

Michael Kors Privacy Notice: Applicants, Employees and Non-Employee Workers

Michael Kors has prepared this Privacy Notice (“**Notice**”) for applicants, employees, and other individuals that provide services to Michael Kors, either directly or indirectly. The purpose of this Notice is to give you information about how Michael Kors collects, processes, stores, and otherwise uses information about you.

Michael Kors needs to process your personal data in order to process your application, enter into our contract of employment with you, otherwise engage you to provide services to us, and to continue to perform crucial aspects of the contract under which you provide those services. This may include processing your application, facilitating payments or providing you with benefits (as applicable). There are also statutory requirements and other contractual requirements we have to comply with in relation to your employment. If we are not able to carry out the activities we describe in this Notice, we may not be able to engage you to provide services to us and, in certain very exceptional cases, we may not be able to continue your employment.

In certain limited circumstances, we may need to ask for your specific consent to process your personal data in a particular way. For example, we may collect specific consent to process your data for the purposes of carrying out a background check. However, in most cases, we will process your personal data for the reasons set out in this Notice, and it won’t be necessary or appropriate for you to provide consent in order for us to legally process your data.

When we say “Michael Kors,” “we,” or “us” in this Notice, we mean each of Michael Kors (USA), Inc. and its parent, subsidiary and affiliate entities worldwide that you are applying to, employed by, and/or providing services to. We may update this document from time to time, for example if we implement new systems or processes that involve the use of personal data.

What categories of personal data does Michael Kors collect about me?

“Personal data” means any information relating to you.

Applicants

If you are an **applicant**, Michael Kors may collect, process, and use the following categories and types of personal data about you:

- **Identifiers**, such as your name, citizenship, passport data, contact details, telephone number and email address;
- **Professional or employment-related information**, such as contact details for your current/former employer, information about your educational background, your work experience and other experience, such as the information included in your application form/resume;
- **Education information**, such as information obtained through reference checks and confirmation about your work/educational background;
- **Inferences drawn from any of the collected information**, including those made in notes taken during your interview or information provided from recruitment agencies;
- **Protected classifications**, such as information on disability for purposes of accommodating your application and interview and compliance with legal obligations, and race or ethnicity data such as information contained in your passport or other citizenship and right to work

documentation, and information which you have voluntarily provided to Michael Kors for the purposes of our equal opportunities and diversity monitoring initiatives.

Employees

If you are an **employee**, Michael Kors may collect, process, and use the following categories and types of personal data about you:

- **Identifiers**, such as your name, signature, your date and place of birth, clothes size, emergency contact details, next of kin, gender, preferred language, contact details, such as your home address, telephone number and email address, your photo if you choose to upload it to the Workday system, business email address, business address, business landline, citizenship, passport/ID data, driver's license information, health insurance and retirement plan information, and tax reference.
- **Professional or employment-related information**, such as:
 - your position, business title, employee ID, payroll ID, register ID, employee type, management level, time type (full or part time and percentage), weekly working hours, scheduled weekly working hours, working time information, work location, location tracking information (for delivery staff), division, department, position level, manager (name & ID), support roles, start and end date, contract status, job history (including position history, title history, effective dates and past pay groups), education history and qualifications, worker history (including log-files of changes in HR databases) and reason for leaving;
 - your basic salary, bonus and commission entitlements, raise amounts and percentages, allowances, other compensation, and insurance benefits (including information about you and your dependents that we provide to the insurer), tax code, your bank account details and payment dates, and accrued salary information;
 - units of stock or directorships held, details of all restricted stock units or any other entitlement to shares of stock awarded, cancelled, exercised, vested, unvested or outstanding in your favor;
 - performance reviews, evaluations and ratings, information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of grievances and any outcome; and
 - IDs for IT systems, company details, cost center allocations, and organizations.
- **Internet or other electronic network activity information**, such as CCTV images, swipe card access, time recording software, internet, email and telephone usage data; and
- **Protected classifications**, such as dates of leave of absence/vacation, parental leave, confirmation of a birth of a child, training/educational leave, family care leave, medical leave, health and medical data, criminal records data, race or ethnicity data, and sexual orientation data.

Non-Employee Workers

If you are a **non-employee worker**, Michael Kors may collect, process, and use the following categories and types of personal data about you:

- **Identifiers**, such as your name, signature, business email address, business address, business landline, citizenship, passport/ID data, driver's license information, your date and place of birth, emergency contact details, gender, preferred language, home address, telephone number and email address;

- **Professional or employment-related information**, such as the start and end date of the contract under which you provide services to us, the number of hours that you provide services for, education history and qualifications, information about the pay you receive, such as your hourly rate of pay, tax reference for invoicing, your/your personal services company’s bank account details and payment dates, service provision reviews, the handling of any complaints in relation to the services you provide, IDs for IT systems, company details, cost center allocations, and organizations; and
- **Internet or other electronic network activity information**, such as CCTV images, swipe card access, time recording software, internet, email and telephone usage data.

together, and as applicable, “Data.”

How does Michael Kors use my data?

We collect and use this Data for a variety of reasons linked to the services you provide to us. The exact reasons that we collect and use the Data will differ depending on whether you are an applicant or how you are engaged to provide services to us. To help clarify these, we have set out below a list of reasons why we may collect and use this Data (the “**Processing Purposes**”), along with examples of some of the Data used for each of the Processing Purposes:

For Applicants, Employees, and Non-Employee Workers:

- **administering and providing compensation**, including, as applicable, payroll, expenses, bonus, stock options, and other applicable incentives which involve the processing of identification data, contact details, information about the services you provide, your rate of pay and the number of hours you have worked, and details of your bank account/your personal service company’s or other intermediary’s bank account;
- **administering our workforce and managing the working relationship**, including, as applicable, tracking internet, email and telephone usage, conducting reviews of the services provided and handling any complaints in relation to the services you provide, and administering ethics and compliance training which involves the processing of identification data, contact details, information about your job, salary and benefits and equity compensation or hourly rate of pay, performance and disciplinary information, absence information, and organizational data;
- **providing IT systems and support** to enable you and others to perform their work to enable our business to operate, to enable us to identify and resolve issues in our IT systems, and to keep our systems secure which involves processing almost all categories of Data;
- **complying with applicable laws** along with the administration of those requirements, including tax laws which involve the processing of identification data;
- **monitoring and ensuring compliance with applicable policies and procedures and laws**, including conducting internal investigations, which involves the processing of identification data, contact details, information about your job, salary and benefits and equity compensation or your hourly rate of pay, the services you provide, performance and disciplinary information, absence information and organizational data;
- **communicating with you, other Michael Kors employees and third parties** (such as existing or potential business partners, suppliers, customers, end-customers or government officials), which involves the processing of identification data, contact details, information about the services you provide and organizational data;
- **communicating with your designated contacts in the case of an emergency** which involves the processing of contact details, information about the services you provide and organizational data;

- **responding to and complying with requests and legal demands from regulators or other authorities** in or outside of your home country which involves the processing of identification data, contact details, information about your job, salary and benefits and equity compensation, performance and disciplinary information, absence information and organizational data; and
- **complying with corporate financial responsibilities**, including audit requirements (both internal and external) and cost/budgeting analysis and control which involves the processing of identification data, contact details, information about your job, salary and benefits and equity compensation, performance and disciplinary information, absence information and organizational data.

For Applicants Only:

- **administering and processing your application**, (including processing a job offer should you be successful) including identification data, contact details, information about your qualifications and employment history, and information obtained during your interview and information contained in your resume;
- **to determine your eligibility for the role you applied for**, including identification data, contact details, information about your work and education experience, information obtained during your interview and information contained in your resume; and
- **conducting background checks as part of your application**, including identification data, contact details, information about your qualification and employment history.

For Employees Only:

- **administering and providing applicable benefits and other work-related allowances**, including reporting of benefit entitlements and take-up of benefits which involves the processing of identification data, contact details, information about your job, salary and benefits and equity compensation, performance and disciplinary information, absence information and organizational data;
- **administering our workforce and managing the working relationship**, including managing work activities, tracking working hours, monitoring till collections, providing performance evaluations and promotions, producing and maintaining corporate organizational charts, entity and intra-entity staffing and team management, managing and monitoring business travel, carrying out workforce analysis, conducting talent management and career development, leave management/approvals, providing references as requested, and recruitment for other roles both during and after the end of your employment;
- **complying with applicable laws and employment-related requirements** along with the administration of those requirements, such as income tax, health and safety, and employment and immigration laws which involve the processing of identification data, contact details, information about your job, performance and disciplinary information, absence information and organizational data; and
- **communications relating to alumni events and exit interviews.**

Who can I contact if I have questions?

If you have concerns or questions regarding this Notice, please contact us at privacy@michaelkors.com, or at: Michael Kors, 11 West 42nd Street, New York, New York 10036, Attn: Privacy Officer.