

**EMPLOYEE AND JOB APPLICANT  
NOTICE AT COLLECTION AND PRIVACY POLICY**

H&M Hennes & Mauritz GBC AB (“H&M Sweden”) and H&M Hennes & Mauritz L.P. (“H&M USA”) (collectively, “H&M,” “us,” “we,” and “our”) provides this Employee and Job Applicant Privacy Policy (“Privacy Policy”) for employees and job applicants who reside in the States of California, Virginia, Connecticut, Colorado, and Utah (the “States”). This Privacy Policy is provided in accordance with California Consumer Privacy Act, the Virginia Consumer Data Protection Act, the Connecticut Data Privacy Act, the Colorado Privacy Act, or the Utah Consumer Privacy Act (the “State Privacy Laws”).

**Collection of Personal Information**

We may collect the personal information and sensitive personal information categories listed in the table[s] below. The table[s] also list[s], for each category, our expected retention period, how we obtain the personal information, and whether we sell the information or share it with third parties for cross-context behavioral advertising.

<b>Personal Information Category (per the CPRA)</b>	<b>Retention Period</b>	<b>Source</b>	<b>Sold or Shared</b>
Identifiers, such as real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, or other similar identifiers.	For as long as necessary to fulfil our legitimate business purposes.	Directly from you.	We do not sell or share this information.
Categories of personal information described in Cal. Civ. Code § 1798.80(e), such as name, signature, physical characteristics or description, address, telephone number, bank account number, credit card number, debit card number, or any other financial information.	For as long as necessary to fulfil our legitimate business purposes.	Directly from you.	We do not sell or share this information.
Characteristics of protected classifications under state or federal law, such as age, citizenship, and sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions).	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.

Commercial information, such as records of products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Biometric information	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Geolocation data	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Audio, electronic, visual, thermal, olfactory, or similar information,	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Internet or other electronic network activity information, such as browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.	For as long as necessary to fulfil our legitimate business purposes.	Indirectly from you. For example, from observing your actions on our Site.	We do not sell or share this information.

<b>Sensitive Personal Information Category</b>	<b>[Retention Period]</b>	<b>Source</b>	<b>[Sold or Shared]</b>
Government identifiers (social security, driver's license, state identification card, or passport number)	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.

Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password)	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Racial or ethnic origin	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Union membership	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Mail, email, or text messages contents not directed to us	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Unique identifying biometric information	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.
Health, sex life, or sexual orientation information	For as long as necessary to fulfil our legitimate business purposes.		We do not sell or share this information.

Personal information does not include: publicly available information lawfully made available from government records, deidentified or aggregated consumer information, or information excluded from the State Privacy Laws.

**Use of Personal Information**

We may use or disclose the personal information collected for one or more of the following business purposes:

- To comply with all applicable laws and regulations.
- To recruit and evaluate job applicants and candidates for employment.
- To manage your employment relationship with us, including for:
  - Onboarding processes;
  - Timekeeping, payroll, and expense report administration;
  - Employee benefits administration;
  - Employee training and development requirements;
  - The creation, maintenance, and security of your online employee accounts;
  - Reaching your emergency contacts when needed, such as when you are not reachable or are injured or ill;
  - Workers' compensation claims management; and
  - Employee job performance, including goals and performance reviews, promotions, discipline, and termination.
- To manage and monitor employee access to company facilities, equipment, and systems.
- To conduct internal audits and workplace investigations.
- To investigate and enforce compliance with potential breaches of our policies and procedures.
- To engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of H&M.
- Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance.
- Perform workforce analytics, data analytics, and benchmarking.
- Administer and maintain our operations, including for safety purposes.
- As necessary or appropriate to protect the rights, property, or safety of us, our employees, our customers, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or government regulations.
- As described to you when collecting your personal information.

We will not collect additional categories of personal information or use the personal information we collect for material different, unrelated, or incompatible purposes without providing you with notice.

### **Your Rights**

Residents of the States have certain rights. Please note that the below rights are not absolute, and we may be entitled to refuse requests, wholly or in part, where exceptions under applicable law apply.

#### *Right to Access*

You have the right to access personal information that we may collect or retain about you. If requested, we shall provide you with a copy of your personal information which we collected as permitted by the State Privacy Laws.

You also have the right to receive your personal information in a structured and commonly used format so that it can be transferred to another entity ("data portability").

### Right to Know

You have the right to request that we disclose the following about your personal information, as defined by the State Privacy Laws:

- The specific personal information we have collected;
- The categories of personal information we have collected;
- The categories of sources from which we have collected your personal information;
- The business purpose(s) for collecting or sharing your personal information;
- The categories of personal information we disclosed for business purposes; and
- The categories of third parties to whom we disclosed your personal information.

### Right to Opt-Out/Do Not Sell My Personal Information

You have the right to opt-out of sharing your personal information with third parties for some purposes, including sharing that may be defined as a sale under applicable laws. You can opt-out of this sharing by clicking [HERE](#) or clicking on the “Do Not Sell My Information” link at the bottom of our homepage and submitting a request via the authorized methods.

You also may have a right to opt-out of the use of curtailed automated decision-making technology.

### Do Not Share or Disclose My Sensitive Personal Information

You have the right to limit how your sensitive personal information is disclosed or share with third parties, as defined in the State Privacy Laws.

### Right to Deletion

In certain circumstances, you have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (instructions and description below), we will delete, and, as applicable, direct our service providers to delete, your personal information from our records, unless an exception applies.

We may deny your request to delete your personal information if retaining the information is necessary for us or our service providers, subject to certain exemptions.

### Right to Correct/Right to Rectification

In certain circumstances, you have the right to request correction of any inaccurate personal information. Upon verifying the validity of a valid consumer correction request, we will use commercially reasonable efforts to correct your personal information as directed, taking into account the nature of the personal information and the purposes of maintaining your personal information.

### Right to Non-Discrimination

We will not discriminate against you for exercising any of your rights under the State Privacy Laws.

### **Exercising Your Rights**

If you are a resident of the States, you can exercise any of your rights as described in this Privacy Policy and under applicable State Privacy Laws (i) if an employee, in the manner set forth in the Employee File

Access Policy, found in H&M's POV Manual; (ii) if an applicant, by contacting [EmployeeRelations.US@hm.com](mailto:EmployeeRelations.US@hm.com).

You can contact us at any time if you wish to exercise your rights as set out above, or if you have any questions regarding our privacy policy or the processing of your data by sending an email to [EmployeeRelations.US@hm.com](mailto:EmployeeRelations.US@hm.com) and [Dataprivacy@hm.com](mailto:Dataprivacy@hm.com).

#### *What Personal Information Do I Provide to Verify My Identity?*

We take the privacy of your personal information seriously and want to ensure that we provide only you or your authorized agent with your personal information. Applicable law also requires that we verify the identity of each person who makes a request to know what personal information we have about you or to delete the personal information we have about you. To verify your identity, we ask you to provide your:

- First name\*
- Last name\*
- Middle initial
- Email address
- Phone number
- \*required field

#### *How Do You Verify My Identity?*

We may verify your identity in a few different ways in order to balance the requirements of state law and our obligation to keep your information private. When you make your request, you will be asked to answer a few questions about yourself to help us validate your identity, which may include personal information about yourself in connection with your application or employee file.

In some instances, we may ask you to provide other documentation to verify your identity. If this happens, we will reach out to you directly with this request.

#### *What If You Can't Verify My Identity?*

If we can't verify your identity, we will not be able to process your request to know what personal information we have about you or to delete the personal information we have about you. If we are unable to verify your identity with a high degree of certainty, we will only be able to provide a report with category-level information and we may not be able to delete some of your information.

#### *How to Submit a Request Using an Authorized Agent*

An authorized agent is a person or business who has authorization to request to know what personal information we have about you, to delete the personal information we have about you, or to opt out of the sale of personal information on behalf of a State resident. Authorized agents use the same links described above to submit requests.

If you are submitting a request on behalf of another person, we require a valid power of attorney or other documentation demonstrating your authority to submit this request. This can be a letter or other

documentation signed by the Supplemental State resident authorizing you to submit this request. You can download a sample letter from the request form.

*How Do I Send You My Documentation?*

Documentation should be sent in the manner set forth reasonably requested by H&M human resources. Any questions can be directed to EmployeeRelations.US@hm.com.

*Response Timing and Format*

We will confirm receipt of a request within 10 days and provide information about how we will process the request. We endeavor to substantively respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosure we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

If you wish to appeal our decision, please submit your appeal to the above contact information. Please clearly denote that it is an appeal.

**Last Updated: February 6, 2023**