

# Privacy Notice Recruitment

Data privacy is of high importance for H&M and we want to be open and transparent with our processing of the personal data of our employees, contractors, job applicants, and prospective employees about whom we have collected personal information in the course of your employment or application for employment with us (collectively, “you”).

We therefore have a policy setting out how your personal data will be processed and protected.

## **Who is the controller of your personal data?**

The company that you apply for a job at will be the Controller of your data. In the United States, this H&M Hennes & Mauritz L.P. (“H&M”).

## **Where do we store your data?**

The data that we collect from you is stored within the European Economic Area (“EEA”) but may also be transferred to and processed in a country outside of the EEA. Any such transfer of your personal data will be carried out in compliance with applicable laws.

For transfers outside the EEA, H&M will use Standard Contractual Clauses and Privacy Shield as safeguards for countries without adequacy decision from the European Commission.

## **Who has access to your personal data?**

Your data may be shared within the H&M group (for details on the companies within the H&M group, please refer to our annual report which may be found at [about.hm.com](http://about.hm.com)).

We never pass on, sell or swap your data for marketing purposes to third parties outside the H&M group. Data that is forwarded to third parties, is only used to provide you with our services. You will find what categories of third parties under every specific process below.

## **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. You can contact H&M that will provide you with your personal data via e-mail.

### **Right to portability:**

Whenever H&M process your personal data by automated means based on your consent or based on an agreement you have the right to get 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 erase any personal data processed by H&M at any time except for the following situations

- for exercising the right of freedom of expression and information
- to comply with a legal obligation
- for the establishment, exercise or defense of legal claims

#### **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's legitimate interest. H&M will not continue to process the personal data unless we can demonstrate a legitimate ground for the process which overrides your interest and rights or due to legal claims.

#### **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 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:

- Candidates applying to H&M Hennes & Mauritz L.P. and current H&M employees, please email your request to [USRecruitment@hm.com](mailto:USRecruitment@hm.com).

#### **Data Protection Officer:**

We have appointed a Data Protection Officer to ensure that we continuously process your personal data in an open, accurate and legal manner. You can contact our Data Protection Officer at:

- Candidates applying to H&M Hennes & Mauritz L.P. and current H&M employees, contact [USRecruitment@hm.com](mailto:USRecruitment@hm.com).

#### **Updates to our Privacy Notice:**

We may need to update our Privacy Notice. We will communicate any material changes to the Privacy Notice, for example the purpose of why we use your personal data, the identity of the Controller or your rights.

### **Why do we process your personal data?**

For purposes of this section and the section immediately following, “personal data” includes “personal information,” defined as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Personal information does not include publicly available information or information that has been de-identified.

We will process your personal data when we manage internal and external recruitments in order to communicate with you and to evaluate your profile to current and/or future recruitment needs within the H&M group. This process can include screening, interviews, tests, reference checks, background checks and informing you of new positions based on your profile. We might also process your personal data in order to keep you updated on job openings and upcoming events and for surveys.

If you are offered a position, we will also use your personal data for the following purposes:

- Signing employment documents
- Administering payroll and timekeeping
- Processing employee benefit claims
- Employee training
- Workforce communications
- Workforce management (e.g., performance reviews; evaluations; internal investigations)
- Event management
- IT and systems operations, maintenance, and security
- Risk management and audit
- Compliance with applicable laws and legislation, including all applicable labor and employment legislation
- Protect legal rights, safety, privacy, and property of us and others
- Tax and other government filing requirements
- Other in accordance with your written consent to do so

### **What type 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, such as CV and personal letter, to us:

- Identifiers, which includes name, e-mail address, postal address and telephone number;
- Professional or employment-related information, which includes the names of former employers; references; and recruitment documentation, such as interview notes and test results Education information, which includes academic transcripts; education and training history; educational degrees; grades; languages; and qualifications/certifications;
- Information relating to Internet activity or other electronic network activity, which includes cookie identifiers; tracking pixels containing an ID number; online tracking technology; browser software; your computer's operating system; your computer monitor's resolution; your Internet connection speed; the website that referred you to our site and/or the search terms you entered into a search engine to reach our site; clear gifs (a.k.a. web beacons/web bugs); internet service provider (ISP); date/time stamp; clickstream data; and device platform, version, and other device characteristics including your choice of settings such as Wi-Fi, Bluetooth, and Global Positioning System ("GPS");
- Geolocation data, which includes Global Positioning System ("GPS") data; Bluetooth location; locational information based upon your IP address; cell network data; and other similar locational data which may be collected from various devices including your mobile device(s);
- Inferences about you drawn based on the above data collected, which includes gender, race, and ethnicity;
- Information not listed above and related to characteristics protected under California or federal law, which includes your age/date of birth; gender; parents' and children's names; nationality; criminal history; criminal records; driving citations; drug test results; and marital status;
- Other personal information not listed above and described in California Civil Code § 1798.80(e), which includes signature; physical characteristics or description; insurance policy number; and/or other financial, medical, and health insurance information.

H&M does not request sensitive personal data, for example racial or ethnical origin, political views, religious or philosophical conviction, union membership, health or sexual orientation so please do not submit that information in your application.

If you become employed by H&M, we may process other categories of personal information, such as:

- Social Security Number and Date of Birth
- Biometric information, which includes a biometric scan of your fingerprint;
- Commercial information, which includes banking information, if you choose to be paid via direct deposit;
- Audio, electronic, or visual information, which includes records of calls to or from our customer service centers; and video surveillance information;
- Driver's license information;
- Emergency contact details;
- Government-issued identification number and related information
- Personnel number
- Other account or user identification information.

To help you understand which types of personal information are used for which of the above purposes, please review the matrix at the end of this Notice that details which of the purposes identified in the section immediately above are relevant to each category of personal information identified in this section.

### **Who has access to your personal data?**

Data that is forwarded to third parties is only used for the purposes mentioned above. Third parties include recruitment agencies, test and/or survey providers.

### **What is the legal ground for process of your personal data?**

The legal ground for processing your personal data is based on your consent when you submit your application and personal data into our recruitment system.

If you have applied outside our recruitment system, the processing of your personal data is based on H&M's legitimate interest.

Further we will store personal data in order to handle discrimination claims, based on H&M's legitimate interest.

### **How long do we save your data?**

We will keep your data for three years from when the data was last handled within our recruitment process or until you withdraw your consent.

### **Your right to withdraw your consent:**

You have the right to withdraw your consent for the processing of your personal data at any time.

When you do so H&M won't be able to go further in the recruitment process which is based on your consent.

You can withdraw your consent by the following means:

- Candidates applying to H&M Hennes & Mauritz L.P. and current H&M employees, email your request to [USRecruitment@hm.com](mailto:USRecruitment@hm.com)

### **Cookies**

A cookie is a small piece of data (text file) that a website – when visited by a user – asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Those cookies are set by us and called first-party cookies. We also use third-party cookies – which are cookies from a domain different than the domain of the website you are visiting – for our advertising and marketing efforts. More specifically, we use cookies and other tracking technologies for the following purposes:

### **Strictly Necessary Cookies**

These cookies are necessary to maintain our services and cannot be switched off. They are usually only set in response to actions made by you, such as creating an account or saving a wish-list for

later. You can set your browser to block or alert you about these cookies, but that can make some parts of the site not work. These cookies do not store any personally identifiable information.

Strictly Necessary Cookies		
Cookie Subgroup	Cookies	Cookies used
hm.com	<u><a href="#">_ga</a></u> , <u><a href="#">_gid</a></u> , <u><a href="#">_gat</a></u>	First Party
career.hm.com	<u><a href="#">OptanonAlertBoxClosed</a></u> , <u><a href="#">JSESSIONID</a></u> , <u><a href="#">NSC xxxxxxxxxxxxxxxx</a></u> , <u><a href="#">OptanonConsent</a></u> , <u><a href="#">NSC WTFSW-MC-DBSEFS-IUUQ</a></u>	First Party
<u><a href="#">youtube.com</a></u>	YSC	Third Party

### Functional Cookies

These cookies enable the website to provide enhanced functionality and personalisation. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, then some or all of these services may not function properly.

Functional Cookies		
Cookie Subgroup	Cookies	Cookies used
career.hm.com	<u><a href="#">_atuvc</a></u> , <u><a href="#">_atuvs</a></u>	First Party
<u><a href="#">addthis.com</a></u>	xtc, uvc	Third Party
<u><a href="#">s7.addthis.com</a></u>	<u><a href="#">_atuvs</a></u> , <u><a href="#">_atrfs</a></u> , <u><a href="#">_atuvc</a></u>	Third Party

### Marketing cookies

When you accept marketing cookies, you give us your consent to place cookies on your device to provide you with relevant content that fits your interests. These cookies may be set through our site by our advertising partners or us, to build a profile of your interests and show you relevant content on our and third-party sites. To be able to deliver content that fits your interests, we will use your interactions together with personal information you have provided to us on our site. To

present you with relevant content on third-party sites, we will share this information and a customer identifier such as an encrypted email-address or device id with third parties, such as advertising platforms and social networks. To make the content as interesting as possible for you, we may link this data across the different devices you use. If you choose not to accept marketing cookies, we will not place such cookies on your device, and you may experience less relevant content from us.

Marketing cookies		
Cookie Subgroup	Cookies	Cookies used
<a href="https://www.linkedin.com">linkedin.com</a>	li_gc, lang, AnalyticsSyncHistory, bcookie, lidc, UserMatchHistory	Third Party
<a href="https://www.doubleclick.net">doubleclick.net</a>	IDE, test_cookie	Third Party
<a href="https://ads.linkedin.com">ads.linkedin.com</a>	lang	Third Party
<a href="https://www.linkedin.com">www.linkedin.com</a>	bcookie	Third Party