your employment terms, such as pension agreement, signed declarations, Power of Attorney, and insurance
- Visa application details, including photo when needed

We may also process personal data within special categories of data:

- Health declaration where applicable

What is the legal ground for processing your personal data?

H&M Company will process your personal data to the extent necessary to fulfill the obligations of the international assignment contract or to take steps to enter such a contract. In addition, H&M Company may also be compelled to process your personal data by mandatory laws, such as labour law, including collective agreements, tax law and social security law.

How long do we save your data?

We will retain your personal data as required by our business needs and applicable laws. Certain types of data, such as health declaration and other immigration related data, will be deleted once the application process is concluded. Other data will be retained for longer periods to comply with legislative requirements, including those related to taxation, labour, and immigration.

OPERATIONAL & ORGANISATIONAL DEVELOPMENT

Why do we process your personal data?

H&M runs various programs and initiatives for different purposes, aiming at developing our internal operational and organisational capabilities. In this context operational and organisational capability development mean the development, improvement and enhancement of our company brands, employer branding, company values and culture, health and safety at work and general well-being. Being a high

performing organization and an employer of choice is a paramount objective for H&M as a business, securing long term growth in a competitive industry.

On a regular basis or occasionally you are asked and encouraged to contribute to these objectives, either by participation in surveys or polls or through performance at certain events, campaigns, conferences, or workshops. Your engagement may sometimes require the collection and use of your personal data, which may vary from time to time and situation:

- To improve employee relations by conducting activities such as People Engagement Pulses (PEP), Employee Value Proposition (EVP), etc.
- To optimize organisation structure based on workforce performance, skills, capacity and interest.
- To remain a competitive employer through initiatives such as employer branding, Inclusiveness & Diversity, etc.

What type of data do we process?

What type of data we need to collect from you and to process may vary due to the scope, context objective, venue or occasion etc. However, we will only ask you to provide your personal data that are necessary for the particular purpose. In no event we will ask for sensitive personal data that relate to your ethnic origin, political opinions, religious or philosophical belief, sexual orientation, trade union membership or health data.

Examples of personal data we may obtain from you are:

- Contact information i.e. name and e-mail address, e.g. when you are participating in surveys and polls
- Photo, video and audio recordings, e.g. when you act as an ambassador for your function, or call recordings being used for phone line trouble shooting
- Work related information such as role/function, department, geographical location, salary, cost centre
- Quotes and statements made by you

What is the legal ground for processing your personal data?

Any collection and processing of employee personal data, fitting with the objectives of developing our operational and organization capabilities, is justified on our legitimate interest as a company, business and employer.

How long do we keep your data?

We will keep your personal data no more than necessary for the purposes the personal data was collected. Survey results are kept for as long the employee is employed; however, the data is only used for benchmarking purposes and no access can be granted.

Updates November 2024