

GAP INC.

US Employee Privacy Policy

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I. Scope of this Policy

As global businesses, The Gap, Inc. (“Gap” or the “Company”) and its affiliated entities operate in many different countries. This Policy explains how we collect, generate, use, and disclose Personal Information (as defined below) about our employees residing in the US and its territories. Please note that this Privacy Policy does not apply to medical and health related information collected by the Gap Inc. health insurance plans. Please see the Notice of Privacy Practices on the Benefits site for how the Gap Inc. health insurance plans collect and use your personal information.

II. What “Personal Information” Do We Collect?

For purposes of this Policy, “Personal Information” is any information, recorded or not, that is about an identifiable individual. It may include, but is not limited to the following categories of information that we may collect:

- **Personal details:** First name and surname, gender, home address, telephone numbers, personal email address, date and place of birth, Social Security Number (“SSN”), marital status, dependents, emergency contact information, details and documentation required under immigration laws (such as citizenship, birth certificate, residency or work permit);
- **Picture and video data:** Store, facility, and office locations may be monitored with CCTV systems or other devices, which may collect audio, photographic or video data depicting our employees and customers;
- **Professional qualifications and interests:** Details contained in letters of application, résumé/CV, and information given through online applications, previous employment background, references, education history, professional qualifications, and other information submitted to us during the employment application process, which may be subject to the applicant privacy policy provided at the time the application is submitted;
- **Compensation and payroll data:** Base salary or wage, bonus eligibility, benefits, pay enhancements, pension contributions, details on stock options, stock grants, and other awards, salary reviews and performance appraisals, personal banking information, working time records (including vacation/holiday schedule, sick time or other absences, hours worked, flexible and home working hours, department standard hours and details of corporate travel), corporate credit card information, business expense reimbursement information, employee use of discount card/purchase history, and information required for statutory deductions and administration;

- **Personnel data:** Information related to appraisals, promotions, disciplinary actions, internal investigations, dates of absence and reasons for absence, driving license details, and details of any work accidents; and
- **Other information:** As permitted and allowed by applicable law, such as data that identifies health-related conditions to provide accommodations, sex and racial or ethnic origin for diversity purposes, the commission or alleged commission of any offenses, and credit information.

Personal Information does not include business contact information (i.e., title, work e-mail, work phone number, work address etc.) or other information stored on Company-owned devices in accordance with Gap's Information Security Policies.

III. Where Do We Collect Personal Information From?

We receive Personal Information from you when you provide it to us, or when you access and use Company systems and property, as well as from other sources such as:

- Colleagues
- Managers
- References & personal acquaintance information you provide
- Prior employers or education providers
- Clients
- Background check providers
- Recruiters
- Employment networking and search companies and websites
- Security systems used to protect physical and IT assets

IV. How Do We Use Personal Information?

Currently, Gap collects, generates, uses and discloses Personal Information for any of the following purposes:

- **Managing Our Workforce:** Managing work activities and personnel generally, including recruitment, appraisals, promotions and succession planning, rehiring, administering salary, wages and other awards, stock grants and bonuses, employee recognition and rewards programs, performing background checks, managing disciplinary actions, and terminations. Examples of Company's use of Personal Information include providing employees with healthcare insurance, pensions and savings plans, leave, managing sickness leave, promotions, transfers, secondments, honoring other contractual benefits including company car and car allowance provision, employee discount cards, as well as determining eligibility for and providing training, recreational activities, loans, stock options, making business travel arrangements, managing business expenses and reimbursements, planning and monitoring of career development activities and skills, and creating and maintaining one or more internal employee directories.

- **Communications and Emergencies:** Facilitating communication with employees at the workplace location, home and when employees are traveling, ensuring business continuity and crisis management, providing references, protecting the health and safety of employees and others, safeguarding and maintaining IT infrastructure, office equipment, facilities and other property, facilitating communication with you and your nominated contacts in an emergency, issuing building entry and identification passes;
- **Business Operations:** Operating and managing the Company's business such as the IT and communications systems, including company-sponsored online social networking sites, videoconferencing, file sharing, centralized email servers, marketing products or services, tracking product and service development, improving our products and services, managing company assets, resource and asset allocation, strategic planning, project management, business continuity, compilation of audit trails and other reporting to promote proper business practices, maintaining records relating to business activities, budgeting, financial management and reporting, communications within and outside of the Company, managing acquisitions, mergers, reorganizations or disposals and integrations with purchaser;
- **Workforce Analytics:** We use workforce analytics to assist in planning succession and to ensure business continuity, to design employee retention programs and diversity initiatives, to offer training opportunities, to identify patterns in the use of technology systems, to information entrusted to us, as well as to protect Gap's people and property.
- **Compliance:** Complying with the Company's policies and procedures, terms of use, and applicable legal requirements, including income tax and insurance deductions, record keeping and reporting obligations, conducting audits, and applicable legal requirements, including responding to legitimate requests from government or other public authorities, responding to legal process such as subpoenas, pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims arising out of or relating to employment with the Company, monitoring activities as permitted by local law and Company policies (including the monitoring with regard to telephone, email, Internet, social networking sites, and other company resources); and
- **Legal Authority:** As otherwise required or permitted by law.

V. Do We Disclose Personal Information to Third Parties?

Gap may disclose Personal Information to third parties for the purposes listed above. We also disclose Personal Information to third party service providers pursuant to agreements to perform various services and business activities on Gap's behalf. We do not authorize any of these service providers to make any other use or disclosure of your Personal Information.

Personal Information will not be disclosed to third parties for their marketing purposes unless you have agreed to it.

Categories of Third Parties We Disclose Personal Information:

- **Professional Advisors:** Accountants, auditors, lawyers, insurers, bankers, and other outside professional advisors in all of the countries in which we operate.
- **Service Providers:** Companies that provide products and services to Gap such as payroll, pension scheme, benefits providers or administrators; human resources services (such as companies that verify employees' employment and education background and other information provided by the employee to us or that that conduct employee security checks and clearances), relocation and travel arrangement companies, performance management, training, expense management, IT systems suppliers and support; workers' compensation boards and related bodies, third parties assisting with equity compensation programs, banks and credit card companies, medical or health practitioners, trade bodies and associations, landlords, security companies and access card providers, conference or training organizers or providers, schools, corporate survey administrators, and other service providers.
- **Public and Governmental Authorities:** Entities that regulate or have jurisdiction over Gap such as regulatory authorities, law enforcement, public bodies, and judicial bodies.
- **Entities Involved in a Corporate Transaction:** A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Gap business, assets or stock (including in connection with any bankruptcy or similar proceedings).

VI. How Long Do We Keep Personal Information?

Gap will retain records containing Personal Information in accordance with our Records Compliance Policy or as otherwise required by law.

VII. How Do We Protect and Secure Personal Information?

Gap has put in place a wide variety of technical and organizational security measures to help protect your Personal Information.

VIII. How Do I Change My Personal Information?

Employees can use update features within the relevant HR applications; or if not available, employees should make their requests, to their Human Resources representative.

IX. Who Should I Talk to If I Have a Question or Concern?

Should employees have any questions or concerns related to the collection, generation, use or disclosure of their Personal Information, they should contact privacy@gap.com.