



Privacy Notice at Collection of Personal Information for California Applicants, Employees, and Contractors

Tory Burch LLC (the “Company”) is providing you with this Privacy Notice At Collection of Personal Information For California Applicants, Employees, and Contractors (“Notice”) in accordance with the California Consumer Privacy Act, as modified by the California Privacy Rights Act of 2020, (the “CCPA”) to inform you about:

1. the categories of Personal Information that the Company collects about applicants, employees, and contractors who reside in California;
2. why we collect it, how we use and share it; and
3. the rights you have relating to your Personal Information under the CCPA.

For purposes of this Notice, the term “**Personal Information**” (“**PI**”) means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, di-identified, or aggregated.

Not all PI identified in this Notice is collected about each applicant, employee, or contractor. The PI collected from and about each individual will depend upon the status of their relationship with the Company, their role, and other circumstances.

Assistance For Disabled Applicants and Employees

Alternative formats of this Notice are available to individuals with a disability. Please contact thetalentteam@toryburch.com for assistance.

How and Why We Collect and Disclose Your Personal Information, Including Within the Past 12 Months

1. Identifiers

- 1.1. Personal Information Collected Includes:** real name, nickname or alias, postal address, telephone number, e-mail address, unique personal identifier, Social Security number, signature, online identifier, Internet Protocol address, bank account name and number for direct deposits, driver’s license number or state identification card number, passport number, or other similar identifiers.

1.2. Categories of Sources from which PI is Collected: directly from you, automatically when you use our electronic systems, created by us (e.g., your username and Company email address), and from service providers that help us to run our business.

1.3. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business, benefits providers, governmental authorities.

1.4. Purposes for Collection, Use, and Disclosure: to communicate with you, to assess your eligibility for employment, to onboard and enroll you as an employee, to allow you to perform job functions, to provide compensation and benefits, to comply with applicable laws and regulations, to manage the security of our premises and systems, to detect and prevent fraud against you and/or us.

2. Personal Information Described in Cal. Civ. Code § 1798.80(e)

2.1. Personal Information Collected Includes: your 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 other financial information, medical information, or health insurance information.

2.2. Categories of Sources from which PI is Collected: directly from you, from service providers that help us to run our business, from third parties.

2.3. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business, benefits providers, governmental authorities.

2.4. Purposes for Collection, Use, and Disclosure: to communicate with you, to assess your eligibility for employment, to onboard and enroll you as an employee, to manage job duties and operate our business, to manage corporate information technology, to provide compensation and benefits, to comply with applicable laws and regulations, to manage the security of our premises and systems, to detect and prevent fraud against you and/or us.

3. Characteristics of Protected Classifications Under California or Federal Law

3.1. Personal Information Collected Includes: age and date of birth; marital status; race; ancestry; ethnic origin; sex; gender; sexual orientation; gender identity; gender expression; religion or creed; military or veteran status; medical condition; pregnancy, childbirth, breastfeeding, and related medical conditions; genetic information; disability.

3.2. Categories of Sources from which PI is Collected: directly from you, from service providers that help us to run our business, from third parties.

3.3. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business, benefits providers, governmental authorities.

3.4. Purposes for Collection, Use, and Disclosure: to comply with applicable laws and regulations, for diversity and inclusion programs.

4. Commercial Information

4.1. Personal Information Collected Includes: records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.

If you interact with Tory Burch as a consumer, you can find our California Consumer Privacy Notice [here](#).

4.2. Categories of Sources from which PI is Collected: directly from you, from service providers that help us to run our business.

4.3. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business.

4.4. Purposes for Collection, Use, and Disclosure: reimbursement of expenses, auditing, to detect and prevent fraud against you and/or us.

5. Internet or Other Electronic Network Activity Information

5.1. Personal Information Collected Includes: browsing history, search history, log-in or log-out activity on Company resources, email communications, stored documents and emails, all activity on Company communication systems, other information regarding an employee's use of Company-issued devices, and information regarding your interactions with our websites, applications, or advertisements.

5.2. Categories of Sources from which PI is Collected: automatically when you use our electronic systems and/or Company-issued devices, from service providers that help us to run our business.

5.3. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business, governmental authorities.

5.4. Purposes for Collection, Use, and Disclosure: to manage corporate information technology, to manage the security of our premises and systems, to manage job duties and operate our business, to train artificial intelligence algorithms for purposes of anticipating and offering tools to support employee needs, to detect and prevent fraud against you and/or us, to conduct internal audits, and to conduct internal investigations.

6. Geolocation Data

6.1. Personal Information Collected Includes: access-control data based on employee badge swipes and location data inferred from your device's IP address.

6.2. Categories of Sources from which PI is Collected: directly from you, automatically when you use our electronic systems.

6.3. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business.

6.4. Purposes for Collection, Use, and Disclosure: to manage corporate information technology, to manage the security of our premises and systems, to detect and prevent fraud against you and/or us, to conduct internal investigations.

7. Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information

7.1. Personal Information Collected Includes: closed-circuit images, photographs and video of you (for ID badges, marketing materials, etc.), and audio recordings as may relate to your job functions.

7.2. Categories of Sources from which PI is Collected: directly from you, automatically while you are on Company property or using certain Company devices (e.g., if you answer or place phone calls on a recorded line, or use our videoconferencing software).

7.3. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business.

7.4. Purposes for Collection, Use, and Disclosure: to manage the security of our premises and systems; to manage job duties, evaluate performance, and operate our business; to conduct internal investigations.

8. Professional or Employment-Related Information

8.1. Personal Information Collected Includes: recruitment information (such as skills, qualifications, references, recommendations, and other information included in a resume, application form, or cover letter); background information commonly used for onboarding and security screenings; employee profile information (employee status, organization information, performance and talent information, employment background, functional experience, leadership experience, honors or awards, timesheets, education, training, professional certifications, evaluations, developmental planning, career interests and development information, and other talent management and team-based assessments); compensation, payroll and benefits information; medical, parental, family, vacation, and other leave and associated records, including details of the types of and reasons for leave being taken, duration of leave, and leave-related correspondence; any termination of employment documentation, including resignation letters, dismissal letters, minutes of meetings, settlement agreements, and related correspondence.

8.2. Categories of Sources from which PI is Collected: directly from you, from service providers that help us to run our business, from third parties.

8.3. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business, benefits providers, governmental authorities.

8.4. Purposes for Collection, Use, and Disclosure: to assess your eligibility for employment; to onboard and enroll you as an employee; to manage job duties,

evaluate performance, and operate our business; to provide compensation and benefits; to comply with applicable laws and regulations; to manage the security of our premises and system; to detect and prevent fraud against you and/or us; to conduct internal investigations.

9. Non-Public Education Information

- 9.1. Personal Information Collected Includes:** school(s) attended, grades, and other information relating to your secondary and post-secondary education.
- 9.2. Categories of Sources from which PI is Collected:** directly from you.
- 9.3. Categories of Recipients to which PI may be Disclosed:** service providers that help us to run our business.
- 9.4. Purposes for Collection, Use, and Disclosure:** to assess your eligibility for employment, to onboard and enroll you as an employee, and to assist with professional licensing.

10. Inferences Used to Create a Profile

- 10.1. Personal Information Collected Includes:** information reflecting your preferences, characteristics, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
- 10.2. Categories of Sources from which PI is Collected:** directly from you, drawn from other categories of Personal Information we collect.
- 10.3. Categories of Recipients to which PI may be Disclosed:** service providers that help us to run our business.
- 10.4. Purposes for Collection, Use, and Disclosure:** to manage job duties, evaluate performance, and operate our business; to manage corporate information technology; to detect and prevent fraud against you and/or us.

11. Background Screening Information

- 11.1. Personal Information Collected Includes:** results of the following types of background screening: criminal history; sex offender registration; motor vehicle records; employment history; drug testing.
- 11.2. Categories of Sources from which PI is Collected:** directly from you, from service providers that help us to run our business, from third parties.
- 11.3. Categories of Recipients to which PI may be Disclosed:** service providers that help us to run our business.
- 11.4. Purposes for Collection, Use, and Disclosure:** to screen applicants and employees for risks to the Company and continued suitability for their jobs, to evaluate employees for internal promotions.

12. Sensitive Personal Information

12.1. Social Security, Driver's License, State Identification Card, or Passport Number.

12.1.1.1. Categories of Sources from which PI is Collected: directly from you.

12.1.1.2. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business.

12.1.1.3. Purposes for Collection, Use, and Disclosure: to assess your eligibility for employment, to onboard and enroll you as an employee, to provide compensation and benefits, to comply with applicable laws and regulations, to manage the security of our premises and systems.

12.2. Account Log-in, Financial Account, Debit Card, or Credit Card Number in Combination with any Required Security or Access Code, Password, or Credentials Allowing Access to an Account.

12.2.1.1. Categories of Sources from which PI is Collected: directly from you, automatically when you use our electronic systems.

12.2.1.2. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business.

12.2.1.3. Purposes for Collection, Use, and Disclosure: to manage corporate information technology, to manage the security of our premises and systems.

12.3. Personal Information that Reveals an Employee's Racial or Ethnic Origin, Citizenship or Immigration Status, Religious or Philosophical Beliefs, or Union Membership.

12.3.1.1. Categories of Sources from which PI is Collected: directly from you and documents you provide with your US Citizenship and Immigration Services Form I-9, from service providers that help us run our business, from third parties.

12.3.1.2. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business.

12.3.1.3. Purposes for Collection, Use, and Disclosure: to comply with applicable laws and regulations, for diversity and inclusion programs.

12.4. Contents of Mail, Email, and Text Messages Except Those for which We are the Intended Recipient.

12.4.1.1. Categories of Sources from which PI is Collected: directly from you, from service providers that help us to run our business.

12.4.1.2. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business.

12.4.1.3. Purposes for Collection, Use, and Disclosure: to manage job duties, to evaluate performance, to operate our business, to manage corporate information technology.

12.5. Personal Information Collected and Analyzed Concerning an Employee's Health.

12.5.1.1. Categories of Sources from which PI is Collected: directly from you, service providers that help us to run our business, and benefits providers.

12.5.1.2. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business and benefits providers.

12.5.1.3. Purposes for Collection, Use, and Disclosure: to manage job duties, to operate our business, to provide benefits incentivize making healthier lifestyle choices, and to comply with applicable laws and regulations.

12.6. Personal Information Collected and Analyzed Concerning an Employee's Sexual Orientation.

12.6.1.1. Categories of Sources from which PI is Collected: directly from you, from service providers that help us run our business, from benefits providers.

12.6.1.2. Categories of Recipients to which PI may be Disclosed: service providers that help us to run our business.

12.6.1.3. Purposes for Collection, Use, and Disclosure: to comply with applicable laws and regulations, to provide benefits, for diversity and inclusion programs.

We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

Additional Categories of Personal Information we Collect

We collect the following information about you, which does not directly fall within the categories listed in the CCPA:

- Visa status and work authorization information (including information from related documents, such as your passport, driver's license, or other identification, proof of residence, and proof of authorization to work in the United States)
- Emergency contacts/next of kin information, details about your spouse/partner, dependents, and beneficiaries (such as their names, ages, titles, relationship to you, addresses, telephone numbers, and email addresses)

- Languages spoken
- Criminal records information including results of background checks obtained through government agencies such as the US Federal Bureau of Investigation
- Withholdings and tax information (such as information collected on IRS Form W-4 and California Tax Form DE 4)
- Information about births, adoptions, deaths, child medical support orders, loss of eligibility for medical coverage, and other life events that may trigger an opportunity to modify your benefits elections
- Information about your health, sickness, and absences (including information regarding your physical and/or mental health, any participation in health and wellness programs, drug and alcohol screening information, medical provider information – for example, if you apply for workers' compensation – and information about any conditions that may require accommodations within the workplace)
- Vehicle information used for parking assignments (e.g., year, make, model, color, and license plate)

Unless otherwise specified, the sources of this Personal Information, the purposes for which we use it, and the categories of persons to which we disclose it are the same as those listed for Professional or Employment-Related Information.

Disclosures of California Employee Personal Information

We do not, nor have we within the preceding 12 months, sell or share for cross-context behavioral advertising the personal information of California employees that we collect in relation to your employment at Tory Burch. If you also interact with us as a consumer, please review our [California Consumer Privacy Notice](#) for more information about our practices in that context.

How Long We Keep Your Personal Information

We keep the categories of Personal Information described above for as long as necessary or permitted for the purposes described in this Notice or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;
- The Personal Information is reasonably necessary to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

Submitting Requests Relating to Your Personal Information

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. To exercise any of these rights, please submit a request by contacting us at thetalentteam@toryburch.com or 866-480-8679. Please note that, if you submit a request to know, request to delete or request to correct, you will be asked to log into your employee account or to provide 2-3 pieces of Personal Information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the webform or toll-free number listed above.

Right to Know. You have the right to know what Personal Information we have collected about you, which includes:

- (1) The categories of Personal Information we have collected about you, including:
 - a. The categories of sources from which the Personal Information was collected;
 - b. Our business or commercial purposes for collecting or disclosing Personal Information;
 - c. The categories of recipients to which we disclose Personal Information;
 - d. The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information;
- (2) The specific pieces of Personal Information we have collected about you.

Right to Delete Your Personal Information. You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions.

Right to Correct Inaccurate Information. If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us, including retaliation against you as an employee, job applicant, or independent contractor.

How to Contact Us

If you have questions regarding this CCPA Notice, you can contact us by phone at (866) 480-8679 or via email at thetalentteam@toryburch.com.

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