

## WORKFORCE PRIVACY NOTICE

### 1. Overview

The Privacy Notice describes how Torrid LLC and its affiliated entities (“Torrid” “we” and “us”) process personal information in connection with your application to become a member of our workforce, your employment with us, or work for us as an independent contractor.

If you are a current employee, you may obtain a hard copy of this Privacy Notice by contacting us at TDHumanResources@torrid.com. If you are an applicant or independent contractor, you may obtain a hard copy of this Privacy Notice by contacting us at Recruiting@torrid.com. If you have a disability and need to receive this Privacy Policy in a different format, please contact us at privacy@torrid.com.

**BY PROVIDING INFORMATION IN CONNECTION WITH APPLYING TO JOIN OUR WORKFORCE, ACCEPTING AN OFFER OF EMPLOYMENT, BECOMING A MEMBER OF OUR WORKFORCE, OR PROVIDING PERSONAL INFORMATION TO US IN CONNECTION WITH YOUR EMPLOYMENT, YOU AGREE THAT WE WILL COLLECT, USE, AND DISCLOSE PERSONAL INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. PLEASE READ IT CAREFULLY.**

### 2. Who This Notice Applies To

The Notice applies to current and former job applicants, employees, owners/officers/directors, and contractors (“**Workforce**” or “**you**”); emergency contacts provided by Workforce; and individuals/dependents of Workforce whose Personal Information is provided to administer benefits.

### 3. What Information We Collect

The following discusses the categories of Personal Information we collected in the last twelve (12) months. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different purposes without first providing you notice.

- **Personal Identifiers.** We collect contact information including full name, email address, address, and telephone number. We also collect social security number, driver's license number, employee number signature, passport number, state identification card number, I-9 documentation, IP address, social media user names and profiles, and account username and password. We may also collect this information for your emergency contacts, dependents, and references if you provide that information to us.
- **Characteristics of Protected Classifications.** We may collect your date of birth, age, gender identity, sexual orientation, racial or ethnic origin, disability information, genetic information, marital status, citizenship status, veteran status, or pregnancy and related information, if you provide this information as part of your application, during onboarding, or while working at Torrid.
- **Professional or Employment-related Information.** We collect information related to your employment history during the application process. Additionally, we collect information from you during your employment with us, such as your work attendance.
- **Non-public Education Information.** We collect resume, job application details, previous work history, references and list of professional memberships.
- **Financial Information.** We collect financial information, including when you provide us your bank account information to process payroll.
- **Audio/Visual Data.** We collect audio, electronic, photographic, visual or similar data including videos, photographs, or audio recordings.
- **Geolocation Data.** If you apply through our website, we may collect information such as your GPS coordinates and location.
- **Internet or Electronic Usage Data.** We collect data related to network and website interaction history, IP address, website cookie information, interaction with advertisements and browsing time.

- **Health Insurance Information.** We collect health insurance information such as your policy number, spouse or dependent information, coverage information, worker's compensation, request for disability accommodation, or any similar request.
- **Medical Information.** To the extent permitted and required by applicable laws, we may collect information about your medical and treatment history, diagnosis, dates of service, provider name, and your ability to perform certain tasks or to work. Additionally, we may collect information about physical screenings or drug test results, if your application or position required such screenings or testing.
- **Inferences.** We may collect inferences drawn from the foregoing information such as your characteristics, preferences, aptitudes, or behaviors.
- **Sensitive Personal Information.** We may collect social security number, driver's license number, passport number, state identification card number, racial or ethnic origin, religious or philosophical beliefs, or union membership, generic information, health information, and sexual orientation. Some personal information included in this category may overlap with other categories.
- **Personal Information Listed in the California Customer Records Statute ("records information").** We collect name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

#### 4. How We Collect Personal Information

We collect information in a variety of ways:

- **Directly from you.** We collect contact information, identifiers, personal characteristics or traits, financial information, professional or employment information, non-public education information, health insurance information, medical information, and sensitive personal information that you provide directly to us.
- **When you visit our locations.** We collect audio/visual data from security cameras at our facilities.
- **Automatically.** We collect internet or electronic usage data and geolocation information when you visit our careers website.
- **From third parties:** We may collect contact information, identifiers, financial information, personal characteristics or traits, audio/visual data, professional or employment information, non-public education information, health insurance information, medical information, sensitive personal information, and inferences, from third-parties including recruiters, LinkedIn, vendors, service providers, and your references.
- **From other employees.** We may collect contact information, identifiers, financial information, personal characteristics or traits, non-public education information, health insurance information, medical information, sensitive personal information, and professional or employment information from our current or former applicants or employees.

#### 5. How We Use the Information We Collect

We use the Personal Information we collect for the following business and commercial purposes:

- **Recruiting and Hiring.** We use contact information, identifiers, audio/visual data, professional or employment information, non-public education information, financial information, medical information, sensitive personal information, records information, and inferences to make informed decisions on recruitment and assess your suitability for the role, communicate with you about your application, respond to your inquiries and schedule interviews, and to reimburse you for any agreed expenses incurred in the application process.
- **Background Checks.** Where permitted by law and where we obtain your consent, we require our applicants and employees to complete a background check to verify your identity, check your credit history, check for criminal history, and confirm the validity of your application. We use your

identifiers, personal characteristics or traits, professional or employment information, non-public education information, records information, and sensitive information to enable the completion of the background check form.

- **Onboarding.** We use contact information, identifiers, personal characteristics or traits, audio/visual data, professional or employment information, non-public education information, medical information, records information, and sensitive personal information to complete new hire paperwork, enroll you in our HR system, set up your personnel file, and provide you access to our offices and IT systems.
- **Benefits.** We use the contact information, identifiers, personal characteristics or traits, audio/visual data, professional or employment information, non-public education information, medical information, health insurance information, records information, and sensitive personal information we collect to create benefits packages and, if eligible, provide you employee benefits.
- **Payroll.** We use contact information, identifiers, financial information, geolocation data, records information, and sensitive personal information, to track your time and attendance and absences and to pay you and reimburse you for professional expenses.
- **Leave and Accommodation Requests.** We use contact information, identifiers, personal characteristics or traits, professional or employment information, health insurance information, medical information, records information, and sensitive personal information to evaluate and process time off, sick leave, leaves of absence, or accommodation requests, if you make such requests.
- **Training, Performance Reviews, and Goals Monitoring.** We use contact information, identifiers, personal characteristics or traits, professional or employment information, health insurance information, medical information, and sensitive personal information to provide you with relevant training, feedback, and to support your career development.
- **Business Operations.** We use contact information, identifiers, financial information, personal characteristics or traits, geolocation data, internet or electronic usage data, audio/visual data, non-public education information, health insurance information, medical information, sensitive personal information, inferences, records information, and professional or employment information for guiding our recruiting, hiring, and onboarding efforts, maintaining records, audit, investigative and disciplinary purposes (including disclosure of such information in connection with legal process or litigation) and other ethics and compliance reporting tools, and support our business operations.
- **Analytical Purposes.** We use identifiers, personal characteristics or traits, professional or employment information, non-public education information, sensitive personal information, records information, and inferences to analyze trends and statistics, including analyzing and monitoring the equality, diversity and inclusivity of our consultant workforce (as permitted by local law). We may do so in order to better understand our workforce, to prevent discrimination in the workplace and/or to respond to allegations or claims.
- **Maintenance and Improvement of our Systems.** We use identifiers, geolocation data, internet or electronic usage data to improve our systems, provide and maintain functionality on our systems, and help us diagnose technical and service problems and administer our systems. Maintenance of our systems includes activities such as applying security controls for company systems, providing new system implementations, applying change management processes, and providing IT Service Desk / Help Desk Support.
- **Security and Fraud Prevention.** We use contact information, identifiers, financial information, personal characteristics or traits, geolocation data, records information, internet or electronic usage data, audio/visual data, inferences, non-public education information, health insurance information, medical information, sensitive personal information, and professional or employment information to: (i) protect our website, premises, assets, systems, products, services and intellectual property; (ii) protect us, our affiliated companies, our employees, our carriers and others from fraud, theft and other misconduct; (iii) enforce our policies or the policies of our clients; and (iv) detect and prevent fraud, theft and misconduct including by verifying the identity of those we are conducting business with.
- **Legal.** We use contact information, identifiers, financial information, personal characteristics or traits, geolocation data, records information, internet or electronic usage data, audio/visual data, inferences, non-public education information, health insurance information, medical information,

sensitive personal information, inferences, and professional or employment information to comply with our legal obligations, including reporting requirements, and defend ourselves in legal proceedings, and protect our company and our property, employees, and others through legal proceedings.

- **Other Purposes.** We may use contact information, identifiers, financial information, personal characteristics or traits, geolocation data, biometric information, records information, internet or electronic usage data, audio/visual data, inferences, non-public education information, health insurance information, medical information, sensitive personal information, and professional or employment information for other reasons we may describe to you.

## 6. How We Share Personal Information

We share personal information in the following circumstances or as otherwise described in this Privacy Notice:

- **Service Providers.** We may share personal information with vendors and service providers who support the operation of our services, website, and our business and who need access to such information to carry out their work for us (including, for example, cloud hosting, payment processing, order fulfillment, email delivery, marketing, insurance, operating systems and platforms, transportation, and customer support services). In some cases, such as payment processors, the vendor or service provider may directly collect the information from you on our behalf.
- **Affiliates.** We may share personal information with and among our parent company, subsidiaries, affiliates, or their successors or assigns.
- **Professional Advisors.** We may share information with professional advisors, such as lawyers, bankers, tax consultants, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- **Government Entities.** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us.
- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments.
- **With Your Consent or At Your Direction.** We may share information with third parties whenever you consent to or direct such sharing.
- **Other Reasons.** We may share information for other reasons we may describe to you.

## 7. Cookies, Analytics, and Other Tracking Technology

We receive and store certain types of information when you visit our careers website.

### Cookies and Tracking Technology

When you access the careers website, we (including third-parties advertising and marketing companies we work with) may place web beacons, cookies, clear gifs, pixel tags, e-tags, Javascript packages, flash cookies, log files, or other tracking technologies on your browser or application. These tracking technologies, which are often referred to collectively as cookies, collect information about your use of the Sites and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked, conversion information ,

as well as personal information if you have submitted such information to us, such as your name, postal address, email address, or device ID. We use this information to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand your online activity. We allow third-parties to provide analytics and advertising services and serve advertisements on our behalf across the Internet and in mobile applications. Our advertising partners may collect information about your activities on our Sites on your current device and combine it with information about your activities on other websites, mobile apps, and devices. They collect such information using server logs, cookies, web beacons, tags, pixels, mobile advertising IDs (such as Facebook cookies or Google's Advertising ID), cross-device linking, and similar technologies. These third parties partners use this information for our and their own advertising, analytics, attribution, and reporting purposes. To learn more about interest-based advertising, tracking technologies, and how to opt out, please visit <http://www.aboutads.info/choices>. You can disable the sharing of your personal information for cross-contextual behavioral advertising or targeted advertising through online cookies and tracking technology by clicking Do Not Sell or Share My Personal Information on the footer of our website and turn off Targeting cookies.

### Do Not Track Signals

Some browsers have a “do not track” feature. It lets you tell websites you visit that you do not want them to track your online activity. These features are not yet uniform across browsers. Our Sites are thus not currently set up to respond to these signals. For more information on Do Not Track signals, please visit <https://allaboutdnt.com/>.

### Google Analytics

We use analytics services provided by Google. If you would like more information on how Google uses data when you visit or use our Sites, please visit [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners). If you would like to opt-out, Google provides a an opt-out tool which is available at <https://tools.google.com/dlpage/gaoptout>.

## **8. Security**

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security and encourage you to use websites and share information with caution.

## **9. Processing in the United States**

Please be aware that information we obtain about you will be processed in the United States by us, our affiliates, our clients, our marketing/analytics/advertising partners, or our service providers. By using the submitting personal information to us, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Notice. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States or other jurisdictions may be different from the laws in your country of residence. The United States may not afford the same level of protection as laws in your own country.

## **10. California Privacy Rights**

This section applies to you if you are a resident of California.

Categories, Sources, Uses, and Disclosure of Personal Information We Collect. In the preceding 12 months, we have collected the following categories of personal information: identifiers, characteristics of protected classifications, records information, professional or employment information, non-public education information, audio/visual data, geolocation data, internet or electronic usage data, financial information,

medical information, health insurance information, sensitive information, and inferences. For details about precise data points we collect, the categories of sources of such collection, and the business and commercial purposes for collecting personal information, please see the sections 3-6 of this Privacy Notice.

Use or Disclosure of Sensitive Personal Information. In the 12 months preceding the last updated date below, we have not used or disclosed sensitive personal information for purposes to which the right to limit use and disclosure applies under the CCPA.

Sale or Sharing of Personal Information. In the 12 months preceding the last updated date below, we have not “sold” or “shared” (as those terms are defined in the CCPA) any personal information collected in connection with your application to work for us or employment with us. We do not knowingly sell or share the personal information of minors under the age of 16.

Your Rights Under the CCPA. Subject to certain exceptions and limitations, the CCPA affords California consumers the following rights:

- You have the right to request that we tell you (i) the categories of personal information we have collected, sold, or shared about you, (ii) the sources of that information, (iii) the business or commercial purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed, sold or shared personal information.
- You have the right to request that we provide you with a copy of your personal information.
- You have the right to request that we delete personal information that we have collected from you.
- You have the right to opt-out of the sale of your personal information.
- You have the right to opt-out of the sharing of your personal information for cross-contextual behavioral advertising.
- You have the right to direct us to limit the use or disclosure of your sensitive personal information to only the purposes specified in the CCPA.
- You have the right to correct inaccurate personal information that we hold about you.
- You have the right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you, deny you services, charge you a different price, or provide you with a lesser quality of services if you exercise any of your CCPA rights.

Exercising Your Rights. To exercise any of your CCPA rights, please use our webform, which is available [here](#), or call us toll free at 1-833-865-8502. For all requests, you must provide us with your name, email address, phone number, and mailing address. We will verify your identity by matching the information we have collected against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. In order to designate an authorized agent to act on your behalf, you must provide us with a signed, written authorization. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

## **11. How We Retain Your Personal Information**

To the extent permitted by applicable law, Torrid will retain and use your information for as long as we need it to provide you services or products, or as long as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. We use the following criteria to determine retention periods: (i) how long the information is needed to provide our services and operate our business; (ii) the duration of your employment or work with us; (iii) whether there are contractual or legal obligations that exist that require us to retain the information for period of time; (iv) whether any law, statute, or regulation allows for a specific retention period; (v) whether an individual has agreed to a longer retention period; (vi) whether the data is considered to be sensitive data, and (vii) what the expectation for retention was at the time the data was provided to us.

## **12. How Other Torrid Policies & Disclosures Apply**

This Notice is in addition to the policies and disclosures found in the Employee Handbook. If you are unsure whether this Notice applies to you, please contact Human Resources.

### **13. Disclaimer**

Nothing in this Notice restricts Torrid's ability to:

- Comply with federal, state, or local laws;
- Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- Cooperate with law enforcement agencies concerning conduct or activity that the business, service provider, or third party reasonably and in good faith believes may violate federal, state, or local law;
- Exercise or defend legal claims;
- Detect security incidents and protect against fraudulent or illegal activity and prosecute those responsible for such activity; or
- Transfer Personal Information as part of a merger or acquisition, dissolution or in the event of bankruptcy or any other transaction in which a third party assumes control of all or part of Torrid.

### **14. Changes to this Notice**

This Notice is reviewed annually to ensure it accurately captures our practices and procedures. We may also update our Privacy Notice from time to time. We will notify you of any material changes to this Privacy Notice where required by law. The "Last Updated" legend above indicates when this Privacy Notice was last revised.

### **15. Resolving Concerns and How to Contact Us**

If you have questions or concerns regarding this Privacy Notice or the handling of your Personal Information, please contact us at [TDHumanResources@torrid.com](mailto:TDHumanResources@torrid.com) and use the main number to HQ 626-667-1002.

**EFFECTIVE DATE:** January 1, 2024

**LAST UPDATED:** December 8, 2023