



## CANDIDATES PRIVACY NOTICE

### North America and Asia Pacific

When applying for a job position at Foot Locker in the United States or Canada or in the Asia Pacific region, or when using our Career website, we and third parties will process certain personal information (“**Personal Information**”). With this Candidates Privacy Statement (“**Statement**”) we inform you on how we process your Personal Information.

This Statement has the following chapters:

1. Introduction
2. What Personal Information do we collect from you and from others?
3. Why do we use your Personal Information?
4. How long do we retain your Personal Information?
5. Who do we disclose your Personal Information to?
6. How do we protect your Personal Information?
7. What are my rights?
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#### 1. Introduction

Transparency is one of the key principles of data protection legislation. With this in mind, we inform you on how your Personal Information is processed and we promote the objective of strengthening your rights as an individual, accountability and the lawful and fair processing of Personal Information.

This Statement contains information on how we process your Personal Information when you apply for a position at Foot Locker within the United States or Canada or the Asia Pacific region and/or when you visit our site for Candidates [www.careers.footlocker.com](http://www.careers.footlocker.com) (“**Career Site**”). This Statement applies to all Personal Information of job applicants collected by Foot Locker, Inc and its North American or Asia Pacific affiliates and brands, including Kids Foot Locker, Lady Foot Locker, Footaction, Champs Sports, Eastbay “**Foot Locker**”).





## 2. What Personal Information do we collect?

### 2.1 Personal Information you share with us directly

We collect the following Personal Information directly from you when you apply online or otherwise for a job position at Foot Locker:

- a. Identifiers: candidate ID, full name, home address, email-address and phone number;
- b. Personal information about education, diplomas, certifications
- c. Professional or employment-related information: working career, skills, jobs interests, qualifications, experience details, eligibility to work in the country to which you are applying, (country of residence, and visa status), jobs in which you have expressed an interest or for which you would like to submit an application, CV and attachments (including photographs), minimum age requirements, preferred compensation, a background information, spoken languages;
- d. Professional assessment and Fit Score for certain positions based, for example on external vendors matching answers from questionnaires to positions;
- e. Inferences: regarding problem solving abilities, motivations, working with others, work style, leadership and other personal attributes;
- f. Characteristics Protected under applicable laws if you have a disability and would like Foot Locker to consider any accommodation, you may provide that information during the recruiting process. In connection with positions in the United States, we may explicitly ask for information such as race or ethnicity and other information on characteristics protected under applicable laws for the purpose of monitoring equal opportunity. However, we do not require applicants to provide this information in connection with their job application and our recruiting efforts; and
- g. Additional personal information request form: social security ID/social insurance number, permit details when relevant, ethnicity (in the United States), gender, emergency contact/relationship and date of birth.

### 2.2 Personal Information we and others collect from you indirectly or automatically

We collect the following categories of Personal Information when you apply online or otherwise for a job position at Foot Locker:

- a. Internet or other electronic network activity: we and third parties collect Personal Information automatically or indirectly from you regarding your online activity, browsing history and search history, preferences and location through the use of cookies, web beacons, pixel tags, log files or





other similar technologies when you use our Career Site. To manage your cookie preferences, please visit <https://careers.footlocker.com/us/en/cookiesettings>; and

- b. Service providers and other third parties: we collect Personal Information indirectly about you when we use service providers and third parties, such as, internet service providers, data analytics providers, operating systems and platforms, data brokers and other service providers and third parties that provide web platforms, data storage and processing, recruitment services, background screenings, professional assessments, talent analytics services, I-9 verification, tax related services and others managing the application process. Data Analytics cookies include, among others, Google Analytics. For more information on how Google Analytics collects and processes data see <https://support.google.com/analytics/answer/7318509?hl=en>.

If you are redirected to a third-party site, then the privacy statement and cookie policy of such third-party sites may apply.

### **3. Why do we use your personal information?**

We may use your collected Personal Information for the following specific purposes and categories of use:

#### **3.1 To manage the recruitment process**

Your Personal Information is used for the purpose of analyzing your experience and expertise and matching those with our employment opportunities, for evaluating your suitability for the position applied for or to propose to you any other suitable and available job position.

#### **3.2 To inform you on your application, other employment opportunities and information about Foot Locker**

#### **3.3 To operate our business and analyze, develop and improve our Career Site, recruitment and talent search services**

This includes maintaining security of our Career Site and helping us to improve and enable your use of our Career Site to administer accounts

#### **3.4 To comply with applicable laws and regulations**

#### **3.5 To prepare and finalize your employment offer and, where applicable contract**

#### **3.6 Or otherwise, as described to you at the point of collection**





#### **4. How long do we retain your Personal Information?**

In case you are hired by Foot Locker, your Personal Information gathered through the recruitment process will also be uploaded in our HR related systems. Once you have become an employee, we may inform you on how your Personal Information is processed through an Employee Privacy Statement or other policies or communications.

In case you are not hired, Foot Locker will retain your Personal Information for up to 3 years of your last visit to the Site in accordance with our retention policies.

As provided by applicable law you may have the right to request a deletion at any time.

For information that you have provided to third parties directly as part of the application process, please visit the websites or contact such third parties for more information on their retention and deletion policies.

In this regard, please note that as you will apply on our Career Site online tool, your information will be stored on the server of our connected vendors or their suppliers. To learn more about these key vendors see our [Third-Party Vendor List](#).

Please note, to the extent permitted or required by law, we may delete your Personal Information at any time. As a result, you should retain your own copy of any information you submitted to us.

#### **5. Who do we disclose your Personal Information to?**

In particular, in connection with the purposes and uses described in this Statement we may share or disclose your Personal Information in the following ways:

5.1 With affiliates and subsidiaries of Foot Locker, Inc

5.2 With third party vendors

a. Specifically, we use third party vendors and their servers for web platforms, data storage and processing. In limited circumstances these vendors might have access to your Personal Information when, for example, this is required for maintenance or problem solving.





b. In addition, we may select third party vendors who might assist us for certain services, including technical, recruitment and human research related services such as background checks, professional assessments, talent analytics, tax reviews, I-9 verification, and managing the application process.

Hosting locations of your data by a key vendor, include but may not be limited to: Primary AWS US East, Backup: AWS US West, Virginia, and Oregon. A complete list is available upon request.

### 5.3 With a competent public authority

We and our service providers may disclose your Personal Information in order to comply with a subpoena or other legal process, including lawful access by foreign courts, when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to government requests, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes, or as otherwise required or permitted by law.

5.4 Relevant third parties in the event of a prospective or completed 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 possible bankruptcy or similar proceedings).

## 6. How do we protect your Personal Information?

Foot Locker endeavors to implement physical, administrative and technical security measures designed to protect your personal information against unlawful access, loss, misuse or alteration. Foot Locker uses a variety of techniques to protect your information, including, firewalls and access controls. For example, we have systems and processes in place to designed to limit access to recruitment systems to authorized staff involved in the recruitment or hiring processes. Please note that no website, App, or system is completely safe from cyber-attacks. We need your help! Keep your data safe by creating a unique, strong password and protect against unauthorized access to that password and your device. Be sure to sign off when finished using a shared device and do not share your password with anyone.

We and our service providers may host and store your Personal Information in the United States and other jurisdictions. The other jurisdictions may differ from the laws where you reside.

## 7. Links to other sites





Our Career Site may contain links to other sites for your convenience and information. We are not responsible for the privacy practices or content of such other sites that are not affiliated with Foot Locker. We recommend that you review the privacy notice posted on any such site that you access through our Career Site.

## **8. What are my rights?**

Depending upon your jurisdiction of residence, you may have the right:

- 8.1 Of access to your Personal Information that we process about you;
- 8.2 To rectification of inaccurate Personal Information or to completion if it is incomplete;
- 8.3 To erasure of your Personal Information;
- 8.4 To restriction of processing of your Personal Information; and
- 8.5 To move, copy or transfer your Personal Information (data portability).

If you live in a jurisdiction where you have any of the above rights, please use the following webpage [Privacy Candidate Webform](#). We will provide you with information on the action taken as required by applicable law. In certain jurisdictions, we are required to verify your identity including, but not limited to, the verification of your email address. If you do not allow us to verify your identity, we cannot proceed to process your request.

Please note that depending on our jurisdiction of residence, some or all of the above-mentioned rights may not apply or be subject to exceptions. Under certain conditions and in line with applicable data protection legislation we may refuse your request. Where we are of the opinion that such a restriction (partially) applies to your request, we will inform you on the reason of the refusal in accordance with applicable law.

## **9. How can I file a complaint?**

If you are unsatisfied with the way we have handled your personal information, please contact us at: -- [privacyteam@footlocker.com](mailto:privacyteam@footlocker.com).

## **10. Updates to this Privacy Statement**

We amend this Statement from time to time to keep the information provided up to date. We encourage you to review this Statement periodically.

Last Updated: May 2021





## 11. Contact

If you have any questions, concerns or complaints regarding this Statement or about the manner in which we or our service providers treat your Personal Information, please contact Senior Manager of Privacy at: [privacyteam@footlocker.com](mailto:privacyteam@footlocker.com)

