

## **GAP INC. GLOBAL APPLICANT PRIVACY POLICY**

**LAST UPDATED: SEPTEMBER 27, 2021**

Gap Inc. and our global companies and subsidiaries, Athleta, Banana Republic, Banana Republic Factory Stores, babyGap, Gap, GapKids, Gap Factory, Gap Outlet, Intermix, and Old Navy (“we” or “us”), value your trust and are committed to the responsible management of your personal information. This Global Applicant Privacy Policy describes how we collect, use, and share personal information received from our “Careers Site” (meaning <http://www.gapinctalent.com> and <https://www.gapinc.com/en-us/careers>) and other Gap Inc. webpages and mobile sites which we operate and on which we link to this policy. By providing personal information to Gap Inc., you agree to this Privacy Policy.

As described below, if you apply for a job through the Careers Site, Gap Inc.’s use of the personal information you provide will be subject to additional terms outlined in the applicant agreement.

### **WHAT PERSONAL INFORMATION DO WE RECEIVE?**

Our Careers Site is designed to help you find and apply for job openings at Gap Inc.’s global locations and guide you through the various steps of our recruitment and onboarding processes. You can generally navigate our site without providing us with much personal information, but if you choose to register on the site, interact with the site’s features or take advantage of the site’s many benefits, we may receive additional types of personal information.

### **Information You Provide**

This Privacy Policy covers any personal information you may submit when applying or searching for a position at Gap Inc. If you register on our Careers Site as part of your job application or job search process, the following information may be collected:

- Name, address, telephone number, e-mail address, and other contact information;
- Account username and password;
- Social Security Number, National ID number, or Tax ID;
- Employee ID numbers and information about your work history with Gap Inc. if you are a current or former Gap Inc. employee;
- CV, résumé, cover letter, previous work experience, and education information;
- Employment preferences, current salary, desired salary, and how you heard about the Careers Site;
- Professional and other work-related licenses, permits, and certifications held;
- Languages and other relevant skills;
- Demographic information and marital status;
- Racial or ethnic origin;
- Political opinions, religious affiliation, or philosophical beliefs;
- Awards and professional memberships;
- Work authorization status and available start date;
- Information relating to references; and
- Details of your job search, including what roles, departments, and locations interest you.

The information we request as part of the recruitment process may vary by job location and may change from time to time in order to support our local offices and retail stores with their recruitment needs and abide by applicable local legal and regulatory requirements. The specific categories of information collected by Gap Inc. may vary by location. Prior to submitting your application, you will be asked to review and agree to a localized employee privacy policy or applicant agreement through our site, which describes how local affiliates will handle your personal information in accordance with this Privacy Policy and any applicable location-specific laws. Any employment-related decisions will be made by the applicable hiring affiliate(s) in accordance with the laws of the jurisdiction where the job will be located.

For additional details on what personal information is collected and how it will be used during the application process, read the full terms of the applicant agreement prior to submitting a job application to Gap Inc.

In addition to the foregoing, the following sensitive personal information may be collected:

- Health-related data, including data on disability.

To the extent that you provide us with sensitive personal information or information about your criminal record or history, job evaluations, educational records, or financial information, including account numbers, by providing us such information, you expressly authorize Gap Inc. to handle such information for the purposes of processing or evaluating your job application.

Any information you submit through the site must be true, complete, and not misleading. Should the information provided be inaccurate, incomplete, or misleading, subject to applicable law, this may lead to a rejection of your application during the application process or disciplinary action, including immediate dismissal if you have been employed. In addition, it is your responsibility to ensure that information you submit does not infringe on any third party's rights and is not otherwise legally actionable by any such third party.

### **Information from Other Sources**

For the purpose of background checks and verifying the information you submitted in connection with your application, in each case as permitted by applicable law, Gap Inc. may obtain information about you from other sources, including:

- Your references or third parties mentioned in your application;
- Prior employers; and
- Educational institutions you attended.

If you provide us with details of a reference or any other third party along with your CV or résumé, it is your responsibility to obtain consent from that third party prior to sharing this personal information with us.

Additionally, we collect certain forms of technical data from you as you visit and use our site. For more specific information, please see the section "Technical Data & Cookies," below.

### **HOW DO WE USE YOUR PERSONAL INFORMATION?**

We may use your information for the following purposes and, as applicable, to manage our prospective contractual relationship with you, based on our legitimate interests, to:

- Allow you to register on the Careers Site and use the site's features;
- Allow you to search and apply for jobs at Gap Inc. locations;
- Manage your account;
- Process your application;
- Assess your capabilities and qualifications for a job;
- Manage the recruitment process in accordance with the terms of the applicable employee privacy agreement;
- Conduct reference checks;
- Manage, evaluate, and improve Gap Inc.'s recruiting and onboarding tools and processes;
- Provide you with a job offer or an employment agreement and assist with any contract finalization and execution;

- Help you to register for Gap Inc. employment benefits;
- Communicate with you and provide you with updates on the recruitment process, information you requested, and information about Gap Inc.;
- Provide you with recommendations about open positions which may interest you based on your past searches and/or job applications;
- Tailor and improve our site and experiences to better suit your needs and the needs of our community;
- Help us meet and document Gap Inc.'s global recruitment goals;
- Meet recordkeeping and internal and external reporting responsibilities;
- Conduct background checks if you are offered a job, as permitted by applicable law; and
- Protect the security and stability of our site.

We may also use and disclose your personal information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To comply with applicable laws or regulations, including laws outside your country of residence, or to comply with legal process;
- To respond to requests from public and government authorities, including authorities outside of your country of residence;
- To cooperate with law enforcement (for example, when we receive law enforcement requests and orders);
- To protect against fraud or other illegal activities or for risk management purposes;
- To permit us to pursue available remedies or limit damages that we may sustain;
- For other legal reasons (for example, to enforce our terms and conditions and to protect our rights, privacy, safety, or property, and/or that of our affiliates or subsidiaries, you or others, including but not limited to, visitors, employees, and contractors); and
- In connection with a sale or business transaction (for example, we may have a legitimate interest in disclosing or transferring your personal information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings)).

Your personal information will be added to Gap Inc.'s international candidate database and will be used for the purposes of considering whether your profile is suitable for other job vacancies at Gap Inc. other than the one(s) for which you have applied. If we make you an offer, your personal information may be incorporated into our human resources system and used to manage the new-hire process, and if you become an employee, any such information may become part of your employee file and may be used for other employment-related purposes.

The provision of personal information on the Careers Site is voluntary. However, if you do not provide sufficient information, this may result in Gap Inc. being unable to consider your employment application or, if employment is offered, your subsequent promotion, transfer, or relocation.

Additionally, if you are an employee of Gap Inc., we may use your information as required to abide by Gap Inc.'s internal policies, including but not limited to our employment and human resources policies. Information received from Gap Inc. employees on our site may be supplemented with information received offline, such as your contact information; your birthdate; and details about your employment, such as what team you work on, where you work, and how long you have worked for Gap Inc. The sharing of offline information is governed by the terms of the relevant employment policies, employee privacy policies/notices, and local laws and regulatory requirements of your job's jurisdiction.

## **WITH WHOM WILL WE SHARE YOUR PERSONAL INFORMATION?**

In order for us to assist you with your job search needs and the recruitment and hiring process and also to assist us with managing our global workforce, Gap Inc. may share your information with the group of affiliated Gap Inc. companies. Your personal information will be reviewed by Gap Inc. employees or agents who have a business need to access such personal information and may include recruiters, human resources personnel, technical services personnel, and managers or their designees.

Gap Inc. contracts with third-party service providers to manage the Careers Site and assist us with our business needs. Gap Inc. may share personal information with these service providers to the extent needed to deliver the site and services as described in this Privacy Policy. We may share personal information about you with selected service providers or consultants acting on our behalf, such as third parties assisting Gap Inc. with the operation of the Careers Site. Third-party service providers receiving personal information are expected to apply the same level of privacy and data security protections described in this Privacy Policy, and they are required to keep confidential the personal information received from us and not use it for any purpose other than as originally intended.

Gap Inc. is not in the business of selling or renting your information to others and will not share personal information with third parties except as described in this Privacy Policy or as otherwise permitted by law.

### **HOW LONG DOES GAP INC. RETAIN MY INFORMATION?**

We will retain your personal information for the period necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods are as follows: (i) the duration of the application process or considering whether your skills are suitable for other opportunities; (ii) as long as we have an ongoing relationship with you; (iii) as required by a legal obligation to which we are subject; and (iv) as advisable in light of our legal considerations such as applicable statutes of limitations, litigation, or regulatory investigations.

Note that Gap Inc. may delete personal information about you at any time (including your CV or résumé), without any reason. Therefore, please retain your own copy of the personal information provided to us.

### **TRANSFERS OF YOUR PERSONAL INFORMATION TO OTHER COUNTRIES**

In accordance with applicable law, personal information covered by this Privacy Policy and any applicant agreement between you and Gap Inc. may be transferred to, and processed in any country in which Gap Inc., or Gap Inc.'s affiliates, subsidiaries or service providers maintain facilities.

### **COMMUNICATIONS PREFERENCES**

If you would like to change the notifications you receive about Gap Inc.'s recruitment activities, including notifications about jobs which may interest you, please go to [gapincalent.com](http://gapincalent.com) and log into your candidate profile. To subscribe or unsubscribe from job notifications, access "My Account Options." The job notifications are located in the correspondence section. After checking or unchecking the box, click "Save."

### **CHOICES AND ACCESS**

If you choose to register with Gap Inc.'s Careers Site, you may log in to your candidate profile to access, review, and change personal information stored on the Careers Site. Please note that our recruitment teams may be able to see the history of changes that you make to your profile. To update personal information that you submitted for consideration for a specific position, please edit your application for that position. Upon your request, we will deactivate or remove your personal information from our active databases, although some information may be retained as permitted or required by applicable laws.

Please contact us as indicated in the "How Can I Contact Gap Inc.?" section below if you have any questions or concerns about how we process personal information or to make a request, where permitted by applicable law, to access, modify, or object to the use of personal information. Please note that certain personal information may be exempt from such access, correction, or objection rights pursuant to applicable laws.

### **SECURITY OF PERSONAL INFORMATION**

We seek to use reasonable physical, technical, and organizational safeguards to protect personal information within our organization.

Unfortunately, no data transmission over the Internet or data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us using the contact information below.

Gap Inc. hereby disclaims, as far as permitted by local laws, any liability for itself and its affiliates and contractors for any of your information sent to our site and which is lost, misused, illegally accessed, disclosed, altered or destroyed, or not integrally or timely delivered.

## **LINKS TO THIRD-PARTY WEBSITES & SERVICES**

We may provide links to third-party websites for your convenience and information. This Privacy Policy does not address, and we are not responsible for, the privacy, information, or other practices of any third parties, including any third party operating any website or service to which our websites link. The inclusion of links to third-party websites does not imply endorsement of the linked sites or the applicable third parties' services by Gap Inc. or our affiliates.

## **DIVERSITY**

Gap Inc. is an equal opportunity employer, which means we offer equal treatment to all applicants. Gap Inc. does not discriminate, either directly or indirectly, on the grounds of sex, sexual orientation, gender identity, race, ethnic origin, religion, belief, disability, marital status, creed, nationality, national origin, color, and/or age in any area of recruitment. We may ask for information on the ethnic origin, gender, and disability of our applicants for the purpose of monitoring equal opportunity.

## **FORUMS, BLOGS AND SOCIAL MEDIA**

Parts of our sites are designed to help you share your job opportunities with your friends, family and contacts who may be interested in those opportunities. You can use our sites to share content and opportunities through a variety of channels, including email and your personal social media accounts. Any information that is shared through these channels may become public information which could be read, collected or used by other users on a worldwide basis. You should exercise caution when deciding to disclose your personal information with others.

Additionally, our site may enable you to link your online application to certain social media platforms (such as LinkedIn) to enable you to auto-populate your online application with personal information taken from your social media profile. Please note that you are wholly responsible for the content of any online application you submit via this site and it is your responsibility to ensure that any errors arising out of auto-population of online application fields are rectified. Similarly, it is your responsibility to ensure that any fields which are not auto-populated by such functionality are correctly completed. As described above in the Section "Links to Third Party Websites and Services", we do not control the terms or privacy policies of third-party websites.

At your request, we may collect, store and/or share personal information about other people which you provide to us through the sites, including name, demographic information and/or their contact information. If you share personal information about others, including photographs of other people, you are responsible for ensuring that you have the proper authorization to use and share those persons' personal information (which may include requirements to seek appropriate parental consent).

## **TECHNICAL DATA & COOKIES**

Our websites, including the Careers Site, log Internet Protocol addresses, Internet domain names, information about the web browser and operating system used to access our sites, your location, details about the pages you visit and the features you use, and the date and time of each visit.

Additionally, we use cookies on some of our sites. Information collected by cookies (as described below) may be linked to your personal information, including your contact information, device information, login information, and other personal information we receive from you.

Cookies are small amounts of data sent to your browser from a web server and stored on your computer's hard drive. Cookies can help a website recognize repeat users and allow the site to track web usage behavior. Cookies are useful because they allow a website to recognize a user's device and may be used in a variety of ways to enhance and/or personalize your online experience. For example, we may use cookies to enable you to use certain website features, store your preferences, recognize you when you return to our site, enhance the security of our site, and to understand the aggregated demographic and traffic data of our site visitors.

You can set your browser to notify you when you are sent a cookie, and you may also elect not to accept cookies by changing the designated settings on your web browser. However, not utilizing cookies may prevent you from using certain functions and features of the site. For more information on how to adjust your browser settings to reject cookies, please visit: <http://www.allaboutcookies.org/manage-cookies>.

To learn more about cookies, please visit: <http://www.allaboutcookies.org>.

Read more about the individual cookies we use on this site and how to recognize them below:

### **Required First-Party Cookies**

Cookie Name: Cookie Description

- Session ID Cookies: Created by Tomcat (a servlet container) to store java session Id.
- JSESSIONID: Social Sourcing stores the application session Id.
- ORA\_OTSS\_SESSION\_ID: This cookie stores flash Uploadify session Id. Note: We use a Shockwave Flash component for handling uploads.
- ORA\_OTSS\_\_SWF\_SESSION\_ID ORA\_OTSS\_ANCHOR: Handles anchors in the deep links; we store the anchor with an expiry of 2 seconds.
- **SSO Cookies** if "LoginAuth.OIF.VerifyModeList" property contains "cookie," then we use this cookie – SMSSOIF: we store the value "true" with an expiry of 1 year.

### **Optional Third-Party Cookies**

Cookie Name: Cookie Description

- \_utma: Google Analytics – stores information about what pages you visit, how long you are on the site, how you got here, and what you click on. Google may share aggregated, non-personally identifiable information publicly and with its partners – like publishers, advertisers, or connected sites. For more information, please visit: <http://www.google.com/privacypolicy.html>.
- \_utmb
- \_utmz
- \_utmc
- \_utmv
- \_utmz

### **PERFORMANCE COOKIES: THIRD-PARTY COOKIES**

These cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is anonymous and is only used to improve how a website works. These cookies collect anonymous information on the pages visited. Examples of these cookies include cookies used

for testing designs and ensuring that a consistent look and feel is maintained for the user. This category does not include cookies used for behavioral/targeted advertising networks.

## **HOW CAN I CONTACT GAP INC.?**

### **Non-Gap Inc. Employees**

For questions about our Global Applicant Privacy Policy, to request that we delete or deactivate your personal information, or to object to Gap Inc.'s uses of your personal information, you may submit a request in writing to the attention of Gap Inc., Legal Department, 2 Folsom Street, San Francisco, CA 94105 or by emailing: [privacy@gapinc.com](mailto:privacy@gapinc.com).

### **Gap Inc. Employees**

If you are an employee of Gap Inc., or one of Gap Inc.'s affiliates or subsidiaries, and have questions concerning your personal information or this Global Applicant Privacy Policy, feel that your confidentiality has been compromised, or observe behavior that is inconsistent with our Code of Business Conduct ("COBC"), the following resources are available:

- Use the Open Door process and talk to your manager, next level manager, or HR;
- Contact your HR Generalist or the Employee Services at the Corporate Shared Services Center ("CSSC") at (866) 411-2772;
- Use the COBC Hotline: [speakup.gapinc.com](http://speakup.gapinc.com) or 1-866-427-2633 (1-866-GAP INC.-CODE); or
- Contact Gap Inc.'s Privacy Team via email at: [privacy@gapinc.com](mailto:privacy@gapinc.com).

## **CHILDREN**

Our websites are not targeted or intended for use by children under the age of sixteen (16). This site is not targeted toward children under the age of 16, nor do we knowingly collect information directly from children under the age of 16. Where specifically requested, we welcome the parent or guardian of a child under the age of 16 to provide relevant information about the child. If you are aware that a child under the age of 16 is using our site and/or submitting their personal information directly to us, please contact [privacy@gapinc.com](mailto:privacy@gapinc.com).

## **CHANGES TO THIS POLICY**

If our information practices change, we will post an updated policy on the website. You can tell if the policy has changed by checking the revision date that appears above. Any changes will become effective when we post the revised Policy on the Careers Site.

## **CALIFORNIA PRIVACY RIGHTS**

### **California Do Not Track Disclosure**

Do Not Track is a privacy preference that users can set in their web browsers. When a user turns on the Do Not Track signal, the browser sends a message to websites requesting them not to track the user. At this time, we do not respond to Do Not Track browser settings or signals. For information about Do Not Track, please visit: [www.allaboutdnt.org](http://www.allaboutdnt.org).

As described above, we deploy cookies, tracking pixels, web beacons, and other technologies on our websites and mobile applications. We may also collect information through our in-store technologies, such as our in-store Wi-Fi service. Those tools may be used by us to collect information about you and your internet activity, even if you have turned on the Do Not Track signal.

California Civil Code Section 1798.83 permits customers of Gap Inc. who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please write to us at the following address:

Gap Inc. – California Privacy Rights  
Legal Department  
2 Folsom Street  
San Francisco, CA 94105