

**SIDESTEP**

CANDIDATE PRIVACY STATEMENT

When applying for a job position at Foot Locker or any of its affiliates or brands, including Kids Foot Locker and Sidestep located in Europe (“**Foot Locker**”) or when using our Career Site as described below, you will be sharing certain personal data with us. With this Candidate Privacy Statement (“**Statement**”) we inform you on how we process your personal data.

This Statement has the following chapters:

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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 data is being processed and we promote the objective of strengthening your rights as an individual, our accountability and the lawful and fair processing of personal data.

This Statement applies to all users, who visit our site www.careers.footlocker.com (“**Career Site**”) and who apply for a position at Foot Locker, either online via the Career Site or by other means, such as direct applications in our stores or other career websites (e.g., LinkedIn).

2. Who are we?

The data controller of your personal data depends on which entity you deal with. Please refer to our [list of entities](#) to find your relevant entity.

In this Statement, the terms “we”, “our” and “us” are used to refer to Foot Locker entities in Europe. Our main establishment is Foot Locker Europe B.V. in the Netherlands.

Foot Locker Europe B.V. is incorporated under Dutch law and is registered at the Dutch Chamber of Commerce under the registration number 23067735. It has its principal address at Ir. D.S. Tuijnmanweg 3-5, 4131 PN, Vianen.

3. What personal data do we collect from you?

3.1 Personal data you share with us directly

We collect and use the following categories of personal data when you visit the Career Site or apply for a job position at Foot Locker (some or all may apply to you):

- a. Identification data: full name, royal prefix/suffix;
- b. Contact information: address, email-address, and phone number;
- c. Education information: level of education, schools attended, diplomas, certifications;
- d. Professional experience and skills: background check information, your resumé (including photograph), your LinkedIn profile or similar social network, your employment history, previous employers and positions, responsibilities and duties, professional and language skills, years of experience, interested work areas and locations, your current title, etc.
- e. Other information: confirmation of minimum age requirement, details or preferences about the contract (e.g., availability, full/part time, preferred location, current and preferred compensation, notice period);
- f. Exclusively for store positions, professional assessment: we request the completion of a questionnaire for screening the most suitable candidates for the positions available, e.g., your problem solving, leadership or teamwork abilities. After you have taken the questionnaire, an assessment will be made and a fit score will be generated which will help us assess your suitability for the position you applied;
- g. Interview notes: during the interview, we may collect certain notes about you;
- h. Additional personal data: at the end of the recruitment process, once we reach a verbal agreement with you, we will request you to provide additional personal data, via completion of the additional personal data form, provided by our Career Site or via other means, which contains social security number or ID number, copy of your national ID or passport, work permit details if relevant, nationality, gender, birthdate and place, bank details, emergency contact details, marital status and tax information; and
- i. If you are already a Foot Locker employee and you are applying for another job position: we may match your candidate profile with your employee profile, via your employee ID or your email address. We may also obtain your employment history (e.g., previous employers and positions, responsibilities, reasons for leaving), your relocation preference, and your professional skills for the applied position.

3.2 Special categories of personal data

Foot Locker knows that by embracing diverse people, ideas, and perspective, we will grow our workplace culture, encouraging team members to feel unique valued and engaged, enabling them to reach or achieve their full potential. If you require support or accommodation to complete the job application process, we may collect special categories of personal data such as your disability to provide the required support to you.

With the exception above, Foot Locker does not collect any special categories of personal data during the application process unless this is required by law in order to fulfill the legal obligation to hire a certain number of people with disabilities. To comply, you may have to provide a specific certificate in order for us to assess the truthfulness of the document and the percentage of disability. This document is securely stored with limited access.

3.3 Personal data we collect from you indirectly

We collect the following categories of personal data when you visit our Career Site or apply for a job position at Foot Locker:

- a. Internet or other electronic network activity: we and third parties collect personal data 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. For more information, please read our [Cookies Statement](#); and
- b. Service providers and other third parties: we collect personal data indirectly from 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 or others managing the application process.

4. Why do we use your personal data?

We use your collected personal data for the following specific purposes and categories of use:

#	Purpose	Legal basis	Explanation
1.	To manage the recruitment process	Consent <i>The processing of your personal data for recruiting purposes is based on your consent for the job position you applied. Please note that you can always withdraw your consent by requesting the deletion of your candidate profile.</i>	Your personal data is used to analyze your experience and expertise and match those with our employment opportunities, to evaluate your suitability for the position applied and to inform and contact you about your application.
2.	To find the best candidate, and to increase diversity, inclusion, and belonging by reducing bias or prejudice	Legitimate interest <i>The processing of your personal data is based on our legitimate interest in finding the best person for a specific job in the context of the application procedure and make sure that bias or discrimination among candidates are excluded.</i>	Your personal data is used to evaluate your suitability for the position applied and to ensure biases or prejudices from happening. We aim to achieve this by requiring you to complete a professional assessment. The fit score resulting from such assessment will be taken into consideration together with your profile.
3.	To contact you for possible job positions and send you job alert emails	Consent <i>The processing of your personal data to keep you informed is based on your consent. You can always withdraw your consent by using the unsubscribe link at the bottom of our emails.</i>	In case you would like to be kept informed about job opportunities at Foot Locker, we will ask your consent to communicate with you about any future job positions, based on your preferences, interests and profile.

4.	To provide you personalized site and job recommendations based on your interests and profile	Consent <i>The processing of your personal data is based on your consent. You can always withdraw your consent by resetting personalization in the Career Site and/or in the cookies setting.</i>	We provide you personalized site and job recommendations, based on your preferences, interests, and profile.
5.	To organize and carry out interviews with you	Consent <i>The processing of your personal data for organizing and carrying out interviews is based on your consent. Please note that you can always withdraw your consent by not booking or canceling your interview meeting.</i>	Once we evaluate your application and decide to invite you for an interview, we will send you a link to schedule and carry out an interview. The interview confirmation, link for the interview and calendar updates will be sent to your email address.
6.	To operate our business and analyze, develop, and improve our Career Site and services	Legitimate interest <i>The processing of your personal data is based on our legitimate interest in operating our business in an efficient and appropriate manner and in enhancing the effectiveness, user experience, functioning, and security of our systems, networks, and services.</i>	This includes maintaining security of our Career Site and helping us to enable your use of our Career Site, and to administer accounts.
7.	To comply with applicable laws and regulations	Legal obligation <i>The processing of your personal data for legal and regulatory purposes is necessary for compliance with legal obligations that we are subject to.</i>	When it is mandatory by local law, we may process your personal data as required in order to fulfill our legal obligations.
8.	To prepare and finalize your employment contract	Performance of a contract <i>The processing of your personal data is necessary in order to finalize the steps for entering into an employment contract with you.</i>	At the end of the recruitment process, once we reach a verbal agreement with you, we will request you to provide additional personal data.
9.	Or otherwise as described to you at the point of collection		

5. How long do we retain your personal data?

In case you are hired by Foot Locker, all your personal data, gathered through the recruitment process will be uploaded in our HR related system. We will maintain your candidate profile in the Career Site during your employment with us. We will inform you on how your personal data is processed through the Employee Privacy Statement. In case you have provided the additional personal data via the form provided by our Career Site, such data will be deleted from the Career Site within 15 days.

In case you are not hired, Foot Locker will retain your personal data for one year (six months in Germany) starting from the last update of your profile. During this one-year period, you can reapply for another position at Foot Locker using the same profile. Your profile will be then deleted.

As provided by applicable law, you have the right to request the deletion of your personal data in our Career Site at any time as described in Chapter 9.

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

6. Who do we disclose your personal data to?

In connection with one or more of the purposes outlined in the above Chapter 4, we may disclose to the extent required your personal data in the following ways:

6.1 With our group organization

All Foot Locker entities are part of our group organization, which is owned, directly or indirectly by Foot Locker, Inc., a company organized under the laws of the State of New York, USA. We may share your personal data with entities that are part of our group organization.

6.2 With third party vendors

We use third party vendors for obtaining services and support. Except Infor, Inc. these companies use your personal data on behalf of us and under our written instructions. For the professional assessment of candidates applying to store positions, we have teamed up with Infor. Once you are asked to take the questionnaire, you will be redirected to Infor's own webpage. Please note that Infor acts as both processor and independent controller: they provide us with a professional assessment and a fit score to help us find the most suitable candidates; and they use your professional assessment for their own purposes. To know more about Infor's privacy practices, please read [Infor's privacy statement](#) and visit their official site. You can contact Infor at the following email address: Privacy.Inquiries@infor.com. For more information, please read our [Third Party Vendors List](#).

6.3 With a competent public authority

In order to comply with a subpoena or other legal process or obligations, 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 legitimate government requests, including public and government authorities outside your country of residence, for national security and/or law enforcement purposes.

6.4 To any other third party for which you have consented.

7. Do we transfer your personal data outside of the European Economic Area ("EEA")?

Your personal data will be transferred to and stored in countries outside of the EEA and Switzerland. When we transfer your personal data to recipients in other countries, we will protect your personal data as described in this Statement and in compliance with applicable data protection laws.

We use various measures to ensure lawful transfer of your personal data. This includes signing the EU Model Standard Contractual Clauses.

8. How do we protect your personal data?

Foot Locker has implemented appropriate physical, organizational and technical security measures designed to protect your personal data against unlawful access, loss, misuse or alteration. Foot Locker uses a variety of secure techniques to protect your personal data, including secure servers, firewalls, and encryption of application data and of your communications via the Internet. Our recruitment systems will only be accessed by authorized staff involved in the recruitment or hiring processes.

9. What are your rights?

You have the right:

- 9.1 Of access to your personal data that we process on you;
- 9.2 To rectification of inaccurate or incomplete personal data;
- 9.3 Of erasure of your personal data;
- 9.4 To restrict of processing of your personal data;
- 9.5 To move, copy or transfer your personal data (data portability). This right only applies when you have directly provided the personal data and where the processing relies on consent or where it is necessary for entering into, or performance of, a contract between us;
- 9.6 To object to:
 - a. processing based on legitimate interests (including profiling);
 - b. direct marketing (including profiling); and
 - c. processing for purposes of scientific/historical research and statistics.
- 9.7 Not to be subjected to a decision based solely on automated processing, including profiling: (e.g., automated processing of personal data to evaluate certain aspects about you), which produces legal effects concerning you or similarly significantly affects you unless it is:
 - a. necessary for entering into, or performance of, a contract between us; or
 - b. authorized by law (e.g., for the purposes of fraud or tax evasion); or
 - c. you provide your explicit consent; and
- 9.8 To revoke your consent for further processing of your personal data when such processing is based on your consent.

To exercise any of these rights, please use the following webpage www.footlocker-emea.com/en/privacy. We will provide you with information on the action taken within one month after the successful submission of your request via this webpage.

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 the above-mentioned rights, with the exception of the right to object to direct marketing, are not absolute. Under certain conditions and in line with applicable data protection legislation, we may refuse a request. When such a restriction (partially) applies to your request, we will inform you on the reason of our refusal to comply to your request.

10. How can you file a complaint?

If you are unsatisfied with the way we have handled your personal data, please contact us at: privacy@footlocker.com.

Please note that you also have the right to lodge a complaint with the competent Data Protection Authority.

11. 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: February 2022

12. Contacts

If you have any questions, concerns or complaints regarding this Statement or the processing of your personal data, please contact us at: privacy@footlocker.com.

In case you desire to exercise any of your rights, please use the following webpage www.footlocker-emea.com/en/privacy.